



ARCHITECTURAL WINDOW SYSTEMS PTY LTD

Architectural Window Systems (AWS) Modern Slavery Statement FY 2024-2025

1 Introduction

This Modern Slavery Statement (“Statement”) has been prepared for the 1 July 2024 – 30 June 2025 reporting period in accordance with the seven mandatory reporting criteria under the Commonwealth Modern Slavery Act 2018 (Cth). It describes how we identify, assess and manage modern slavery risks across our operations and supply chains.

Architectural Window Systems Pty Ltd (AWS), ACN 067 950 903, is a proprietary limited company incorporated in Australia, with its head office located at 76-78 Jemma Road, Prestons NSW 2170. AWS is one of Australia’s leading suppliers of aluminium window and door systems for the residential and commercial building industry.

For the purposes of this Statement, AWS includes the following related entities:

- Colourworks Coatings LLP – ABN 42 287 822 827
- Aluminium Innovations Pty Ltd (trading as Architectural Window Systems WA) – ACN 107 800 966
- A.C.N. 611 940 393 Pty Ltd (trading as AWS Barr Profiles) – ACN 611 940 393
- Alfab Investments Pty Ltd (trading as Tenlow Tooling) – ACN 623 189 284
- Independent Extrusions LLP – ABN 58 515 316 810

Together, these entities are referred to as “AWS”, “we”, “us” and “our” throughout this Statement.

2 Our Structure, Operations and Supply Chain

Our operations are based entirely in Australia. We operate factory locations in Queensland, Victoria and Western Australia, which are supported by offices and distribution centres in New South Wales, Queensland, Victoria, Western Australia and South Australia.

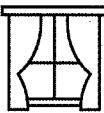

Operational activities span the aluminium systems value chain and include:

- aluminium extrusion,
- component machining and fabrication,
- tooling design, manufacture and maintenance,
- powder coating,
- warehousing and distribution of aluminium window and door systems.

We employ 412 people across production, logistics, technical, sales and administrative roles supporting these activities.

AWS' supply chain includes 883 suppliers, approximately 96% of which are based in Australia. This means that most operational inputs are sourced domestically. Overseas suppliers are primarily used for machinery and tooling, specialised hardware, chemicals, and specific aluminium inputs that are not available locally. These suppliers are mainly located in New Zealand and China, and to a lesser extent in Singapore, the United Kingdom, Denmark, the United States, Belgium, Canada, Italy, Malaysia, Taiwan, and Bahrain.

Our supplier base includes both trade and non-trade suppliers: trade suppliers provide the inputs needed to produce the final product, while non-trade suppliers support AWS' operational and business needs.

 Trade suppliers	Provide the materials and specialist inputs required for manufacturing and assembly, including aluminium inputs, hardware, machinery, tooling and surface-finishing materials.
 Non-trade suppliers	Provide the goods and services that support AWS' operational sites and business functions, such as domestic and international freight, property and maintenance services, waste services, ICT and business support services.

Supplier relationships are generally long term, reflecting the specialised nature of our products and the importance of a stable supply chain. We have a Supplier Code of Conduct that outlines minimum expectations and non-negotiable standards for suppliers, including legal compliance, integrity, human rights, labour practices, health and safety and environmental management. Additionally, all extrusions provided are sourced from suppliers certified by the Aluminium Stewardship Initiative (ASI).

3 Modern Slavery Risks in Our Operations and Supply Chain

We recognise that modern slavery risks can arise in both our operations and our supply chains due to factors such as industry characteristics, geographic context and the structure of global value chains. The presence of these factors does not mean modern slavery is occurring, but they indicate where greater attention is required.

Operations

The risk of modern slavery within our operations is low. While aluminium production generally carries higher global labour risks, these risks do not affect our direct operations. All work is conducted in Australia under formal written contracts and regulated working conditions. During this reporting period, no employment concerns were raised.

We do not utilise seasonal labour, and the use of labour hire is minimal. Recruitment for most roles is carried out directly, with specialist recruitment partners engaged only to enhance workforce diversity and inclusion initiatives. We recognise that labour hire is considered a higher-risk arrangement because it can reduce direct oversight of employment conditions; however, all the workers involved with AWS are required to follow our workplace health and safety policies and procedures.

Supply chain

Modern slavery risk across AWS' supply chain varies and is primarily driven by supplier sector and geographic location. Higher inherent risk is concentrated in upstream raw material processing and overseas manufacturing, as well as domestic service sectors such as freight and building maintenance, where workforces are often sourced through indirect employment models.

Most of AWS' suppliers operate in Australia under regulated labour conditions, which supports lower overall risk. Some domestic service categories still carry inherent vulnerabilities due to employment structures, including multiple layers of subcontracting and the use of low paid or migrant workers. Suppliers in these categories demonstrated awareness of these vulnerabilities and reported the presence of policies and mechanisms to ensure fair and safe working conditions.

For suppliers operating overseas, risk is elevated in categories linked to offshore manufacturing, including aluminium inputs, hardware, chemicals, plastics and machinery. These products often originate from complex supply chains where commodity extraction and processing take place in countries with higher modern slavery prevalence. Several suppliers acknowledged these upstream vulnerabilities in their due diligence responses and described having measurements in place such as supplier codes of conduct, grievance mechanisms and selective audits.

The most significant exposure relates to aluminium production, where upstream mining and smelting can occur in countries with a high prevalence of modern slavery. Our suppliers reported established governance measures in place, including risk assessments, modern slavery statements and responsible sourcing commitments.

All suppliers that completed our annual supplier engagement confirmed that employees receive written employment contracts, lawful wage entitlements and timely payment. Approximately 70% also reported having at least one formal document outlining expectations for labour standards, human rights and ethical conduct, such as a Code of Conduct, Supplier Code of Conduct or Modern Slavery Policy.

4 Assessing and Addressing Modern Slavery Risks

AWS is committed to identifying and addressing modern slavery risks across our operations and supply chain.

Assessing modern slavery risks

For the FY2024–25 reporting period, AWS conducted a modern slavery risk assessment under the supervision of our Financial Controller.

The primary method we use to assess modern slavery risks is through engagement with our suppliers via an annual supplier questionnaire. This questionnaire, based on the Australian Government’s Supplier Questionnaire, seeks information about employment conditions, governance controls, and the locations of their operations, as well as those of their key suppliers. The responses we receive give us insight into their employment practices and inform our risk analysis.

The assessment addressed risk indicators, considering:

- Product and service
- Sector and industry
- Geography
- Supply chain model

In alignment with the United Nations Guiding Principles on Business and Human Rights, the assessment evaluated whether AWS may *cause, contribute to, or be directly linked* to modern slavery risks through our business activities and supply chain relationships. This process helped us identify areas for improvement and strengthen our overall approach.

Addressing modern slavery risks

AWS has established internal policies to help prevent and manage risks associated with modern slavery.

- **Code of Conduct:** This document outlines the expectations for ethical behaviour, integrity, and lawful working conditions for all workers.
- **Whistleblower Policy:** This policy provides a confidential channel for reporting concerns about misconduct, including potential modern slavery risks. It also explains how disclosures will be managed.
- **Modern Slavery Policy:** This policy details our commitments, roles, and responsibilities regarding the prevention, identification, and reporting of modern slavery risks. It has been communicated to all workers and is included in our onboarding process.

During the reporting year, we implemented a Supplier Code of Conduct. This document outlines our expectations for suppliers regarding labour standards, ethical behaviour, and compliance. It has been communicated to all our suppliers and serves as a crucial way to convey our requirements to both existing and new suppliers.

These measures enhance our ability to detect and respond to modern slavery risks and provide a foundation for the continuous improvement of our due diligence processes.

5 Assessing the Effectiveness of Our Actions

As part of preparing this Modern Slavery Statement, we carry out an annual review to assess the effectiveness of the actions taken to identify, assess and manage modern slavery risks.

As part of this review, we assessed the internal frameworks that guide our approach to modern slavery and examined their consistency across our related entities. This assessment identifies opportunities to further integrate modern slavery considerations into workforce practices and procurement activities.

A key indicator of effectiveness across our supply chain is the level and quality of supplier engagement, as this directly affects our ability to assess modern slavery risks. During this reporting period, participation in our annual Modern Slavery Questionnaire increased by approximately 10% compared to the previous year. This improvement enhanced the quality of information available and strengthened the reliability of our risk assessment.

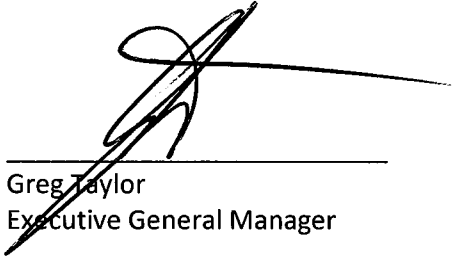
We maintain strong relationships with key suppliers and will continue to use the questionnaire and targeted discussions to build visibility of practices in higher risk industries, sectors and geographies, and to monitor changes in supplier controls over time.

Insights from these reviews inform updates to our policies, supplier communications and internal procedures. We are committed to continuous improvement and will continue to refine our approach so that our systems and engagement practices remain effective in identifying and addressing modern slavery risks across our operations and supply chain.

6 Consultation and Statement Approval

All related entities were actively engaged and consulted in preparing this Statement. Each entity provided information on key suppliers to identify shared supplier relationships and strengthen visibility over material supply chains. Input was also supplied on workplace practices and existing controls to ensure the Statement reflects current arrangements across all entities.

This Statement was approved by the board of directors of Architectural Window Systems Pty Ltd, as the parent entity, on behalf of all reporting entities covered by this Statement on 26 February 2026.



Greg Taylor
Executive General Manager