

### **Modern Slavery Statement 2025**

Statement pursuant to S.14 of the Modern Slavery Act 2018 (Aust)

This statement is made and published on behalf of Waterstone Holdings Pty Ltd, trading as, Waterstone Pallets, having its registered office in Victoria. References to "Waterstone Holdings", "we", "us", "our", or the "company" are to this entity that carry on the Waterstone Holdings Pty Ltd business in Australia.

### **The Company Structure**

Waterstone Holdings is a family owned and operated business based in Melbourne that provides products to domestic and international companies. Our registered office is 32 Glomar Court, Dandenong South, Victoria, Australia.

Waterstone Holdings Pty Ltd (ABN 63 006 202 553) is a company constituted under the laws of the Australian Government.

### **Company Declaration**

We operate in Australia and establish supplier business relationships with organisations that have been assessed by the Global Slavery Index as having both a lower prevalence of modern slavery and active government responses to dealing with such issues.

We wholeheartedly support the Modern Slavery Act 2018 (Aust).

### **Company Training**

Our people are our greatest asset. We foster an environment that is welcoming, inclusive and respectful of all backgrounds and perspectives. We pay our employees in accordance with the Fairwork Ombudsman as stated in Victoria. We require all company personnel to complete an induction and sign a code of conduct on modern slavery and workplace behaviours.

### **Supply Chain**

Our manufacturing and warehouse site is based in Australia.

Our supply chain consists primarily of low-risk wholesale manufacturers, which supply our company materials and services. The key components they supply us with are:

- **Timber:** for construction of timber packaging.
- **Nails:** as fasteners for timber packaging.
- **Other products:** the products we buy; factory equipment, office furniture, stationery and marketing items, as well as the services we use, such as cleaning.
- **Transport services:** organising and booking delivery requirements.
- **Professional services:** including external training services, consultants, contractors and legal support services.

During the 2024-25 Financial Year, 90% of our suppliers were Australian based and operate under Australian Laws. The remaining supply of material and services came from New Zealand and China.

Waterstone Holdings Pty Ltd does not tolerate slavery or human trafficking or abusive treatment in any of our supply chains.

We carry out thorough due diligence and ongoing monitoring on all major global suppliers in line with legal and regulatory requirements across our business. Our team does annual checks through due diligence questionnaires, answers and supporting documentation that can be exchanged between the supplier and our company. This platform allows us to identify and score risk areas, including modern slavery and human trafficking. This enables us to monitor any remediation action by a supplier.

#### **Policies and procedures**

Our policies make clear our approach to modern slavery and all forms of discriminatory or exploitative behaviour and treatment. Our key policies and procedures are set out below. They outline how we mitigate the risks of modern slavery and are reviewed on a regular basis:

**Code of Conduct:** sets out the conduct that we expect of our people, contractors and suppliers. It also sets out that we conduct our business in accordance with international human rights principles. Our code of conduct states that we will not tolerate slavery or human trafficking or abusive or unfair treatment in any part of our own business, or in any of our supply chains.

**Procurement Guidelines:** establishes framework to ensure the company is procuring goods and services in an ethical and sustainable way. The guidelines sets out the company's expectation that appropriate due diligence is carried out on an ongoing basis to ensure that slavery and human trafficking are not taking place in any of the company's supply chains.

**Harassment and Bullying Policy:** ensures that everyone at Waterstone Holdings is treated with respect and dignity and that no one is exposed to harassment, bullying, discrimination or victimisation in any aspect of their work. The policy sets out the firm's zero-tolerance approach to any inappropriate behaviour, whether by or against employees or by any work-related third party, and the steps to take to report and resolve any concerns. The policy also provides support and protection for those who raise, or participate in, complaints and aims to foster an inclusive, diverse and belonging culture at Waterstone Holdings.

**Whistleblowing Protection Procedure:** encourages everyone at Waterstone Holdings to disclose any illegal or unethical conduct that may be related to the company or conduct that places the company at risk. The guidelines are designed to ensure that individuals have a way of raising these concerns safely and in the knowledge that they will be treated seriously.

**Our actions in the past 12 months and looking ahead**

Over the past 12 months, the following actions have been undertaken:

- **Enhanced training for our new intake process for spend requests resulting in increased visibility of spend on goods that may be at increased risk of modern slavery:** Training has been provided to administrative staff that explains the due diligence process. The company is focused on awareness and processes to create socially responsible supply chains, with the aim of minimising our exposure to modern slavery.

Actions ongoing with delivery expected in the next 12 months:

- **Implementation of a database of suppliers:** We anticipate that this new database will allow more-detailed modern slavery due diligence by targeting suppliers at increased vulnerability to modern slavery. This reporting will create opportunity for a more strategic approach to modern slavery risk management of all our suppliers. The new system is planned to be implemented in Q2 2026.

**Communication**

We publish copies of our Modern Slavery Statements on our website and on the Australia Modern Slavery Statement Registers.

This statement was:

Approved by the management of Waterstone Holdings Pty Ltd on 5<sup>th</sup> February 2026.

Signed by the Directors of the company.

Signed:



**Kim Waterstone**  
Director

Signed:



**Jeremy Waterstone**  
Director