



Statement on Modern Slavery

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This is a statement pursuant to section 54 of the United Kingdom Modern Slavery Act 2015 (**UK Law**) and section 16 of the Australian Modern Slavery Act 2018 (Cth) (**AU Law**), of the steps Clevertronics has taken during the financial year July 2024 to June 2025 to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any parts of its own business.

In this statement, Clevertronics adopts the meaning of modern slavery as defined in the AU Law and UK Law as it applies to the jurisdictions in which Clevertronics operates.

Slavery, human trafficking, exploitation, servitude and forced or compulsory labour are serious global concerns that have the potential to impact every industry and organisation. Clevertronics takes its responsibilities seriously and is committed to ensuring that we and our business partners act ethically and with integrity in all our business dealings and activities. Clevertronics does not tolerate modern slavery in any of our operations or supply chains within the jurisdictions we operate.

Our business

Clevertronics Pty Ltd (ABN 64 136 264 349) (**Clevertronics AU**) is an Australian privately held company. It wholly owns the subsidiaries Clevertronics NZ and Clevertronics International UK Ltd (**Clevertronics UK**), which operate in New Zealand and the United Kingdom respectively. Clevertronics AU is wholly owned by a non-trading holding company.

For the purposes of this statement, Clevertronics AU is the reporting entity as defined in the AU Law and Clevertronics UK is the commercial organisation as defined in the UK Law. This statement has been prepared in consultation with all entities owned or controlled by Clevertronics AU (noting that all such entities share the same sole director).

We employ 256 staff predominately in Australia with smaller sales offices in New

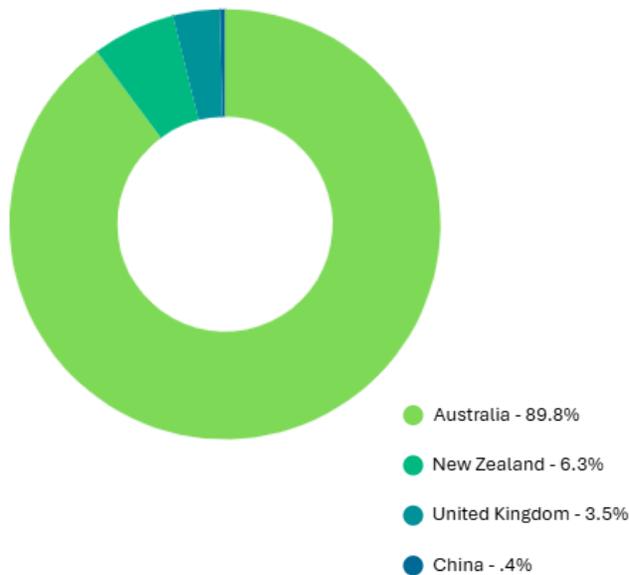
Zealand and the United Kingdom. Our primary activities are the design, manufacture, distribution and commissioning of emergency lighting products and systems.

We employ staff in Finance & Human Resources, Operations, Manufacturing, System Commissioning, Marketing, Engineering / Research and Development and Sales roles.

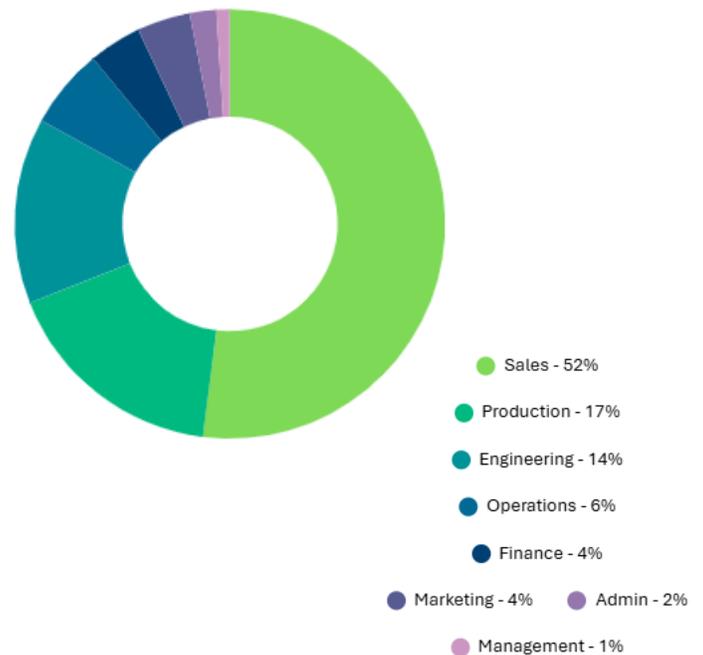
Graph 1 illustrates that our direct work force is predominately based in Australia (90% based in Australia), and graph 2 shows that most of our roles are based in sales (52%) while 17% of our staff are engaged in manufacturing.

Our manufacturing plants are based in Scoresby, Melbourne, Australia and in Shanghai, China (a joint venture manufacturing plant).

Employees by region



Employees by role



Our supply chain

By “supply chain”, we mean the products or services we acquire and that contribute toward the services we provide. Clevertronics recognises modern slavery risks may arise in our supply chains.

Clevertronics Supply Chains

Our supply chains can be classified into three main categories. **Direct Suppliers of Hardware** and **Direct Suppliers of Services** that are supplied to Clevertronics to manufacture our products and **Indirect Suppliers** of goods and services in order to conduct business.

Supply Chain	Description
Direct Hardware	The sourcing of materials that are used in the manufacture of our emergency lighting products Labour: <ul style="list-style-type: none"> that is used to manufacture our products for the design/development of the software and hardware for our emergency lighting products and systems for commissioning and maintenance of our installed systems
Direct Service	
Indirect Suppliers	Who provide goods and services we purchase in order to operate our businesses on a day to day basis

Our Australian operations account for approximately 10% of our volume production with approximately 90% being sourced from our joint venture factory in Shanghai, China. In FY2025, we had a total of 380 suppliers with 75 of these being direct suppliers for product manufacture.

Number Direct Suppliers to Clevertronics Offices (n=75)

Category	Australia	NZ	UK
Hardware	60	2	3
Service	9	0	1

Direct Suppliers by Sourcing Geography

90% of our supplier purchases by value are attributable to China (predominately via our joint venture partner). Our other direct suppliers include those based in Australia, Finland, Netherlands, New Zealand, Singapore, United Kingdom and United States.

Indirect Suppliers

305 of our suppliers are Indirect Suppliers, based in various regions including Australia, China, New Zealand and United Kingdom.

Risks of modern slavery in our supply chains

Clevertronics acknowledges that modern slavery risks exist in supply chains via suppliers of components, goods and services and their intermediaries.

To focus our efforts, Clevertronics has applied tiers to our Australian suppliers by annual spending (\$AUD).

AUD\$	No. Suppliers
Tier 1 \$500,000 or greater	19
Tier 2 \$250,000 to \$499,999	9
Tier 3 Less than \$250,000	352

Actions taken to control, assess and address risks

How we assess risks

Supplier due diligence

Clevertronics has a relatively small number of direct suppliers, meaning we can work directly with many of these suppliers to actively observe and influence their ethical performance.

We continue to undertake due diligence of major suppliers via a supplier evaluation process, in which suppliers are required to directly engage with us regarding their supply chain practices. Suppliers are also screened against conceptual risks, and our supply chain mapped to identify potential risks.

Assessment of multiple risk factors

To identify where the risks of modern slavery are highest in our activities and supply chains, it is necessary to assess and review the risk of various geographies, sectors and activities.

Geographic risk assessment

An essential method to mapping the supply chain is to assess the risk associated with

various countries, especially those regarded as medium to extreme risk.

Clevertronics' sales activities are based in three global regions: Australia, New Zealand and the United Kingdom. These regions are regarded as having a relatively low prevalence of and vulnerability to modern slavery, with a relatively strong government response to modern slavery in each.¹

Clevertronics' product is sourced from two regions: Australia, via our factory in Scoresby, Victoria, and China, via our joint venture partner operations in Shanghai. China is regarded as having a low to medium prevalence of and medium vulnerability to modern slavery.²

Industry sectors risk assessment

Clevertronics primarily procures goods and services for the purpose of manufacturing and supporting its product. We also engage indirect suppliers for cleaning, catering and recruitment services.

¹ Global Slavery Index 2023 (<https://www.walkfree.org/global-slavery-index/>)

² Global Slavery Index 2023 (<https://www.walkfree.org/global-slavery-index/country-studies/china/>)

How we address and control risks

Clevertronics' Ethics Framework

Clevertronics cares about people. Suppliers are an important part of our business, and our goal is that they share our values.

The Clevertronics Ethics Framework includes our:

- Supplier Code of Conduct
- Procurement Policy
- Anti Discrimination Policy
- Anti Bribery & and Corruption Policy
- Workplace Health & Safety Policy
- Health & Wellbeing Policy
- Whistleblower Policies
- Respect@Work Policy

Our culture of caring about people is reflected in our workplaces which we strive to keep free from discrimination, bullying and harassment, and our values of Respect, Empowerment and Integrity.

Monitoring Procurement

Our supply chain is identified as Direct Hardware, Direct Services, and Indirect Suppliers (of materials and services). Suppliers are subject to review based on research and a risk assessment which is conducted annually and is subject to a continual improvement process.

Suppliers are assessed against our Procurement Policy, which categorises suppliers based on risk factors such as region, industry risk levels and annual spending tiers and specifies minimum purchasing requirements/criteria based on same (for example, circumstances in which a supplier is required to provide a signed Supplier Code of Conduct).

Management of Direct Hardware Procurement

Our operations in Australia procure from several direct suppliers of componentry for the manufacture and assembly of our products. The supply of electrical componentry is predominately from China and is regarded as medium risk.

Our main hardware supplier is our joint venture partner and they account for 90% of our purchases by value. Our Chinese partner has embedded Australian management within the organisation and an engineer in the design team. This provides Clevertronics with visibility within the joint venture and downstream supply chains componentry.

The joint venture partner is vetted via regular visits by our engineering team and various members of our management staff.

In relation to our procured manufacturing services in Australia, they are regarded as low risk for modern slavery. The recruitment process is overseen by Clevertronics Management and our recruitment agencies for our temporary labour are reputable and meet all local labour laws.

Management of Indirect Goods and Materials Procurement

Clevertronics has 305 indirect suppliers for a range of goods and materials. Our research has indicated that promotional materials (not for resale products) used for internal or corporate activities are regarded as high risk.

Other suppliers are risk assessed if they source their goods from high risk geographies for high risk commodities or materials. Overall, we consider indirect suppliers to

present a greater risk of modern slavery than our direct suppliers, due to our direct suppliers being subject to more stringent evaluation processes.

Management of Indirect Services Procurement

Our Chinese joint venture partners employ a permanent work force in the manufacture and assembly of our products. The organisation meets all local labour laws, and embedded Australian staff and regular visits by our local representatives provide visibility over the joint venture operations.

In Australia, professional services such as accounting, legal and insurance are regarded as low risk and no additional measures are taken.

Services such as cleaning, building maintenance, security and travel services are considered low risk as Clevertronics engages reputable service providers in each jurisdiction. Notwithstanding this, we acknowledge that there is an increased risk of modern slavery in these industries, which often utilise labour hire arrangements and unskilled labour.

Working with Our Customers

Our direct customers are typically large multinational corporations who have adopted their own anti-slavery policies and procedures, of which we are signatories. Many of our indirect customers seek visibility of our business practises and supply chains via their own supplier management policies, of which we are also signatories.

Assessing the effectiveness of our actions

Risk Mitigation of Modern Slavery

Clevertronics takes active measures to mitigate modern slavery risks from eventuating. Once a risk is identified using geographic, supplier and industry metrics, we undertake ongoing due diligence and research to assess our effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains. We also apply controls to further mitigate or remediate any identified risks.

- undertakes an annual review of processes, internal audits and compliance monitoring.
- is providing relevant staff training on risk identification and mitigation within the supply chain.
- has developed and utilises a supplier questionnaire which assists us in assessing modern slavery risks in our supply chains.

Within the Supply Chain

Clevertronics:

- has developed and utilises a Supplier Code of Conduct, which details our expectations of suppliers and a risk-based due diligence process for manufacturing operations, marketing activities and select service providers, to address responsible business sourcing.

Other relevant information

In addition to specialised staff training on risk identification and mitigation mentioned above, in the coming financial year Clevertronics will roll out training for all staff concerning modern slavery, reiterating our company-wide commitment to identifying and combatting such practices.

Contacting us

If you wish to contact Clevertronics, or if you have a question in relation to our policies, practises or codes, please contact the following company representative for assistance.

Joanne Schembri
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Signatory

This statement was approved by the sole director of Clevertronics AU, and its subsidiary entities.



Antonio Todaro

Dated: 31 December 2025