



MODERN SLAVERY STATEMENT 2024

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ABOUT THIS STATEMENT

This statement has been produced in accordance with the Australian Modern Slavery Act 2018 (Cth). This is Capral's fifth statement disclosing progress towards identifying and addressing the risks of Modern Slavery in our business operations and supply chain and reports on the financial year ended 31 December 2024.

This statement has been approved by the Capral Board of Directors.

ABOUT CAPRAL

Capral Limited (ABN: 78 004 213 692) commenced operations in Australia in 1936 and is Australia's largest manufacturer and distributor of Aluminium extrusions, with revenues of \$650 million in 2024 and total assets of \$470 million.

Capral has a national footprint of world class Aluminium extrusion plants, comprising of eight operating presses with an annual capacity of around 65,000 tonnes.

Capral also has an extensive distribution network, consisting of major distribution facilities, as well as regional and metropolitan centres with an extensive range of products and logistics capabilities. Capral is a market leader in supply to fabricators and distributors, focusing on the residential and commercial building and industrial segments.

Capral has a comprehensive product range and innovative R&D capability.

Capral employs over 1,000 people within its operations throughout Australia, with significant industry skills and expertise.



6 plants; 8 extrusion presses



**22 distribution centres
Australia-wide**



**Annual extrusion capacity
65k tonnes**



**Annual turnover
~\$650 million¹**



**Residential & commercial
construction, industrial**



Over 1,000 employees

MESSAGE FROM THE MANAGING DIRECTOR AND CEO

At Capral, we know that our impact on the environment, society, and economy comes from how we operate and interact with our employees and partners. Our success is not just about making money, but also about sticking to our principles and commitments.

Our core values – Safety First, Play Fair, Own It, Customer Success, and Better Every Day – guide everything we do. They help us assess risks and engage with stakeholders wherever we are.

Modern Slavery is a serious issue in global supply chains, affecting many people and communities. Capral supports efforts to eliminate all forms of Modern Slavery, both in Australia and globally.

Tackling Modern Slavery is tough and requires both broad strategies and detailed analysis, along with active engagement with our supply chain. We see this challenge as part of our overall risk management, rather than just a compliance task.

With suppliers from various countries, we focus on identifying and addressing high-risk areas in our supply chains. Our strategy uses data to evaluate risks and engages directly with suppliers. We believe ongoing dialogue, understanding shared risks, and working together on solutions are crucial.

Preventing Modern Slavery is important to our growth as an organisation. It helps us improve our systems and collaborative risk management skills, understand the human side of business decisions, and create better strategies for complex operational challenges.

Our approach to fighting Modern Slavery is based on the idea that sustainable business relies on strong supplier relationships, creating shared value, and making decisions that consider both human and business impacts.

Stopping any involvement in Modern Slavery is key to our sustainability strategy and shows our commitment to running a safe, ethical, and responsible business.

A handwritten signature in black ink, appearing to read 'Tony Dragicevich', with a long horizontal line extending to the left.

Tony Dragicevich

CEO and Managing Director

CAPRAL'S VISION AND VALUES

Capral's commitment to leadership in responsible manufacturing and ethical business practices is deeply embedded in our corporate vision and resonates through our core values. Under our responsible manufacturing strategy, Capral recognises that good business decisions need to be made in consultation with a variety of interests and with judgements that reflect both short-term and long-term consequences. Participation in the Global Reporting Initiative (**GRI**) and alignment with the United Nations Sustainable Development Goals (**SDGs**) strengthen our commitment to best practices in our industry, contributing to global knowledge networks that inform our ethical business decision-making.

We use GRI standards as a reporting and management tool, helping us better identify the broader implications of our business decisions in social, environmental, and economic terms. It enables us to enhance our traditional data analysis methods with insights derived from stakeholders and our relationships with suppliers. The approach helps identify potential problems earlier and build better countermeasures, leveraging both qualitative feedback from our field network and quantitative metrics.

Our supplier training sessions dedicate time to knowledge sharing and collaborative problem-solving on sustainability and human rights issues. We collaborate with partners to develop shared approaches to identifying and managing risk, whether locally, within specific industry sectors, or across systems of multinational operations.

Such alliances contribute to the creation of more robust supply chains that have defined lines of communication and adhere to common standards, which can help in the early detection and resolution of potential problems. Our model for preventing Modern Slavery combines systematic risk assessment with relational monitoring. Our approach does not rely on audit-style compliance; instead, we partner with our suppliers to identify vulnerabilities and develop practical solutions that address fundamental issues.

This approach facilitates the integration of analytical methods and direct participation in the development of more effective interventions, as well as the establishment of working relationships that can sustain surveillance and support ongoing improvement. We add to industry frameworks to localise global standards into constituency processes. We aim to demonstrate that businesses can integrate responsible practices into their 'way we do things around here', while maintaining competitive performance and achieving improved community outcomes.



Capral's Vision & Values



CAPRAL'S BUSINESS STRUCTURE, OPERATIONS AND SUPPLY CHAIN

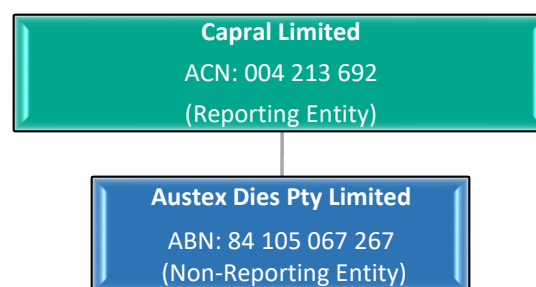
Business Structure

This statement is made by Capral Limited (**Capral**), for itself and its subsidiary company, Austex Dies Pty Ltd (**Austex**). Capral was incorporated in Victoria in 1936, and now has its registered office at Bundamba, Queensland and its corporate head office at Huntingwood, New South Wales.

Capral is a public company listed on the Australian Stock Exchange (CAA).

Our registered office is located at 71 Ashburn Road, Bundamba, QLD, 4304, Australia.

The corporate structure of Capral is shown below. All entities shown in the corporate structure are companies and subsidiaries are 100% owned. Not all entities are reporting entities.



Operations Footprint

Capral has a national footprint with a presence in every state and Extrusion plants near five mainland capital cities

Distribution Centres

Queensland

1. Cairns AC
2. Townsville RDC
3. Sunshine Coast (Kunda Park) AC
4. North Brisbane (Deception Bay) AC
5. Bremer Park RDC
6. Springwood AC
7. Gold Coast (Burleigh Heads) AC
8. Archerfield AC

New South Wales

9. Newcastle AC
11. Huntingwood RDC
12. Rockdale AC
14. Wollongong AC

Victoria

15. Lynbrook AC
16. Noble Park AC
17. Campbellfield RDC
18. Laverton AC

South Australia

20. Kilburn RDC

Western Australia

21. Canning Vale RDC
22. Welshpool AC
23. Wangara AC

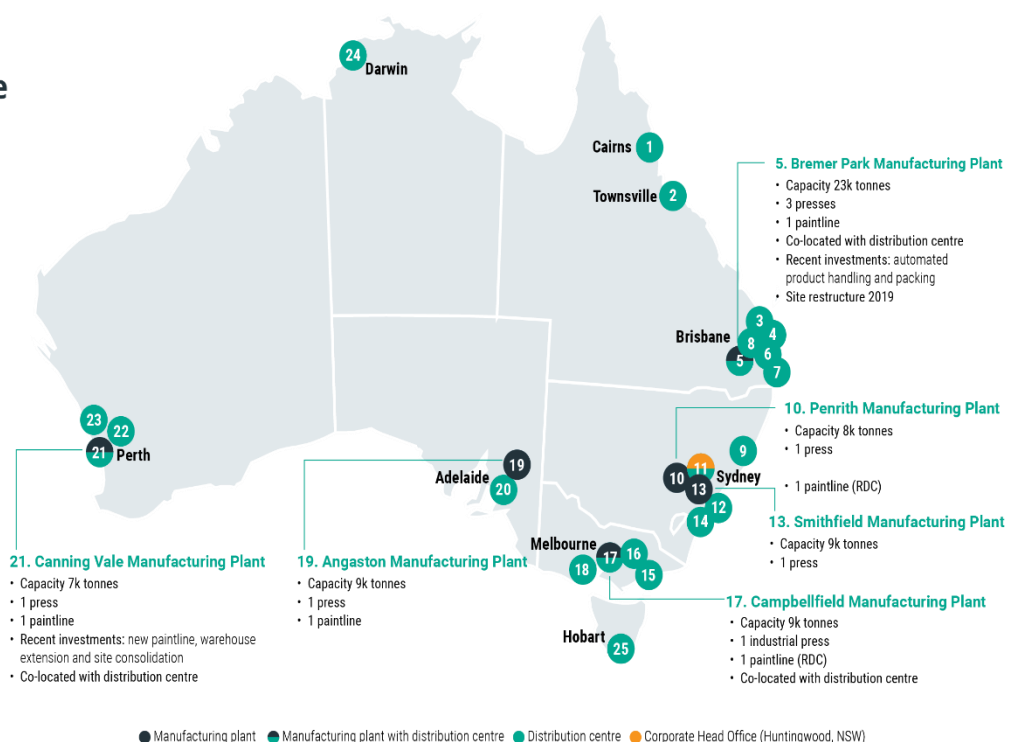
Northern Territory

24. Darwin RDC

Tasmania

25. Hobart RDC

RDC - Regional Distribution Centre
AC - Aluminium Trade Centre



Supply Chain

Capral maintains established supplier relationships across domestic and international markets. We source the majority of our products and services from Australian suppliers, with additional sourcing from South and East Asia, the Middle East, and Europe.

Our procurement activities support three primary business functions: manufacturing operations, customer sales, and operational support. Manufacturing inputs include aluminium billet, coating materials, packaging supplies, and production equipment, along with services such as contract labour, technical consulting, and utilities.

Products for customer sale include aluminium sheet and plate, extruded profiles, fabricated window and door systems, and associated hardware. Operational support procurement covers IT infrastructure, manufacturing equipment, distribution logistics, and corporate services, including facilities management, security, and professional consulting.

Our centralised procurement team manages the majority of purchasing activities, providing oversight of supplier selection, contract management, and performance monitoring across our supply base

GOVERNANCE, POLICIES AND RISK ASSESSMENT

Governance

Capral operates under a formal governance structure with Board-level oversight provided through our Audit Committee. The Audit Committee is responsible for overseeing corporate compliance, including Modern Slavery reporting and risk management.



Annual reviews of Capral's Modern Slavery Programme are undertaken by the Modern Slavery Working group which comprises members across core functions of the business including:

- ESG
- Risk Management
- Procurement
- Legal.

Our governance approach is supported by established policies that address Modern Slavery risk management and related compliance requirements, detailed further on the following page.

Policies

Policy	Purpose
Corporate Governance Statement	We believe good governance means ethical dealings with everyone – investors, customers, suppliers and employees. This statement outlines Capral’s corporate governance policies and practices in line with the ASX Corporate Governance Council’s Corporate Governance Principles and Recommendations.
Code of Conduct	A series of clear and concise rules concerning the conduct of directors, executives, management and staff of Capral including expectations regarding creating a safe and non-discriminatory workplace, and only dealing with business partners who demonstrate similar ethical and responsible business practices. The Code of Conduct commits the directors and all employees to adhere to high standards of business conduct and compliance with the law and articulates the principles and values that allow the directors and all employees to work in a positive, supportive environment.
Equal Employment Opportunity Policy and Diversity Policy	Capral recognises the importance of equal opportunity and diversity in the workforce and values the contribution of all employees regardless of gender, age, ethnicity, disability, sexual orientation, and cultural background. These policies aim to ensure that the work environment is free from discrimination, harassment and bullying and that everyone respects and values the diversity of our workplace.
Whistleblower Policy	Provides all employees, upstream suppliers, stakeholders and communities the opportunity to raise concerns regarding improper conduct without fear of any adverse ramifications. These concerns can be raised internally with our human resources department, or through an independent and confidential service.
Supplier Trading Agreement	Our contracts with suppliers set out our terms of trade. It enlists our suppliers to act as partners and support our business to act responsibly and ethically. Suppliers without individual Trading Agreements are bound by Capral’s Purchasing Terms - updated to include a specific Modern Slavery clause in 2021.
Ethical Sourcing and Modern Slavery Policy	We have a commitment to verify our suppliers do not engage in, or support modern slavery, while helping Capral to adhere to its ethical sourcing and social responsibility requirements
Supplier Code of Conduct	A series of clear and concise rules concerning the conduct of suppliers including expectations regarding sustainability, adherence to legislation and regulations and ethical and responsible business practices. The Code of Conduct commits the supplier to adhere to high standards of business conduct and compliance with the law and articulates the principles and values that allow all stakeholders to work in a positive, supportive, sustainable environment.

Risk Assessment – Modern Slavery Risks in Our Operations

Capral has identified specific risk areas related to Modern Slavery as part of our comprehensive risk management approach. These risk areas are outlined in the accompanying assessment table.

Capral has been Aluminium Stewardship Initiative certified since 2023. This certification requires adherence to established frameworks for responsible sourcing and organisational management, including specific requirements related to social and employee standards that address Modern Slavery risks. Capral's most recent audit, completed in 2024, determined that Capral's compliance framework is robust and mature.

Risk	Description	Finding	Our Risk Exposure
1	Casual or Contract workers engaged directly by Capral	Capral's workforce is mainly permanent, with only 1.5% casual and 13% contractors (via labour hire).	Low
2	Casual workers under the age of 18	Capral has 0 casual employees under the age of 18.	Low
3	Migrant Workers	Capral has 3 employees on a temporary visa. All of these employees are in managerial positions.	Low
4	Seasonal workforce fluctuation	Capral operations are not seasonal, with consistent workforce turnover during the reporting period.	Low
5	Freedom of association	A large percentage of Capral employees operate under Enterprise Bargaining Agreements.	Low
6	External Auditing	Capral is certified to quality, environmental and safety management standards ISO9001, ISO14001, ISO45001. Additionally, Capral's ASI certification requires detailed system and suppliers' verification auditing to meet the responsible sourcing requirements.	Medium
7	Sector Risk	Capral operates in high-risk sectors including: Manufacturing, and Wholesale and Trade.	Medium
8	Services engaged by Capral	Capral relies on services including recruitment, legal, cleaning services, property maintenance, waste disposal and equipment maintenance. As part of our supplier code of conduct, all suppliers and contractors are reviewed as per our risk-based systems. Recruitment, construction and cleaning services are considered particularly high risk, but none of these are sourced outside Australia, thus lowering the risk.	Low

Risk Assessment – Modern Slavery Risks in Our Supply Chain

Capral has implemented a risk-based procurement methodology to identify and manage potential supply chain risks. This approach includes conducting due diligence on suppliers and subcontractors, with priority given to higher-risk categories.

Our supply chain assessment follows a tiered review schedule: low-risk suppliers are reviewed annually, moderate-risk suppliers are reviewed every six months, and high-risk suppliers are reviewed quarterly. Assessment criteria include the designation of conflict-affected and high-risk areas (**CAHRA**), reported organisational outcomes, domestic legislation, and OECD country status.

In 2022, we implemented a Supplier Code of Conduct that establishes environmental, social, and governance requirements for suppliers to align with Capral's compliance and ethical standards. This document is updated and recalculated annually as part of our new supplier onboarding programs.

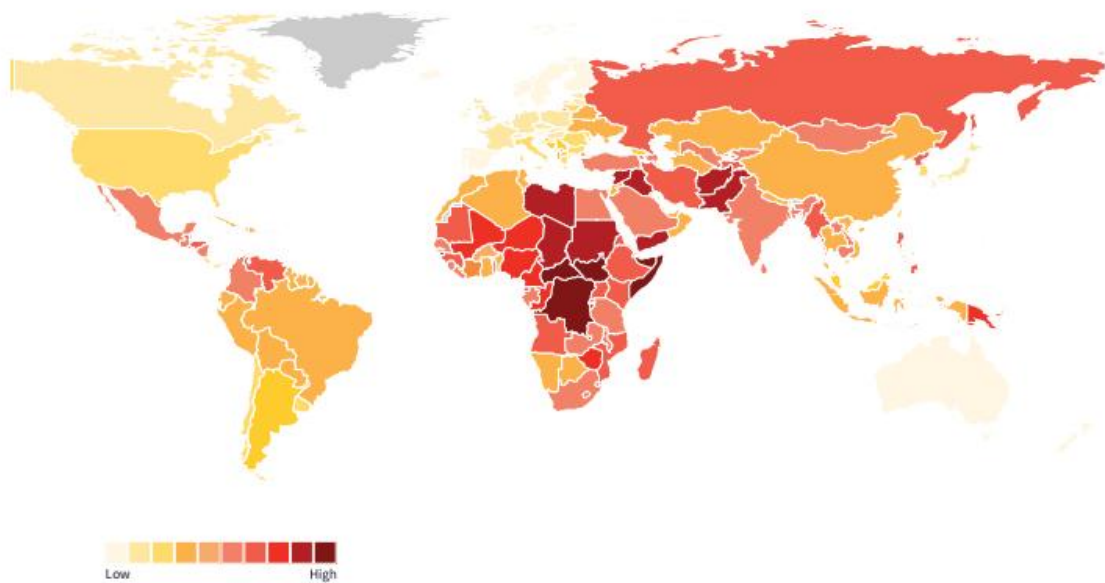
Our Whistleblower program has been extended to cover procurement activities, enabling individuals to report concerns within our supply chain.

For suppliers identified as deficient in compliance areas, we have established support strategies to assist with capability development. On-site visits to moderate and high-risk suppliers include observational assessments aligned with our Supplier Code of Conduct.

Our supplier risk assessment evaluates five key factors:

- CAHRA designation and associated risks,
- OECD participation and commitment to democratic and market economy principles;
- Supplier-reported outcomes, including annual reports and policy documentation;
- Any reported breaches through our whistleblower system or public disclosures; and
- Domestic legislation addressing Modern Slavery risks.

During the year 2024, Capral sourced products and services from 1,308 suppliers, of which 1,237 (95% in number) were based in Australia and New Zealand. The weighted average Global Slavery Vulnerability Score (weighted on \$ purchased) is 18.4. Capral's overall supply chain risk is Low.



Estimated vulnerability to modern slavery by country

Supplying Country	% of Total Capral Purchases	Number of Suppliers	Country Global Slavery Vulnerability Score (%)*
Australia	68.9%	1229	7
Bahrain	6.8%	1	40
Belgium	0.0%	1	11
China	8.0%	16	46
France	0.0%	1	13
Germany	0.1%	9	11
India	5.1%	2	56
Indonesia	1.3%	3	49
Italy	0.7%	18	22
Japan	0.0%	2	11
Liechtenstein	0.0%	1	0
New Zealand	0.3%	8	8
Oman	0.1%	1	40
Poland	0.0%	1	19
Qatar	5.5%	1	38
Singapore	0.0%	1	24
South Korea	0.0%	3	29
Thailand	2.3%	2	46
Turkey	0.0%	1	51
United Arab Emi	0.6%	2	40
United Kingdom	0.0%	4	14
USA	0.0%	1	25

*Walk Free 2023, Global Slavery Index 2023

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS IN OPERATIONS

Aluminium Stewardship Initiative (ASI) Certification

Capral's ASI certification demonstrates our commitment to responsible aluminium production practices. ASI is a recognised non-profit organisation that establishes industry standards for environmental, social, and governance practices across the aluminium value chain.

The certification process involved a comprehensive third-party audit evaluating our operations against ASI's Performance Standard V3 and Chain of Custody Standard. The assessment covered governance structures, environmental management, and social practices, including areas such as biodiversity protection, human and indigenous rights, greenhouse gas management, material stewardship, recycling practices and responsible sources through Capral's verified suppliers on key products.

ASI certification supports our sustainability strategy and provides a framework for ongoing improvement initiatives. The standards align with international best practices and inform our decision-making processes across operations.

Continued Risk-based Procurement Methodology

Capral utilises a risk-based procurement model which includes the continued monitoring of Modern Slavery risks throughout its supply chain. This approach takes into account the geographical and industrial diversity of our supplier base and is reviewed periodically to be appropriate for the current risk profile. As part of our pre-on boarding we undertake due diligence of suppliers which includes a risk-assessment of the potential or likelihood to ensure compliance with our supplier code of conduct, including in respect of Modern Slavery.

Over the past year, we have introduced monitoring schemes that combine technology-based assessments with on-site supplier engagement to assess adherence to our policy requirements. Our risk assessment methodologies are reviewed and adjusted for new risks and to ensure effectiveness over changes in global supply chain environments.

Our procurement team communicates Capral's expectations regarding the prevention of Modern Slavery and compliance and engages with suppliers in an ongoing manner. These include broad assessments of suppliers' practices with respect to labour rights and environmental standards.

In 2024 none of our suppliers were found to be non-compliant in our risk assessments. We are continuing to collaborate with suppliers to ensure that we and our suppliers are aligned on our ethical sourcing values and requirements.

Supplier contracting

Capral takes management modern slavery risks seriously. As part of our management of the risks of modern slavery in our supply chains we require our suppliers contractually commit to addressing modern slavery (see clause 17 of Capral's Conditions of Purchase (January 2024) available at our website). This includes the supplier warranting that:

- it will comply with all applicable laws and regulations in relation to human rights and modern slavery;
- it will take reasonable steps to ensure that there is no modern slavery in its supply chains (or those of its suppliers or subcontractors);
- it will implement and maintain throughout its contract with Capral appropriate due diligence processes for its own suppliers and sub-contractors to ensure that there is no modern slavery in its supply chains;

- it will notify Capral as soon as it becomes aware of actual or suspected modern slavery in a supply chain which is connected with its contract with Capral; and
- it will maintain records to trace the supply chain of all goods and/or services provided to Capral in connection with its contract with Capral.

Capral's Conditions of Purchase also provide Capral with the right to audit the Supplier's compliance with our modern slavery requirements, including granting access to the Supplier's records and premises. We also include requirements for Suppliers to remedy, or provide an acceptable plan to remedy, any identified instances of modern slavery within a specified time period – with a failure to do so giving Capral a right to terminate its contract with the Supplier.

To ensure cover of our downstream supply chain, we require Suppliers to include a condition similar to clause 17 of Capral's Conditions of Purchase (dealing with Modern Slavery) in all contracts it enters with its suppliers or sub-contractors.

Supplier Code of Conduct to Suppliers

Capral has provided our Supplier Code of Conduct to all suppliers, establishing clear expectations for labour rights and ethical business practices including remediation where required. This Code forms the foundation of our procurement process and ensures suppliers understand our compliance standards.

Our risk assessments have identified no compliance issues among suppliers who have acknowledged and agreed to these requirements.

Review of Work Hours and Benefits

Our commitment to fair labour practices includes a systematic review of supplier working conditions and benefit provisions. In 2024, we conducted two compliance reviews that confirmed all suppliers met our standards for working hours and employee benefits, with no violations identified.

Expansive Whistle Blower Program

Our Whistleblower Program covers all procurement activities, including suppliers and contractors. The program aligns with Capral's Supplier Code of Conduct, Responsible Sourcing, and Modern Slavery policies, providing a confidential reporting mechanism for procurement-related concerns without risk of retaliation.

ASSESSING EFFECTIVENESS

Capral is committed to ensuring that our actions and controls in mitigating modern slavery risks are practical and effective. Capral's Modern Slavery Working Group introduced indicators to be measured annually. These indicators provide an objective measure of Capral's internal controls, actions and progress.

Evaluation Area	Outcome FY2024
Number of Procurement staff trained on Modern Slavery program	All
Mass update of Capral's Supplier Code of Conduct - Number sent in 2023	1336*
Audit of supply chain custody (ASI) – as due	1
Reports of Modern Slavery concern on Fair Call hotline	0
Number of suppliers removed due to Modern Slavery concerns	0
Onsite review of suppliers compliance	13
Desktop review of suppliers compliance	3

*Mass update in 2023, next mass update scheduled for 2025

CONSULTATION

This statement was developed through collaboration with Capral's internal stakeholders, led by the Modern Slavery Working Group. The working group included subject matter experts from ESG, Risk Management, Procurement, and Legal functions.

As part of our risk assessment process, Capral conducted consultations with Austex Dies Pty Ltd (**Austex**), our controlled entity to assess the risk of modern slavery in Austex's supply chains and ensure Austex's practices and procedures to address modern slavery risk align with Capral's. While Austex is not a reporting entity under the Modern Slavery Act 2018 (Cth), we determined that consultation was appropriate given the shared management oversight, with Capral's CEO and CFO serving as directors of Austex.

Our consultation process included discussions with management and officeholders at Austex regarding their supply chains and procurement processes and confirming they adhere to Capral's Group policies and procedures. We further requested purchasing data from Austex, and analysed this data to identify risks of modern slavery. Taking into account the same risk factors as outlined in the analysis of Capral's operations and supply chain described in the report above, our consultation with Austex's management and officeholders, and analysis of Austex's purchasing data, we assessed the risk of Modern Slavery within this business as extremely low.