VENTORA GROUP – MODERN SLAVERY STATEMENT

INTRODUCTION

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (Act) by Ventora Group Pty Ltd (ACN 087 012 226) (VENTORA, we, our).

This statement covers the financial year reporting period from 1 January 2025 to 31 December 2025 (**the Reporting Period**). VENTORA is the relevant reporting entity for the purposes of the Act and outlines the steps VENTORA has taken to assess and address risks of modern slavery in its operations and supply chains.

VENTORA is committed to conducting its business in a lawful, ethical and responsible manner and to mitigating the risk of modern slavery practices within its operations and supply chains, acknowledging that modern slavery risk is an ongoing and complex issue requiring continuous improvement.

OUR STRUCTURE

VENTORA is an Australian company with headquarters in Sydney. It employs over 3,700 employees and is comprised of 32 manufacturing facilities across Australia, Asia and the Pacific. Within the VENTORA structure there are 27 wholly owned subsidiaries including the brands Corinthian®, Stegbar®, A&L®, Trend® and Breezway®, among others.

OUR OPERATIONS

As a group, VENTORA 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, multi-residential and commercial building and construction industry.

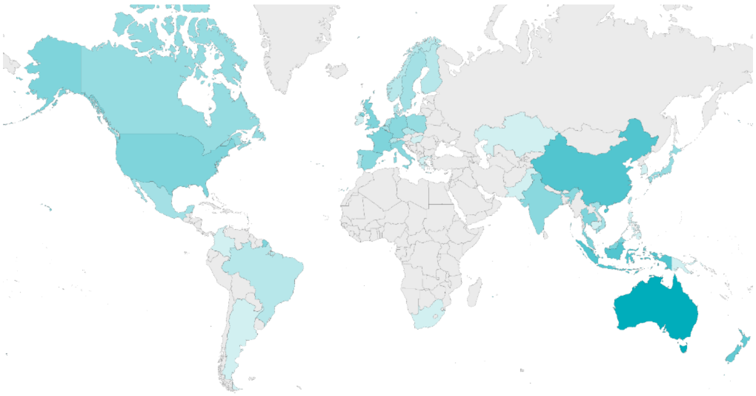
OUR SUPPLY CHAIN

As a designer and manufacturer of a broad range of products and solutions for the construction industry, VENTORA has an extensive and diverse supply chain.

Within its Australian operations, VENTORA sources materials from more than 1,400 suppliers from more than 40 countries outside Australia, including key production and manufacturing hubs such as Indonesia, China, Malaysia, Taiwan, New Zealand, Thailand and Singapore. Key procurement categories include aluminium extrusions, locks, timber, hardware, furniture and glass.

VENTORA also sources non-trade (operational) goods and services, including hire fleet, cleaning, stationery and energy.

The spread of our global supplier network is illustrated in blue below:



VENTORA's supply network is centrally managed by a dedicated procurement function, with category oversight.

IDENTIFYING MODERN SLAVERY RISK IN SUPPLY CHAINS

VENTORA recognises that modern slavery risks can arise in complex supply chains, particularly where raw materials and finished goods are sourced from overseas and visibility beyond direct suppliers is limited. These risks may be higher in relation to key materials used in VENTORA's operations, including timber products, aluminium and other metals, glass, and hardware. VENTORA also recognises that these risks can arise in non-trade services such as cleaning, labour hire and other outsourced services. VENTORA's commitment to operating ethically and safely guides how we identify and address these risks across our operations and supply chain.

VENTORA works collaboratively with suppliers to support ethical sourcing and identify, assess and address modern slavery risks in its operations and supply chain. During this Reporting Period, VENTORA also implemented a digital assessment tool, discussed further below, to better identify risks within supplier supply chains.

ASSESSING AND ADDRESSING MODERN SLAVERY RISK

VENTORA maintains a framework to support ethical sourcing and risk management, including:

- Supplier Code of Conduct (required as a condition of engagement, with ongoing rollout efforts, see https://www.ventora.com.au/supplier-information/)
- Ethical sourcing requirements embedded in procurement processes
- Internal reporting mechanisms (including confidential whistleblower channels)

VENTORA may suspend or terminate supplier relationships where there is a failure to adequately address material modern slavery risks.

During this Reporting Period, VENTORA implemented a new online tool, iPro, to support modern slavery reporting. The tool assesses supplier risk by considering factors such as location, supply chain controls, labour policies and employment practices. It also gives VENTORA a clearer view of risk across its supply chain by grouping assessed suppliers by risk score and providing action plans to help reduce risk.

The tool has enabled VENTORA to assess more suppliers than in previous reporting periods. VENTORA intends to continue using the platform to benchmark results and measure improvement over time. As this is the first year iPro has been implemented, continuous improvement will be measured against this year's results.

KEY METRICS

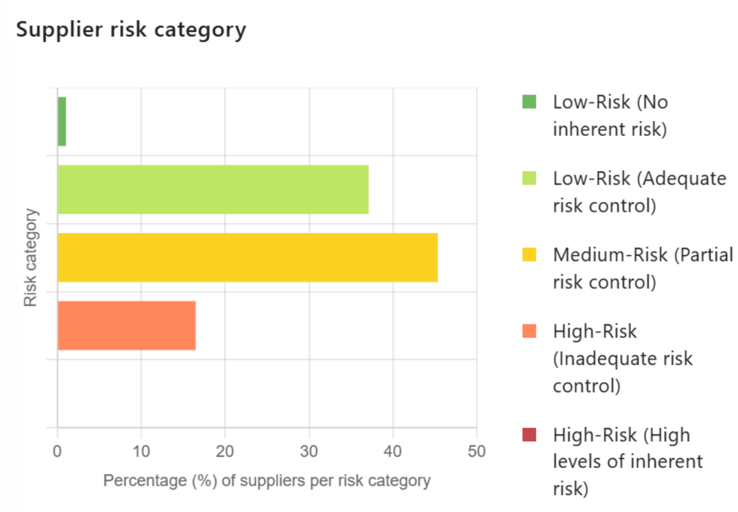
For the Reporting Period, the following key metrics assessing modern slavery risk in VENTORA's operations and supply chains have been generated by iPro:

VENTORA's Self-Assessment Scores	
Inherent Risk	90.00/100
Unmitigated Risk	39.70/100
Supplier Assessment Scores	
Inherent Risk	49.95/100
Unmitigated Risk	30.06/100
Response Rate	85%
% of targeted spend captured in responders	97%

VENTORA notes its inherent risk scores for both its self-assessment and supplier assessments are high. This is driven largely by the geographic spread of its operations and supply chains , and industries of operation which are associated with modern slavery risk (particularly raw material extraction and processing).

Despite this, both the self-assessment and supplier scores for unmitigated risk is relatively lower, which indicates both VENTORA and its suppliers have active processes in place to monitor and reduce the risk of modern slavery in their operations and supply chains.

The below graphics provide further insight into the spread of risk categorisations for our supply chain:



As seen in the included graph, 16% of VENTORA's suppliers are considered high risk with inadequate modern slavery risk controls in place within their own operations. In order to address these risks, VENTORA has taken the following actions:

- Requiring, where applicable, third-party certification of supply chains that includes audit and monitoring of Modern Slavery Risk/ILO Convention Compliance (e.g., FSC certification for timber suppliers).

- Updating contracts with incumbent suppliers and new suppliers which explicitly includes provisions referring to Modern Slavery Risk, reporting transparency and commitment to co-operation with VENTORA to mitigate/reduce risk where identified.
- Implemented internal policies that govern supplier engagement relating to modern slavery risk and processes to facilitate risk mitigation and reduction efforts with suppliers identified as having inadequate risk controls in place.

Further actions are outlined in the below Continuous Improvement Initiatives section for the following reporting period.

Approximately 15% of the targeted suppliers did not respond within the assessment period. VENTORA recognises non-response as a potential risk indicator and is undertaking follow-up engagement to ensure completion for continuing suppliers. Despite this, it is noted that iPro's general statistics note the average response rate for organisations using the software is between 40-45%, with continuous engagement raising this average to 60-65%, so VENTORA considers its suppliers are highly responsive in the initial deployment of iPro.

DETERMINING THE EFFECTIVENESS OF RISK ASSESSMENT AND REDUCTION PROCESSES

The introduction of iPro has improved VENTORA's ability to assess supplier controls and track risk across its supply chain. During the Reporting Period, iPro has enabled VENTORA to re-assess all previously assessed suppliers and newly onboarded suppliers within one reporting period.

VENTORA has initially focused on suppliers representing at least 80% of total procurement spend, prioritising material suppliers with larger spend and more complex supply chains. VENTORA recognises that lower-spend suppliers may still present modern slavery risks and that spend is not on its own a suitable sole criterion for determining suppliers to assess. A key improvement action for the next Reporting Period is to expand its assessment campaigns and include additional criteria for selecting suppliers to assess.

For each completed assessment, VENTORA receives inherent and unmitigated risk scores, together with recommended actions to reduce risk. Suppliers must upload evidence before actions are marked as completed or answers are amended. These scores and actions help VENTORA identify risk, monitor supplier progress and hold suppliers accountable. Where required actions are not completed, VENTORA may review or terminate the supplier relationship.

Based on this process, VENTORA did not identify any human rights violations or indicators of modern slavery in its operations or supply chains during the Reporting Period, nor did it terminate any supplier for failing to complete required mitigation actions.

Whilst the iPro platform has been used to improve visibility and benchmarking capability across its suppliers, VENTORA recognises that assessments rely on supplier disclosures and that independent verification is not applied in all cases, noting in particular that risk may exist beyond assessed suppliers or tiers.

CONTINUOUS IMPROVEMENT INITIATIVES

VENTORA has compared its activity in the Reporting Period to its 2024 continuous improvement initiatives to monitor ongoing progress.

In considering this, the following are improvement initiatives that are completed or in progress over the course of the 2025 Reporting Period:

- Automation of the modern slavery information gathering and assessment process has been successfully completed, as described throughout this statement.
- Prepared a Modern Slavery Policy and associated compliance training sessions for our employees to complete to further raise awareness of modern slavery risks and the actions they can take to address them.
- Voluntary certification was encouraged for key commodities as a part of ongoing procurement projects (e.g., FSC transition for higher risk supply chains) to provide additional assurance/mitigation.
- Information gathering and assessment campaign was expanded, capturing 80% of annual spend.
- Updated relevant supplier agreement templates for new suppliers and incumbent suppliers as well as internal policies to ensure explicit reference to obligations and expectations surrounding modern slavery.

For the incoming reporting period, VENTORA is pursuing the following initiatives for continuous improvement in assessing and addressing modern slavery risk:

- Maturing the selection methodology for determining the suppliers requiring assessment. VENTORA will implement ‘hot-spot mapping’ which will identify operational or supply chain risks based on geography or industry (irrespective of spend). VENTORA will then include these suppliers in the scope of ongoing assessment campaigns.
- Actively pursue any non-responders to our online assessment requests, to aim for a minimum 90% response rate at the conclusion of next reporting period.
- Formal rollout of the Modern Slavery Policy and employee training.
- Encourage direct suppliers assessed as “high-risk” to complete outstanding actions identified to reduce their unmitigated risk score.
- VENTORA aims to reduce its unmitigated risk score in the next period to 25/100 in our next annual assessment.

CONSULTATION WITH CONTROLLED ENTITIES

Entities controlled by VENTORA all share the same directors and report through to the VENTORA CEO. Critical functions across all business units are managed through the same shared corporate service teams (e.g., Finance, HR, Legal and Procurement functions are all shared). Controlled entities all use the same assessment framework and through the actions detailed above are made aware of the Act, their responsibilities relating to the Act and are trained and committed to operating the company in an ethical manner. Operations and supply chains assessed in this statement relate to the whole group.

This statement was approved by the directors of VENTORA Group Pty Ltd and is signed by its authorised person Scott Kelly, CEO of VENTORA Group Pty Ltd.

Signed by:
Scott Kelly
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Scott Kelly

Chief Executive Officer