



MODERN SLAVERY STATEMENT-2025

This statement covers Stowe Australia Pty Ltd ABN 27 002 556 603 and its related entities for reporting on the performance of our management systems and initiatives to control the risk of Modern Slavery Practices within our business operations and extended supply chain.

For the Reporting Period: 01 July 2024 – 30 June 2025



Introduction

This is the Stowe Australia Pty Ltd *Modern Slavery Statement* ("Statement") as required by the Modern Slavery Act (Cth) 2018. This Statement outlines the approach taken by Stowe Australia (Stowe) and its' related entities to eliminate risks of modern slavery within our operations including but not limited to our suppliers and subcontractors and throughout the extended supply chain.

Modern slavery and worker exploitation may assume various forms including slavery, servitude, forced labour, debt bondage, child labour, human trafficking, and exploitative employment arrangements and conditions.

Stowe values and promotes responsible corporate citizenship, and shall work with our supply chain partners to maintain the highest ethical standards throughout our operations at all times.



Our business

Stowe Australia is a private corporation that operates within the States and Territories of the Commonwealth of Australia, with a long history dating back 1910.

Today, Stowe is recognised as the leading privately-owned electrical and communications contractor with over 2000 staff and 13 branch locations throughout Australia.

Stowe Australia provides electrical and communications installations, engineering services, reactive and preventative maintenance solutions for our clients within the commercial constructions, facilities management, high voltage infrastructure & utilities, and government sectors amongst others.

We monitor a range of indicators to assess compliance with our business management systems within our operations including amongst others, corporate citizenship programs, statutory compliance obligations, and financial position. We report on progress and performance in our company's Business Management System. Please refer to the company's website at <https://www.stoweaustralia.com.au/> for further details regarding Stowe Australia's structure and operations.

Our structure, operations, and supply chain

For the purposes of this statement, our key business entities and associated operations and supply chains are as follows:



Entity	Operations	Supply Chain
 <p>STOWE AUSTRALIA SINCE 1910</p> <p>ABN: 27 002 556 603</p>	<p>Electrical & data communications contracting and engineering design services including:</p> <ul style="list-style-type: none"> • Large & medium scale commercial, high voltage infrastructure & utilities, and Federal & State government funded construction projects; • Electrical & data communications engineering & design services; • Mobile service & facilities maintenance services; • Energy management services; • Corporate governance & accreditation; • Information technology business support & data security; • Finance & accounts administration; • Human Resources & Payroll. 	<ul style="list-style-type: none"> • Electric cable manufacturers • Switchboard suppliers • Electrical equipment wholesalers • Trades consumable materials & hardware suppliers • Tools, plant & equipment suppliers • Specialist subcontractors; • Logistics contractors • Motor dealers • WHS service providers • Training providers & RTO's • Waste contractors • Security contractors • Cleaning contractors • Stationary & office equipment wholesalers • Uniform & personal protective equipment suppliers • Equipment hire suppliers • Information technology equipment & service providers • Corporate travel & accommodation services
 <p>Elonara</p> <p>ABN: 75 630 632 450</p>	<p>Electrical & data communications contracting and engineering design services including:</p> <ul style="list-style-type: none"> • Small & medium scale commercial & residential projects; • Mobile service & facilities maintenance services; • Small to medium commercial fit-out projects; • Corporate governance & accreditation; • Information technology business support & data security; • Finance & accounts administration; • Human Resources & Payroll. 	<ul style="list-style-type: none"> • Electric cable manufacturers • Switchboard suppliers • Electrical equipment wholesalers • Trades consumable materials & hardware suppliers • Tools, plant & equipment suppliers • Specialist subcontractors • Logistics contractors • Motor dealers • WHS service providers • Training providers & RTO's • Waste contractors • Security contractors • Cleaning contractors • Stationary & office equipment wholesalers • Uniform & personal protective equipment suppliers • Equipment hire suppliers • Information technology equipment & service providers • Corporate travel & accommodation services

Stowe Australia's supply chains encompass a wide range of goods and services required to support our operations, including electrical products, equipment, subcontracted specialist services, and professional services. These inputs to our business can originate locally or overseas with direct purchases from overseas being extremely rare (a local wholesaler is the usual channel for products coming from overseas).

Our supply chains range from large multinational organisations to smaller local businesses, reflecting the complexity and breadth of the industry in which we operate. We recognise that the nature of our supply



chains may expose us to risks of modern slavery, particularly in the procurement of overseas products, and we are committed to working with our suppliers to promote transparency, ethical practices, and continuous improvement in managing these risks.

Our suppliers operate in the following sectors:

- Accommodation and Food Service Activities
- Administration and Support Services
- Building services contractor
- Construction
- Domestic work
- Education
- Electricity, Gas, Steam and A/C supply
- Finance and Insurance
- Government administration, Defence and Social Security
- Information and Communication
- Labour hire
- Maintenance and Repair of motor vehicles
- Manufacturing
- Mining and Quarrying
- Professional and Scientific Services
- Retail
- Transportation and Storage
- Water supply, Sewerage and Waste Management
- Wholesale

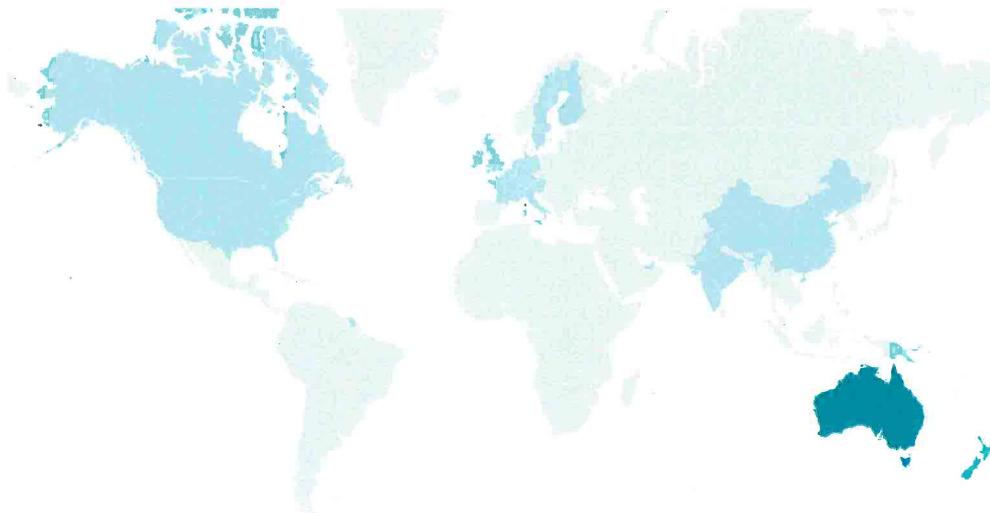


The below graphic represents the geographical regions of our operations. For the context of modern slavery, this map, and the supply chain maps that follow, have been overlaid with the colour tier system of the [Trafficking-in Persons Report](#).



Our supply chain partners operate in various countries as listed in the table below and depicted in the associated supply chain map diagram:

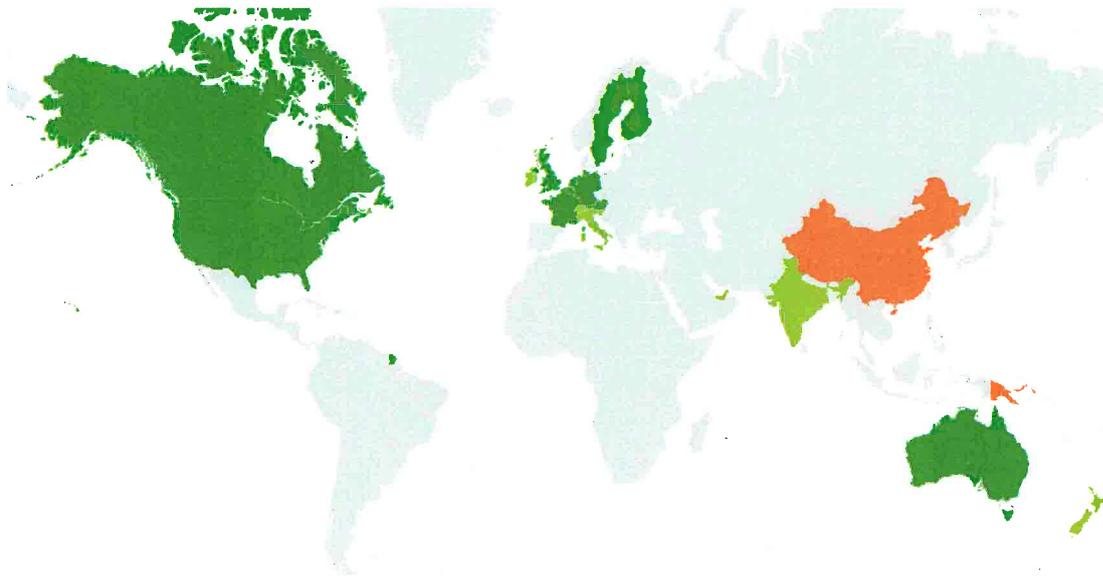
- | | | |
|-------------|--------------------|--|
| • Australia | • Hong Kong | • Sweden |
| • Austria | • India | • Switzerland |
| • Belgium | • Ireland | • United Arab Emirates |
| • Canada | • Italy | • United Kingdom of Great Britain and Northern Ireland |
| • China | • Luxembourg | • United States of America |
| • Finland | • Netherlands | |
| • France | • New Zealand | |
| • Germany | • Papua New Guinea | |
| | • Slovenia | |





Some countries or regions where our suppliers operate, as well as some goods produced and sourced by our suppliers, can be described as high-risk due to the possibility of a link to modern slavery practices such as Forced Labour, Human Trafficking, Child Labour, and Debt Bondage.

The geographical regions where our supply chain partners operate are shown in the map below. This map, and the supply chain maps that follow, have been overlaid with the colour tier system of the *Trafficking-in Persons Report*.



There is a modern slavery risk associated with sourcing the following goods and services from the countries listed below:

Country	High Risk Items
China	<ul style="list-style-type: none"> • Aluminium • Electronics • Lithium-Ion batteries • Thread / Yarn
Malaysia	<ul style="list-style-type: none"> • Electronics





Our strategy

The company expanded its detailed surveillance of our supplier network by 20% during the 2024-2025 reporting year.

Our strategy follows a risk-based methodology whereby supply chain partners identified as holding a higher potential for modern slavery practices within their operations and / or supply chains, shall be targeted as a priority for collaboration and surveillance activities.

We have utilised the *iPRO Modern Slavery Assessment Tool* to assess and prioritise modern slavery risks in our operations and supply chain in accordance with our strategy. The risks identified in the following section were all identified utilising this assessment tool. We engaged iPRO during the reporting period to conduct the assessment of our operations, and a bulk assessment of 24 of our suppliers. We intend to carry this process forward as an annual assessment of our operations and 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 Modern Slavery Assessment Tool (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.

Our risks

Our suppliers operate, produce, and source across several/ different sectors. Some of these sectors can be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).

The below graphics show the high-risk sectors of operation, production, and sourcing for 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:

 Construction 3	 Labour hire 1
 Manufacturing 6	 Mining and Quarrying 1
 Transportation and Storage 1	 Wholesale 4

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

 Building services contractor 1	 Construction 6
 Labour hire 1	 Manufacturing 9
 Mining and Quarrying 2	 Wholesale 1

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

 Accommodation and Food Service Activities 1	 Construction 8
 Domestic work 1	 Maintenance and Repair of motor vehicles 2
 Manufacturing 12	 Mining and Quarrying 2
 Retail 1	 Transportation and Storage 2
 Wholesale 3	



The *iPRO Modern Slavery Assessment Tool* provided the following initial benchmark of Modern Slavery risks to our operations:

This is the score for Stowe Australia Pty Limited and associated reporting entity:

Operations Risk Scores	
Inherent Risk Score	50.00 / 100
Unmitigated Risk Score	7.49 / 100

Aggregated Supply Chain Risk Scores	
Inherent Risk Score	40.21 / 100
Unmitigated Risk Score	25.58 / 100

Stowe Australia’s Modern Slavery Assessment is low risk:

MY ASSESSMENT
Modern Slavery Assessment

Summary

Your current risk category [ⓘ]



Low-Risk (Adequate risk control)

Your risk control is adequate. Strive for best practice by taking action to further reduce unmitigated risk.

Inherent risk [ⓘ]

50.00 / 100

= Moderate to High

Unmitigated risk [ⓘ]

7.49 / 100

= Adequate risk control

↓ [Improve your risk score](#)

Our Approach

Stowe Australia’s management system includes various formal policies and procedures that are intended to promote responsible corporate citizenship and compliance to our statutory obligations. Such policies include amongst others our *Modern Slavery Policy*, *Corporate Code of Conduct* and *Whistleblower Policy*.

Our “*Terms and Conditions of Purchase*” agreements have been revised to incorporate specific provisions intended to mitigate modern slavery risks and satisfy Stowe Australia’s associated statutory obligations. In addition, these supplier agreements assist our company to exercise due diligence through establishing



agreed standards with our suppliers and monitoring compliance with these.

We have also developed and implemented training content specific to modern slavery practices and our policies and procedures to control associated risks. This content is included in our onboarding process during initial employment inductions and during refresher training. A more detailed training course has been subsequently provided for personnel who require specific knowledge and capabilities to successfully implement and administer associated operational activities during the course of their employment. To date, we have trained 295 employees across both associated entities.

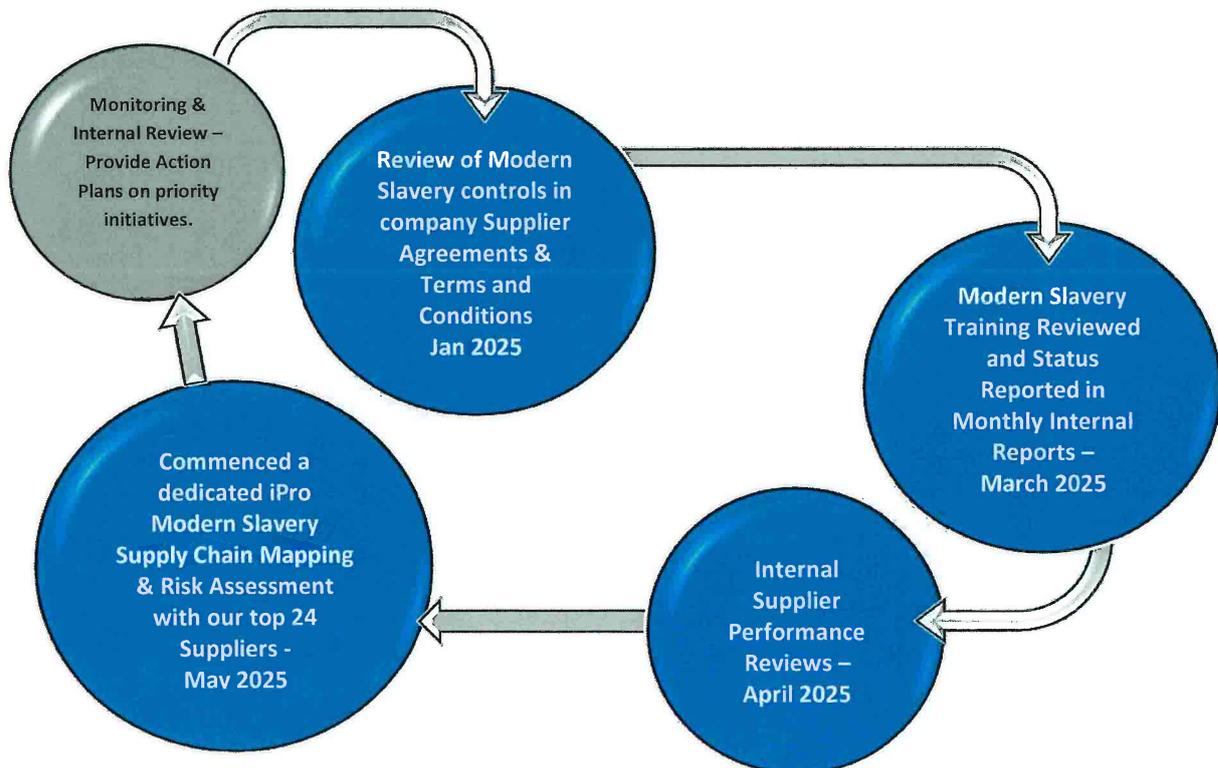
Our procedural controls shall be monitored, discussed, and reviewed by Stowe’s management team during scheduled meetings to ensure policies and procedures are robust and effective to minimise the risk of modern slavery practices throughout our business operations and extended supply chain.

The 2025 reporting period involved some disruptions to our operations within the States and Territories where the entities covered under this Statement operate including:

- Increasing labour market activity and higher than usual employee turnover; &
- Extended lead times for materials and equipment purchases due to global shortages of various essential commodities and electronic components; &
- Delays in service delivery deadlines and statutory reporting obligations; &
- Additional WHS obligations and implementation of associated operational processes and staff training; &
- Significant escalation in operating costs.

Despite these impacts on our operations, we have not attempted to source labour from any other sources or engage any additional subcontracting of operational activities outside of our current supply chain.

Key milestones of Stowe Australia’s modern slavery implementation and compliance activities in the 2024 reporting period:





Our strategy for the future

Priorities for the 2026 reporting period include the following initiatives:

- Consultation with interested parties for the purpose of increasing awareness of modern slavery risks and developing higher levels of engagement and collaboration for these risks;
- Continuing delivery of employee training courses on modern slavery practices and instructions on the operational requirements of associated corporate policies and procedures that have been implemented and / or revised;
- Continued assessment of Modern Slavery risks in our top 24 suppliers within our iPro Modern Slavery Supply Chain Mapping & Risk Assessment service subscription including:
 - assessing the effectiveness of their policies and procedures and for managing risks of modern slavery practices throughout their supply chains; &
 - providing action plans for our key supply chain partners to reduce Modern Slavery risks; &
 - assessing compliance with our company “*Terms and Conditions of Purchase*” agreements that are already in place with existing supply chain partners.
- Provide additional performance and evaluation information within Modern Slavery Statements from supply chain mapping, risk assessment and control activities to ensure modern slavery compliance and performance history information is compiled and reported.
- Where higher levels of risk are identified within our supply chain, we will provide access to resources, information and recommendations to affected entities on how to reduce the specific risks of modern slavery within their organisation and associated supply chains.
- Ongoing monitoring of internal policies and procedures for managing risks of modern slavery practices throughout our supply chain and assessing the effectiveness of our risk control strategy and associated operational procedures.
- Produce and publish our next “Modern Slavery Statement” for the 2026 reporting period in accordance with statutory obligations.

Consultation

Consultation was carried out between all reporting entities we own or control (as detailed on page 3) in the development of this statement. This consultation involved discussions on our joint reporting obligations, the actions taken to address these, and the outcomes and effectiveness of the action taken.



Approval

This statement was approved by the boards of both reporting entities covered by this statement, namely the board of Stowe Australia Pty Ltd and the board of Elonara Pty Ltd on the 14th of October 2025.

17/10/2025

Chris Madson

Date

Managing Director – Stowe Australia Pty Ltd

17/10/2025

Mick Pawelko

Date

Director – Elonara Pty Ltd