

ASSA ABLOY Australia

ASSA ABLOY

Modern Slavery Statement

Experience a safer
and more open world

for the reporting period
1 January 2024 to 31 December 2024

Publication date: June 2025

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1. Introduction

This modern slavery statement is made to comply with the requirements of the Modern Slavery Act 2018 (Cth) ('the Act').

Reporting Entities

This modern slavery statement is a joint statement made by ASSA ABLOY Australia Pacific Pty Ltd ('AAP') on behalf of itself and the ASSA ABLOY Australia group companies listed in the Schedule to this statement¹.

2. ASSA ABLOY Australia Group Structure, Operations and Supply Chain

2.1 Structure

AAP is the parent company of all companies in Schedule 1 (together '**ASSA ABLOY Australia Group**', '**AAAG**' or '**We**'). In turn, AAP is owned by a Swedish parent company, ASSA ABLOY AB, which is traded on the Swedish Stock Exchange and is responsible for ASSA ABLOY group management and group-wide functions.

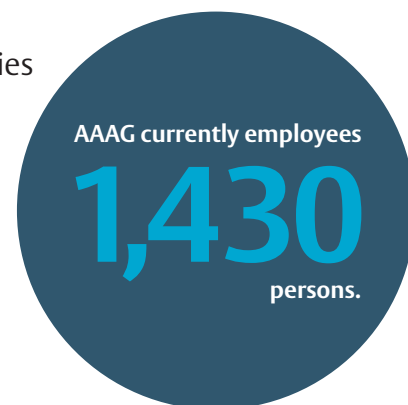
2.2 Operations

ASSA ABLOY has been operating in Australia in one form or another for over 25 years.

Collectively, AAAG operates numerous manufacturing facilities, as well as sales, service, research and development and administration offices throughout Australia.

ASSA ABLOY globally leads the development within door openings and products for access solutions in homes, businesses, and institutions. Our offering includes doors, door and window hardware, mechanical and smart locks, access control and service.

Internally we also sourced from ASSA ABLOY owned manufacturing facilities in countries including Australia, Malaysia, Vietnam and China.



¹ The ASSA ABLOY group acquired Skidata Australasia Pty Ltd in September 2024, and it only became a subsidiary of Australia Pacific Pty Ltd on 31 December 2024. Accordingly, the general commentary in this statement relating to how AAAG has assessed and mitigated risk does not apply to Skidata Australasia Pty Ltd. That entity is expected to be incorporated into relevant AAAG modern slavery-related risk assessment and mitigation processes during 2025.

2.3 Supply chain

AAAG at the end of 2024 had

4,214

suppliers. In the reporting period, AAAG spent approximately

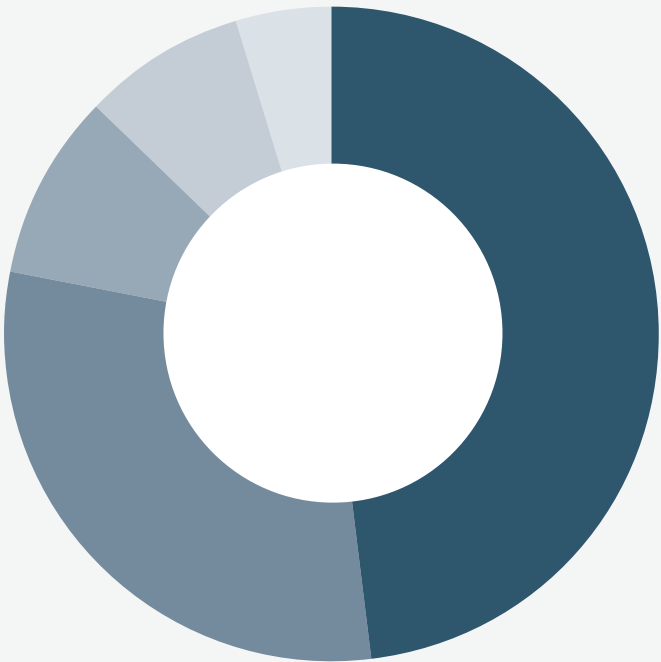
\$398

MILLION

with its supply chain, with a total import spent of just over

\$169

MILLION



Below is a list of the countries where we incurred the highest levels of spend (AUD rounded up to the nearest million) with suppliers during the 2024 reporting period (based on the location of the invoicing supplier):

- 1. Sweden – \$53m
- 2. China – \$33m
- 3. Finland – \$10m
- 4. Singapore – \$9m
- 5. Switzerland – \$5m

The categories supplied from these countries include raw materials, components, finished goods and services. The types of business relationships AAAG has with external suppliers range from one time or short-term engagements, to long-term relationships.

3. Risks of Modern Slavery Practices in our Operations and Supply Chains

To assist identification of potential modern slavery risks in our operations and supply chains, and in particular to help us to identify areas of operation that may have greater inherent risk, we have regard to a range of internationally recognised reports and data sets. These include information published by Walkfree, an international human rights group focussed on the eradication of modern slavery.



In particular, we have had regard to:

- The Global Slavery Index published by Walkfree, which identifies countries where individuals are considered most at risk of being subject to modern slavery, and;
- Walkfree's business and investor toolkit, which amongst other things identifies potential high-risk sectors in the context of modern slavery, which include sectors such as industrial cleaning, meat works, hospitality, construction, manufacturing, agriculture and fishing.

Set out below is information on how we have used these and related resources as part of our due diligence assessments relating to modern slavery.

3.1 Operations

Most of our AAAG entities operate in Australia and are engaged in activities which we consider to pose low risks in relation to modern slavery. However, we do recognise that the inherent risks of modern slavery issues arising may be heightened for us in the context of our significant manufacturing operations, given manufacturing is one of the sectors that has been identified as a high-risk sector by Walkfree.

In addition, based on the above mentioned internationally recognized modern slavery related resources, one area of potential modern slavery risk vulnerability we identified in our operations relates to labour hiring for our manufacturing facilities in Asian countries such as China, Malaysia and Vietnam - because these are countries identified as having a relatively high prevalence of modern slavery in the Global Slavery Index.

Finally, we identified that due to complexity of different corporate structure and entity operation among the AAAG entities, our intra-AAAG management and reporting relevant to assessing modern slavery risks was not consistent. Until those reporting processes are sufficiently optimised, we may be limited in the extent to which we can comprehensively identify risk areas.

3.2 Supply Chains

During the 2024 reporting period, we engaged iPRO to assess the modern slavery risk in our supply chains using iPRO's Modern Slavery Assessment Tool (MSAT). We intend to use this tool to conduct an annual risk assessment of our key suppliers as part of our modern slavery due diligence processes going forward.

The MSAT is a tool that requires participating suppliers to complete an online self-assessment survey. This includes questions about the sectors and locations where suppliers operate, produce goods, and source materials, as well as the existing modern slavery controls in their business. Once each supplier has completed and submitted the questionnaire, their answers are processed within the iPro system to determine their modern slavery risk scores and associated risk category. As an additional due diligence step, we may also request suppliers to upload documentation to support their assessment responses.

The iPRO assessment and analysis draw on information from various reputable sources, including The Social Responsibility Alliance, the International Labour Organisation, the United Nations, and government departments from Australia, the US, and the UK, as well as UNICEF. To ensure the questions and risk data remain timely and accurate, iPRO regularly updates their assessment in response to evolving modern slavery information and legislation.

We have onboarded over 700 key suppliers to iPRO last year and established a baseline of suppliers' inherent and unmitigated MSAT risk scores (explained in more details in 5.1 below). While these scores may change as we add more suppliers and assess their potential risks, we will continuously collaborate with our suppliers to reduce risk scores and mitigate modern slavery-related risks.

This assessment reflected that our suppliers operate, produce, and source across a range of different sectors, some of which can be described as high-risk. High-risk sectors are known for prevalent human trafficking activities, as identified in the 2021 ILO and UNICEF publication on Child Labour.

Our Suppliers Operate in the following High-risk Sectors

The below graphics show the high-risk sectors of operation, production, and sourcing for our suppliers. The numbers in the following graphics describe how many suppliers are in the corresponding sectors.



Our Suppliers Produce Goods & Provide Services in the Following High-risk Sectors

	Accommodation and Food Service Activities 12		Agriculture, Forestries and Fishing 8
	Building Services Contractor 3		Cleaning 1
	Construction 58		Domestic Work 5
	Labour Hire 2		Maintenance & Repair of Motor Vehicles 5
	Manufacturing 123		Mining & Quarrying 11
	Personal Services 5		Retail 17
	Security Services 1		Transportation and Storage 20
	Wholesale 34		

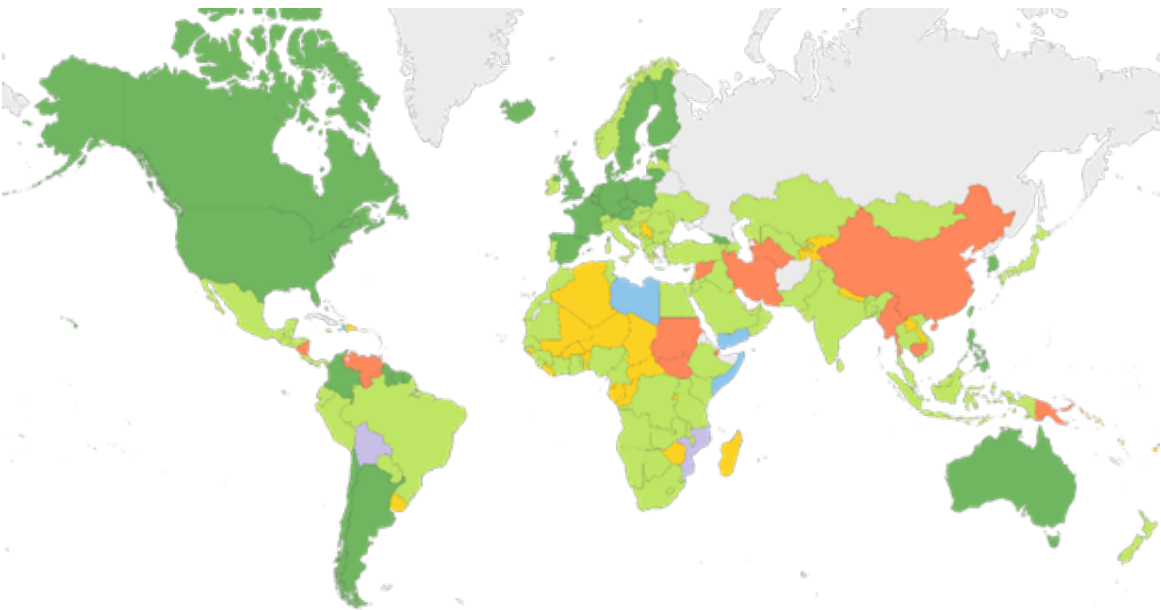
Our Suppliers Source Goods & Services from
the Following High-risk Sectors

	Accommodation and Food Service Activities 6		Agriculture, Forestries and Fishing 3
	Building Services Contractor 1		Cleaning 2
	Construction 50		Domestic Work 5
	Labour Hire 2		Maintenance & Repair of Motor Vehicles 7
	Manufacturing 140		Mining & Quarrying 4
	Personal Services 1		Security Services 20
	Security Services 1		Wholesale 26
	Wholesale 42		

Our Suppliers Operate in the following countries with overlay of human trafficking

Some countries or regions where our suppliers operate can be described as high-risk due to the greater prevalence of businesses operating in those regions with possibility of a link to human trafficking.

The geographical regions where our supply chain partners operate are shown in the map below. This map has been overlaid with the colour tier system of the Trafficking in Persons Report. The US State Department’s annual Trafficking in Persons Report provides the world’s most comprehensive assessment of this abhorrent practice, as well as efforts by governments and stakeholders around the globe to combat it. It measures progress in 188 countries – including the United States.



- Tier 1**
Countries and regions whose governments, at the date of this assessment, fully meet the Trafficking Victims Protection Act's (TVPA) minimum standards.
- Tier 2 Watch List**
Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, and as the (increasing) number of victims is significant without proportional action, and / no evidence of increased efforts to combat trafficking has been provided.
- Tier Special Case**
Due to civil conflict and humanitarian crises, gaining information is difficult and a tier has not been assigned.

- Tier 2**
Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, but are making significant efforts to meet those standards.
- Tier 3**
Countries and regions whose governments do not, at the date of this assessment, fully meet the minimum standards and are not yet making significant efforts to do so.
- Uncategorised**
At the date of this assessment, insufficient information is available about these countries or regions and a tier has not been assigned.

In summary:

As demonstrated above, we identified 4 potential risks, relating to the following areas:

- 1) Internal labour hiring processes relating to ASSA ABLOY owned manufacturing facilities located in certain high-risk countries, which some of our companies source from;
- 2) Our companies are in Manufacturing which is identified as a high risk sector;
- 3) Intra-group modern slavery risk management and reporting process was not consistent;
- 4) Our suppliers operate, produce and source across different sectors, including high-risk sectors.

4. Actions Taken to Assess and Address Those Risks, Including Due Diligence and Remediation Processes

One of the key objectives of our supply chain management is to collaborate with world-class suppliers who can help us meet our customers' needs in alignment with ASSA ABLOY's policies and aspirations. Together, we aim to reduce risk, enhance supply chain integrity, and elevate performance throughout the value chain.

In 2024, we executed our strategic plans developed in 2023 relating to how we could continue to enhance our processes to assess and address modern slavery risks. We made significant efforts and achieved substantial progress in mitigating the potential risks mentioned above. Please see below for more details in relation to our actions taken corresponding to each of the above-mentioned risks.



4.1 In relation to Risk 1). Internal labour hiring in certain high-risk countries:

We focused on taking steps to ensure we were appropriately understanding and mitigating risk in relation to our labour hiring practices in Vietnam and China in 2024. Amongst other things:

- We reached out to our HR directors and managers who are responsible for our factories in Vietnam and in China to discuss and assess potential risks.
- We asked detailed questions including if we hire migrants, if we use recruitment agency, if we follow our group Code of Conduct and HR policy and local labour laws, and if all employees have access to our Employee Handbook (which includes information about employee's rights, labour standards, wages, welfare, and channel to make complaints).
- Based on assessment, we understand we do not hire migrants, all our factories in Vietnam and China follow our ASSA ABLOY Group Code of Conduct and HR policies, as well as local laws. Employees have access to our Employee Handbook and Whistle Blowing portal.
- We are satisfied we have minimal risks based on our findings.

4.2 In relation to the below three risks:

Risk 2). Our company is in Manufacturing which is identified as a high risk sector;

Risk 3). Intra-group modern slavery risk reporting process was not consistent;

Risk 4). Our suppliers operate, produce and source across different sectors, including high-risk sectors.

Our efforts include but are not limited to:

4.2.1 Setting up a Modern Slavery Council

- This is a senior management level council consisting of CEO, CFO, legal counsel of AAAP and General Managers, business heads and relevant compliance managers of across all entities under all AAAG group entities.
- The purpose of this council is to:
 - 1) Understand and assess current gain a better cross-business understanding of AAAG's operations and supply chain,
 - 2) Develop, agree and roll out a consistent modern slavery risk assessment and remediation process among AAAG entities,
 - 3) Regularly review the process and effectiveness of our modern slavery risk assessment, remediation, and management steps, and
 - 4) Sign off on the annual Modern Slavery Statement

4.2.2 Adopting iPRO as a modern slavery risk assessment tool

- 1) As mentioned in section 3.2 above, during the 2024 reporting period we adopted iPRO's Modern Slavery Assessment Tool (MSAT) to help us assess the modern slavery risk in our supply chains.
- 2) Assessment covers inherent risks such as geography, sector risk as well as risk controls such as policies and procedures. This provides insights into our modern slavery risks.
- 3) This helps us to assess and mitigate supply chain risks in a consistent way across group entities.
- 4) The risks identified in the previous section were all identified utilising this assessment tool. We engaged iPRO during the reporting period to conduct the assessments on our operations, and a bulk assessment of 749 of our suppliers. We intend to carry this process forward as an annual assessment of our operations and supply chain.
- 5) Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.
- 6) Each supplier that completed the assessment was assigned one of the following risk categories:
 - a) High-risk (high levels of inherent risk)
 - b) High-risk (inadequate risk control)
 - c) Medium-risk (partial risk control)
 - d) Low-risk (adequate risk control)
 - e) Low-risk (low levels of inherent risk)

- 7) To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score.
 - a) The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).
 - b) Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.
 - c) Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

4.2.3 *Setting up an AAAG Modern Slavery Team*

- 1) This is a team formed with supply chain managers from each AAAG entity.
- 2) The purpose of this team is to:
 - a) To roll out a consistent modern slavery risk assessment and mitigation plan
 - b) To monitor progress and share resources, experiences, update task progresses and discuss challenges
 - c) To follow up with high-risk and non-respondent suppliers
 - d) To continue improvement of our process and ensure uplifting of our modern slavery mitigation efforts and practices

4.2.4 Rolling out AAAG 2024 modern slavery risk mitigation plan which include:

- 1) Identifying the top 90% spend major suppliers and high-risk suppliers based on location and section
- 2) Requesting the above suppliers to complete iPRO risk assessment
- 3) Requiring new suppliers that are medium to high risk to complete iPRO risk assessment
- 4) Updating our corporate Modern Slavery Policy and upload on all corporate websites of AAAG entities
- 5) Educating employees about Modern Slavery and our approach
- 6) Enhancing key suppliers' compliance with our Business Partner Code of Conduct, which outlines essential requirements for sustainable, legally compliant, and fair business practices. This includes ethics, human rights and labor standards, environmental considerations, and health and safety measures.
- 7) Following up on non-respondent suppliers to participate in the process
- 8) Reaching out to high-risk suppliers to mitigate risks
- 9) Reaching out to suppliers with records of child employment to clarify and mitigate risks

4.2.5 Continuing Sustainability Audits on key suppliers

AAAG continues to conduct Sustainability Audits in relation to key suppliers in developing countries. This type of audit includes a focus on Workers' Rights and Modern Slavery. If any audited suppliers do not meet our expectations in this area, we may cease trading with them or, if there is an appropriate opportunity to use our relationship to push for positive change, we may give them a remedy period to enhance their operations in a way that aligns with our requirements – failing which trade would be ceased.

Where our audit processes indicate close monitoring is appropriate, we seek to repeat these audits every half year. This ensures we can identify and respond to risks in a timely manner. We have conducted such audits on 9 key suppliers in the last 48 months.

5. How we Assess the Effectiveness of AAAG's Actions Being Taken

During the first quarter of the reporting period, we assessed the effectiveness of our actions across the following key areas:

- Due diligence and governance processes
- Awareness training (including in relation to reporting channels)
- Supply chain and procurement
- HR practices

5.1 iPRO

Against such focus areas, we identified opportunities to implement more systematic tools and processes to identify and address modern slavery risks, which resulted our decision to adopt and implement the iPro modern slavery software as a tool to assess and mitigate risks of modern slavery in our supply chain.

The iPro software uses KPI's to benchmark our efforts by reference to the Inherent Risk Score and Unmitigated Risk Score given to each supplier and the Aggregated Risk Scores given to our company (*see a description of these scores in section 4.2.2*).

The main KPIs we are using to benchmark our efforts are supplier completion rate and the risk scores that are generated as part of the assessment process.

Each organisation who completed the assessment questionnaire was assessed and given 2 risk scores.

- Inherent Risk Score
- Unmitigated Risk Score

The Inherent Risk Score measures modern slavery risks that are intrinsic/built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The Unmitigated Risk Score measures the organisations risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.

We are provided an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level.

We aim to continuously improve on these KPIs.

As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score by introducing relevant policies and procedures.



We also measure the effectiveness based on KPIs related to our engagement with suppliers including:

- Number of suppliers followed up in order to encourage participation in our iPRO assessment programme to better identify and mitigate modern slavery risks in our supply chain;
- Number of identified high risk suppliers followed up in order to mitigate risks;
- Number of potential child labour suppliers followed up to clarify and mitigate risks.

5.2 Review Process:

As mentioned above, we also established an AAAG Modern Slavery Review Council and regular meetings to monitor our strategy plan and progress.

We also established an AAAG Modern Slavery Team and hold regular meetings to review actions we have taken and monitor progress of our annual modern slavery risk mitigation plan.

Over subsequent reporting period, we will continue to review and update our strategic plan, and the corresponding KPIs to continue to improve the effectiveness of our actions.

6. Consultation with Entities Owned or Controlled by AAAP

The directors of AAAP, as the parent Australian entity for AAAG, led the process of engaging relevant compliance and other personnel to help develop this statement.

As mentioned above, we formed a Modern Slavery Council, consisting of senior management from each AAAG entity. We hold regular council meetings to consult our modern slavery related action plan and obtain approval from council on the final action plan and this Statement.

Therefore, the relevant management personnel were involved in discussion on the Modern Slavery Act requirements, shared perspectives on how we should address these requirements and the necessary information to include in this statement, developed and agreed on our above-mentioned strategic action plan, and agreed the KPIs to assess the effectiveness of our actions in the reporting period and going forward. The management of each entity also approved the contents of this statement.



7. Our Stance on Modern Slavery

ASSA ABLOY has been a signatory to the UN Global Compact since 2008. Our affiliation with the UN Global Compact means that we support and commit to actively promoting and respecting the 10 principles on human rights, labour standards, the environment, and anti-corruption in our operations and in dealings with external stakeholders.

AAAG, as part of ASSA ABLOY, recognises the risk that modern slavery represents in society and condemns any use of modern slavery, as defined in the Act, by any AAAG company or any company in our supply chain.

AAAG complies with all laws and standards that we are required to adhere to in Australia and expects that all AAAG suppliers also comply with the laws and standards in the countries in which they operate.

AAAG continues to reinforce its Modern Slavery Policy and improve related internal and supply chain processes to emphasise the expectations we have in relation to modern slavery for our group companies and suppliers.

AAAG remain committed to applying appropriate practices and policies to ensure it is supporting the ongoing efforts across society and corporate Australia to help abolish modern slavery. AAAG has developed detailed strategic action plan and related KPIs including updating Modern Slavery Policy, supplier self-assessment and onboarding process and audit process to improve our effectiveness to reduce the risk of modern slavery within our business and supply chain.

AAAG will continually review its suppliers for any increased risk and update all relevant supplier agreements and employee manuals as the modern slavery laws evolve.



8. Approval



This statement was approved by the Board of ASSA ABLOY Australia Pacific Pty Ltd on 12th June 2025 and is signed by Simon Ellis who is a director of ASSA ABLOY Australia Pacific Pty Ltd and Executive Vice President and Head of ASSA ABLOY Opening solutions Pacific/ North East Asia. This modern slavery statement has been adopted across the ASSA ABLOY Australia Group.

Simon Ellis

Executive Vice President and Head
of ASSA ABLOY Opening solutions
Pacific/North East Asia.

Schedule 1 – Group Companies

Entity	ACN
ActivIdentity (Australia) Pty Limited	062 955 060
ASSA ABLOY Australia Pacific Pty Limited	095 354 582
ASSA ABLOY Australia Pty Limited	086 451 907
ASSA ABLOY Door Group Australia Pty Limited	004 519 331
ASSA ABLOY Entrance Systems Australia Pty Limited	095 443 486
ASSA ABLOY Entrance Systems Commercial Pty Limited	001 028 691
ASSA ABLOY Entrance Systems Industrial Pty Limited	601 182 629
ASSA ABLOY Global Solutions Australia Pty Limited	088 022 548
Austral Monsoon Building Products Pty Limited	083 857 452
D&D Technologies Pty Ltd	059 412 430
Go Doors Pty Ltd	623 240 906
Lietzke Australia Pty Limited	076 172 051
Placard Pty Limited	074 646 343
Record Automatic Doors Pty Ltd	601 122 874
Secure Edge Technologies Pty Limited	103 561 075
SKIDATA Australasia Pty Ltd	164 259 750

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ASSA ABLOY Opening Solutions leads the development within door openings and products for access solutions in homes, businesses and institutions. Our offering includes doors, door and window hardware, mechanical and smart locks, access control and service.

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