

ASDAM Holdings Pty Ltd Modern Slavery Statement (FY26)

INTRODUCTION

ASDAM Holdings Pty Ltd (ACN 631 990 086) ('ASDAM') has prepared this Modern Slavery Statement ('the Statement') in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)* ('the Act') for the reporting period ending 30 June 2026 ('the Reporting Period').

ASDAM has updated its Statement to the accurate Financial Report Period in accordance with the Act and has continued to refine its Modern Slavery Statement to improve clarity and focus on material risk areas.

REPORTING ENTITY

This is a joint Statement on behalf of ASDAM and its six wholly owned operating entities:

- Marand Precision Engineering Pty Ltd (ACN 004 763 688) (**Marand**);
- Levett Engineering Pty Ltd (ACN 065 311 506) (**Levett**);
- TAE Aerospace Pty Ltd (ACN 084 974 710) (**TAE**);
- Rosebank Engineering Pty Ltd (ACN 005 285 101) (**Rosebank**);
- Quickstep Technologies Pty Ltd (ACN 088 154 876) (**Quickstep**);
- Oldham Engineering Ltd (Co Number: 02808484) (**Oldham**)

While Marand and TAE are reporting entities as per the Act's definition and can therefore prepare a modern slavery statement for submission, given all ASDAM entities operate in the same Industry group and have similar supply chains, ASDAM will be submitting a response on behalf of all operating entities outlined above.

ASDAM has a centralised team of management consisting of business unit general managers and functional group directors. It also has a Board of Directors that oversees all operational entities of the group.

STRUCTURE AND OPERATIONS

ASDAM is an Australian-based aerospace and advanced manufacturing group comprising several wholly owned subsidiaries, employing over 1,200 people, operating in Australia and internationally, including in New Zealand, the United States, and the United Kingdom.

The Group operates through several key business units specialising in advanced manufacturing, precision engineering and sustainment services primarily in the aerospace and defence sectors, to a range of commercial and government customers. Operations involve a combination of skilled labour, specialised components and external suppliers.

ASDAM's supply chains include both domestic and international suppliers, providing raw materials, components, and specialist services. These supply chains vary in complexity and include suppliers operating in jurisdictions and sectors that may present elevated modern slavery risks.

ASDAM maintains centralised governance and risk management frameworks across the Group, supporting consistent oversight of operations and supply chain activities.

SUPPLY CHAIN OVERVIEW

ASDAM group companies engage suppliers from various industries that offer products and services that enable ASDAM's manufacturing and sustinment of core products (for example, suppliers of steel, aluminium and electrical components or equipment) and office operations (this would include, for example, suppliers of office services and supplies, real estate services and insurance brokers).

Supplier onboarding and management processes incorporate risk-based considerations aligned with operational and compliance requirements.

Existing supplier reviews, including quality-related audits, are undertaken using a risk-based approach to ensure quality is maintained. Suppliers may be reviewed or removed from the supply chain where they do not meet ASDAM's requirements.

MODERN SLAVERY RISKS ASSOCIATED WITH ASDAM

ASDAM's operational entities engaged over 1,200 direct suppliers in their operations during the reporting period.

ASDAM undertook a high-level risk assessment of its direct suppliers as part of the preparation of this statement, based on geographic location and type of goods or services provided. Risk assessment considered geographic and sector-based factors, supported by publicly available sources including the Global Slavery Index.

Procurement categories were assigned to each supplier, based on the goods or services provided, and were then screened for five social risk categories:

- Labour rights & decent work;
- Health & safety;
- Human rights;
- Governance; and
- Community infrastructure.

Although the majority of the suppliers are Australian companies, a number of suppliers are located in countries where modern slavery risks are more prevalent, with the countries assessed as highest risk being China and India.

The procurement category risk assessment indicated that ASDAM group engaged with suppliers from the following higher risk categories during the reporting period:

- Electrical components & equipment
- Steel
- Aluminium
- Office services & supplies
- Human resource & employment services
- Food retail
- Corporate and Industrial clothing

While we understand suppliers located in Australia are generally regarded as lower risk, due to the robust laws and regulations in place, these suppliers have complex supply chains spread across several geographies. As such, it is expected that elevated modern slavery risk likely exists beyond our direct supply chain (Tier 2 and beyond).

ASSESSING AND ADDRESSING MODERN SLAVERY RISKS

There were no known reported incidents in ASDAM's operations or supply chain relating to human rights violations brought to management's attention during the reporting period.

ASDAM maintains governance policies that support ethical conduct and risk management, including a Whistleblower Policy and a Code of Conduct.

- A Whistleblower Policy, which outlines our commitment to operate to the highest standards of conduct in its business activities, and the reporting of behaviours that fail to meet this standard. This is to ensure that at ASDAM, everyone contributes to their culture of accountability and risk management. The Whistleblower Policy is open to external parties, including suppliers and their employees, and is publicly available on the company's website.
- A Business Ethics and Conduct Policy including the Code of Conduct for all ASDAM employees, to manage and operate business activities in alignment with applicable laws and high ethical standards to uphold ASDAM's values of integrity and fairness.

The policies and processes currently in place across ASDAM support the management of human capital and human rights risks. However, we recognise that it is important to continually improve our processes and controls to ensure modern slavery risk is adequately managed.

ASDAM assesses the effectiveness of its actions through ongoing review of supplier engagement processes, governance oversight and the continued development of its risk management framework.

ACTION PLAN

ASDAM is committed to the ongoing identification and management of modern slavery risks across its operations and supply chains. The Board and Executive Leadership Team oversee this approach as part of broader risk management processes.

Over the Australian FY26 reporting period, ASDAM's mitigation actions have included:

- Completing a review of ASDAM's Supplier Terms and Conditions and General Contractual Terms to ensure modern slavery compliance requirements are included where applicable and applied consistently across the Group.
- Establishing an ASDAM Board Risk Committee and Executive Risk Committee to assist the Board and management with overseeing risk governance and supporting the implementation of ASDAM's risk management framework.

Over the next reporting period, ASDAM will undertake the following actions to continue its commitment to managing modern slavery risks:

- Reviewing current Quality Management Systems to ensure that due diligence considerations relating to modern slavery are embedded within the supplier review framework.
- Continuing to develop the maturity of ASDAM's Risk Management Framework to enable stronger oversight of risk culture including modern slavery risks.

CONSULTATION PROCESS

This Statement was prepared in consultation with relevant entities within the ASDAM Group. Input was obtained from management across business units and functional areas, including supply chain, quality, risk and compliance.

SIGN OFF

This Statement has been prepared by ASDAM's management team in collaboration with ASDAM executives. The Statement has been approved by the Board of ASDAM Holdings Pty Ltd.



Rohan Stocker

Chief Executive Officer