

## Architectural Window Systems (AWS) Modern Slavery Statement FY 2023-2024



### 1 – Introduction

This statement is submitted by Architectural Window Systems Pty Ltd, ACN 067 950 903 (AWS) under the Modern Slavery Act 2018 (the Act) for the reporting period between 1 July 2023 and 30 June 2024. This statement outlines the risks of modern slavery, and actions to address those risks. Unless otherwise specified, references to “Architectural Window Systems”, “AWS”, “we”, “us” or “our” refers to Architectural Window Systems Pty Ltd, and its owned and controlled entities as defined in the Act.

AWS is committed to combating modern slavery and playing our part to identify and address risks within our operations and supply chains, in alignment with the Australia's Modern Slavery Act 2018. We are committed to protecting and promoting human rights and dignity, and acting in an ethical and transparent manner at all times.

AWS has a zero-tolerance approach to modern slavery, servitude, human trafficking, forced labour, child labour, bonded labour, forced marriage and deceptive recruiting in our operations and supply chain. We are committed to applying appropriate practices and policies to prevent modern slavery in our own operations, and to helping prevent modern slavery in our supply chains, so far as is reasonably practicable.

### 2 – Structure, operations and supply chains

#### Our structure

Architectural Window Systems Pty Ltd, ACN 067 950 903, is a privately owned Australian company.

We own and control multiple entities in our supply chain:

- Colourworks Coatings LLP – ABN 42 287 822 827
- Aluminium Innovations Pty Ltd (trading as Architectural Window Systems WA) – ACN 107 800 966
- A.C.N. 611 940 393 Pty Ltd (trading as AWS Barr Profiles) – ACN 611 940 393
- Alfab Investments Pty Ltd (trading as Tenlow Tooling) – ACN 623 189 284
- Independent Extrusions LLP – ABN 58 515 316 810

Our group of entities (as per the company structure listed above) has an annual consolidated revenue of over \$100m across the reporting period, therefore meeting the Act's definition of a reporting entity.

In the reporting year, we directly employed approximately 309 workers.

#### Our operations

Founded in 1995, AWS is one of Australia's leading suppliers of aluminium window and door systems for the residential and commercial building industry. Our operational activities include aluminium extrusion, component machining and fabrication, tooling design, manufacture and maintenance, powder coating, and warehousing and distribution of aluminium window and door systems.

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We have offices and distribution locations in five states across Australia, and distribution centres and offices in three states.

### **Our supply chains**

AWS has a long and stable relationship with its main suppliers. Our supply chains include over 400 local suppliers and 21 international suppliers used to source a wide range of aluminium products, tools, machinery and services. The largest category of supplier spend during the reporting period was on our national suppliers, as we strive to source locally whenever possible.

A small fraction of products used by our entities are sourced from overseas. In the main, AWS source over 90% of goods and services nationally and the remaining is procured internationally from Italy, New Zealand, Belgium, the United States; Singapore and the United Kingdom.

Products sourced include aluminium products, window/door hardware, window screens, machinery, press and cutting tools, plastic profiles and tubes, software, powder, chemicals, and packaging supplies.

Services procured include aluminium finishing, anodising, freight, waste and energy service, repairs and maintenance, plumbing, electrical and office cleaning services.

### **3 – Risks of modern slavery practices in the operations and supply chains of the reporting entity (and any entities it owns or controls)**

Given the highly regulated nature of the Australian market and our organisation's size, the risk of modern slavery employment within AWS is considered to be low. Modern slavery risk is mitigated through compliance with national wage and working time laws, and the provision of grievance mechanisms for all employees to safely raise concerns.

We acknowledge that there is a variable degree of modern slavery risk throughout our supply chains, and obtaining global visibility and traceability is a shared concern. We recognise the risk associated with our national and international suppliers operating in and sourcing from countries with a high prevalence of modern slavery, such as China and India. Metal products from these countries have a very high prevalence of excessive working time, forced labour and child labour, particularly at risk for state-imposed forced labour and when workers are provided with accommodation.

Within our supply chain, we have also identified that the extractives industry is recognised as high-risk globally due to little visibility over lower tier suppliers and the potential informal or unregulated nature of the industry. Cleaning, building and freight service suppliers also pose high inherent exposure to modern slavery due to sector informality, predominance of foreign and seasonal work or widespread use of contract and agency workers.

The following risks have been identified that could potentially '**cause**' modern slavery practices:

- a) directly engaging foreign workers, or unskilled, or temporary or seasonal labour to work in warehousing and freight.

The following risks have been identified that could potentially '**contribute**' modern slavery practices:

- a) setting unrealistic delivery timeframes to suppliers.

The following risks have been identified that could potentially be '**directly linked to**' modern slavery practices:

- a) sourcing products from national and international suppliers that have operations or directly source from countries that have a high prevalence of modern slavery, such as China and India,
- b) sourcing products which may have been manufactured by another entity that have sourced extractives, chemicals, rubber, or plastic from another entity using forced labour,

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- c) engaging local freight suppliers that may be using subcontractors that are foreign workers, or unskilled, or temporary or seasonal labour.

#### **4 – Actions taken by the reporting entity (and any entities it owns or controls) to assess and address these risks, including due diligence and remediation processes**

AWS upholds high standards and complies fully with relevant employment laws of Australia and the laws of each State in which we operate. At AWS, we directly contract our employees to ensure fully visibility and control of their working arrangements.

Through our Code of Conduct, we promote a best practice work environment and define the expected standards of ethics, integrity, behaviour and conduct from our employees, agents and contractors.

AWS maintains vertical integration and control of our vendors and partners and regularly visits and consults with our supply chain both in Australia and overseas.

To help us understand the risk of modern slavery in our supply chains, we have engaged key suppliers and service providers through an online Modern Slavery Questionnaire. We identified potential risks based on the geography, sector and industry, and product and services for our top spend (Australian-based) suppliers, all international suppliers, and perceived high-risk suppliers. We have also identified inherent modern slavery risks in our supply chains, referring to the Global Slavery Index and the Social Hotspot Database.

A Modern Slavery Policy has been introduced to complement our existing Whistleblower Policy. The policy outlines our commitment, responsibility and actions to prevent, identify and report on modern slavery risks in our operations and supply chains.

During the FY2024-25, we intend to communicate our Modern Slavery Policy to all employees and integrate it into our induction process. We will also design, establish and implement a Supplier Code of Conduct to clearly communicate our high standard and expectations to our supply chain, including respect of human rights and zero-tolerance to modern slavery. We will ensure regular review and update of all relevant policies and procedures as required. We will also identify and determine the processes to operationalise our Modern Slavery Policy and questionnaire in our onboarding and procurement process.

To date, we have not been made aware of any modern slavery activities within our operations and supply chain, but if any concerns are identified, they will be acted upon immediately.

#### **5 – How the reporting entity assesses the effectiveness of these actions**

Effectiveness of the actions taken above will be assessed through periodic internal review. Measurements will include the completion and implementation of actions stated above and communication of the Modern Slavery Policy and Statement among all our employees.

We will continue to maintain a strong relationship with our key suppliers and engage them directly through the questionnaire to improve our understanding of their actions in place and progress in combating modern slavery. We will review the appropriateness of modern slavery questions and monitoring high risk industries, geographies and sectors.

Addressing the risk of modern slavery is complex, therefore AWS understands the importance of continuous improvement to ensure our commitment to combatting modern slavery is upheld. Our approach to identify modern slavery risks will be reviewed annually to assess its effectiveness in evaluating the risk of modern slavery throughout our operations and supply chains and to address any areas of concern. This includes an annual management review of our response to modern slavery and commitment to improve our systems and processes.

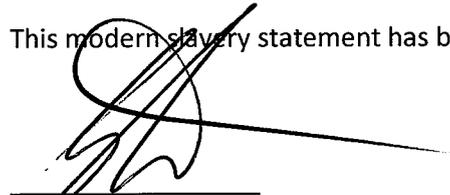
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**6 – Process of consultation with any entities the reporting entity owns or controls**

In preparing this statement, AWS has engaged relevant management across the entities that we own and control to identify modern slavery risks in our operations and supply chains as appropriate.

In line with the obligations under the Act, AWS will produce an annual statement highlighting any modern slavery risks as identified in our operations and supply chain and summarise the measures we have taken to mitigate those risks during the relevant period.

This modern slavery statement has been approved and endorsed by the board of directors of AWS.



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Greg Taylor  
Executive General Manager  
14<sup>th</sup> October 2024