



MODERN SLAVERY STATEMENT-2021

This statement covers Stowe Australia Pty Ltd ABN 27 002 556 603 and its related entities for reporting on the performance of our management systems and initiatives to control the risk of Modern Slavery Practices within our business operations and extended supply chain.

For the Reporting Period: 01 July 2020 – 30 June 2021

Introduction

This is the Stowe Australia Pty Ltd *Modern Slavery Statement* ("Statement") as required by the Modern Slavery Act (Cth) 2018. This Statement outlines the approach taken by Stowe Australia (Stowe) and its' related entities to eliminate risks of modern slavery within our operations including but not limited to our suppliers and subcontractors and throughout the extended supply chain.

Modern slavery and worker exploitation may assume various forms including slavery, servitude, forced labour, debt bondage, child labour, human trafficking, and exploitative employment arrangements and conditions.

Stowe values and promotes responsible corporate citizenship and shall work with our supply chain partners to maintain the highest ethical standards throughout all operations at all times.

Our business



Stowe Australia is a private corporation that operates within the States and Territories of the Commonwealth of Australia, with a long history dating back to the change-over from gas to electricity in the 1890's. Today, Stowe is recognised as the leading privately-owned National electrical & data communications contractor and employer of choice with over 1,500 people throughout 14 branch locations throughout Australia.



We provide electrical & data communications installation, engineering, reactive service, and facilities maintenance solutions to a variety of our valued clients within the

commercial construction, facilities management, high voltage infrastructure & utilities, and government sectors amongst others.

We monitor a range of indicators to assess compliance to our business management systems within our operations including amongst others, corporate citizenship programs, statutory compliance obligations, and financial position. We report progress and performance in our company's Business Management System. Please refer to the company's website at <https://www.stoweaustralia.com.au/> for further details regarding Stowe Australia's structure and operations.

Our structure, operations, and supply chain

For the purposes of this statement, our key business entities and associated operations and supply chains are as follows:

Entity	Operations	Supply Chain
 <p>ABN: 27 002 556 603</p>	<p>Electrical & data communications contracting and engineering design services including:</p> <ul style="list-style-type: none"> • Large & medium scale commercial, high voltage infrastructure & utilities, and Federal & State government funded construction projects; • Electrical & data communications engineering & design services; • Mobile service & facilities maintenance services; • Energy management services; • Corporate governance & accreditation; • Information technology business support & data security; • Finance & accounts administration; • Human Resources & Payroll. 	<ul style="list-style-type: none"> • Electric cable manufacturers • Switchboard suppliers • Electrical equipment wholesalers • Trades consumable materials & hardware suppliers • Tools, plant & equipment suppliers • Specialist subcontractors; • Logistics contractors • Motor dealers • WHS service providers • Training providers & RTO's • Waste contractors • Security contractors • Cleaning contractors • Stationary & office equipment wholesalers • Uniform & personal protective equipment suppliers • Equipment hire suppliers • Information technology equipment & service providers • Corporate travel & accommodation services
 <p>ABN: 75 630 632 450</p>	<p>Electrical & data communications contracting and engineering design services including:</p> <ul style="list-style-type: none"> • Small & medium scale commercial & residential projects; • Mobile service & facilities maintenance services; • Small to medium commercial fit-out projects; • Corporate governance & accreditation; • Information technology business support & data security; • Finance & accounts administration; • Human Resources & Payroll. 	<ul style="list-style-type: none"> • Electric cable manufacturers • Switchboard suppliers • Electrical equipment wholesalers • Trades consumable materials & hardware suppliers • Tools, plant & equipment suppliers • Specialist subcontractors • Logistics contractors • Motor dealers • WHS service providers • Training providers & RTO's • Waste contractors • Security contractors • Cleaning contractors • Stationary & office equipment wholesalers • Uniform & personal protective equipment suppliers • Equipment hire suppliers • Information technology equipment & service providers • Corporate travel & accommodation services

Our strategy

The company executive management group directed our governance & compliance team to carry out a review of corporate policies and procedures. The purpose of this analysis was to identify risks and opportunities associated with compliance to the requirements of the *Modern Slavery Act (Cth) 2018* and make recommendations to ensure these risks are eliminated or controlled whilst supporting opportunities for statutory reporting and the development of a framework for continuous improvement within the business management system.

Our strategy follows a risk-based methodology whereby supply chain partners identified as holding a higher potential for modern slavery practices within their operations and / or supply chains, shall be targeted as a priority for collaboration and surveillance activities.

Our risks

In the previous financial reporting year, Stowe Australia and our related entities spent approximately 12% of our total purchasing expenditure with a group of major global suppliers that provide materials and equipment to the electrical contracting industry, both in Australia and globally. Due to the Global sourcing of these purchases, we have identified these purchases having a higher inherent risk of poor modern slavery practices.

Our remaining 88% of purchases were with smaller Australian sub-contractors, manufacturers and distributors which represents a significantly lower risk of modern slavery practices due to established Australian labour regulations, minimum employment standards, and regulatory infrastructure to enforce associated statutory obligations.

Consideration was given to the types of products and materials primarily used within the organisation which is predominantly electrical and data communications cable, switch gear and associated electrical fittings and fixtures.

Information available from the [Australian Government](#) and [International Labour Organisation](#) informed the company that the modern slavery risks involved in the electronics manufacturing sector is higher in South-East Asia.

As the vast majority of the products and materials procured from our major global suppliers are manufactured in the South-East Asia region, the company determined that this was likely to represent the most significant risk of modern slavery impacts to our business operations.

Our approach

Stowe Australia's management system includes various formal policies and procedures that are intended to promote responsible corporate citizenship and compliance to our statutory obligations. Such policies include amongst others our *Modern Slavery Policy*, *Corporate Code of Conduct* and *Whistleblower Policy*.

Our "*Terms and Conditions of Purchase*" agreements have been revised to incorporate specific provisions intended to mitigate modern slavery risks and satisfy Stowe Australia's associated statutory obligations. In addition, these supplier agreements assist our company to exercise due diligence through establishing agreed performance standards with our suppliers and monitoring compliance to these through formal on-site surveillance activities.

We have also developed and implemented training content specific to modern slavery practices and our policies and procedures to control associated risks. This content is included in our onboarding process during initial employment inductions and during refresher training. A more detailed training course has been subsequently provided for personnel who require specific knowledge and capabilities to successfully implement and administer associated operational activities during the course of their employment. To date, we have trained 302 employees across both associated entities.

Our procedural controls shall be monitored, discussed, and reviewed by Stowe's management team during scheduled meetings to ensure policies and procedures are robust and effective to minimise the risk of modern slavery practices throughout our business operations and extended supply chain.

The 2021 reporting period involved significant disruptions to our operations within the States and Territories where the entities covered under this Statement operate including:

- A business focus on preventing the risks of our employees and supervisory staff contracting and / or spreading Covid-19 at workplaces under the control of our reporting entities; &
- Government restrictions imposed by Public Health Orders issued by Health Authorities limiting access to certain locations where contracted works were intending to be carried out; &
- Limited access to our existing labour force with employees and supervisory staff being subject to mandatory self-isolation or quarantine periods; &
- Delays in delivery times for goods and services procured; &
- Extended lead times for ordering of materials and equipment; &
- Delays in service delivery deadlines and statutory reporting obligations.

Despite these impacts on our operations, we have not attempted to source labour from any other sources, nor has any additional subcontracting of operational activities occurred outside of our current supply chain.

Key milestones of Stowe Australia's modern slavery implementation and compliance activities

Monitoring & Review



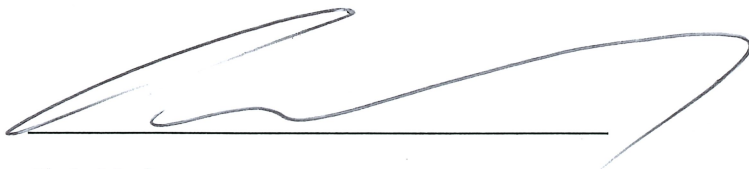
Our strategy for the future

Priorities for the 2022 reporting period include the following initiatives, some of which are ongoing and existing initiatives that have been delayed due to current Covid-19 related activities and restrictions:

- Consultation with interested parties for the purpose of increasing awareness of modern slavery risks and developing higher levels of engagement and collaboration of these risks;
- Continuing delivery of employee training courses on modern slavery practices and instructions on the operational requirements of associated corporate policies and procedures that have been implemented and / or revised;
- Developing a monitoring schedule for formal supplier and subcontractor reviews including developing criteria for:
 - assessing the effectiveness of their policies and procedures and for managing risks of modern slavery practices throughout their supply chains; &
 - assessing compliance with our company “*Terms and Conditions of Purchase*” agreements that are already in place with existing supply chain partners.
- Identification and targeted selection of our supply chain partners with exposure to higher levels of risk of modern slavery practices which will become the focus of future supplier and subcontractor audits and inspections by our compliance and accreditation team.
- Conducting formal reviews of suppliers and subcontractors to enable modern slavery compliance and performance history information to be compiled.
- Ongoing monitoring of internal policies and procedures for managing risks of modern slavery practices throughout our supply chain and assessing the effectiveness of our risk control strategy and associated operational procedures.
- Produce and publish our next “*Modern Slavery Statement*” for the 2021 reporting period in accordance with statutory obligations.

Approval

This statement was approved by the boards of both reporting entities covered by this statement, namely the 31st December 2021.



Chris Madson
Managing Director – Stowe Australia Pty Ltd

31 / 12 / 2021

Date



Mick Pawelko
Director – Elonara Pty Ltd

31 / 12 / 2021

Date