

## VENTORA GROUP – MODERN SLAVERY STATEMENT

### 1. INTRODUCTION

In July 2023, JELD-WEN Australia Pty Ltd was acquired by an affiliate of Platinum Equity Advisors, LLC and subsequently rebranded to VENTORA Group. VENTORA Group Pty Ltd (ACN 087 012 226) and its wholly owned subsidiaries (**VENTORA/we/our**) is making this statement in accordance with the Modern Slavery Act 2018 (Cth) (the **Act**). VENTORA takes its commitments under the Act very seriously. As a company, we are committed to conducting business in a lawful, ethical, and responsible manner and expect our supply chain partners to share this commitment.

This statement covers our financial year ended 31 December 2023 unless otherwise stated.

### 2. OUR STRUCTURE, OPERATIONS, AND SUPPLY CHAIN

VENTORA is an Australian company with headquarters in Sydney. It employs approximately 4,000 employees and comprises of 41 manufacturing facilities across Australia, Indonesia, Malaysia.

VENTORA has 31 wholly owned subsidiaries within its structure. Its brands include Corinthian<sup>®</sup>, Stegbar<sup>®</sup>, A&L<sup>®</sup>, Trend<sup>®</sup> and Breezway<sup>®</sup>, among others. 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 & remodelling market, multi-residential and commercial building and construction industry.

We source materials from over 1,400 suppliers, of which the top categories of spend include aluminium extrusions, timber, glass, locks, hardware furniture and related plastic components from countries including Australia, Indonesia, Malaysia, China, Taiwan, New Zealand, Thailand and Singapore. VENTORA has a centralised procurement team managing the procurement of the bulk of products and services purchased.

### 3. IDENTIFYING THE RISK OF MODERN SLAVERY

In the building products industry, it is difficult to provide assurance that the original production of raw materials are managed responsibly, because some of these processes occur so far up our supply chain, and, therefore, are beyond VENTORA's direct control. Nevertheless, VENTORA's value of "building businesses ethically and safely" ensures employees doing what is right while prioritising safety is at the forefront of business decisions.

In line with this value, VENTORA is committed to eliminating modern slavery throughout its business and supply chains. We require the same commitment from our suppliers and other business partners. These expectations are detailed in the company's Supplier Code of Conduct, which includes:

- Respect for human rights through appropriate anti-discrimination, anti-harassment and anti-abuse policies and practices;
- Compliance with all applicable labour laws, anti-slavery rules and regulations;
- No underage or involuntary labour;
- Employees are to be paid at least minimum wages or a wage that meets local industry standards, whichever is greater; and
- Employee rights of freedom of association and to bargain in accordance with applicable laws.

VENTORA's aim is to work collaboratively with all suppliers to achieve our ethical sourcing goals by where suppliers and their employees commit to our Supplier Code of Conduct as a condition of doing business with the Company. Our Supplier Code of Conduct is available on the Company's website at <https://www.ventora.com.au/supplier-information/>.

### **Risk Assessment of our Supply Chain**

Prior to engaging in business with a supplier, and throughout the relationship, we assess the supplier's compliance with our ethical standards. Our preliminary assessment is based on several parameters such as:

- geography,
- known risks in their geographic location,
- the commodity purchased,
- the level of manual labour required for the assembly of parts,
- the supplier's ownership structure,
- supplier quality performance and
- the nature of the business transaction.

This risk assessment is performed by VENTORA with input from external stakeholders as required.

VENTORA reserves the right to conduct enhanced due diligence to assess vendor supply chains and to confirm compliance with our requirements for responsible sourcing. Suppliers unable to demonstrate compliance with our requirements or lack of willingness to take steps to address identified issues of concern can result in the termination of the supplier relationship.

To improve supply chain transparency and identify where there are potential risks of contributing directly or indirectly to modern slavery related practices within its supply chains, suppliers are required to periodically complete a self-assessment questionnaire. The questionnaire is designed to identify potential modern slavery and human/labour rights issues in their supply chain. With the large number of suppliers in our supply chain, we recognise there could be a potential risk in our supply chain. The legal and procurement teams work closely in the assessment of our suppliers and to date, we are not aware of, nor have we detected any human rights violations in our supply chain.

## **4. RISK MANAGEMENT AND DUE DILIGENCE**

We recognise that modern slavery takes various forms, such as:

- slavery,
- servitude,
- debt bondage,
- forced and compulsory labour, and
- human trafficking.

All of which have in common the deprivation of a person's liberty by a third party to exploit them for personal or commercial gain. To address the risks of modern slavery in our business, we have undertaken or will undertake the following actions:

- The issue of modern slavery is addressed annually in our Code of Conduct and Ethics and compliance training sessions that our employees are required to complete.
- Our employees are required to adhere to our Code of Conduct and Ethics that informs them about the requirements of supply chain transparency with respect to modern slavery. Employees and suppliers who suspect any modern slavery violations are required to report this activity to the company's Legal department, HR department or to our confidential ethics and compliance helpline.
- VENTORA continues to assess the risks of modern slavery being present in our supply chain by using tools such as the self-assessment questionnaire. To date, approximately 84% of all suppliers have now completed the questionnaire. VENTORA continues to work with the remaining suppliers to encourage completion.

## **5. CONSULTATION WITH OTHER CONTROLLED ENTITIES**

Entities controlled by VENTORA all have shared directors and report through to the VENTORA CEO. Controlled entities all use the same assessment framework and through the actions set out in section 4 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.

## 6. ONGOING ASSESSMENT OF RISK

We monitor the effectiveness of our actions to remove the risk of modern slavery from our operations and supply chain by:

- Extending our supply chain review to include additional suppliers that we have not reviewed in prior years.
- Review and monitoring for changes to regions, locations and industries that carry a higher risk of modern slavery; and
- Working with suppliers set up in the past and having them acknowledge and sign our Supplier Code of Conduct.
- Terminate any contract and relationship with a supplier that cannot satisfactorily demonstrate they have adequate processes/controls in place to adhere with our requirements for responsible sourcing.

## 7. CONTINUOUS IMPROVEMENT

VENTORA is committed to continuous improvement of our systems and processes to reduce the risk of modern slavery in our supply chain. VENTORA's continuous improvement program includes, but is not limited to:

- Continued training of our employees.
- Conducting a risk assessment of the remaining supplier base to identify our exposure to modern slavery. This will be guided by our knowledge of our supplier, their industry, as well as our supplier's response to our questionnaire.
- Continuously reviewing our suppliers for any increased risk based on location and the type of products supplied to us. Any suppliers deemed to be of risk will go through an audit process to identify and reduce the risks of modern slavery being present in our supply chain and assessing these suppliers' compliance with our policy.
- Updating all relevant supplier agreements and internal policies as the modern slavery laws evolve.

VENTORA and its group entities remain committed to abolishing modern slavery by continuing to raise awareness, improve our due diligence processes to effectively identify any risk which may arise, and take appropriate actions in line with the intent of the Act and our Code of Conduct and Ethics.

This statement was approved by the board of VENTORA Pty Ltd and is signed by Scott Kelly, CEO of VENTORA Group Pty Ltd.

Signed by:  
  
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Scott Kelly  
Chief Executive Officer