

FY21 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 2021.

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 2021, Fleetwood had approximately 689 employees, 812 contractors and 2 casuals engaged on an as needs basis.

For further information about Fleetwood, please refer to 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 FY21, Fleetwood engaged with over 3,200 first tier suppliers that were mostly based in Australia. Approximately 96% 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

In FY21, Fleetwood undertook further due diligence on its suppliers (having undertaken high level due diligence in FY20) 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 continue to consider the risk of modern slavery in our first tier, which is predominantly in Australia, to be relatively low. However, we also 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 Index¹. 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

¹ <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 FY21, Fleetwood updated its Code of Conduct. The updated Code of Conduct specifically requires all employees and those we work with to maintain a work environment where human rights are valued. If any human rights violations are reported to or identified by Fleetwood, they will be responded to appropriately (see Fleetwood's Code of Conduct for further information).

Further, Fleetwood's Whistleblower Policy 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).

Modern Slavery Working Group

In FY21, Fleetwood established a Modern Slavery Working Group. The working group is represented by a cross-section of Fleetwood's senior management and employees working in areas of the business with supplier engagement (such as procurement, risk and compliance, legal, company secretariat and human resources functions).

The Modern Slavery Working Group discusses trends in modern slavery reporting, modern slavery supplier questionnaires and opportunities to improve Fleetwood's performance in managing modern slavery in our operations and supply chain. The working group meets on a bi-monthly basis and in FY21, took the following steps to further improve and support Fleetwood's commitment to addressing modern slavery in our operations and supply chain:

- Risk Assessment – During FY21, the working group progressed supplier due diligence by developing an internal risk assessment matrix. The matrix is a working document to assist Fleetwood map its suppliers and assess risk across its businesses and will continue to develop as Fleetwood continues to increase its understanding of the risks of modern slavery practices in its operations and supply chains. The risk assessment has been developed in accordance with best practice and references several key criteria to identify those suppliers at a higher risk of contributing to, or being directly linked to, modern slavery practices, in accordance with the Global Modern Slavery Index.
- Supplier Questionnaire – The working group developed a questionnaire which have progressively been provided to suppliers as part of further due diligence, with a view to incorporating the questionnaire into Fleetwood's standard onboarding documents in FY22. The questionnaire is being provided as part of a phased approach, including by reference to the level of supplier spend and / or Fleetwood's preliminary assessment of whether the risk of modern slavery is medium to high in accordance with the Global Modern Slavery Index. Fleetwood has also begun (and will continue to) analyse the responses being provided to the questionnaires and appropriately implement any next steps required.
- Completion of Questionnaires – In addition to Fleetwood providing its own modern slavery questionnaire, the working group has completed similar questionnaires as received from its contracting entities or as required as part of tendering processes. These questionnaires have allowed the working group to consider points of focus in the industries in which Fleetwood operates and consider the effectiveness of our internal policies and processes.

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.

Fleetwood's precedent and standard form contracts contain 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. The warranties also provide a right of termination in the event that parties engage in or allow conduct which would comprise a modern slavery offence.

Education and Training

In FY21, the Modern Slavery Working Group nominated over 50 employees to undertake modern slavery training via an external online module. The nominated employees were identified as being in the best position to identify any modern slavery practices, with roles related to procurement and supplier engagement. The module includes information regarding what modern slavery encompasses and the relevant laws, how to identify modern slavery risks in our supply chain and business and individual employee responsibilities.

Effectiveness of Actions Taken

Fleetwood plans to measure its effectiveness by focussing on progressing our due diligence and engagement with suppliers, including in light of the responses received to supplier questionnaires.

The establishment of the Modern Slavery Working Group has been a positive and effective mechanism to engage with all areas of the business and develop methods of, and strategies for, identifying and mitigating modern slavery risks in our operations and supply chain. The members of the working group have all made valuable contributions, including in relation to targeting modern slavery risks by reference to particular industries and geographical locations. The Modern Slavery Working Group's composition and collaboration has also resulted in us being able to practically manage incorporating supplier due diligence into our existing procurement and compliance systems.

Fleetwood will continue to 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

Fleetwood acknowledges it takes sustained action to identify and act on modern slavery risks and we are committed to continuous improvement of our modern slavery management activities. Our future aims are to:

- Supplier due diligence – continue to engage with suppliers to gain a deeper knowledge of Fleetwood's supply chain risks, including to continue providing the supplier questionnaire under a phased approach. As part of this process, in FY22, Fleetwood RV Solutions (which has a higher percentage of overseas suppliers than Fleetwood's other businesses), will be progressing its review and assessment of certain overseas suppliers including in relation to compliance with modern slavery laws.
- Supplier on-boarding – incorporate a questionnaire into our standardised on-boarding process for all new suppliers to detect and 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.
- Training – conduct refreshed modern slavery training for procurement and project team personnel to help ensure that modern slavery is targeted more effectively and persistently.

- Remediation – develop remediation guidelines, as necessary.

Consultation

This Modern Slavery Statement has been prepared in consultation with our controlled entities (including the reporting entities) via input and endorsement from the Fleetwood Limited Board, responsible management and members of the Modern Slavery Working Group.

Approval

Fleetwood makes this Modern Slavery Statement in accordance with the *Modern Slavery Act 2018* (Cth) and constitutes Fleetwood's Modern Slavery Statement for its financial year ended 30 June 2021.

This Modern Slavery Statement was approved by the Board of Fleetwood Limited on 16 December 2021.



John Klepec
Chair of the Board
Fleetwood Limited



Bruce Nicholson
CEO
Fleetwood Limited