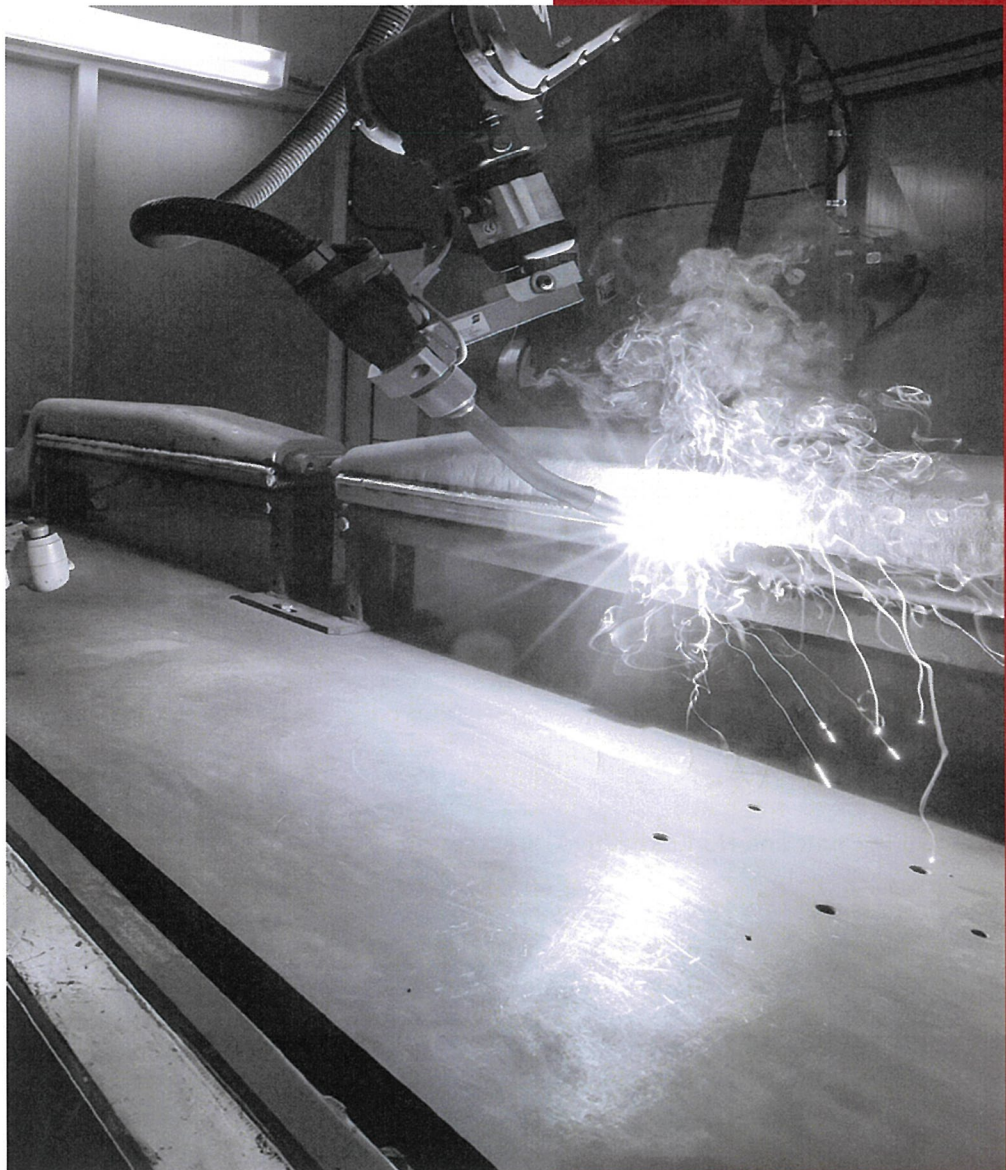


VERSION: FINAL

5 NOVEMBER 2025

ADRAD HOLDINGS LIMITED

MODERN SLAVERY STATEMENT



Reporting Criteria 1. The identity of the reporting entity

This Modern Slavery Statement is submitted by Adrad Holdings Limited (AHL), a company listed on the Australian Securities Exchange (ASX), operating in the Automobiles & Components industry, and headquartered in South Australia. AHL meets the reporting threshold under the Modern Slavery Act 2018 (Cth).

Reporting Period: 1st July 2024 to 30th June 2025

Entity Name: Adrad Holdings Limited (ASX: AHL)

ABN: 51121033396

Registered office and Principal place of business: 26 Howards Road, Beverley, SA 5009 Australia

Website: www.adradholdings.com.au

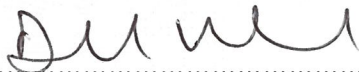
Controlled entities:

Name	Country of incorporation
Adrad Investments Pty Ltd	Australia
Adrad Group Limited	Australia
Adrad Pty Ltd	Australia
Air Radiators Pty Ltd	Australia
Air Radiators Beverley Pty Ltd	Australia
National Radiators Ltd	New Zealand
Air Radiators-Industrial Pty Ltd	Australia
Air Radiators (Thailand) Limited	Thailand
Breakaway Industrial Radiators Pty Ltd	Australia
Air Radiators (WA) Pty Ltd	Australia
Adrad Management Services Pty Ltd	Australia
Adrad IT Services Pty Ltd	Australia
Wingfan Pty Ltd	Australia

Directors / Senior management:

Mr Donald McGurk	Non-Executive Director
Mr Glenn Davis	Non-Executive Chair (until 9/9/25)
Mr Gary Washington	Non-Executive Director (transition effective 24/7/25)
Mr Darryl Abotomey	Non-Executive Director (until 22/9/25)
Mr Paul Proctor	Chief Executive Officer (effective 28/7/25) and Managing Director (effective 9/9/25)
Mr Rod Hyslop	Chief Financial Officer and Joint Company Secretary

Date of Approval: This Statement is approved for release by the Board of Adrad Holdings Limited.



Donald McGurk, Chair and Non-Executive Director

Date 01/11/2025



Paul Proctor, Chief Executive Officer

Date 05/11/2025

Reporting Criteria 2. The structure, operations and supply chains of the reporting entity

PRINCIPAL ACTIVITIES

Adrad is an Australian-based business specialising in the design and manufacture of innovative heat transfer solutions for industrial applications and the manufacture, importation and distribution of automotive cooling components and parts for the aftermarket segment.

The company has two key business segments:

Heat Transfer Solutions

Designs and manufactures industrial cooling solutions for use in road transport and heavy vehicles, mining, power generation, data centres and rail industries.

Distribution

Imports and distributes radiators, mobile and stationary heat exchange products and a variety of automotive parts for the Australian and New Zealand automotive and industrial markets.

The Company has facilities across Australia, New Zealand and Thailand, a number of which include warehousing, manufacturing and service facilities capable of responding to urgent customer needs. The Company has approximately 500 employees.

There has been no significant change in the nature of the Company's activities during the year.



Vision: 1st Choice for Industrial & Engine Cooling Solutions

Two major segments servicing all aspects of the engine cooling market:



**HEAT TRANSFER SOLUTIONS
(AIR RADIATORS)**

A vertically integrated designer and manufacturer of industrial and automotive radiator and cooling solutions.



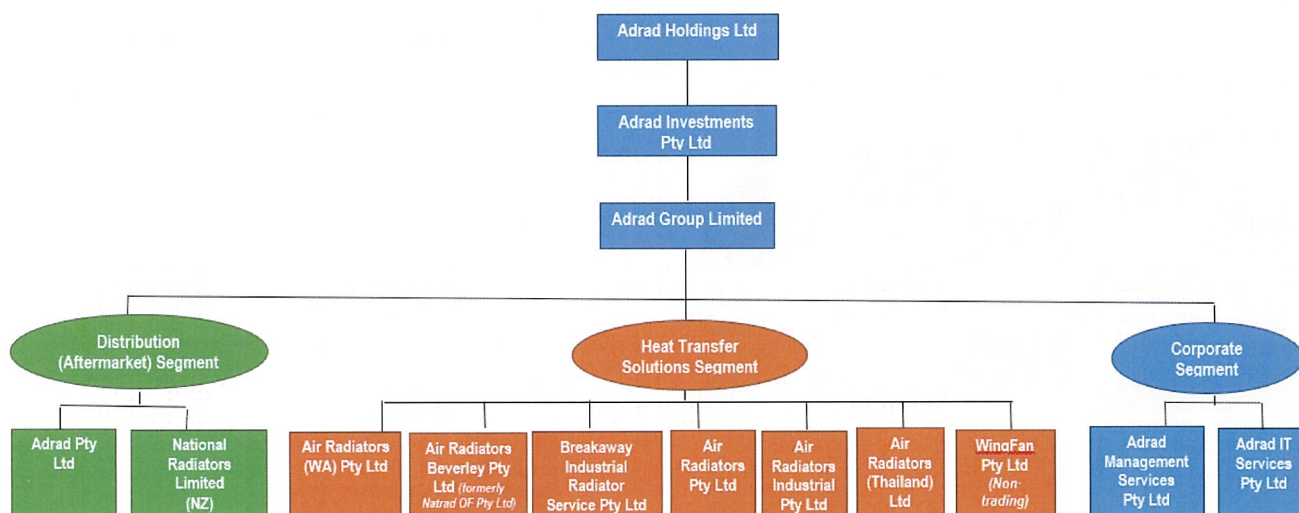
DISTRIBUTION

Importer and distributor of radiators and other products for the Australasian automotive and industrial aftermarket.

ENTITY STRUCTURE

The AHL entity structure is reflective of the diverse business operations and geographical locations (Australia, New Zealand and Thailand).

Adrad Holdings Group of Companies



CORPORATE STRUCTURE

The AHL corporate structure is reflective of the current business and where it is headed, with clear accountability for business performance.



SUPPLY CHAIN OVERVIEW

During the reporting period, AHL operated in Australia, New Zealand and Thailand.

Our supply chains span the following countries: Australia; Austria; Canada; China; Fiji; France; Germany; Hong Kong; India; Ireland; Italy; Japan; Malaysia; Myanmar; Netherlands; New Zealand; Pakistan; Poland; Singapore; South Korea; Taiwan; Thailand; Turkiye; United Arab Emirates; United Kingdom; and the United States of America.

Our supply chains involve suppliers of radiators, air conditioning products and service parts – including Australian manufactured and imported quality aftermarket parts) below:

- Adrad Distribution products: Radiators; EGR coolers and intercoolers; Auto air conditioning; Coolants & fluids; Brake parts; Cooling system; Auto electrical parts; Auto accessories; Auto filters.
- Air Radiators products: Custom radiators and engine coolers; Air blast heat exchangers; Industrial air coolers; Oil coolers; Axial fans for radiators; Plate heat exchangers.



Reporting Criteria 3. The risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls

AHL has assessed the potential risk of modern slavery practices in its operations and supply chain as LOW risk, having considered the risk factors set out below.

Geographic Risk

Suppliers in high-risk countries, specifically the top 15 ranked countries with highest estimated prevalence of modern slavery (estimated number of people in modern slavery per 1000 population) as identified in the Global Slavery Index 2023

Estimated number of people in modern slavery per 1000 population: AHL operates in Australia (1.6 per thousand), New Zealand (1.6 per thousand) and Thailand (5.7 per thousand), all of which are ranked LOW.

<https://walkfree.org/global-slavery-index/>

Sector and Industry Risk

Industries such as manufacturing and importing/distribution in relation to AHL's business operations set out below:

- Distribution: Importer and distributor of radiators, mobile and stationary heat exchange products and a variety of automotive parts and other products for the Australasian automotive and industrial aftermarket.
- Heat Transfer Solutions: A vertically integrated designer and manufacturer of industrial and automotive radiator and cooling solutions for use in road transport and heavy vehicles, mining, power generation, data centres and rail industries.

Products and Services Risk

Importing risk (goods and services) that may have high modern slavery risks because of the way they are produced, provided or used. Typical indicators considered:

- Cost requirements or delivery timeframes require suppliers to engage in excessive working hours, make cost savings on labour hire or rapidly increase workforce size.
- The development of the product (or components of the product) or delivery of the services is from countries where there is a high risk of labour exploitation.
- The product is made from materials or using services reported to involve a high risk of labour exploitation.

Supply Chain Model / Entity Risk

Typical indicators considered:

- Consumer-driven industries require high flexibility, at times of high consumer demand, that leave workers vulnerable to exploitation e.g. long working hours and forced overtime.
- Lack of government regulation, inspectors and regulators have inadequate powers and resources, that can facilitate worker exploitation.
- Lack of access to representative workers' organisations and collective agreements that can expose workers to risks of exploitation.
- Jobs requiring unskilled labour, typically low paying and undervalued, which often employ more vulnerable workers.
- Temporary, seasonal or agency work (employment uncertainty) and the use of labour recruiters, that makes workers more vulnerable to exploitation.
- Dangerous or physically demanding work that exposes workers to health and safety risks, particularly where there are limited protections for workers.

Reporting Criteria 4. The actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks

During the reporting period, AHL undertook the following actions to address the risks of modern slavery practices in its business operations and supply chains:

Supplier Risk Assessment	Grievance and Remediation Mechanism
Developed a Supplier Risk Screening Tool (excel workbook) incorporating: Geographic risk; Sector and industry risk; Products and services risk; and Supply chain model / entity risk. Conducted supplier risk assessments utilising the Tool and ERP system generated supplier data.	Ongoing monitoring and reporting of company-wide whistleblower mechanism (allegations received and actions taken).
Procurement and Contract Management	Training
Developed standard supplier terms and conditions for goods and services agreements, to include modern slavery clauses.	Delivered modern slavery training (e-Learning) to employees.
Ethical Supply Chain (ESC) Policy / Procedure	Internal Reporting
Developed the ESC Policy / Procedure, that incorporates tools for deep-dive supplier modern slavery risk assessments, where required. Engaged with selected suppliers to improve transparency.	Developed internal reporting mechanism for the Board and Group Leadership Team (GLT) to provide status reports on compliance with the reporting obligations under the Modern Slavery Act 2018 (Cth).
Workplace Management Practices	External Reporting
Completed company-wide Employee Engagement Survey and developed actions plans to address key findings.	Submitted AHL’s first Annual Modern Slavery Statement (YE 30/6/24) to the Australian Government Attorney-General’s Department (Modern Slavery Statements Register).



Reporting Criteria 5. How the reporting entity assesses the effectiveness of such actions

AHL assesses the effectiveness of its actions through:

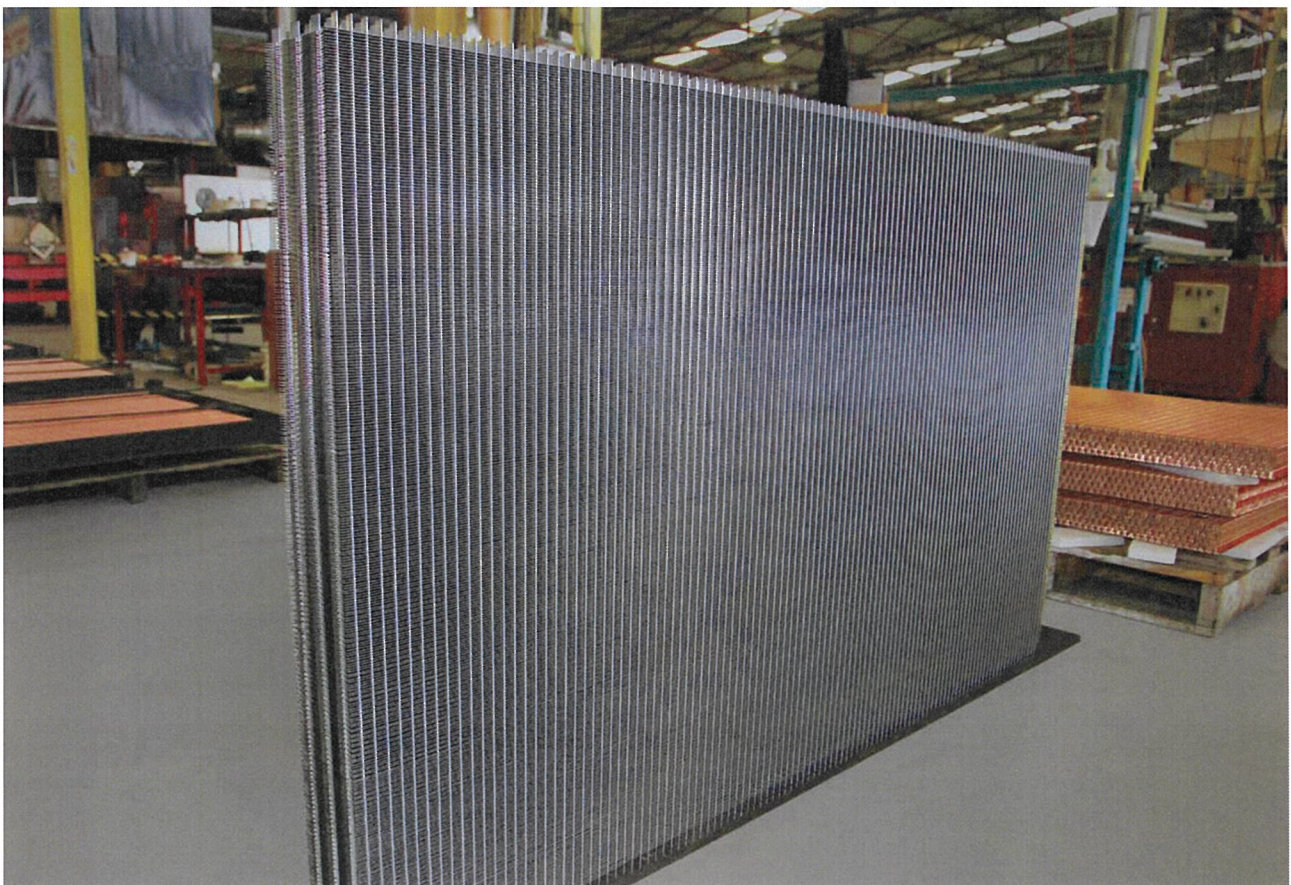
- Feedback from key stakeholders, including the Board, senior management and employees.
- Review of incident reports and remediation outcomes.
- Ongoing monitoring and reporting for compliance (e.g. suppliers, labour sourcing and recruitment practices, grievance mechanisms, and modern awards or individual employment contracts).
- Ad-hoc supplier site visits to monitor supplier compliance with expectations.
- Benchmarking against industry standards (e.g. work health and safety, workplace management practices, employee engagement, and the Global Slavery Index 2023 <https://walkfree.org/global-slavery-index/>).
- Continuous improvement (people, process and technology).
- Tracking training completion rates.
- Expert external advice.



Reporting Criteria 6. The process of consultation with any entities the reporting entity owns or controls or is issuing a joint modern slavery statement with

This statement was developed in consultation with:

- **Subsidiaries and controlled entities:** General managers representing Adrad Distribution, and Air Radiators.
- **Internal departments:** Representatives from Information Technology, and Risk and Compliance.
- **Internal subject matter experts:** Representatives from Procurement and contract management, Supply chain management, and Product development.
- **Leadership team:** The Board of Directors, the Group Leadership Team (GLT) and the Senior Leadership Teams (SLTs) at Adrad Distribution and Air Radiators.
- **All Personnel:** Communication of group-wide expectations (training and policy deployment) in relation to the risks of modern slavery practices in AHL's business operations and supply chain.



Reporting Criteria 7. Any other information that the reporting entity considers relevant

Additional initiatives relevant to the risks of modern slavery practices in AHL's operations and supply chains, include:

- **People:** Ongoing training and awareness on the risks of modern slavery practices.
- **Process:** Participation in industry working groups (e.g. membership with the Australian Packaging Covenant Organisation (APCO) and the Australian Industry Group (Ai Group)); Engagement with suppliers; Engagement with customers (including completing Modern Slavery questionnaires requested by AHL's customers); and Improved grievance and remediation processes to manage allegations or actual incidents of modern slavery. *(As at the date of this Statement, no reports of modern slavery have been received).*
- **Technology:** Investment in technology to support system-generated supplier data.



