



Modern Slavery Statement

EGR Group: Modern Slavery Statement for the financial year ended 30th June 2025, issued pursuant to Section 13 of the Modern Slavery Act 2018 (Australia); and Section 54 of the Modern Slavery Act 2015 (UK).

OUR BUSINESS, STRUCTURE AND SUPPLY CHAINS

Founded in 1973, the EGR Group is a privately owned world-class designer and manufacturer of precision engineered solutions marketed through two Strategic Divisions – Automotive, and Building and Commercial Products.

EGR's Automotive Division services over fifty of the world's carmakers in the supply of premium automotive accessories. We're trusted to produce OEM-branded and aftermarket window visors, canopies, side steps, hood guards, sports bars, roll covers, tonneau covers and more.

EGR's Building and Commercial Products Division comprises EGR Décor, EGR Design and EGR Extrusion. All brands are market leaders and supply to an ever-growing global client base.

EGR's operates under a vertically integrated structure with multiple manufacturing sites located in Brisbane, Queensland Australia; in Ontario, California, USA; and Bangkok, Thailand.

EGR also has support sites focused on sales, product development liaison and warehousing located in Sydney and Melbourne, Australia; Milton Keynes, The United Kingdom; Detroit, Michigan USA; and Foshan City, China.

EGR consulted the relevant companies we own or control in the development of this modern slavery statement.

EGR employs approximately 735 personnel worldwide and prides itself as a diverse, people-friendly company. We welcome all within our ranks and are proud of the wide range of cultures and languages we employ. From mechanical engineering to marketing, and carpentry to robotics, skilled workers make up the majority of our workforce, operating multi-million-dollar production lines to create a huge range of products to serve global needs. We're proud of our history of staff training, and internal promotion.

Our supply chain includes over 1300 suppliers worldwide throughout Australia, Asia, Europe, North and South America. Our main products sourced include subcomponents for automotive accessories including but not limited to adhesives, clips, electrical components, extrusions, fasteners, injection moulded products, locks, packaging materials, paint, plastic sheet, seals, steel, and tapes.

EGR has its own personnel placed directly in and working with our key automotive accessory suppliers in China and Thailand to provide technical assistance and monitor quality.

OUR POLICIES

EGR is against modern slavery and human trafficking in all its forms, and our company policies and practices strongly reflect this. The company has already developed policies and procedures such as -

Document #111224 EGR Group and Supplier Corporate Social Responsibility (CSR) & Sustainability Policy (Includes policies for Human Rights and Fair Labour Practices; Working Hours; Ethical Recruiting; Freedom of Association and Collective Bargaining; Women's Rights; Financial Responsibility and Accurate Records; Counterfeit Parts Prevention; Export Controls and economic Sanctions; Environmental Responsibility; Business Ethics and Transparency; Workplace Health and Safety; Community Impact and Engagement; Supply Chain Due Diligence and Risk Management; and the Environment)

Document #111619 EGR Group - Whistleblower Policy

Document #111618 EGR Group - Complaints Handling Policy

Document #111486 EGR Group - Competition Law Compliance Policy

Document #104976 Workplace Health & Safety Policy

Document #105003 EGR Grievance Policy

Document #117205 EGR Code of Ethics

Document # 111704 EGR Mental Health and Wellbeing Policy

Document # 121639 EGR Global Industrial Relation and Employment Law Compliance Policy

EGR also has a long-standing Employee Code of Conduct that includes Zero Tolerance Policies for –

- 1) Drugs and Alcohol in the workplace
- 2) Sexual Harassment
- 3) Workplace harassment and bullying
- 4) Anti-discrimination and equal opportunity
- 5) Theft
- 6) Threatened / Physical Assault; and

7) Manual Handling

All of the above documented policies form an important part of our business management systems and fit under EGR's Core Values, known internally as the EGR Standards –

Safety always comes first

Teamwork, work together to achieve more

Attention to detail with a sense of urgency

Nothing less than the highest quality

Do what you say you are going to do, own your actions

Act with integrity

Respect yourself, respect others, respect the environment

Diversity is encouraged and makes us stronger

Seek a better way, continuous learning, continuous improvement.

As part of EGR's commitment to helping eliminate modern slavery and human trafficking practices worldwide, it is our goal to continue to improve upon these policies and practices now and into future.

DUE DILIGENCE PROCESSES - STEPS TO ASSESS AND MANAGE RISKS

As part of our due diligence and ongoing efforts to assess and manage modern slavery risk in our operations, EGR has conducted internal surveillance of our existing sites. To date, no known or reported incidences of modern slavery or human trafficking have been identified within our direct operations.

In our supply chains, we have assessed suppliers focusing particularly on our key (Preferred and High-Spending) suppliers in Asia & the Pacific, North America, and Europe/UK. Based on the data available at the time and using country-level risk criteria (such as geographic location and commodity type), the majority of assessed suppliers were considered to present a low risk of involvement in modern slavery or human trafficking.

However, the 2023 Global Slavery Index has underlined that modern slavery risks are rising: globally an estimated 50 million people were living in modern slavery in 2021, including 28 million in forced labour. The Index emphasises that modern slavery is not confined to low-income countries; over half of all forced labour is linked to global supply chains and the import of risk-goods by major economies. It also points to a widening range of drivers of vulnerability, including conflict, climate change-induced migration, and multiple intersecting inequalities.

In light of these findings, we acknowledge that even low-risk suppliers may be exposed to newly emerging risks of modern slavery. Accordingly, EGR is implementing a strengthened suite of measures to mitigate risk throughout our supply chain:

- We are developing a new electronic Environmental, Social & Governance (ESG) supplier questionnaire (to replace our existing modern slavery/human trafficking questionnaire) which will roll out across our supply chain in 2025-26.
- Suppliers (including sub-tier where data allows) assessed as medium or high risk following this new questionnaire will be required to complete it, and suppliers categorised as high risk will be subject to a site audit (or other verification/assurance process) to confirm compliance and remedial action.
- We will review our supplier segmentation criteria to reflect evolving risk factors identified in the 2023 GSI — beyond geographic location and commodity type: for example, supplier dependence on migrant labour, exposure to climate- or conflict-driven migration, transparency of labour practices, and alignment of government regulation and enforcement in the country of supply.
- We will integrate findings from the 2023 GSI (and subsequent updates) into our supplier risk-mapping, prioritisation and monitoring processes, thereby ensuring our supplier assessments remain dynamic and responsive to changing global vulnerabilities.
- We will enhance training and awareness for procurement, quality, supply chain and sustainability teams to understand the broader drivers of modern slavery (as flagged by the 2023 GSI) and to recognise “hidden” risk profiles—even in jurisdictions traditionally assessed as low-risk.

By updating our approach in this way, EGR reaffirms our commitment to rigorous oversight of modern slavery risk in our operations and supply chains, and to continuous improvement aligned with the most current global evidence.

Should a supplier ever be discovered to be using slavery, servitude, forced or compulsory labour and/or human trafficking within its workforce (or within its own supply chain), EGR would immediately cease using that supplier (or seek for the supplier to cease using their sub-supplier).

FINDINGS

Our overall findings to date indicate that the risk of modern slavery and/or human trafficking occurring within our own operations remains very low. This reflects the nature of the industries we operate in, the commodities we procure, and the structure of our directly managed workforce.

However, given the 2023 Global Slavery Index indication of increased modern slavery risks as mentioned above, and with significant exposure embedded in global supply chains across all major economies, while our prior assessments identified most suppliers as low risk, we acknowledge that suppliers may now face emerging or evolving vulnerabilities not previously captured under earlier (2018-based) frameworks.

Responses received from suppliers who previously completed our modern slavery / human trafficking questionnaire demonstrated a good level of awareness of relevant legislative requirements and a high degree of stated conformance. The enhanced ESG supplier questionnaire to be deployed from 2025–26 will enable EGR to validate and monitor this alignment more effectively against the risk factors highlighted in the 2023 GSI.

TRAINING

EGR has identified the areas of our business where modern slavery risks may be most relevant and provides targeted awareness training to personnel in these functions — including human resources, procurement, quality assurance, and support staff located in regions where the Global Slavery Index indicates elevated or emerging risk factors.

Training content is being updated to reflect insights from the 2023 GSI, including:

- increasing global vulnerability arising from conflict, climate-driven displacement and forced migration;
- risks present even in countries traditionally considered low risk; and
- emerging high-risk product groups and labour-intensive supply-chain segments.

As part of our supplier selection process, a pre-qualification assessment is required to be completed by prospective suppliers. This process is being updated to integrate expanded modern-slavery risk indicators so that higher-risk suppliers can be identified early and, where necessary, prevented from entering the supply chain until adequate controls are demonstrated.

OUR EFFECTIVENESS IN ELIMINATING MODERN SLAVERY

Based on our current policies, controls, supplier engagement processes and the surveillance undertaken across our operations, EGR maintains that there is no evidence of modern slavery within our own direct activities. While our supply chain has historically been assessed as very low risk, the broader rise in global vulnerability reported in the 2023 GSI confirms the necessity of stronger, ongoing monitoring and more adaptive risk-assessment processes.

EGR will continue to uphold a zero-tolerance stance toward modern slavery and human trafficking. Our approach includes:

- complying with all statutory and regulatory requirements;
- strengthening supplier assessment tools, including the rollout of our new ESG questionnaire;
- applying enhanced scrutiny to medium and high-risk suppliers, including audits where appropriate; and
- continually reviewing global data sources, including updates to the Global Slavery Index, to ensure our risk-management activities remain current and credible.

Through these actions, EGR remains committed to proactively preventing modern slavery in our operations and supply chains, and to continuously improving the effectiveness of our controls as global risk profiles evolve.

This EGR Group Modern Slavery Statement has been approved by the Board of Directors for the EGR Group on 24th November 2025.

Signature:



Name: Mr Simon McLellan

Title: Chief Executive Officer

Date: 25th November 2025.