
This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by HHGL Limited (trading as Homebase and Bunnings) (“HHGL”) to prevent modern slavery in its business and supply chain.

Our Business

HHGL is a subsidiary of Bunnings Group Limited (“Bunnings Group”), an international household hardware chain. The chain has been owned by Wesfarmers Limited since 1994, and has stores in Australia, New Zealand, the United Kingdom and the Republic of Ireland. Bunnings Group is part of the Wesfarmers Group with Wesfarmers Limited (“Wesfarmers”) being its ultimate parent company. Wesfarmers is listed on the Australian stock exchange and is an Australian conglomerate of companies with interests in retail, chemicals, fertilisers, coal mining and industrial and safety products. Wesfarmers annual reports its efforts to protect human rights, ensure ethical trading and prevent modern slavery. HHGL, Bunnings Group and Wesfarmers work together to achieve these shared goals.

Our Commitment

HHGL is committed to ensuring human rights are respected, and slavery or human trafficking is not taking place in our business. Our approach is guided by international conventions and standards including the United Nations (UN) Universal Declaration of Human Rights, the UH Guiding Principles on Business and Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

Our Approach

We have policies which embed the importance of “respect for the rights of all” and strive to create a work environment which is inclusive regardless of gender, age, race, disability, sexual orientation, cultural background, religion, family responsibilities or other areas of potential difference.

Our Supply Chain

We have a large supply chain and we are careful with how we choose our suppliers. We aim to ensure human rights issues are understood, respected and upheld by our suppliers. This includes a commitment to act transparently, remedy issues and to drive continuous improvement. We expect our suppliers to meet our Ethical Code of Conduct which forms part of our standard terms and conditions. Our Ethical Code of Conduct sets out our expectations of our partners and suppliers which includes:

- No forced, bonded or child labour;
- No bribery;
- No discrimination, harassment or abuse;
- Wages and benefits must, at minimum, meet the higher of local laws or industry practices and be paid on time with transparent record keeping;
- Working hours and leave must comply with applicable local laws, overtime to be voluntary;
- Freedom of Association;
- Working conditions are to be safe and hygienic, with adequate safety equipment and regular training;
- Any subcontracting must be approved and comply with our Code of Conduct;
- At a minimum, compliance with local/national environmental laws.

Our Ethical Code of Conduct applies to all suppliers including our own and exclusive brand products and provides a framework for us to assess our operations and factory working conditions. It also acts as a model for our suppliers who may be establishing ethical sourcing programmes to assist with compliance.

Through our partnership with the European DIY Retailer Association, we are working to promote better labour and environmental conditions in the global home improvement supply chain.

Our Due Diligence Approach

We take a risk-based approach to focus on products or supply chains that are at high risk. Our criteria is informed with international research on geographical, industry-specific, product type and raw material sourcing risk for modern slavery (for example Maplecroft risk indices, Transparency International Corruption Perception Index and Walk Free Global Slavery Index).

Onboarding of suppliers starts with an initial desktop assessment and we require ongoing participation in the SEDEX supplier assessment programme, which is reviewed annually. Those identified as high risk also need to provide an independent third-party audit report, renewed biennially.

Concerns raised during this process are required to have an agreed timed action plan for improvement and if a supplier refuses to resolve any critical issues, we will cease trading with them immediately.

As well as working to remedy issues, we deliver training on our ethical sourcing requirements to team members, third-party auditors, suppliers and factories, so they understand the risks and the standards expected by our business.

In 2017, the merchandising team had refresher training on modern slavery issues, a strength and gap analysis of our programme was conducted and identified opportunities to address human rights risks, and a raw material risk analysis was conducted, prioritising our responsible sourcing programme within the extended supply chain tiers.

Our Next Steps

In the next 12 months, our key areas of focus include the alignment of policies and procedures in the United Kingdom, Republic of Ireland, Australia and New Zealand to maintain appropriate safeguards against the mistreatment of any person within our business or supply chain. We will continue to work with our suppliers and partners to continually improve our performance in relation to modern slavery. Continuous training sessions on the importance of responsible sourcing to our team members, and suppliers will be delivered.

This statement was approved by the Board of Directors of HHGL Limited and Andrew Coleman was authorised by the Board to sign the statement on their behalf.



Andrew Coleman
Finance Director
HHGL Limited (trading as Homebase and Bunnings)