



JELD-WEN AUSTRALIA – MODERN SLAVERY STATEMENT

1. INTRODUCTION

JELD-WEN Australia Pty Ltd (ACN 087 012 226) (**JELD-WEN**) and its wholly owned subsidiaries (**we/our**) within the Australasia region is making this statement in accordance with the Modern Slavery Act 2018 (Cth) (the **Act**). JELD-WEN takes its commitments under the Act very seriously. As a company, we are committed to conducting business in a lawful, ethical, and responsible manner and expect our supply chain partners to share this commitment. Modern slavery and human trafficking are hidden, pervasive crimes, and we all have the responsibility to drive them out of our industry.

This statement covers our financial year ended 31 December 2020 unless otherwise stated.

2. OUR STRUCTURE, OPERATIONS, AND SUPPLY CHAIN

JELD-WEN is part of the JELD-WEN Group and the ultimate controlling parent of JELD-WEN is JELD-WEN Holding, Inc., headquartered in Charlotte, North Carolina.

In the Australasia region, JELD-WEN is the parent entity and has 31 wholly owned subsidiaries within its structure. As a group, JELD-WEN is a leading manufacturer of high-performance interior and exterior building products, offering one of the broadest selections of windows, interior and exterior doors, and wall systems to service the residential, renovation & remodelling market, multi-residential and commercial building and construction industry in Australia. This statement relates to those business activities.

JELD-WEN has approximately 79 facilities in Australasia which are made up of a combination of manufacturing facilities and showrooms in every state except Tasmania but also has operations overseas in Indonesia, Malaysia, Taiwan and Hawaii and employs approximately 4,300 employees. We procure raw materials such as aluminium extrusion, timber, glass, locks, hardware furniture and related plastic components from countries such as Australia, Indonesia, Malaysia, China, Taiwan, New Zealand, France and Latvia.

3. IDENTIFYING THE RISK OF MODERN SLAVERY

In the building products industry, it is difficult to provide assurance that the original production of raw materials is done responsibly, because these processes occur so far up our supply chain, and, therefore, are far outside JELD-WEN's direct control. Notwithstanding, JELD-WEN's value of "building businesses ethically and safely" ensures employees doing what is right safely is at the forefront of business decisions.

In line with this value, JELD-WEN is committed to eliminating modern slavery throughout its business and supply chains. We expect the same commitment from our suppliers and other business partners. These expectations are set out in JELD-WEN's global Supplier Code of Business Conduct which include:

- Respect for human rights through appropriate anti-discrimination, anti-harassment and abuse policies and practices;
- Compliance with all applicable regional and local labour laws, anti-slavery rules and regulations;
- No underage or involuntary labour; and
- Employee rights of freedom of association and to bargain in accordance with applicable laws.



JELD-WEN requires suppliers and their employees to commit to this Supplier Code of Business Conduct as a condition of doing business with JELD-WEN. JELD-WEN's Supplier Code of Business Conduct is available on our website at <https://www.jeld-wen.com/en-us/supplier-information>.

Supply Chain

Prior to engaging in business with a supplier, and throughout the term of the relationship, we assess that supplier's compliance with our ethical standards. Our preliminary assessment is based upon geography, the commodity purchased, the level of manual labour required for the assembly of parts, the supplier's ownership structure, supplier quality performance and the nature of the business transaction. This risk assessment is performed by JELD-WEN with input from external stakeholders.

JELD-WEN reserves the right to conduct audit procedures to assess vendor supply chains and to confirm compliance with our requirements for responsible sourcing. Continued noncompliance or lack of willingness to take steps to address issues of concern will result in the termination of the supplier relationship.

JELD-WEN's management team reviews at least annually our exposure to various supply chain risks to assess whether our policies and procedures appropriately identify and address such risks. We evaluate our suppliers and identify high-risk suppliers on several parameters, including known risks and country location.

In order to improve supply chain visibility and identify where there were risks of JELD-WEN contributing to or being indirectly linked with modern slavery related practices within its supply chains, we developed a supplier self-assessment questionnaire designed to capture supplier information and the identification of potential modern slavery and human/labour rights issues. JELD-WEN used this self-assessment questionnaire and issued it to targeted suppliers based on spend and risk. The regional legal and procurement teams worked closely in the assessment of the questionnaire responses and no violations were identified.

4. RISK MANAGEMENT AND DUE DILIGENCE

To address the risks of modern slavery in our business, we have undertaken or will undertake the following actions:

- JELD-WEN recognises that modern slavery takes various forms, such as slavery, servitude, debt bondage, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- The issue of modern slavery is addressed annually in the Code of Conduct or general legal compliance training employees are required to complete. JELD-WEN employees responsible for supply chain related decisions receive additional training on identifying and addressing human trafficking and slavery in our supply chain, emphasising the role of our buyers in responsible decision-making.
- JELD-WEN's employees adhere to a code of business conduct and ethics that informs them about the requirements of supply chain transparency with respect to modern slavery. Employees who suspect any modern slavery violations are required to report this activity to the JELD-WEN legal department, HR department or to JELD-WEN's confidential ethics hotline.
- JELD-WEN continues to assess the risks of modern slavery being present in our supply chain by using tools such as the self-assessment questionnaire and risk rating our current suppliers and assessing their compliance.



5. CONSULTATION WITH OTHER CONTROLLED ENTITIES

There is a commonality of interest among directors across JELD-WEN and its subsidiary entities, as well as regular interaction with the senior leadership team who have been made aware of the Act and its requirements.

6. ONGOING ASSESSMENT OF RISK

We monitor the effectiveness of our actions to remove the risk of modern slavery from our operations and supply chain by:

- Investigating any reports received from employees, the public, or law enforcement agencies that indicate the existence of modern slavery practices, and
- Using tools such as the Global Slavery Index to improve our understanding of the modern slavery risks we may face.

If a violation of our standards is identified and the supplier fails to immediately and satisfactorily remediate the issue, that supplier will risk the immediate termination of all existing and future business with JELD-WEN.

7. CONTINUOUS IMPROVEMENT

JELD-WEN is committed to continuous improvement of our systems and processes to reduce the risk of modern slavery in our supply chain. The continuous improvement JELD-WEN will undertake includes, but is not limited to:

- Further training of associates who have direct responsibility with the supply chain to ensure their understanding of the Modern Slavery Act and its importance.
- Conducting a risk assessment of our entire supply base.
- Continuously reviewing our supply base and their responses to our questionnaire. Any suppliers deemed to be of medium or high risk will go through an audit process to identify and reduce the risks of Modern Slavery being present in our supply chain and assessing these suppliers' compliance with our policy.
- Updating all our supply contracts to include modern slavery clauses.

JELD-WEN will continue to work with parties throughout its supply chains to prevent any contribution that it may have to modern slavery. We will continue to raise awareness among our employees and those we do business with, improve our due diligence processes to effectively identify any risk which may arise, and take appropriate actions in line with the objectives of this document.

This statement has been approved by the board of JELD-WEN Australia Pty Ltd.



Peter Farmakis
Director

Dated: 28 June 2021