

Modern Slavery Statement - FY2021-2022

1. Introduction

This is the Modern Slavery Statement for Architectural Window Systems Pty. Limited ACN 067 950 903 ("AWS," "we," "our"). It is prepared in accordance with the criteria set out in the *Modern Slavery Act 2018* (Cth) ("Act") and relates to our activities between 31 December 2020 and 30 June 2021.

This is our first Modern Slavery Statement and sets the foundation of our intention and actions to identify risks within our supply chain in order to develop policies to meeting the requirements of the Act.

2. Operations and supply chain

AWS is a privately owned Australian company founded in 1995. We are one of Australia's leading suppliers of aluminium window and door systems for the residential and commercial building industry. Our organisation designs, tests, finishes, and supplies the components that make up aluminium window and door systems. These components are supplied to a nationwide network of fully trained, equipped, and licensed manufacturers.

We have offices and distribution locations in five states across Australia and factory locations in Queensland and Victoria. AWS employs approximately 316 employees and generates in excess of \$100 million in revenue annually.

AWS sources materials and products from a national and international network of key suppliers. Our current international suppliers are located in New Zealand, Belgium, and Italy.

3. Risks of modern slavery practises within our operation and supply chain

We recognise that Australia is not immune from modern slavery and that we play an important role in protecting and promoting human rights and dignity. We have a zero-tolerance approach to modern slavery in our operations and supply chain and are committed to at all times acting in an ethical and transparent manner.

AWS understands that there is an elevated risk of modern slavery within its international supply chain due to poor visibility over those international supply chains. Starting in the near future, AWS intends on conducting periodic reviews of our contractors and suppliers, both domestically and abroad.



To date, we have not been made aware of any modern slavery activities within our supply chain, but if any concerns are identified, they will be acted upon immediately.

4. Actions taken to address modern slavery risks

In preparing our first modern slavery statement, AWS has identified several actions it must undertake to continue to mitigate the risk of modern slavery in our operations and supply chain, as well as to protect and promote human rights.

During the 2022-2023 financial year, AWS will begin developing and implementing formal policies and procedures to specifically address modern slavery risks, including:

- an internal modern slavery policy;
- an upstream supplier questionnaire;
- a whistleblowing policy;
- · a code of conduct; and
- a workplace safety policy.

With regard to our employees, we uphold high standards and comply fully with relevant employment laws. All employees, whether they be newly recruited or long term, are provided with training on workplace practices and behaviours. We will undertake a review of our training program in relation to the risks of Modern Slavery with a view to raising general awareness and a greater understanding of this topic.

We also intend to review our supplier agreements and consider the inclusion of provisions to ensure that goods supplied to AWS have not been sourced or produced using modern slavery.

Once these measures have been fully implemented, we expect that all our suppliers will comply with such measures. We are committed to working with each of our suppliers to ensure they fully understand their obligations and are compliant with all of our policies.

Our framework to identify modern slavery risks will be reviewed annually to assess its effectiveness in evaluating the risk of modern slavery throughout our operations and to address any areas of concern.

5. Continuous improvement and our ongoing commitment

AWS understands the importance of continuous improvement to ensure our commitment to combatting modern slavery is upheld. We are committed to combatting modern slavery through continuous review and improvement of our systems and processes.



Effectiveness of the actions taken above will be assessed through internal review and periodic internal audits. Measurements will include the completion and implementation of the policies and procedures stated above.

In line with the obligations under the Act, AWS will produce an annual statement highlighting any modern slavery risks as identified in our operations or supply chain and summarising the measures we have taken to mitigate those risks during the relevant period.

This modern slavery statement has been approved and endorsed by the board of directors of AWS.

Daniel Black

General Manager

Architectural Window Systems Pty. Limited

Date: 30/8/2022