

Modern Slavery Transparency Declaration



SURFACE EVOLUTION



Overall Weighted Score

0.60

Data Quality Score	Risk Assessment Results	Average Score
0.56	DECEPTIVE RECRUITING	0.51
0.56	TRAFFICKING	0.51
0.56	SERVITUDE	0.51
0.56	FORCED LABOUR	0.57
0.56	FORCED MARRIAGE	0.51
0.56	DEBT BONDAGE	0.51
1.23	CHILD LABOUR	0.89
1.24	DISCRIMINATION	0.81
0.83	EQUAL REMUNERATION	0.48
1.23	FREE ASSOCIATION + COLLECTIVE BARGAINING	0.69
Weight Total		0.60

Compliance

Earp Bros Tiles | Porcelanosa Porcelain Products, Porcelanosa Ceramic Products

Earp Bros Porcelanosa Wall and Floor Tiles are suitable for a range of decorative and practical applications and are expected to last for the full lifetime of the building. The products are inherently chemically resistant and suitable for interior, exterior, facade, splashbacks, cladding, wet areas and commercial walling applications. The product is available in a large format which reduces the amount of grout and maintenance required over the life of the product, however the tiles can be cut to size where required.

Products Covered:

Porcelanosa Porcelain Products, Porcelanosa Ceramic Products

Licence site/s: Castellon, Spain
 Licence Number: EBI:PO01:2023:MS
 Screening date: 3rd August 2023
 Valid to: 3rd August 2024

This declaration is a part of company's Modern Slavery Statement and hence it is to be read in conjunction with other documents.

Company Structure Description:

Earp Bros Tiles is a private company limited by shares, incorporated and domiciled in Australia. Its registered office is 26 Darling St, Carrington 2294 NSW. It has approximately 60 employees working across Australia, with offices in Sydney, Melbourne, Adelaide, Brisbane, Canberra and Perth. Of these employees, 55 were full-time permanent employees, 3 were part-time permanent employees and 2 were fixed term, temp or casual employees (as at 31 December 2022).

Company MS Statement: No Company MS Policy: Yes

Overview Of Product Supply Chain Assessment

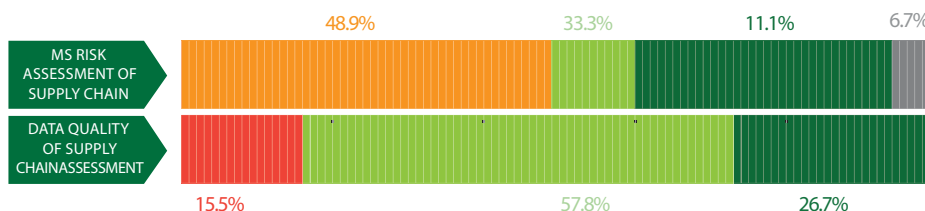
9 Of direct suppliers	100% Of suppliers evaluated	100% Suppliers risk assessed/ desktop assessed
1 No of suppliers at High Risk	100% Suppliers audited (announced/ unannounced)	0 Cases of non-conformance/ modern slavery

Content Declared Accurate for
and on behalf of:
Earp Bros Tiles


Joshua Earp
Operations Director



Risk Assessment & Data Quality Summary



Content Verified by:
Global GreenTag International Pty Ltd


David Baggs
CEO & Program Director

ASSESSMENT BASED ON 1% INCREMENTS ACCORDING TO COLOUR CODE KEY ON PAGE 2 & 3.

Earp Bros Tiles

Verified by GLOBAL GREEN TAG INTERNATIONAL PTY LTD

Verification Methodology

1.0 Scope

The Global GreenTag's Modern Slavery Product Declaration is a facilitation service designed to provide the subject company with an additional level of robustness to their declaration in compliance with Modern Slavery Acts that:

- Provides a third party verified Modern Slavery assessment of product supply chains to the extent possible;
- Provides assessment transparency and gives a quick evaluation overview;
- Uses simple easy to understand colour keys to explain risks;
- Identifies Modern Slavery risks and how they are mitigated (or not);
- Promotes and recognises manufacturers and suppliers willing to be 100% transparent as the Leaders they are;
- Provides plain language explanations of any recognised or assumed Modern Slavery in the supply chain;
- Provides guidance on the 'level of reliability' attached to risk assessments undertaken from 'onsite audit' to 'research based' verification;
- Provides reporting suitable for aggregating into company level reports for companies caught by relevant Acts, especially for companies with large procurement portfolios and mandatory legislative reporting requirements.

The GreenTag MSD is ultimately the subject Company's Modern Slavery declaration on their product Supply chain and is declared as such by a competent public officers of the subject company.

2.0 Preparing a MSD

GGT MSD is prepared after reviewing numerous documents including, but not limited to, the Australian Government's guidance for reporting entities, UK Modern Slavery Act, QLD HRA, Australian Council of Superannuation Investors' (ACSI) Modern Slavery Risks, Rights & Responsibilities, and ETI and ERGON's Managing Risks Associated with Modern Slavery: A Good Practice Not for the Private Sector. Verifications are undertaken by GGT Qualified Exemplar Global Lead Auditors and are reviewed by both the GGT Program Director (also a Qualified Exemplar Global Lead Auditor) and the subject Company's Executive Management.

3.0 Assessment

Global GreenTag will map product supply chain and collect evidence from the supply chain to the extent possible. Company and its suppliers are requested to submit their procurement policies, quality statements, corporate policies, employment policies and contracts, Non-conformance registers, Human Resource policies, Modern Slavery policy, etc. These documents are reviewed and an explanation on any identified MS issues is requested from company/supplier. Based on the information and further evidence received from Company and its suppliers, Global GreenTag will verify each supplier and determine their compliance to MS from 'Low Risk to 'Undetermined Risk', see table 1 for 5 scale code. The data quality of the supply chain assessment will be classified from 'Onsite audit' to 'No data available or Obscure Supply Chain', see table 2

Table 1: MS Risk Assessment of Supply Chains

Risk Identified	Colour
Best Practice Performance - Supplier has really strong policies in place to avoid Modern Slavery and reports transparently on any non-conformances. Suppliers have demonstrated history of strong positive performance outcomes achieved. Improvement on a previously non-compliant situation or the absence of negative impacts are not regarded as positive impacts.	+2
Low Risk - Supplier has strong policies in place to avoid Modern Slavery and reports transparently on any non-conformances. Improvement on a previously non-compliant situation or the absence of negative impacts are not regarded as positive impacts.	+1
Compliance - Supplier have no conflicting policies related to Modern Slavery. Suppliers are compliant to local laws and international ILO core 8 conventions. Any identified 'Modern Slavery non-conformances'* has been actioned and are committed to put stronger policies in place.	0
Medium Risk - Suppliers have commitment to avoid Modern Slavery. The identified local law non-conformances has been actioned and are committed to put stronger policies in place. The policies are improving.	-1
High Risk - Suppliers identified with conflicting Modern Slavery policies in place and has high risk of potential MS activities or identified MS activities without any further actions to prevent it. Identified non-conformance to local law or MS without any actions to improve the situation.	-2
Undetermined Risk (Risk Indeterminable) - No or insufficient data to conclusively determine Modern Slavery	-2

Table 2: Data Quality of Supply Chain Assessment

Criteria	Data Source		Timeliness	Representativeness
	Primary Data	Secondary Data		
+2	Audit – Onsite	Report from well-established, well-documented reliable sources	Data from current period	Data directly from the company/ source/ supplier
+1	Audited – Desktop. Statutory declarations with supporting documents as evidence	Report from a well-established, well-documented reliable source	Data from previous year	Data from other sites of the company in same region
0	Statutory declarations cross-checked with region based research/ secondary reports	Independent but similar claims made by various sources	Data from 2 years ago	Data from other sites of the company in other regions
-1	Research based data	Research based data. Unverifiable claims found on websites, twitter, social media, etc	Data from 3 years ago	Data from other companies in same region/ area/ production conditions
-2	No data available or Obscure supply chain. Assumption based	No data available or obscure supply chain. Assumption based	Timeline unknown or more than 3 years ago	Average country data / average industry data / data from third parties

Above tables 1 and 2 are adapted and adopted from Social LCA methodology.

Executive Summary

Tier 1 (Direct) Suppliers

3 Tier 1 Suppliers out of 9 have publicly available policies or statements addressing modern slavery. The majority of the documentation found addresses modern slavery in the context of the UK Modern Slavery Act (2015) or the California Transparency in Supply Chains Act (2010). Some suppliers have code of conduct that specifically address modern slavery. For the 3 suppliers for which no information was found, assumptions were made based on the geographical location of the suppliers.

No relevant data was found on forced marriage however this aspect is not considered applicable here.

3 Tier 1 Suppliers out of 9 have publicly available policies regarding discrimination. 1 Tier 1 Supplier out of 9 has policies regarding discrimination. For 4 Tier 1 Suppliers out of 9 suppliers, there is insufficient data to conclusively determine the risk of discrimination based only on geographical location. For the 1 remaining supplier there is insufficient data to conclusively determine the risk of discrimination.

3 Tier 1 Suppliers out of 9 have publicly available policies regarding equal remuneration. 1 Tier 1 Supplier out of 9 has policies regarding equal remuneration. For 2 Tier 1 Suppliers out of 9 suppliers, there is insufficient data to conclusively determine the risk of discrimination based only on geographical location. For the 3 remaining suppliers there is insufficient data to conclusively determine the risk of equal remuneration.

3 Tier 1 Suppliers have policies addressing freedom of association and collective bargaining rights. 1 Tier 1 Supplier out of 9 has policies regarding freedom of association and collective bargaining rights. For 4 Tier 1 Suppliers out of 9 suppliers, there is insufficient data to conclusively determine the risk of discrimination based only on geographical location. For the 1 remaining supplier there is insufficient data to conclusively determine the risk of freedom of association and collective bargaining rights.

Tier 2+ (Indirect) Suppliers

No relevant data was found from Indirect suppliers and hence the assessment was done based on assumptions and third party articles/data.

High Priority Tasks

- Obtain data and documentation from Tier 1 Suppliers for which no data was available on forced labour, trafficking in persons, servitude, debt bondage, deceptive recruiting labour or services, worst forms of child labour.
- Obtain data and documentation from Tier 1 Suppliers for which no data was available on discrimination, equal remuneration, freedom of association and collective bargaining.

Whistleblower Provisions? No

GGT disclaimer: As required by various legislation this document constitutes risk assessment and as such does not guarantee that Modern Slavery does not occur in the supply chains described herein. It is issued in good faith and is determined to be as accurate as possible at the date of issuance and is part of a continuous improvement and reporting process and will vary overtime with ongoing consultancy with supply chain.

Global GreenTag provides supply chain verification and research services for manufacturers providing product level declaration for customers asked to provide responses to MS Act & QLD Human Rights.

GGT MSD document is a product level declaration.

The document is owned by the subject company. The IP inherent in the document is owned exclusively by Global GreenTag International Pty Ltd.

As a product level statement, this document is issued in support of those companies undertaking required or voluntary Modern Slavery reporting or publication.

Table3: Applicant: Porcelanosa Wall Tile Range, Porcelanosa Floor Tile Range

3.1 Assessment for Slavery (including deceptive recruiting for labour or services, trafficking in persons, servitude, forced labour, forced marriage and Debt bondage).

Component	Assessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Tiles	100%	Y	+1 The company has a PDCA system in place.	1.33 Current primary data directly from the company	Y

3.2 Assessment for Child labour

Component	Assessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Tiles	100%	Y	+1 The company has a PDCA system in place.	1.33 Current primary data directly from the company	Y

3.3 Assessment for Discrimination

Component	Assessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Tiles	100%	Y	+1 The company has a PDCA system in place.	1.33 Current primary data directly from the company	Y

3.4 Assessment for Equal Remuneration

Component	Assessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Tiles	100%	Y	+1 The company has a PDCA system in place.	1.33 Current primary data directly from the company	Y

3.5 Assessment for Freedom of Association

Component	Assessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Tiles	100%	Y	+1 The company has a PDCA system in place.	1.33 Current primary data directly from the company	Y

Table 4: DIRECT SUPPLIERS: Porcelanosa Wall Tile Range, Porcelanosa Floor Tile Range

4.1 Assessment for Slavery (including deceptive recruiting for labour or services, trafficking in persons, servitude, forced labour, forced marriage and Debt bondage).

Component	No. of Suppliers	As-sessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Clay 1	1	100%	Y	+2 UN Global compact signatory. Code of conduct provided. Code of conduct available on the website.	+2 Current secondary Data directly from the UN Global compact website (2023).	Y
Clay 2	1	100%	Y	-1 The company declared it has a policy in place. ILO ratified.	+1.33 Current primary data directly from the company	Pending
Feldspar	1	100%	Y	+2 UN Global compact signatory. Code of conduct provided. Code of conduct available on the website.	+2 Current secondary Data directly from the UN Global compact website (2023).	Y
Sand	1	100%	Y	-1 The company declared it has a policy in place. ILO ratified.	+1.33 Current primary data directly from the company	Pending
Talc	1	100%	Y	+2 UN Global compact signatory. Code of conduct in place. Code of Business Conduct and Ethics publicly available on company website.	+1.67 Audited data from the previous year (2021)	Y
Limestone	1	100%	Y	-1 Strong secondary data is available from reliable sources	+1.33 Current primary data directly from the company	Pending
Recycled content	1	100%	Y	-1 Strong secondary data is available from reliable sources	+1.33 Current primary data directly from the company	Y
Ink	1	100%	Y	-1 Strong secondary data is available from reliable sources	-2 No data available	Pending

4.2 Assessment for Child Labour

Component	No. of Suppliers	As-sessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Clay 1	1	100%	Y	+2 UN Global compact signatory. Code of conduct provided. Code of conduct available on the website.	+2 Current secondary Data directly from the UN Global compact website (2023).	Y
Clay 2	1	100%	Y	-1 The company declared it has a policy in place. ILO ratified.	+1.33 Current primary data directly from the company	Pending
Feldspar	1	100%	Y	+2 UN Global compact signatory. Code of conduct provided. Code of conduct available on the website.	+2 Current secondary Data directly from the UN Global compact website (2023).	Y
Sand	1	100%	Y	-1 The company declared it has a policy in place. ILO ratified.	+1.33 Current primary data directly from the company	Pending
Talc	1	100%	Y	+2 UN Global compact signatory. Code of conduct in place. Code of Business Conduct and Ethics publicly available on company website.	+1.67 Audited data from the previous year (2021)	Y
Limestone	1	100%	Y	-1 Strong secondary data is available from reliable sources	+1.33 Current primary data directly from the company	Pending
Recycled content	1	100%	Y	-1 Strong secondary data is available from reliable sources	+1.33 Current primary data directly from the company	Y
Ink	1	100%	Y	-1 Strong secondary data is available from reliable sources	-2 No data available	Pending

4.3 Assessment for Discrimination

Component	No. of Suppliers	As-sessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Clay 1	1	100%	Y	+2 UN Global compact signatory. Code of conduct provided. Code of conduct available on the website.	+2 Current secondary Data directly from the UN Global compact website (2023).	Y
Clay 2	1	100%	Y	-1 The company declared it has a policy in place. ILO ratified.	+1.33 Current primary data directly from the company	Pending
Feldspar	1	100%	Y	+2 UN Global compact signatory. Code of conduct provided. Code of conduct available on the website.	+2 Current secondary Data directly from the UN Global compact website (2023).	Y
Sand	1	100%	Y	-1 The company declared it has a policy in place. ILO ratified.	+1.33 Current primary data directly from the company	Pending
Talc	1	100%	Y	+2 UN Global compact signatory. Code of conduct in place. Code of Business Conduct and Ethics publicly available on company website.	+2 Current secondary Data directly from the UN Global compact website (2023).	Y
Limestone	1	100%	Y	-1 Strong secondary data is available from reliable sources	+1.33 Current primary data directly from the company	Pending
Recycled content	1	100%	Y	-1 Strong secondary data is available from reliable sources	+1.33 Current primary data directly from the company	Y
Ink	1	100%	Y	-1 Strong secondary data is available from reliable sources	-2 No data available	Pending

4.4 Assessment for Freedom of Association

Component	No. of Suppliers	As-sessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Clay 1	1	100%	Y	+2 UN Global compact signatory. Code of conduct provided. Code of conduct available on the website.	+2 Current secondary data directly from the UN Global compact website (2023).	Y
Clay 2	1	100%	Y	-1 The company declared it has a policy in place. ILO ratified.	+1.33 Current primary data directly from the company	Pending
Feldspar	1	100%	Y	+2 UN Global compact signatory. Code of conduct provided. Code of conduct available on the website.	+2 Current secondary Data directly from the UN Global compact website (2023).	Y
Sand	1	100%	Y	-1 The company declared it has a policy in place. ILO ratified.	+1.33 Current primary data directly from the company	Pending
Talc	1	100%	Y	+2 UN Global compact signatory. Code of conduct in place. Code of Business Conduct and Ethics publicly available on company website.	+1.68 Audited data from the previous year (2021)	Y
Limestone	1	100%	Y	-1 Strong secondary data is available from reliable sources	+1.33 Current primary data directly from the company	Pending
Recycled content	1	100%	Y	-1 Strong secondary data is available from reliable sources	+1.33 Current primary data directly from the company	Y
Ink	1	100%	Y	-1 Strong secondary data is available from reliable sources	-2 No data available	Pending

4.5 Assessment for Equal Remuneration

Component	No. of Suppliers	As-sessed	Full Compliance	Risk Assessed Outcome	Data Quality Outcome	Company Name commitments/ goals
Clay 1	1	100%	Y	+2 UN Global compact signatory. Code of conduct provided. Code of conduct available on the website.	+2 Current secondary Data directly from the UN Global compact website (2023).	Y
Clay 2	1	100%	Y	-1 The company declared it has a policy in place. ILO ratified.	+1.33 Current primary data directly from the company	Pending
Feldspar	1	100%	Y	+2 UN Global compact signatory. Code of conduct provided. Code of conduct available on the website.	+2 Current secondary Data directly from the UN Global compact website (2023).	Y
Sand	1	100%	Y	-1 The company declared it has a policy in place. ILO ratified.	+1.33 Current primary data directly from the company	Pending
Talc	1	100%	Y	+2 UN Global compact signatory. Code of conduct in place. Code of Business Conduct and Ethics publicly available on company website.	+2 Current secondary Data directly from the UN Global compact website (2023).	Y
Limestone	1	100%	Y	-2 Assumed	-2 No data available	Pending
Recycled content	1	100%	Y	-2 Assumed	-2 No data available	Y
Ink	1	100%	Y	-2 Assumed	-2 No data available	Pending

Limitations & Uncertainties:

3 suppliers found at high or undetermined risk due to:

- Lack of data