

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.

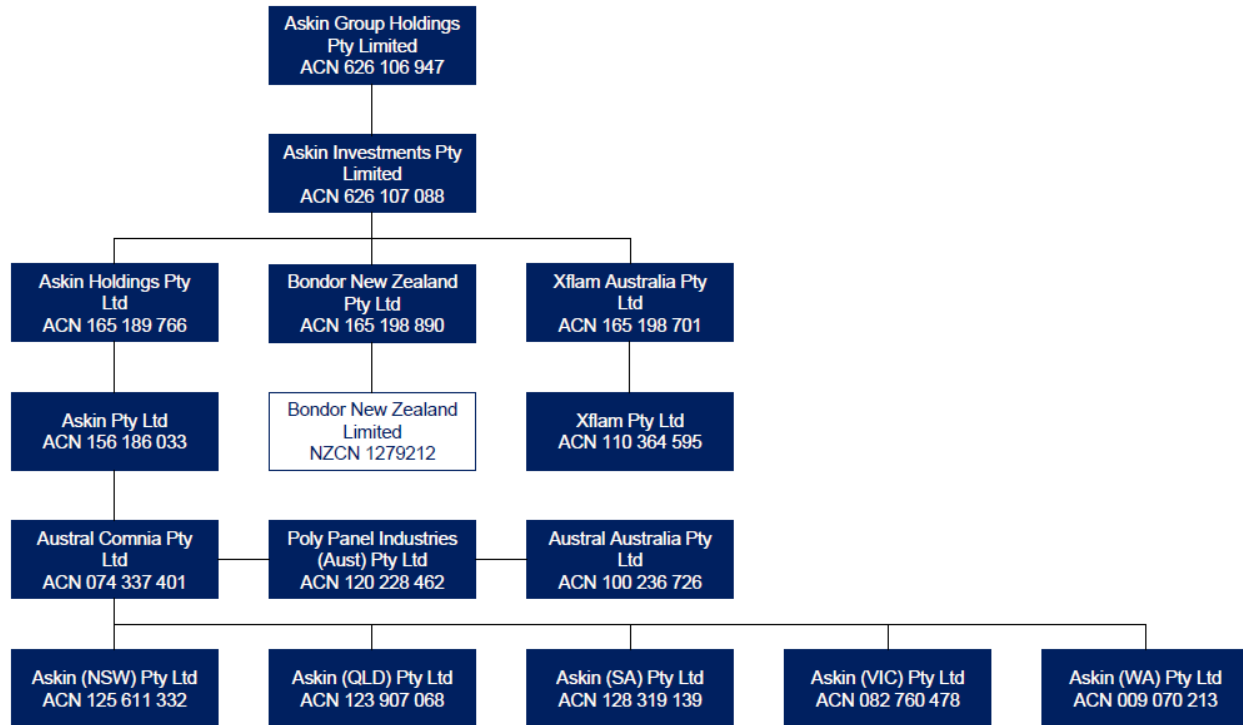
It describes the steps taken by the reporting entities during the financial year ended 30 June 2020 to seek to assess and address the risk of modern slavery occurring in their operations or their supply chains.

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.

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.

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 countries¹ such as India, China, Malaysia and Brazil. Askin's primary focus in the early stages of 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. Through this process, Askin has identified its suppliers in emerging markets, including India, China, Malaysia 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 is in the early stages of mapping 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.

To manage the risk of modern slavery in Askin's operations and supply chains and to identify emerging issues, Askin has begun developing strategies and actions that will 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.

¹ Based on the Global Slavery Index published by the Minderoo Foundation.

Additionally, our responsible procurement process plays a major role in who we engage as our business partners. We are in the early stages of refining this process, which will include three main phases:

1. *Supplier Code of Conduct*

Before we engage with any suppliers, we will 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 sign 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 will 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 will 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.

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 Askin's whistleblowing policy.

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 has begun developing an internal reporting mechanism which includes:

- 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.

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 31 March 2021.

Steve Clarke

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