



MODERN SLAVERY STATEMENT-2024

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 2023 – 30 June 2024

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 all 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 to the change-over from gas to electricity in the 1890's.

Today, Stowe is recognised as the leading privately-owned National electrical & data communications contractor and employer of choice with over 1,800 people within 13 branch locations throughout Australia.



We provide electrical & data communications installation, engineering, reactive service, and facilities maintenance solutions to a variety of our valued clients within the

commercial construction, facilities management, high voltage infrastructure & utilities, and government sectors amongst others.

We monitor a range of indicators to assess compliance to our business management systems within our operations including amongst others, corporate citizenship programs, statutory compliance obligations, and financial position. We report 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:

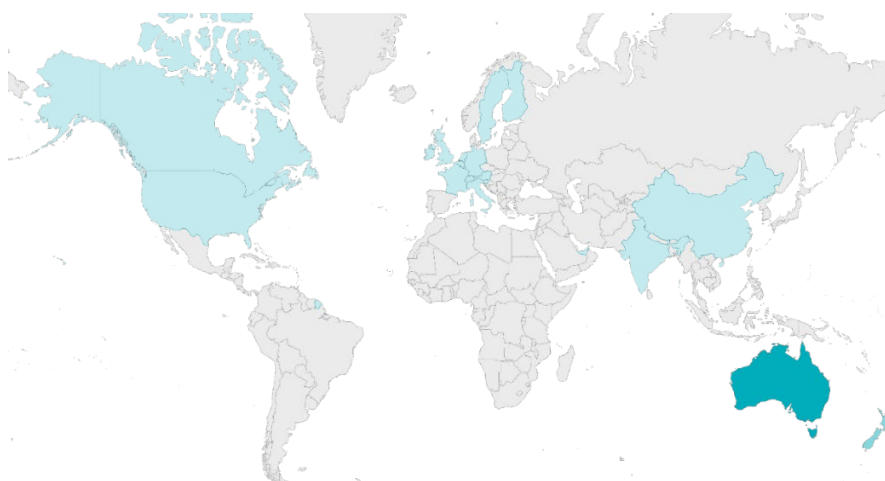
Entity	Operations	Supply Chain
 <p>STOWE AUSTRALIA SINCE 1910</p> <p>ABN: 27 002 556 603</p>	<p>Electrical & data communications contracting and engineering design services including:</p> <ul style="list-style-type: none"> • Large & medium scale commercial, high voltage infrastructure & utilities, and 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

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 below table 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 | • 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](#).



Geographical Region:	High Risk Goods Sourced:
<ul style="list-style-type: none">China	<ul style="list-style-type: none">Thread/Yarn

Our strategy

The company executive management group directed our governance & compliance team to carry out a review of corporate policies and procedures. The purpose of this analysis was to identify risks and opportunities associated with compliance to the requirements of the *Modern Slavery Act (Cth) 2018* and make recommendations to ensure these risks are eliminated or controlled whilst supporting opportunities for statutory reporting, and the development of a framework for continuous improvement within the business management system.

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 on our operations, and a bulk assessment of 20 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

In the previous reporting period, Stowe Australia and our related entities spent approximately 25% of our total purchasing expenditure with a group of major global suppliers that provide materials and equipment to the electrical contracting industry, both in Australia and globally. Due to the Global sourcing of these purchases, we have identified these purchases having a higher inherent risk of poor modern slavery practices.

Our remaining 75% of purchases were with smaller Australian sub-contractors, manufacturers and distributors which represents a significantly lower risk of modern slavery practices due to established Australian labour regulations, minimum employment standards, and regulatory infrastructure to enforce associated statutory obligations.

Consideration was given to the types of products and materials primarily used within the organisation which is predominantly electrical and data communications cable, switch gear and associated electrical fittings and fixtures.

Information available from the [Australian Government](#) and [International Labour Organisation](#) informed the company that the modern slavery risks involved in the electronics manufacturing sector is higher in South-East Asia.

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	42.94 / 100
Unmitigated Risk Score	28.75 / 100

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 performance standards with our suppliers and monitoring compliance to 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 290 employees across both associated entities.

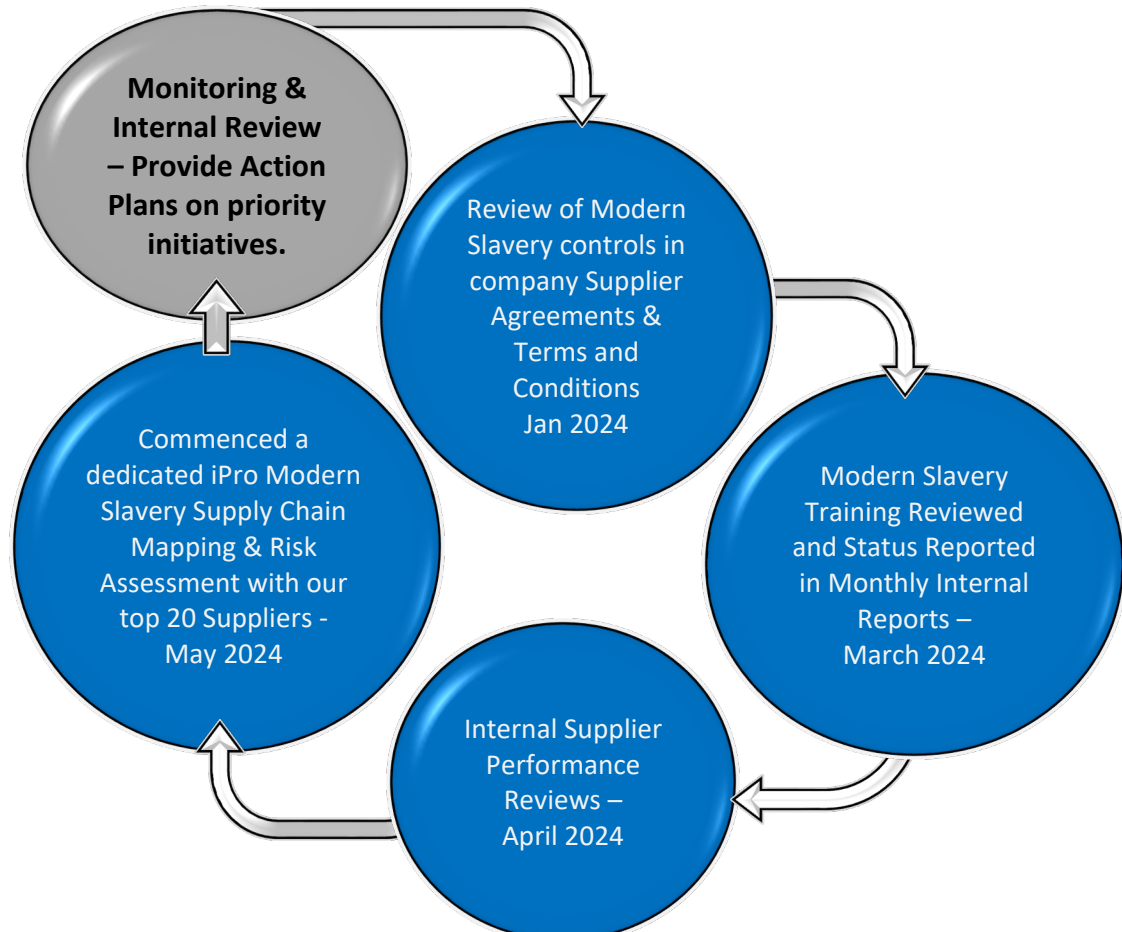
Our procedural controls shall be monitored, discussed, and reviewed by Stowe's management team during scheduled meetings to ensure policies and procedures are robust and effective to minimise the risk of modern slavery practices throughout our business operations and extended supply chain.

The 2024 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, nor has any additional subcontracting of operational activities occurred 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 2025 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 20 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 2025 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 3rd December 2024.



Chris Madson
Managing Director – Stowe Australia Pty Ltd

03/12/2024

Date

Mick Pawelko

Mick Pawelko
Director – Elonara Pty Ltd

03/12/2024

Date

MODERN SLAVERY STATEMENT 2024 final

Final Audit Report

2025-01-22

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