

ASSA ABLOY Australia

Modern Slavery Statement

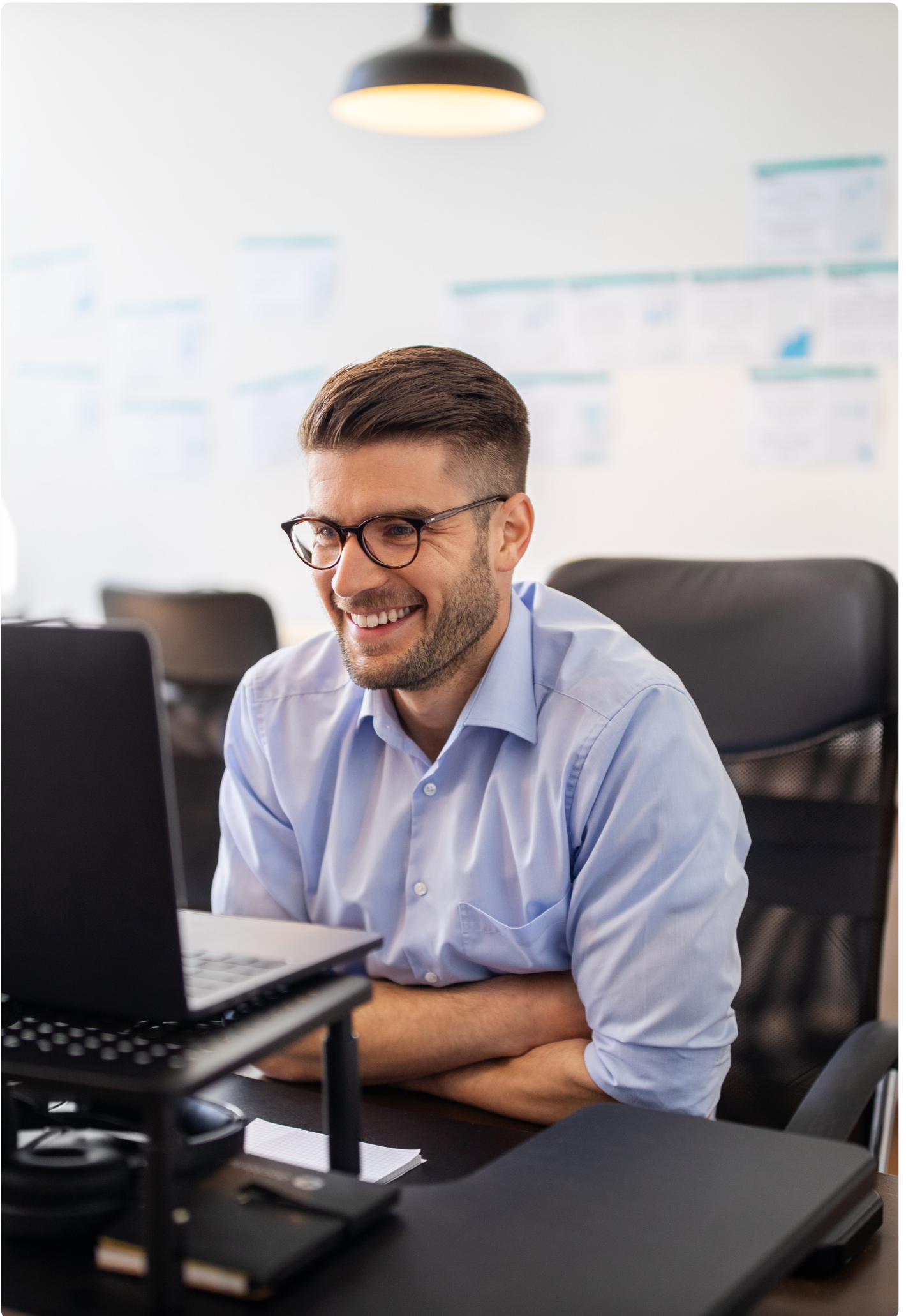
for the reporting period

1 January 2025 to 31 December 2025



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1. Introduction

This modern slavery statement is made to comply with the requirements of the Modern Slavery Act 2018 (Cth) (**'the Act'**).

Note that all monetary amounts referenced in this statement are in Australian Dollars unless otherwise specified and rounded up to the nearest million.

Reporting Entities

This modern slavery statement is a joint statement made by ASSA ABLOY Australia Pacific Pty Ltd (**'AAP'**) on behalf of itself and the ASSA ABLOY Australia group companies listed in the Schedule to this statement.

2. ASSA ABLOY Australia Group Structure, Operations and Supply Chain

2.1 Structure

AAP is the parent company of all companies in Schedule 1 (together **'ASSA ABLOY Australia Group'**, **'AAP'**, **'Us'**, **"We"** and **"Our"**). In turn, AAP is owned by a Swedish parent company, ASSA ABLOY AB, which is traded on the Swedish Stock Exchange and is responsible for ASSA ABLOY group management and group-wide functions.

2.2 Operations

ASSA ABLOY has been operating in Australia in one form or another for over **26 years**.

AAP operates 16 subsidiaries and consolidates into the ultimate parent entity ASSA ABLOY AB.

The AAP value chain is quite complex as the majority of the **16 subsidiaries** operate very different business models within the **4 divisions**, client bases and product families to derive their value.

26

Years

16

Subsidiaries

1,393

persons

The 4 divisions operating in Australia have revenue streams as follows:

Opening Solutions

Door openings and access solutions for homes, businesses and institutions. Our offering includes doors, door and window hardware, mechanical and smart locks, access control and service.

HID

Identification of people, places of things. Common products include ID cards, payment verification and passports.

Entrance Systems

Products and service relating to the safe and efficient flow of good and people for pedestrian access and industrial doors.

Global Solutions

Secure access solutions for accommodation and critical infrastructure.

As at the end of 2025, AAAG employs 1,393 persons. Collectively, AAAG operates numerous manufacturing facilities, as well as sales, service, research and development and administration offices throughout Australia.

2.3 Supply chain

AAAG at the end of 2025 had

4,260

suppliers

In the reporting period, AAAG spent approximately

\$356

million

with its supply chain, with a total import spent of just over

\$166

million



Below is a list of the countries where we incurred the highest levels of spend with suppliers (intragroup and external) during the 2025 reporting period, based on the location of the invoicing supplier:

- | | |
|--------------------|------------------|
| 1. China – \$48m | 4. Macao – \$8m |
| 2. Finland – \$14m | 5. Sweden – \$8m |
| 3. Austria – \$12m | |

We also import products and parts from ASSA ABLOY intragroup companies. Our top 5 internal import are from countries including China, Finland, Sweden, Great Britain, and New Zealand.

The categories supplied from these countries include raw materials, components, finished goods and services. The types of business relationships AAAG has with external suppliers range from one time or short-term engagements to long-term relationships.

3. Risks of Modern Slavery Practices in our Operations and Supply Chains

3.1 Operations

All AAAG entities operate in Australia and are engaged in low-risk activities for modern slavery.

Nevertheless, we recognise that it is important that we continue to be vigilant in this area, particularly where common modern slavery risk assessment tools or methods indicate we are engaged in certain activities in relation to which there is considered to be a higher 'inherent' risk rating (i.e. a higher potential for risk before any controls, mitigations, or safety measures applied in practice are considered).

For example, common modern slavery risk assessment methods would suggest our substantial manufacturing operations present elevated inherent risks, as manufacturing is commonly recognized as a higher-risk sector from modern slavery perspective. Accordingly, we see this as an ongoing risk focus area that we need to ensure we are appropriately managing.

Additionally, we recognise that the complexity of our group structure and operations has contributed to historical inconsistencies in intra-group management and reporting approaches relevant to this area, impacting our ability to comprehensively identify risk areas.

3.2 Supply chains

Our suppliers operate, produce, and source across a range of sectors. Some of these sectors are considered to be inherently high-risk (such as where they are sectors in relation to which human trafficking or child labour exploitation activities are known to occur (as identified in Global Estimates of Modern Slavery and Child Labour: Global Estimates 2020 Trends and the Road Forward reports published by the ILO and UNICEF).

The below graphics show inherent high-risk sectors of operation, production, and sourcing applicable to our suppliers. The numbers in the following graphics describe how many suppliers are in the corresponding sectors.



Our Suppliers Operate in the following High-risk Sectors

	Accommodation and Food Service Activities 2		Agriculture, Forestry and Fishing 3
	Building Services Contractor 13		Cleaning 1
	Construction 103		Domestic Work 6
	Labour Hire 4		Maintenance and Repair of Motor Vehicles 7
	Manufacturing 175		Mining and Quarrying 5
	Personal Services 3		Retail 26
	Security Services 5		Transportation and Storage 35
	Wholesale 48		

Our Suppliers Produce Goods and Provide Services in the following High-risk Sectors

	Accommodation and Food Service Activities 17		Agriculture, Forestries and Fishing 14
	Building Services Contractor 19		Cleaning 4
	Construction 87		Domestic Work 6
	Labour Hire 5		Maintenance and Repair of Motor Vehicles 12
	Manufacturing 161		Mining and Quarrying 19
	Personal Services 5		Retail 25
	Security Services 4		Transportation and Storage 28
	Wholesale 42		

Our Suppliers Source Goods and Services from the following High-risk Sectors



Accommodation and Food Service Activities

10



Agriculture, Forestry and Fishing

2



Building Services Contractor

11



Cleaning

13



Construction

70



Domestic Work

4



Labour Hire

8



Maintenance and Repair of Motor Vehicles

12



Manufacturing

182



Mining and Quarrying

6



Personal Services

1



Retail

25



Security Services

5



Transportation and Storage

35

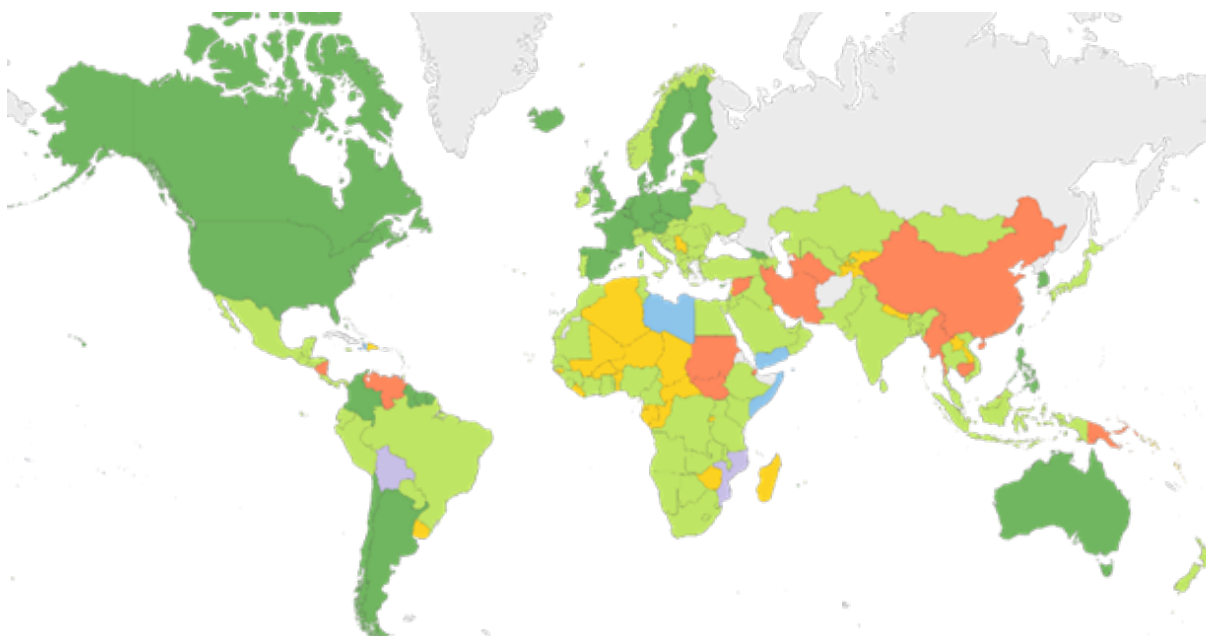


Wholesale

50

Our Suppliers Operate in the following countries

Some countries or regions where our suppliers operate can be described as inherently high-risk due to the fact those countries are considered to be associated with a greater prevalence of links to human trafficking than other countries. The geographical regions where our supply chain partners operate are shown in the map below (all countries other than those shaded grey). Those geographies are then overlaid with the colour tier system of the Trafficking in Persons Report. Please note that the below map reflects our suppliers' broader operations where they have workers or agents.



Tier 1

Countries and regions whose governments, at the date of this assessment, fully meet the TVPA's minimum standards.

Tier 2 Watch List

Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, and as the (increasing) number of victims is significant without proportional action, and / no evidence of increased efforts to combat trafficking has been provided.

Tier Special Case

Due to civil conflict and humanitarian crises, gaining information is difficult and a tier has not been assigned.

Tier 2

Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, but are making significant efforts to meet those standards.

Tier 3

Countries and regions whose governments do not, at the date of this assessment, fully meet the minimum standards and are not yet making significant efforts to do so.

Uncategorised

At the date of this assessment, insufficient information is available about these countries or regions and a tier has not been assigned.

4. Actions taken to assess and address those risks, including due diligence and remediation processes

Assessment of relevant risks

AAAG uses a third-party tool, the iPRO Modern Slavery Assessment Tool (MSAT) to assess modern slavery risks in our operations and supply chain. The risks identified in the previous section were all identified utilising this assessment tool. We engaged iPRO during the reporting period to conduct the assessments on our operations, and a bulk assessment of 801 of our suppliers. We intend to carry this process forward as an annual assessment of our operations and supply chain.

In relation to risk related to our supply chain:

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned one of the following risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the MSAT.

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

Note that the above process was completed both for key existing suppliers and key new suppliers onboarded over recent periods.

In relation to the Tier 3 countries depicted in the map above other than China, these relate to only two of our suppliers. Neither of those suppliers manufactures high-risk goods or sources from high-risk countries (based on modern slavery high risk factors).



In relation to risk related to lack of understanding of internal operations of related entities:

We requested all our AAAG entities to complete a self-assessment using the same iPRO MSAT process mentioned above to understand and evaluate risks inherent in our internal operations as well as policy and organizational measures to mitigate the risks, and to then determine a risk category and risk score for our operations.



Addressing relevant risks

Suppliers that completed the self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment.

Action items were also aggregated, giving AAAG a focused view of the most impactful actions that could be taken by suppliers across the supply chain.

In addition, we rolled out AAAG 2025 modern slavery risk mitigation plan below which addresses our potential risks in relation to supply chain as well as our internal operations:

1. Identify the top 90% spend major suppliers and high-risk suppliers based on location and section
2. Request the above suppliers to complete the MSAT process
3. Require new suppliers that are medium to high risk to complete the MSAT process
4. Reach out to applicable key suppliers to commit to compliance with our Business Partner Code of Conduct, which outlines essential requirements for sustainable, legally compliant, and fair business practices. This includes ethics, human rights and labour standards, environmental considerations, and health and safety measures.
5. Follow up on non-respondent suppliers to participate in the process.
6. Reach out to high-risk suppliers to further discuss appropriate action items to address the risks identified through the assessment, including ensuring they have the right policies and procedures in place to mitigate inherent risks in their business.
7. Requiring AAAG entities to publish our Modern Slavery Policy on corporate website and educate employees.

Finally, we have worked on improving Sustainability Audits on key suppliers.

AAAG continues to conduct Sustainability Audits in relation to key suppliers in developing countries. This type of audit includes a focus on Workers' Rights and Modern Slavery. If any audited suppliers do not meet our expectations in this area, we may cease trading with them or, if there is an appropriate opportunity to use our relationship to push for positive change, we may give them a remedy period to enhance their operations in a way that aligns with our requirements – failing which trade would be ceased.

Where our audit processes indicate close monitoring is appropriate, we seek to repeat these audits every half year. This ensures we can identify and respond to risks in a timely manner.

5. KPIs used to assess the effectiveness of the actions taken in relation to the risks of modern slavery practices in its operations and supply chains.



We utilise the benchmarking and KPIs in MSAT process to assess the effectiveness of our actions.

The main KPIs we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process.

As noted earlier in this statement, each organisation who completed the MSAT process was assessed and given 2 risk scores:

- Inherent Risk Score
- Unmitigated Risk Score

The Inherent Risk Score measures modern slavery risks that are intrinsic/built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The Unmitigated Risk Score measures the organisations risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.

Supply chain:

- AAAG is provided an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level. The higher the Risk Score is, the higher the risk. In other words, for our Supply Chain Risk Scores, we are at the lower end of the risk scale.

Aggregated Supply Chain Risk Scores	
Inherent Risk Score	35.71 / 100
Unmitigated Risk Score	33.22 / 100

Internal operations:

- As we have completed MSAT assessment for our own internal operations this year, we now have a benchmark on our internal operations risk score for each AAAG entity.

We aim to use the Unmitigated Risk Score for each entity as our internal operations KPIs. As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score by introducing relevant policies and procedures.

The other KPI we use is the supplier iPRO completion rate:

We use this to measure the effectiveness of our engagement with suppliers and will continue to encourage participation in our assessment programme to better identify and mitigate modern slavery risks in our supply chain.

Supplier Assessment Completions	
Completions	458 / 801
Completion Rate	57.2%

This has improved considerably from last year's 48.6%.

We also measure the effectiveness based on KPIs including:

1. Number of sustainability audits conducted;
2. Percentage of suppliers who have signed or otherwise formally agreed to comply with the ASSA ABLOY Business Partner Code of Conduct; and
3. Number of identified high risk suppliers followed up to mitigate risks

Please see below for details how we performed regarding these 3 KPIs in FY 2025.

1. In FY2025 we conducted 26 sustainability audits, a considerable increase compared to the previous year's 9 audits. This has strengthened our assessment of our suppliers' compliance levels and assisted us to identify what potential issues may need greater focus.
2. In FY2025, we have improved our performance relating to the percentage of suppliers who have signed or otherwise formally agreed to comply with the ASSA ABLOY Business Partner Code of Conduct. For example, for ASSA ABLOY Australia, as of end of 2025, 99% of direct material suppliers and 50% indirect material suppliers have signed our Code of Conduct. Austral Monsoon Building Products have improved their supplier Code of Conduct completion rate from 30% to 60%.
3. Each AAAG entity contacted their top 3-5 high-risk suppliers to conduct follow-up. With our support, four suppliers initially classified as High risk have successfully reduced their risk level to Medium.

6. Consultation with entities owned or controlled by AAAP

The directors of AAAP, as the parent Australian entity for AAAG, led the process of engaging relevant compliance and other personnel to help develop this statement.

We established a Modern Slavery Council in 2024, comprised of senior management from each AAAG entity. The Council has continued to hold regular meetings to consult on our modern slavery action plan and to approve both the final action plan and this Statement.

We also set up the AAAG Modern Slavery Team in 2024, consisting of key personnel from each AAAG entity. The Team continues to meet regularly to review and monitor progress of our annual modern slavery risk mitigation plan.

Therefore, the relevant management personnel were involved in discussion on the Modern Slavery Act requirements, shared perspectives on how we should address these requirements and the necessary information to include in this statement, developed and agreed on our above-mentioned strategic action plan, and agreed the KPIs to assess the effectiveness of our actions in the reporting period and going forward. The management of each entity also approved the contents of this statement.





7. Our Stance on Modern Slavery

ASSA ABLOY has been a signatory to the UN Global Compact since 2008. Our affiliation with the UN Global Compact means that we support and commit to actively promoting and respecting the 10 principles on human rights, labour standards, the environment, and anti-corruption in our operations and in dealings with external stakeholders.

AAAG, as part of ASSA ABLOY, recognises the risk that modern slavery represents in society and condemns any use of modern slavery, as defined in the Act, by any AAAG company or any company in our supply chain.

AAAG complies with all laws and standards that we are required to adhere to in Australia and expects that all AAAG suppliers also comply with the laws and standards in the countries in which they operate.

AAAG continues to reinforce its Modern Slavery Policy and improve related internal and supply chain processes to emphasise the expectations we have in relation to modern slavery for our group companies and suppliers.

AAAG remain committed to applying appropriate practices and policies to ensure it is supporting the ongoing efforts across society and corporate Australia to help abolish modern slavery. AAAG has developed detailed strategic action plan and related KPIs including supplier and AAAG entities' self-assessment, supplier onboarding process including risk assessment, Business Partner Code of Conduct requirement and sustainability audit process to improve our effectiveness to reduce the risk of modern slavery within our business and supply chain.

AAAG will continually review its suppliers for any increased risk and update all relevant supplier agreements and employee manuals as the modern slavery laws evolve.

8. Approval



This statement was approved by the Board of ASSA ABLOY Australia Pacific Pty Ltd on 15th May 2026 and is signed by Simon Ellis who is a director of ASSA ABLOY Australia Pacific Pty Ltd and Executive Vice President and Head of ASSA ABLOY Opening solutions Pacific/North East Asia. This modern slavery statement has been adopted across the ASSA ABLOY Australia Group.

Simon Ellis
Executive Vice President and Head
of ASSA ABLOY Opening solutions
Pacific/North East Asia.

Schedule 1 – ASSA ABLOY Australia Group Companies

Entity	ACN
ActivIdentity (Australia) Pty Ltd	062 955 060
ASSA ABLOY Australia Pacific Pty Limited	095 354 582
ASSA ABLOY Australia Pty Limited	086 451 907
ASSA ABLOY Door Group Australia Pty Limited	004 519 331
ASSA ABLOY Entrance Systems Australia Pty Limited	095 443 486
ASSA ABLOY Entrance Systems Commercial Pty Limited	001 028 691
ASSA ABLOY Entrance Systems Industrial Pty Ltd	601 182 629
ASSA ABLOY Global Solutions Australia Pty Ltd	088 022 548
Austral Monsoon Building Products Pty Ltd	083 857 452
D&D Technologies Pty Ltd	059 412 430
Go Doors Pty Ltd	623 240 906
Lietzke Australia Pty Limited	076 172 051
Placard Pty Ltd	074 646 343
Record Automatic Doors Pty Ltd	601 122 874
Secure Edge Technologies Pty Ltd	103 561 075
SKIDATA Australasia Pty Ltd	164 259 750

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