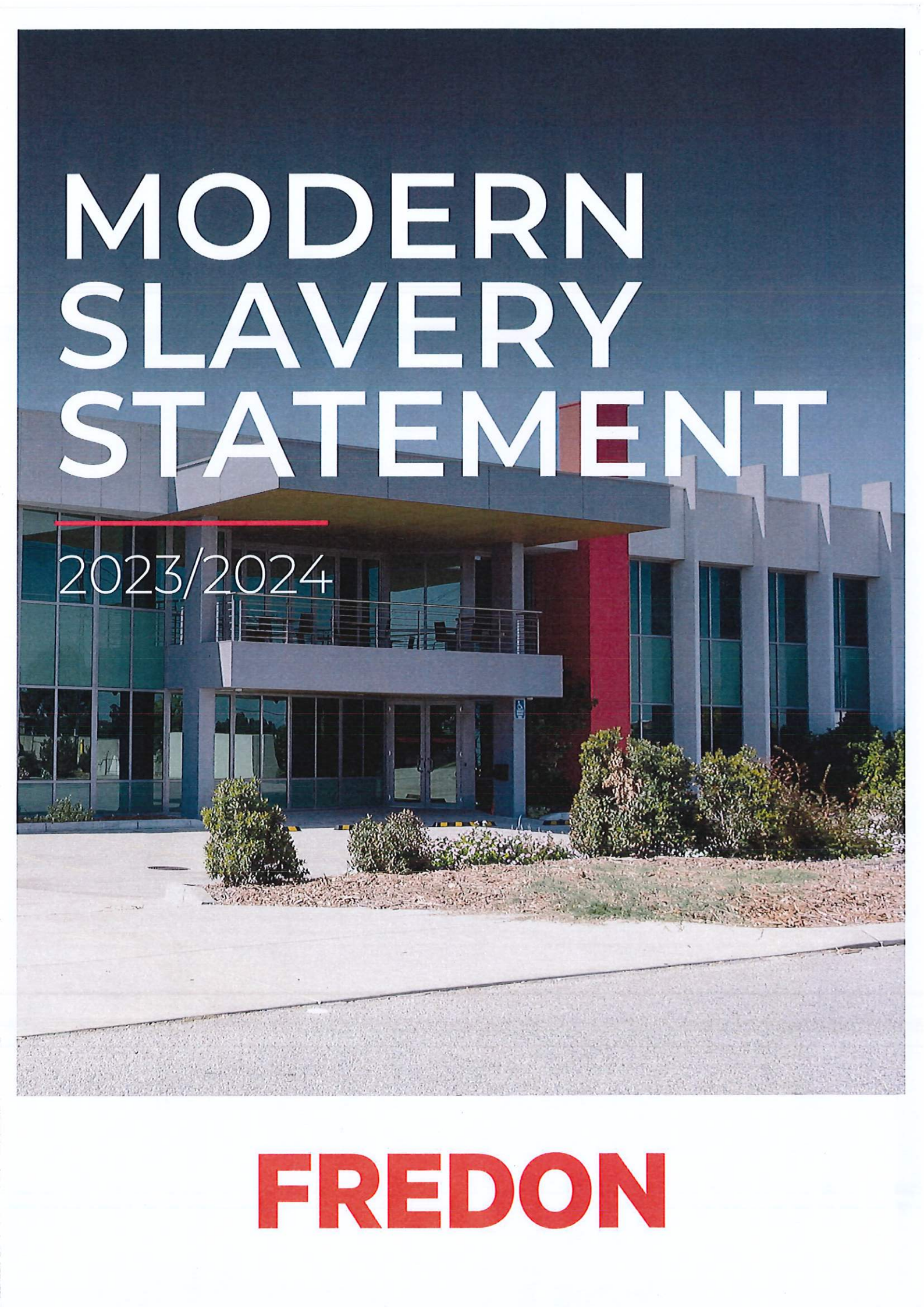


MODERN SLAVERY STATEMENT

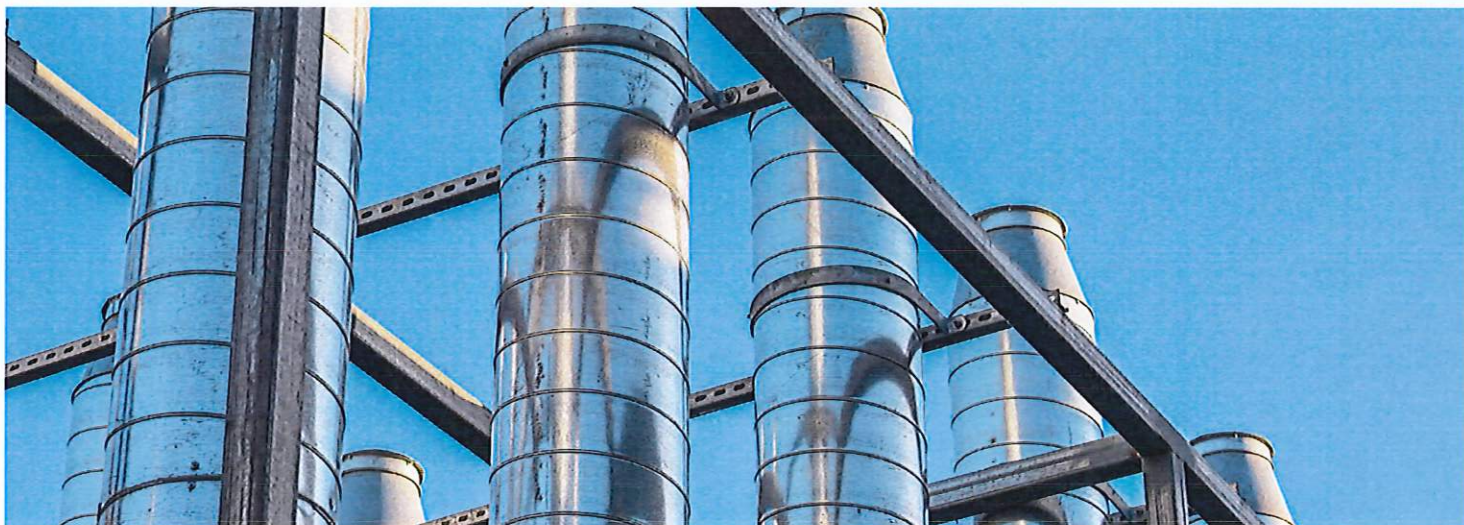


2023/2024

FREDON

TABLE OF CONTENTS

- 01 ABOUT THIS STATEMENT
- 02 CEO MESSAGE
- 03 WHO WE ARE
- 04 OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN
- 05 MODERN SLAVERY RISK IN OUR OPERATIONS AND SUPPLY CHAIN



- 06 ACTIONS WE HAVE TAKEN TO ADDRESS MODERN SLAVERY RISK
- 07 ASSESSING THE EFFECTIVENESS OF OUR ACTIONS
- 08 REMEDIATION PROCESS
- 09 CONSULTATION PROCESS & APPROVAL



01

ABOUT THIS STATEMENT

Fredon Industries Pty Ltd (ABN: 12-003-361-297), submits this statement pursuant to the Australian Modern Slavery Act 2018 on behalf of all Fredon entities. References to "we", "us", "Fredon" or "the Company" are references to any of the Fredon entities.

02

CEO MESSAGE



Scott Olsen, Chief Executive Officer

At Fredon, we firmly believe that the fight against modern slavery is not just a responsibility, but a moral imperative. We are dedicated to upholding the highest ethical standards in our operations and throughout our supply chain.

Modern Slavery is a grave and deeply concerning issue that continues to persist in many corners of the world. It is an affront to our minds.

As the CEO of Fredon, I recognise that Modern Slavery is a complex problem that demands a multifaceted response.

Our commitment is enriched in our fundamental belief that every individual, regardless of their background or circumstances, deserves to live a life free from exploitation and coercion.

We recognise that over time working with our suppliers, will provide us with a deeper understanding of their commitment to modern slavery practices and adherence to our business requirements.

Sincerely,



Scott Olsen

Chief Executive Officer

12/12/2024

WHO WE ARE

Fredon Group is a leading provider of Electrical & Communications, HVAC (Heating/Ventilation/Air Conditioning), Security, Technology Services and Services and Maintenance.

- Engineering/design
- Delivery of large construction projects
- Client services/special projects
- Technology and security integration
- Scheduled preventative maintenance
- Building services integration and off-site prefabrication
- Industrial and Infrastructure projects



1968

Established



Privately

Owned



1500+

Staff



\$708M

Turnover

We provide services to a wide range of clients in sectors including commercial, government, defence, health and aged care, industrial, mining and resources, infrastructure and education. Our track record of major projects, innovation and numerous industry awards demonstrates that we offer industry leading project management and technical expertise.

Fredon is 100% Australian owned and operated and has delivery capabilities Australia wide and in New Zealand.

Our core capabilities include a wide range of services that can be delivered on a design & construct, construct only or full turn-key basis to cover the facilities lifecycle.

We have upheld an enviable reputation, boasting high-quality workmanship, value for money, outstanding safety performance and outstanding client satisfaction. Our WHS, Quality Assurance, Procurement and Project Management systems have been developed to ensure scalability to the highest standards and most complex requirements.

Our parent company, Fredon Industries Pty Ltd has 17 reporting entities.

OFFICE LOCATIONS

FREDON HAS 9 OFFICES ACROSS AUSTRALIA AND 1 IN NEW ZEALAND



- NSW**
SILVERWATER (HEAD OFFICE)
- VIC**
FAIRFIELD
HEATHERTON
FOOTSCRAY
- WA**
BAYSWATER
- ACT**
FYSHWICK
- QLD**
UNDERWOOD
BRISBANE CBD
- SA**
TORRENSVILLE
- NEW ZEALAND**
AUCKLAND

VALUES

We promote the following values across our business and encourage our employee to conduct themselves in alignment with our values.



Excellence

In design, delivery & service



Innovation

Through design, education & sustainability



Integrity

In everything we do



People

Empowered to perform

OUR STRUCTURE

OPERATIONS & SUPPLY CHAIN

ENTITIES

Fredon Group covers 3 brands and 17 entities:

- Fredon Industries Pty Ltd (Parent Company)
- Fredon Infrastructure Pty Ltd
- Fredon (VIC) Electrical Pty Ltd
- Fredon (WA) Electrical Pty Ltd
- Fredon QLD Pty Ltd
- Fredon ACT Pty Ltd
- Fredon AIR Pty Ltd
- Fredon AIR (NSW) Pty Ltd
- Fredon AIR (VIC) Pty Ltd
- Fredon AIR (WA) Pty Ltd
- Fredon AIR Service Pty Ltd
- Fredon Technology Pty Ltd
- Fredon Technology (VIC) Pty Ltd
- Aserve Victoria Pty Ltd
- Aserve Technology (VIC) Pty Ltd
- Sturdie Trade Services Pty Ltd
- Aserve QLD Pty Ltd

MAIN OPERATIONS

Fredon has over 1,500 employees nationally, with our operations covering:

- Providing electrical and HVAC contracting solutions to the construction industry
- Providing servicing and maintenance of electrical, HVAC and AV assets
- Supporting Services (Finance, IT, HR, HSEQ, Procurement, Marketing, Commercial)
- Providing electrical contracting solutions for infrastructure projects
- Providing AV and security contracting solutions
- Providing customised and preventative maintenance
- Providing electrical contracting for minor construction and fit outs
- Providing AV contracting solutions for service, maintenance and fit outs

SUPPLY CHAIN

Our supply chain incorporates:

- Electrical equipment and materials for installation, service and maintenance work
- Office consumables
- Technology (hardware and software)
- Labour hire and subcontractors who perform work for us on projects
- Uniforms and PPE attire
- Recruitment agencies
- HVAC, AV and security equipment and materials for installation, service and maintenance work
- Installations, service and maintenance work



05

MODERN SLAVERY RISK

IN OUR OPERATIONS AND SUPPLY CHAIN

During the 2023 – 2024 financial year our total supplier and subcontractor spend was \$439m with the majority of our procurement with suppliers nationally. In addition to this we have 2,400+ suppliers and subcontractors as part of our supply chain.

Our supply chain sources supply globally. We acknowledge that the geographical locations of certain suppliers within this chain could potentially amplify the risk of Modern Slavery. We recognise that some of our suppliers procure from China which results in a heightened likelihood of Modern Slavery associated production risks however, as only 0.1% of our procurement spend is with overseas organisations, we can consider the risk of poor modern slavery practices to be low.

At Fredon our centralised procurement team manage and coordinate all materials, products and supplies to ensure that all suppliers work within our policies and procedures including Modern Slavery.

Our supplier and subcontractor contract agreements include a specific clause requiring them to comply with all Australian legislation including Modern Slavery.

ADDRESS MODERN SLAVERY RISK

OUR POLICIES AND PROCEDURES

Fredon does not tolerate slavery, human trafficking, forced child labour or child exploitation. We have several policies and procedures that demonstrate our approach to identifying and addressing modern slavery risk in our operations. We are constantly reviewing our policies and procedures to ensure alignment to legislative requirements. These include:

1. SPEAK UP POLICY (WHISTLE-BLOWER)

Our Speak Up Policy outlines the importance of ethical behaviour and conduct. It informs our employees on the procedure they may undertake to report suspected unethical, illegal, fraudulent or undesirable conduct under the protection and support of Fredon. We have engaged an external, third-party reporting service for reporting purposes. Our Employees can contact them 24 hours a day / 7 days a week.

2. SUPPLIER & SUBCONTRACTOR CODE OF CONDUCT

Our Supplier and Subcontractor Code of Conduct outlines our expectations that our suppliers and subcontractors must make good ethical decisions. We expect our suppliers and subcontractors to operate in compliant with relevant laws, regulations and have a working environment that is free of prejudice. Our suppliers and subcontractors are required to sign a declaration of compliance in agreeance to our Supplier and Subcontractor Code of Conduct.

3. CODE OF CONDUCT

Our Code of Conduct defines Fredon's expectations in relation to behaviour and conduct within the workplace. This policy applies to all employees who performs work for or with Fredon including, full-time, part-time and casual employees, directors, apprentices' employees via a registered training organisation and contractors e.g., consultants.

4. WORKPLACE GRIEVANCE POLICY

Fredon endeavours to provide an inclusive, safe and fair working environment for all employees, ensuring that employees have access to a process that supports resolution as promptly and effectively as possible. Our Workplace Grievance Policy aims to provide guidance to our employees on the process of workplace grievance. We use this policy to aim to achieve equality, fairness and consistency in our approach when handling workplace grievances.

5. WORKPLACE ANTI-BULLYING AND ANTI-HARASSMENT POLICY

Fredon have a zero-tolerance approach to workplace bullying and harassment. We are committed to taking all reasonable steps to prevent inappropriate or illegal working behaviour. Our Workplace Anti-bullying and Anti-Harassment Policy encourages and supports positive workplace behaviours that aim to ensure Fredon's workplaces are free from any forms of workplace bullying, harassment or violence and promote an environment of mutual respect, personal dignity and support.

6. MODERN SLAVERY (ANTI-SLAVERY AND ANTI-HUMAN TRAFFICKING) POLICY

Modern Slavery (Anti-Slavery and Anti-Human Trafficking) Policy and our Modern Slavery (Anti-Slavery and Anti- Human Trafficking) policy demonstrates Fredon's commitment to ensuring we meet our obligations and remain compliant with the Modern Slavery Act 2018 (Cth).

EXTERNAL THIRD-PARTY REPORTING SERVICE

As mentioned above, we engage a third-party provider to provide Fredon employees with an external reporting service. This service is available 24 hours, 7 days a week. It seeks to prioritise confidentiality and allows reports to be made anonymously.

NEW SUPPLIER AND SUBCONTRACTOR ONBOARDING FORM

New Supplier and Subcontractors are required to complete onboarding documentation via a portal which includes agreeing to adhere to our Supplier Code of Conduct and declare their compliance with all Australian legislation including Modern Slavery.

EXISTING SUBCONTRACTORS

All subcontractors are required to submit a Statutory Declaration on a monthly basis, declaring adherence to state and federal legislation which encapsulates the Modern Slavery Act,





07 ASSESSING THE

EFFECTIVENESS OF OUR ACTIONS

- We are constantly reviewing our internal processes, procedures and policies to assist in mitigating any risks related to modern slavery within our operations.
- We will continue to conduct informal audits on randomly selected suppliers.
- We will continue to evaluate and develop our procurement process and contract documentation to support the modern slavery requirements
- We will report any deficiencies and implement a correction action plan for continuous improvement
- We will continue to engage with and educate our management team and new managers on modern slavery reporting and compliance with the Act.

REMEDIATION PROCESS

In cases where risk is detected within our supply chain, we will report the matter to relevant authorities and collaborate with the supplier to create a corrective action plan with a mutually agreed timeline.

CONSULTATION PROCESS & APPROVAL

This statement was prepared by Fredon's Human Resources Team in consultation with our Executive Team, Commercial, Procurement and Health, Safety, Environment and Quality teams who actively participate in overseeing the process and tools that formulate our risk management approach.

This statement has been approved by the Fredon Board and signed by Scott Olsen, Chief Executive Officer on behalf of the board on 12 December 2024.

Scott Olsen

Chief Executive Office

