

## ASKIN MODERN SLAVERY STATEMENT

### Introduction

Askin Group Holdings Pty Ltd and its subsidiaries (together, **Askin**) oppose slavery in all its forms. Askin is committed to monitoring and addressing modern slavery within its operations and supply chains. Askin recognises that it has a responsibility to effect change and that tackling modern slavery relies on strong collaboration with its suppliers and partners. By establishing good governance, systems, processes, and capability to identify and manage modern slavery risks in our operations and supply chain, we can make a contribution towards addressing the issue.

This Modern Slavery Statement is made in accordance with the *Australian Modern Slavery Act 2018* (Cth). This Statement is submitted as a joint statement on behalf of the following reporting entities:

- Askin Group Holdings Pty Limited ABN 51 626 106 947;
- Askin Investments Pty Limited ABN 86 626 107 088;
- Askin Holdings Pty Ltd ABN 30 165 189 766;
- Askin Pty Ltd ABN 13 156 186 033; and
- Austral Comnia Pty Ltd ABN 73 074 337 401.

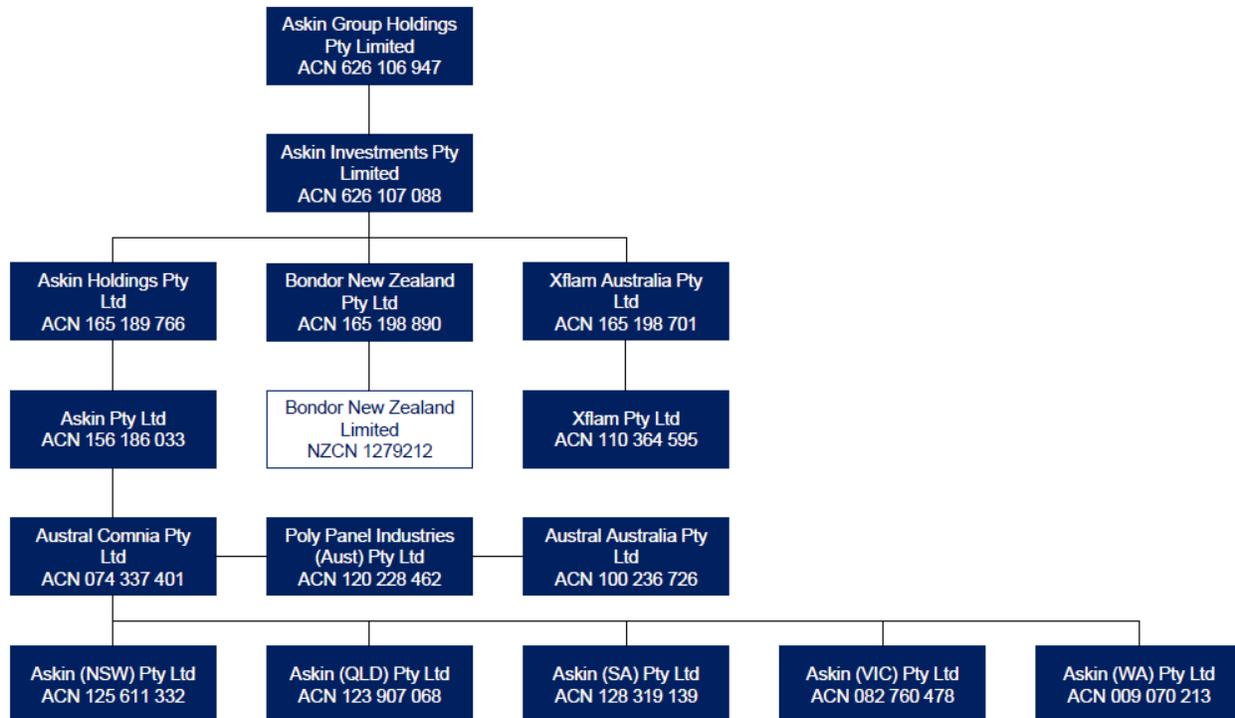
It describes the steps taken by the reporting entities during the year ended 31 December 2023 to seek to assess and address the risk of modern slavery occurring in their operations or their supply chains.

### Our structure, operations and supply chains

#### *Structure*

Askin Group Holdings Pty Ltd is a proprietary company registered in Australia. It owns 14 Australian subsidiaries and one subsidiary registered in New Zealand. Askin has corporate offices in both countries, with its head office located in Melbourne. Askin prepares the group's modern slavery policies and procedures centrally through head office. Askin has 255 direct employees across Australia and New Zealand.

A structure diagram of the group is set out below.



### ***Operations***

Askin manufactures, sources, supplies and installs a range of insulated panel products for the construction industry.

Askin operates manufacturing facilities in Australia and New Zealand in which it produces some of its product range.

Askin leases property in Victoria, South Australia, New South Wales, Queensland, Western Australia, and in both the north and south islands of New Zealand.

Askin's group purchasing is largely managed by the operations and procurement team based in Victoria.

### ***Supply chains***

Askin engages with suppliers that supply products both for resale and not for resale, as well as labour and services.

Askin's supply chain includes the procurement of the following key goods and services:

- raw materials for manufacturing, such as steel, insulation cores, expanded polystyrene beads, resins and chemicals;
- goods for sale, such as fixtures and fittings; and
- contract and outsourced labour, including for the installation of insulated panels.

There are numerous factors which inform Askin's supplier choices including quantitative factors such as price, quality and delivery times and qualitative factors such as reliability, ethical sourcing practices, labour practices and alignment on values.

Askin sources much of its product and raw materials from suppliers which manufacture in Australia. Moreover, the majority of the materials purchased by Askin for its products carry a lower risk of modern slavery, as they are low-labour intensive raw materials.

By far the largest volume of product is sourced directly from tier 1 suppliers within Australia. However, Askin also sources products from suppliers that source their materials from higher risk countries<sup>1</sup> such as India, China, Malaysia, Indonesia, Vietnam, Turkey and Brazil. Askin's primary focus in implementing its modern slavery risk program has been on supply of products from tier 1 suppliers in emerging markets. Askin's approach to the management of modern slavery risk reflects an awareness of heightened risk of sourcing particular products from certain countries.

Askin sources labour for installation within Australia and New Zealand only. Askin also engages with labour hire providers, but, again, only in Australia and New Zealand. Labour hire entities are regulated in Australia. Askin maintains a register of accredited labour hire providers. Askin has put in place a number of existing checks and balances aimed at mitigating the risk of modern slavery practices for labour attending major construction sites in Australia.

### **Risks of modern slavery practices in Askin's operations and supply chains**

Askin has considered the extent to which it may contribute to, cause or be linked to modern slavery risks in its operations and supply chains. Such risks include the working environments and procurement practices of our international suppliers, and their ability to comply with the Modern Slavery Act and Askin's policies.

Through this process, Askin has identified its suppliers in emerging markets, including India, China, Malaysia, Indonesian, Vietnam, Turkey and Brazil, as the key risk areas.

Recognising the level of control it exercises over its operations, including its risk management and compliance systems, Askin considers that key relevant risk exposures reside in its supply chain activities, rather than in its operations.

### **Actions taken by Askin to address modern slavery risks**

#### ***Policy, governance and due diligence***

Askin has policies and procedures which guide the way we engage with suppliers. These include:

- Pre-qualification and on-boarding procedures; and
- Conditions of purchase.

Askin continues to map its supply chains. It maintains details of its suppliers and their country of origin which enables Askin to assess, at a high level, the risk of modern slavery within its supply chains.

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<sup>1</sup> Based on the Global Slavery Index published by the Minderoo Foundation.

To manage the risk of modern slavery in Askin's operations and supply chains and to identify emerging issues, Askin has developed and implemented strategies that include:

- The provision of training to relevant team members and suppliers;
- Embedding ethical sourcing and modern slavery policies into existing processes;
- Auditing high risk suppliers;
- Creating communication channels with existing and future suppliers to enable assessment of modern slavery risks; and
- A review of policies, procedures and contract conditions to ensure that Askin's objectives on modern slavery risk management can be implemented.

Additionally, our responsible procurement process plays a major role in who we engage as our business partners. We have implemented a process, which involves three main phases:

#### *1. Supplier Code of Conduct*

Before we engage with any suppliers, we ask them to confirm that their business activities comply with our expectations on a range of issues including health and safety, labour practices, business integrity and modern slavery, and request that they review and comply with related documents.

#### *2. Risk analysis*

Various risk analyses, such as the review of the country of origin and the nature of the products being provided, help identify risks early on. In addition, we ask suppliers to provide comprehensive information on pertinent processes and management systems via self-assessment.

#### *3. Supplier development*

If our supplier risk analysis shows that there is an elevated risk level regarding specific suppliers, then we strive to conduct a more detailed audit. The audit findings will show us in which areas a supplier needs to improve, following which we can give concrete recommendations on how to address the individual areas of concern.

### ***1. Supplier Code of Conduct***

The Askin Modern Slavery Policy was again communicated to all Askin employees in 2023, and is available on the Askin Performance Panels and Bondor NZ websites. The Askin Modern Slavery Policy was incorporated into the Askin Human Resources Manual which was be distributed to all employees at the start of the 2023.

The Askin Modern Slavery Policy applies to any party who has business dealings with Askin, including employees, directors, labour hire workers, contractors, external consultants, suppliers and business partners. It sets out our commitment to uphold employment law obligations within our own operations. It also sets out our commitment to do business only with ethical labour hire businesses in Australia and with ethical suppliers who share our values, and our requirement for them to uphold the same standards as us. Any contravention of either policy is viewed seriously by Askin and is grounds for dismissal or termination of business relationship.

Askin distributed its Supplier Code of Conduct to key suppliers and all new suppliers. Additionally, the Code was also incorporated into the Askin Human Resources Manual. The Supplier Code of Conduct applies to all manufacturers, suppliers, agencies and contractors involved in the conduct

of Askin's business and the supply of its goods and services. It sets out our expectations on compliance with the law, ethical business practices, and labour and human rights, including our expectations that they should have in place grievance and due diligence procedures to manage ethical issues within their supply chain. The Supplier Code of Conduct requires our suppliers to make reasonable efforts to monitor their supply chain and ensure that their suppliers are aware of, and compliant with, the aims of the Supplier Code of Conduct. The Supplier Code of Conduct is available on the Askin Performance Panels and Bondor NZ websites.

## ***2. Risk analysis***

During 2023, Askin continued to conduct formal supplier investigations. The suppliers selected include Askin's key suppliers and new material suppliers. Each supplier was issued the Askin Modern Slavery Policy, the Askin Supplier Code of Conduct, and the Askin Modern Slavery Questionnaire. The group of suppliers included both domestic and international raw material suppliers, domestic goods suppliers, and service suppliers including labour.

All responses to the questionnaire were reviewed and in circumstances where suppliers had provided insufficient or incomplete answers, they were contacted directly by the Askin procurement team for follow up questioning.

At the conclusion of the process, all suppliers completed the questionnaire satisfactorily or provided their Modern Slavery Policy and / or Code of Conduct to demonstrate compliance with the principles and intent of Askin's Modern Slavery Policy.

For some of our suppliers, the process was educational and informative. For others, they had a well-developed understanding of both the objectives of the Act and their own modern slavery risks. The process fostered open communication and strengthened partnerships with our business partners.

Askin conducted onsite inspections of the manufacturing and operational facilities of several of its international material suppliers in 2023. This practice will continue in 2024.

## ***3. Supplier development***

During 2023, Askin revised several supply agreements with key material suppliers as they became due for renewal. This process will continue over the next 12 months. Askin will endeavour to incorporate terms into all agreements that require compliance with Askin's Modern Slavery Policy and Supplier Code of Conduct, as well as outlining procedures for dealing with non-compliance and disciplinary actions including termination of contract.

## ***Ancillary activities***

Askin implemented the use of its Subcontractor Agreement for various construction projects during 2022 and increased the use of the agreement more broadly in 2023. The Subcontract Agreement is used primarily for construction projects where Askin engages subcontractors for the installation of panel. The Subcontract Agreement outlines the subcontractor's employment law and safety obligations. Use of the Subcontract Agreement will be mandated for all major projects in 2024. Askin now also includes copies of the Askin Modern Slavery Policy and Supplier Code of Conduct in the Subcontract Agreement.

Askin commenced reviewing its Australian and New Zealand Supply Terms and Conditions in late 2023 which will be finalised in the first quarter of 2024 to reflect changes in law and Askin's obligations under the Act.

Key employees and managers in the Askin operations and procurement team undertook formal external Modern Slavery training during 2023. This training will be mandated for to all group managers, regional managers and key employees in the construction team over the next 12 months.

Internal training will be provided to all operational employees during their annual safety update in the first quarter of 2024.

Askin is a member of the Insulated Panel Council of Australasia (**IPCA**). Over the course of 2024, Askin intends commence a dialog with the other members of IPCA regarding modern slavery risks in the panel industry.

### ***Remediation***

Askin has a number of mechanisms which allow employees and third parties to report concerns about suspected or actual improper conduct, including in relation to modern slavery. These include through our human resources and procurement teams or via the Askin Whistleblower Policy. This policy sets out the protections available to current and former officers, employees, suppliers and other eligible persons where they make a report of improper conduct, including modern slavery practices. The policy also sets out the actions that Askin will take to assess and action disclosures made. This policy was incorporated into the Askin Human Resources Manual and distributed to all employees at the start of 2023.

Where issues are identified by Askin, it will engage with the suppliers to understand the position. Failure of suppliers to respond to Askin's satisfaction may lead to termination of any contracts.

### **Assessing the effectiveness of actions taken by Askin**

Askin is committed to continual improvement of its policies and procedures which seek to minimise the risk of modern slavery occurring in the group's businesses or their supply chains.

Askin will continue to develop its internal reporting mechanisms which will include:

- Reporting carried out through a coordinator, who then reports to the Group General Manager – Operations (GGMO);
- In consultation, the coordinator and the GGMO are to prepare an annual ethical sourcing and modern slavery report based on the performance of each entity within the group;
- The GGMO is to report to the Askin Group CEO / Managing Director, including on overall performance and compliance, concerns or areas of high risk and any identified non-compliances.

Askin continues to raise awareness within its business and identify areas where modern slavery risks may arise. All employees and key suppliers have been advised of Askin's obligations and the business has engaged in dialog with key partners to foster open communication and reporting.

## **Consultation**

In preparing this Statement, Askin consulted with a cross-functional working group of employees with responsibility for the oversight of procurement, legal and risk processes across the business.

This Statement was approved by the board of directors of Askin Group Holdings Pty Ltd as the parent entity on 21 December 2023.

A handwritten signature in black ink, appearing to read 'Steve Clarke', with a long horizontal flourish underneath.

**Steve Clarke**

**Group CEO / Managing Director  
Askin Group Holdings Pty Ltd**