

FY23 MODERN SLAVERY STATEMENT

Reporting Entity

This Modern Slavery Statement is made on behalf of the Fleetwood Group. The Fleetwood Group comprises Fleetwood Limited (ACN 009 205 261), an Australian public company listed on the Australian Securities Exchange (ASX: FWD), Fleetwood VIC & QLD Pty Ltd (ACN 114 678 349) and their associated entities (referred to collectively in this Statement as 'Fleetwood' or 'the Company').

This Statement has been developed in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) (the **Act**) and sets out the actions taken by Fleetwood for the financial year ending 30 June 2023.

About Fleetwood

Fleetwood was established in 1964 and has become an industry leader in each of its markets: Building Solutions, Community Solutions and RV Solutions.

Fleetwood Building Solutions is a modular construction business with operations in Western Australia, Victoria, New South Wales, South Australia, and Queensland. Fleetwood works with government departments, owners, architects, and engineers to design and build custom modular buildings predominately for the affordable housing, education, corrections, and mining industries.

Fleetwood Community Solutions has designed, built, and continues to operate two major villages in Western Australia. Searipple Village is one of the largest accommodation villages in Western Australia, offering over 1,300 rooms. Osprey Village provides affordable housing for the South Hedland region, offering 293 high quality dwellings. Osprey Village is a joint initiative between the Government of Western Australia Housing Authority, Royalties for Regions, and Fleetwood, and is now owned by the Housing Authority and operated by Fleetwood.

Fleetwood RV Solutions is comprised of two businesses: Camec and Northern RV. Camec imports, manufactures and distributes products to the recreational vehicle industry throughout Australia and New Zealand. Northern RV is based in Victoria and provides services to customers, caravan builders and manufacturers throughout the industry with qualified and licensed tradesmen.

Fleetwood Limited is the parent company to the following operational companies:

Fleetwood WA & SA Pty Ltd (ACN 009 306 950)
Fleetwood VIC & QLD Pty Ltd (ACN 114 678 349)
Fleetwood NSW Pty Ltd (ACN 127 380 330)
Glyde Digital Pty Ltd (ACN 050 031 993)
Camec Pty Ltd (ACN 004 846 584)
Camec (NZ) Limited (NZBN 9429038762321)
Northern RV Pty Ltd (ACN 008 763 193)
Recreational Vehicle Concepts Pty Ltd (ACN 008 682 513)

Fleetwood's head offices are located in Sydney, New South Wales and Perth, Western Australia. Each of the above-mentioned companies have substantively the same policies and processes as Fleetwood Limited and as such, this Modern Slavery Statement provides a consolidated description of Fleetwood's actions to address modern slavery.

As at 30 June 2023, Fleetwood had 639 employees, 704 subcontractors, 139 labour hire workers and 21 casuals engaged on an as needs basis.

For further information about Fleetwood, please refer to www.fleetwood.com.au.

Supply Chain

Fleetwood's supply chain consists of goods and services from a broad range of industries that support each of its Building Solutions, Community Solutions and RV Solutions businesses.

Key categories within Fleetwood's supply chain include but are not limited to, construction materials and consumables, recreational vehicle parts and accessories, plant and equipment hire, safety equipment, personal protective equipment / work wear, workforce labour hire, subcontract construction services, technology and hardware, transport, travel and accommodation and general facilities management (including cleaning and other office services).

In FY23, Fleetwood engaged with over 650 first tier suppliers for Fleetwood's Building Solutions business, 77 first tier suppliers for Community Solutions and 609 first tier suppliers for RV Solutions. Approximately 98% of Building Solutions' and Community Solutions' procurement spend was from within Australia. Whereas only 60.3% of RV Solutions' procurement spend was from within Australia with a significant portion located overseas. Given RV Solutions is a much smaller business compared to the Building Solutions and Community Solutions businesses, the statistics illustrate that the Fleetwood Group engages largely with suppliers that are local and Australian based.

Assessing Risks of Modern Slavery

In FY23, Fleetwood continued to undertake due diligence on its suppliers in order to gain a greater understanding of the risk of modern slavery in its supply chain.

Given the nature of Fleetwood's supply chain, Fleetwood continues to consider the risk of modern slavery in our first tier, which is predominantly in Australia, to be low. Fleetwood also contracts with many Original Equipment Manufacturers, which reduces the number of tiers in its supply chain.

However, we also acknowledge that some imports in our RV Solutions business are from jurisdictions that present a higher risk of modern slavery according to the Global Modern Slavery Index¹. In addition, Fleetwood acknowledges that some of its first tier suppliers and second tier suppliers source goods from overseas and therefore may present a higher risk of modern slavery.

Fleetwood is committed to addressing any modern slavery risks within its supply chain and has established procurement processes and procedures for external goods and services. Subcontractors and suppliers must participate in a pre-qualification, evaluation, and assessment process prior to any formal engagement. In addition, modern slavery questions were added to Fleetwood's national procurement tender qualitative assessment process in FY22, which continued in FY23 and will continue into FY24.

Fleetwood's national procurement tender qualitative assessment process includes a requirement for suppliers to provide details of any modern slavery risk assessment policy that the supplier maintains and if so, how those risk assessments are conducted with those suppliers' suppliers and throughout the supply chain.

Supplier responses form part of Fleetwood's weighted evaluation process (as part of the broader ESG assessment component of the supplier tender process). Further, if any suppliers are unable to satisfy Fleetwood's on-boarding requirements and demonstrate they have appropriate risk management

¹ <https://www.globalsslaveryindex.org/>

processes in place or are unwilling to share requested information in this regard, Fleetwood may take further action including ceasing to use that supplier's goods or services.

Addressing Risks of Modern Slavery

Risk Management

Fleetwood's Board has responsibility for establishing a risk management framework across Fleetwood. The Risk Committee assists the Board in its responsibilities relating to reviewing and assessing the effectiveness of Fleetwood's risk management framework and ensuring sound management of risks and compliance across Fleetwood.

The Risk Committee reviews a wide range of matters relating to non-financial risks including Fleetwood's human rights related risks and those concerning anti-bribery and corruption, modern slavery, and whistleblower matters. The Risk Committee is chaired by an independent non-executive director and meets at least four times a year.

Policies

In addition, Fleetwood has adopted various policies and associated procedures to improve and support Fleetwood's commitment to addressing modern slavery in our operations and supply chain, including:

- *Code of Conduct:* Fleetwood's Code of Conduct specifically requires all employees and those we work with to maintain a work environment where human rights are valued. If any human rights violations are reported to or identified by Fleetwood, they will be responded to appropriately (see Fleetwood's Code of Conduct for further information).
- *Speak Up Policy:* Fleetwood's Speak Up Policy encourages all employees and external stakeholders to report any improper conduct including if they become aware of any modern slavery connected to Fleetwood or its supply chain. All complaints are investigated in a fair and objective manner, including the involvement of external parties where appropriate. Fleetwood employees or stakeholders who wish to report improper conduct can do so by making a report to Fleetwood's Whistleblower Officers or via Fleetwood's external and independent whistleblowing service provider (see Fleetwood's Speak Up Policy for further information).

Supplier Due Diligence

In addition to the modern slavery questions which Fleetwood has incorporated into its national procurement tender qualitative assessment process, Fleetwood maintains additional supplier due diligence measures to assess modern slavery risks in its supply chain, including:

- *Risk Assessment Matrix:* In addition to supplier questionnaires, Fleetwood has implemented internal supplier due diligence processes by developing an internal risk assessment matrix. The matrix is a working document to assist Fleetwood map its suppliers and assess risk across its businesses and will continue to develop as Fleetwood continues to increase its understanding of the risks of modern slavery practices in its operations and supply chains. The risk assessment has been developed in accordance with best practice and references several key criteria to identify those suppliers at a higher risk of contributing to, or being directly linked to, modern slavery practices, in accordance with the Global Modern Slavery Index.
- *Supplier Questionnaire:* Fleetwood maintains a comprehensive modern slavery questionnaire which is incorporated into Fleetwood's standard onboarding documents, as necessary. Fleetwood has also begun (and will continue to) analyse the responses being provided to the questionnaires and appropriately implement any next steps required.
- *Monitoring Supplier Spend:* Fleetwood has begun developing a dashboard that tracks its supplier spending. Part of this process includes monitoring any spend with suppliers who are not a national supplier (who may be necessary to engage in circumstances where national suppliers are unable

to meet supply requirements). Fleetwood monitors and maintains thresholds for non-national supplier spending as Fleetwood recognises that not all suppliers may have undertaken the national tender qualitative assessment process (and therefore, associated modern slavery risk assessment).

Completion of Questionnaires

Fleetwood completes questionnaires received from Fleetwood's customers or as required as part of tendering processes. These questionnaires have allowed Fleetwood to consider points of focus in the industries in which Fleetwood operates and consider the effectiveness of our internal policies and processes. Input is provided by various key procurement, risk and compliance, legal, company secretariat and human resources functions.

During FY23, Fleetwood did not receive any reported concerns of modern slavery practices from our responses to these questionnaires (or otherwise), nor did it identify any instances of modern slavery in its operations or amongst our suppliers. Even though no cases have been reported, we continue to promote the awareness of modern slavery, support our people in the identification of modern slavery as well as mitigation and management.

Contract Review

Fleetwood acknowledges that imposing certain contractual requirements on its subcontractors and suppliers is one way in which modern slavery risks in the supply chain can be mitigated.

Fleetwood's precedent and standard form contracts contain market standard provisions to address compliance with Australia's modern slavery regime. In addition, as part of Fleetwood's national procurement strategy, Fleetwood has engaged many of its suppliers under national supply agreements, which contain modern slavery obligations. Specifically, Fleetwood's contracts include warranties that counterparties comply with modern slavery laws and that they are not engaged in, or will engage in, any conduct that would comprise a modern slavery offence. The warranties also provide a right of termination if parties engage in or allow conduct which would comprise a modern slavery offence.

Education and Training

Fleetwood maintains an online training module to increase knowledge and awareness of modern slavery practices. The module includes information regarding what modern slavery encompasses and the relevant laws, how to identify modern slavery risks in our supply chain and business and individual employee responsibilities. Key employees within Fleetwood who are in the best position to identify any modern slavery practices (particularly roles related to procurement and supplier engagement) may be enrolled in the online training module, as necessary.

Effectiveness of Actions Taken

Fleetwood plans to measure its effectiveness by focussing on progressing our due diligence and engagement with suppliers, including by way of Fleetwood's national procurement tender process.

The establishment of a national procurement strategy has been a positive and effective mechanism to standardise Fleetwood's supplier on-boarding process and gain further understanding into Fleetwood's suppliers' compliance with modern slavery requirements. Through this process, Fleetwood has also identified that many of its first-tier suppliers are similarly required to comply with modern slavery reporting requirements under the Act, which has provided Fleetwood with certain assurances as to the steps being taken by its first-tier suppliers to assess and address modern slavery risks within its supply chain.

While the positive response to Fleetwood's streamlined national procurement onboarding system has meant limited remedial action has so far been required, Fleetwood recognises that remediation

guidelines may need to be developed as necessary, as Fleetwood further progresses modern slavery risk assessments throughout its supply chain.

Incorporating reciprocal modern slavery contractual obligations and warranties has been well received by contracting partners and suppliers and has further demonstrated Fleetwood's commitment to comply with modern slavery laws.

Fleetwood will continue to report on the outcome of these measures and any other measures taken to improve the overall effectiveness of Fleetwood's actions in connection with modern slavery in future Modern Slavery Statements.

Future Commitments

Fleetwood acknowledges it takes sustained action to identify and act on modern slavery risks and we are committed to continuous improvement of our modern slavery management activities. Our future aims are to:

- Supplier due diligence and on-boarding – continue to engage with suppliers to gain a deeper knowledge of Fleetwood's supply chain risks and develop further strategies to investigate second tier suppliers (and further tiers throughout the supply chain) to mitigate against the risk of engaging with suppliers who may have these second or third tier suppliers located in countries that have been identified as potentially presenting a higher risk of modern slavery.
- Contract suits – ensure that any new contracting frameworks developed in FY24 incorporate modern slavery obligations.
- Onboard training for key personnel – incorporates modern slavery training for all new starters at Fleetwood in procurement roles.
- Remediation – develop remediation guidelines, as necessary.

Consultation

This Modern Slavery Statement has been prepared in consultation with our controlled entities (including the reporting entities) via input and endorsement from the Fleetwood Limited Board, responsible management and members of procurement, risk, and compliance, legal, company secretariat and human resources functions.

Approval

Fleetwood makes this Modern Slavery Statement in accordance with the *Modern Slavery Act 2018* (Cth) and constitutes Fleetwood's Modern Slavery Statement for its financial year ended 30 June 2023.

This Modern Slavery Statement was approved by the Board of Fleetwood Limited on 29 November 2023.



John Klepec
Chair of the Board
Fleetwood Limited



Bruce Nicholson
Managing Director & CEO
Fleetwood Limited