

# Modern Slavery Statement 2024



PEOPLE FIRST







# ABOUT US

Jayco Corporation Pty Ltd (Jayco) has been a trusted leader in the recreational vehicle market across Australia and New Zealand for nearly 50 years. We take pride in providing our customers with innovative, high-quality products backed by a robust after-sales support and dealer network.

As a family-owned business, employing over 840 staff at our manufacturing facilities in South Dandenong and Laverton North, Victoria, we are deeply committed to supporting local manufacturing and ethical labor practices.

Jayco is dedicated to combating modern slavery in all its forms within our operations and supply chains. We strive to uphold the highest standards of transparency, fairness, and respect for human rights, ensuring that all individuals contributing to our business are treated with dignity and respect.

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# Modern Slavery Statement

This statement is prepared in accordance with Section 16(1) of the Australian Modern Slavery Act 2018. It outlines the steps taken by Jayco Corporation Pty Ltd as Trustee for Jayco Unit Trust (ABN: 79 301 936 497) and its associated fiberglass supplier, Tricomposite Pty Ltd (ABN: 54 153 650 901), to assess, identify, and address risks of modern slavery within our operations and supply chains.

We remain committed to promoting ethical practices, ensuring the integrity of our business, and safeguarding human rights across all areas of our operations. At Jayco, our core values—Progress, Aligned, Respect, and Trust (PART)—form the foundation of our interactions, both within the organization and with third parties. These values inherently reflect our firm stance against human rights violations and modern slavery.

We are committed to identifying, mitigating, and addressing the risks of modern slavery within our operations and supply chains. Our approach ensures that all business activities are conducted ethically, professionally, and in compliance with legal standards, emphasizing fairness, honesty, and transparency.

We acknowledge that modern slavery can manifest in various forms, including servitude, forced or compulsory labor, and human trafficking. Recognizing this, we remain dedicated to continuous improvement. We actively engage with our supply chain partners to identify and address any risks and strive to eliminate all forms of modern slavery within our supplier network.

Suppliers

289

Products

5K

Dealer Network

27

Service Agents

84

People

840+





Spend

421m

Countries

20

- Jayco manufactures its products in Australia, distributing them both locally and internationally, including to New Zealand. Our supply chain consists of approximately 289 active supply partners for direct materials, with 69 of these suppliers accounting for over 90% of our 2024 financial year purchases.
- To assess and mitigate the risks of modern slavery, we have engaged all suppliers and applied a risk rating based on their primary manufacturing or sourcing location. By region, our Australian supplier base represents approximately 38.2% of our total spend, making it our largest spend category.
- We acknowledge that Australian suppliers often operate within complex supply networks. To better understand and address potential risks, we have requested that these partners disclose the source countries of the products supplied to Jayco. This information enables us to evaluate and allocate risk more effectively within our supply chain, ensuring alignment with our commitment to ethical and responsible business practices.

# SUPPLY CHAIN RISK OVERVIEW

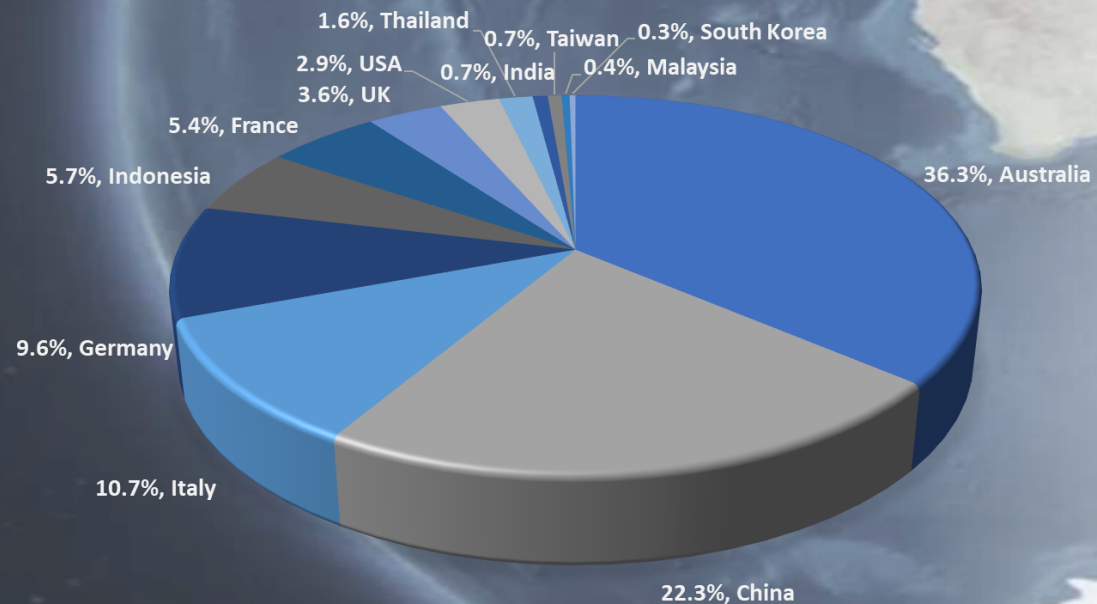


Risk Rating	%	Suppliers
Low	69%	63
High	30%	221
Medium	1%	5

- Jayco recognizes that the scale and complexity of our business and supply chain make it challenging to identify all potential modern slavery risks. To address this, we focus on our Tier 1 suppliers, who collectively account for over 90% of our annual purchases. By engaging with these key suppliers, we aim to better understand and identify risks within their networks.
- Our risk assessment and audit processes are prioritized based on an internationally recognized risk and vulnerability rating, applied to the source country of each supplier. Key categories and commodities sourced for our manufacturing processes include timber, steel, aluminum, plastics, fiberglass, and chemicals.
- As part of our response to modern slavery, Jayco has undertaken internal consultations and worked closely with its associated fiberglass supplier, Tricomposite Pty Ltd. This collaboration has included completing an internal modern slavery audit and appointing a dedicated Modern Slavery Business Representative to lead and enhance our efforts in addressing modern slavery risks.



Top Countries of 90% Spent	Risk Category	Suppliers	% of Spend
Australia	Low	32	36.3%
China	High	13	22.3%
Italy	Low	6	10.7%
Germany	Low	6	9.6%
Indonesia	High	1	5.7%
France	Low	1	5.4%
UK	Low	2	3.6%
USA	Low	2	2.9%
Thailand	High	2	1.6%
India	Medium	1	0.7%
Taiwan	Low	1	0.7%
Malaysia	High	1	0.4%
South Korea	Low	1	0.3%



## COUNTRY OF ORIGIN

- The vast majority of our purchased goods are sourced from 69 suppliers making up over 90% of our spend, with 32 based in Australia, followed by China with 13 suppliers, Italy with 6, Germany with 6 and Indonesia with 1.
- The remaining suppliers are distributed as follows: the UK with 2, USA with 1, Thailand with 2, India, Taiwan, Malaysia, South Korea with 1 each.
- At Jayco, we not only consider the country where the supplier operates but also take a deeper look into their supply chain to understand where their products are sourced and manufactured.
- Based on our FY24 spend, we determined that Australian-sourced products made up 36.3%, China 22.3%, Italy 10.7%, and Germany 9.6%, with the remaining countries of origin each representing a smaller percentage of spend.
- We continue to work with our supply partners to improve the accuracy of our country-of-origin data for future reporting periods to better understand the risks of modern slavery.





# MANAGING MODERN SLAVERY RISKS



- As part of our commitment to mitigating the risks of modern slavery, Jayco continues to maintain and implement robust internal policies and procedures that reflect our firm stance on this issue.
- Our conditions of tendering, as well as our standard contract terms and conditions, explicitly require suppliers to ensure they do not knowingly contribute—either directly or indirectly—to any form of modern slavery.
- To better understand and assess the maturity of our suppliers' modern slavery risk mitigation strategies, we have engaged the top 90% of our supplier base by requesting they complete our Modern Slavery Supplier Self-Assessment Questionnaire. This assessment focuses on key areas, including:
  - Slavery and human trafficking
  - Labour standards
  - Health and safety practices
  - Anti-discrimination measures
  - Business ethics
  - Environmental responsibility
- These efforts reflect our ongoing commitment to working collaboratively with our supply chain partners to identify, address, and mitigate risks associated with modern slavery.



# ACCOUNTABILITY



- Jayco's Board and senior management have been briefed on the actions being undertaken by Jayco's Modern Slavery Working Group.
- Employee Training will continue including an awareness communication program involving Marketing and Communications.

- We have received feedback from 39 of responders out of the 69 suppliers invited to complete our Modern Slavery Supplier Self-Assessment. Of the suppliers that were identified in the high-risk category, 87% have responded of which close to 82% have achieved a high compliance level. Our aim is to continuously work with our suppliers to ensure they meet the compliance level with the aim of improving their rating.





## Commitment to Continuous Improvement



- While the actions we have taken to date provide a strong foundation in addressing modern slavery, we acknowledge there is always more to be done. We are committed to further reducing the risks of exploitation within our operations and supply chains by enhancing our due diligence and risk management practices.
- Looking ahead, during the next reporting period, we aim to strengthen our supply chain accountability through the following initiatives:
- **Developing a Robust Supplier Management Framework:** Continuing to build a framework that places ethical sourcing principles at its core.
- **Conducting Supplier Audits:** Assessing high-risk partners and implementing remediation measures where necessary.
- **Expanding Supplier Risk Coverage:** Targeting 100% engagement and coverage of suppliers rated as high or medium risk.
- **Enhancing Team Training:** Providing further training to our Procurement team to help them identify and address modern slavery risks effectively, equipping them with the tools and knowledge to take meaningful action.
- These actions reflect our dedication to continuous improvement and our commitment to combatting modern slavery in all forms within our business and supply chain.





# Declaration

Pursuant to Section 14 of the Modern Slavery Act 2018, this statement was approved and reviewed by the Principle Governing body of Jayco Corporation Pty Ltd As a Trustee For the Jayco Unit Trust on and Tricomposite Pty Ltd on 6<sup>th</sup> December 2024.

Signature ..... 

Name: Gerard Ryan

Position: Chief Executive Officer/Chairman

Dated 6<sup>th</sup> of December 2024