

## FY20 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), BRB Modular 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) and sets out the actions taken by Fleetwood for the financial year ending 30 June 2020.

### About Fleetwood

Fleetwood was established in 1964 and has become an industry leader in each of its markets: Building Solutions, Accommodation 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 Accommodation 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 Building Solutions Pty Ltd (ACN 009 306 950)  
BRB Modular Pty Ltd (ACN 114 678 349)  
Modular Building Systems 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 office is located in 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 2020, Fleetwood had approximately 635 employees, 958 contractors and 10 casuals engaged on an as needs basis.

For further information about Fleetwood, please refer to [fleetwoodlimited.com.au](http://fleetwoodlimited.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, Accommodation 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 FY20, Fleetwood engaged with over 3,400 first tier suppliers that were mostly based in Australia. Approximately 95% of Fleetwood's procurement spend was from within Australia. The statistics illustrate that Fleetwood engages largely with suppliers that are local and Australian based.

## **Assessing Risks of Modern Slavery**

Fleetwood has undertaken high level due diligence on its FY20 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, we consider the risk of modern slavery in our first tier which is predominantly in Australia, to be relatively low however, 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 Index<sup>1</sup>. 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.

If any suppliers are unable to satisfy Fleetwood's on-boarding requirements and demonstrate they have appropriate risk management 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

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

slavery and whistleblower matters. The Risk Committee is chaired by an independent non-executive director and meets at least four times a year.

In FY20, Fleetwood adopted a formal whistleblower policy and 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 Whistleblower Policy for further information).

#### *Contract Review*

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

In FY20, Fleetwood's precedent and standard form contracts were updated to reflect market standard provisions to address compliance with Australia's modern slavery regime. Specifically, Fleetwood's contracts include warranties that counterparties comply with modern slavery laws and also that they are not engaged in, or will engage in, any conduct that would comprise a modern slavery offence.

#### *Education and Training*

In FY20, we provided educational materials to the Fleetwood Board and provided training to senior managers in each business division to ensure they had a high level understanding of what modern slavery encompasses and the potential risks of modern slavery in Fleetwood's supply chains and business.

### **Effectiveness of Actions Taken**

Fleetwood plans to measure its effectiveness by focussing on employee training and the level of engagement with, and subsequent responses received from, our suppliers. Fleetwood will 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**

In FY21 and beyond, Fleetwood plans to take the following steps to combat any modern slavery in our operations and supply chain:

- Modern slavery working group – form a working group represented by a cross-section of Fleetwood's senior management to implement Fleetwood's further commitments.
- Supplier due diligence – engage with suppliers to gain a deeper knowledge of Fleetwood's supply chain risks as part of a more detailed due diligence process. If after initial engagement Fleetwood considers the risk of modern slavery is medium to high in accordance with the Global Modern Slavery Index, Fleetwood's engagement will include a questionnaire to specifically address modern slavery.
- Supplier on-boarding – implement a questionnaire to specifically address modern slavery in our standardised on-boarding process to mitigate early against the risk of engaging with suppliers who may have second or third tier suppliers located in countries that have been identified as potentially presenting a higher risk of modern slavery.
- Policy review – review current policies and procedures to ensure risk management of modern slavery is appropriately covered within Fleetwood's corporate governance framework.

- Employee training – introduce training for all staff, to help ensure that modern slavery is targeted more effectively and persistently.

## **Consultation**

Fleetwood Limited has consulted with each of the Building Solutions, Accommodation Solutions and RV Solutions divisions, each of which are operated by wholly-owned subsidiaries to develop this Modern Slavery Statement.

Fleetwood intends to increase its consultation between each of its subsidiaries in future years to better understand the differing risks of modern slavery across its operations. To achieve this, a representative from each business division will be appointed to Fleetwood's modern slavery working group.

## **Approval**

Fleetwood makes this Modern Slavery Statement in accordance with section 14 of the *Modern Slavery Act 2018* (Cth) and constitutes Fleetwood's Modern Slavery Statement for its financial year ended 30 June 2020.

This Modern Slavery Statement was approved by the Board of Fleetwood Limited and the Board of BRB Modular Pty Ltd on 24 March 2021.



**John Klepec**  
Chair of the Board  
Fleetwood Limited



**Andrew Wackett**  
Director  
BRB Modular Pty Ltd