



# Modern Slavery Act 2018 (CTH)

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## **1. ABOUT FRONIUS**

A passion for new technologies, intensive research and revolutionary solutions have been shaping the Fronius group of companies (Fronius) brand since 1945. As the technology leader, we find, develop and implement innovative methods to monitor and control energy for welding technology, photovoltaics and battery charging. We forge new paths, try something difficult and succeed where others have failed in achieving what seems to be impossible. But these are not the only reasons why Fronius is the global leader in innovation and technology. We have a clear vision, an unremittingly inventive spirit and an ingrained sense of quality, so we can keep shifting the limits of what is possible and set the trends that change the market. In the Business Unit Perfect Welding, we direct our attention to generating the perfect arc to ensure consistently high welding quality. The focus for our Business Units Solar Energy and Perfect Charging is to have a reliable and comprehensive supply of energy -24 hours a day. The advanced technology and sheer quality of the innovative products from Fronius have filled people with enthusiasm for generations, inspiring confidence, trust and satisfaction. Their sustainability is impressive, they boost productivity, increase energy yields and also reduce operating costs. They help our customers to make significant progress and lay the foundations for growth and successful development. Fronius has about 8.000 employees in 37 subsidiaries - yet we are still the same owner-managed company we have always been, combining the values of a family business with regional roots, with the visions of a global company. Fronius, headquartered in Austria, operates by Fronius Australia Pty Limited (Fronius Australia) in Australia and undertakes to fulfill the requirements of the Modern Slavery Act 2018 (CTH) (the Slavery Legislation).

#### 1.1 Operations

Fronius is focusing on a sustainable approach along the value chain. Sourcing and suppliers play a key role for our value transformation. An important orientation anchor for our decisions is respect and appreciation for people and employees in our businesses and our supply chain, who are driving our innovation. Mutual respect and appreciation are essential values. With a network of roughly 1.500 active suppliers, Fronius hast built a global supply chain and procures from about 30 countries around the world (as at 2023). The Fronius supply chain is global, with a focus on Europe. As regards the procurement volume factor (based on Country of Origin), around 75% of all products and services are currently sourced from the European region – 17% of the total procurement volume is sourced from Austria, and around 58% is imported into the supply chain from the rest of Europe. Procurement plays a key role in ensuring laws are complied with and human rights that are addressed by the Slavery Legislation are protected.

The risk of servitude, forced labour, trafficking of human beings and other forms of slavery in the Fronius supply chain are moderately high by having approximately 25% of the supply chain situated outside Europe (Country of Origin).

Fronius conducts most of its manufacturing operations at Austrian locations, with the main production sites being in Pettenbach, Sattledt and Steinhaus. Manufacturing is also taking place at Krumau in the Czech Republic. Having a centralized manufacturing operation allows Fronius to address necessary requirements for preventing slavery in a focused and consistent manner by having full transparency and control of all activities taking place. The risk of servitude, forced labour, trafficking of human beings and other forms of slavery in the manufacturing operations are low because both Austria and the Czech Republic have legal systems which protect against such abuses. Fronius Australia is predominantly a sales, installation, testing and service operation. It is supplied all its final products by Fronius and does not have a separate supply chain of final products. Fronius Australia has no subsidiary companies.

## 2. Modern Slavery

#### 2.1 Understanding

Sustainable development at Fronius does mean taking social, environmental and economic concerns into consideration. If we want to leave behind an intact, ecological, social and economic structure for future generations, it is necessary to build a sustainable economy.

#### 2.2 Slavery and human trafficking statement

Fronius is committed to meeting the requirements of the Slavery Legislation. The definition given in the Slavery Legislation of "modern slavery" is fully acknowledged by Fronius, and all forms of servitude, forced labour, trafficking of human beings and other forms of slavery are rejected. Fronius will fully comply with the Slavery Legislation. Furthermore, we expect employees, network partners, suppliers as well as those organisations that provide services in the supply chain for Fronius, to be aware of and ensure the requirements contained in the Slavery Legislation are complied with. For the purpose of ensuring compliance with the Slavery Legislation, Fronius develops, publishes and reviews on a regular basis a Code of Conduct for employees and business partners as well as a Corporate Strategy.

All Fronius employees are responsible for knowing and following the Code of Conduct and the ethical, legal, and policy requirements that apply to their jobs and for reporting any suspected violations of the Code of Conduct. Our executives and managers are accountable for creating and promoting a workplace environment consistent with the Code of Conduct as well as a Corporate Strategy.

Along our supply chain, contractors and suppliers commit themselves to comply with the Fronius Code of Conduct for business partners and all relevant national legislations in regard of modern slavery and due diligence regulations for supply chains.

The contractors and suppliers within the Fronius supply chain helps to ensure that human rights are protected and that all slavery including human trafficking are excluded.

#### 2.3 Due Diligence

Fronius addresses major risks within its global supply chain and operations such as operational and commercial business contingency, privacy, fraud, health & safety violations, human rights, bribery and corruption, trade sanctions, export controls, environmental violations as well geographically caused risks.

To further underline the importance of this topic, a separate "Supply Chain Due Diligence Policy" was drawn up as part of the internal Fronius Compliance Management System.

Within the framework of our supplier management, we examine our supply chain and its partners for compliance with human rights by having specific processes in place:

- / Registration of all new vendors on internal supplier relationship management platform.
- / Evaluation process for all new registered vendors including sustainability, corporate social responsibility and human rights.
- / Rolling review of publicly available data on suppliers.
- / Risk analyses for suppliers where there is conspicuous information about violations of principles, standards and laws.
- / Audit process for suppliers where there is conspicuous information about violations of principles, standards and laws. A process audit for sustainability exists for this purpose, which examines social aspects of suppliers in particular.

This enables Fronius to recognize potential risks and counteract them. A continuous process of supplier management is intended to ensure effective implementation of measures and improvements and to eliminate the risks identified, including breach of the Slavery Legislation which is directly checked for compliance. Fronius accepts the requirements derived from the Slavery Legislation in its entirety and does not cooperate with any persons or organisations that are found to be in breach of these requirements or other laws. Fronius requires all its group subsidiary companies, including Fronius Australia to fully comply with local laws, such as core employment conditions including minimum wages at all locations where they operate. Fronius' Corporate Strategy, which applies globally, covers three core values which are defined as superordinate anchors for all entrepreneurial activities. Fronius prepares reports on all social initiatives.

To ensure the effectiveness of all the due diligence activities, we do not only rely on our existing processes, internal expertise and KPI tracking. Since 2021, the Austrian sites of Fronius - i.e. those where the majority of manufacturing and supply chain activities are conducted - have implemented a CSR (Corporate Social Responsibility) management system following the ISO 26000 standard which has also been certified according to the corresponding Austrian standard (ONR 192500). We thus ensure that our due diligence activities are audited annually by an independent external party in terms of effectiveness and accuracy. On this basis, the continuous improvement of our activities and processes takes place to meet the requirements of the Slavery Legislation.

#### 2.4 Awareness & Employees

Centralized management of the due diligence processes within the Fronius group of companies ensures standardized procedures and processes. Regular consultation and specific control structures between the individual entities within the framework of the Fronius Global Collaboration Standard guarantee the stability of the processes and awareness regarding modern slavery risks at national and international level.

A Code of Conduct that applies globally to all Fronius entities furthermore ensures compliance with all human rights requirements and raises awareness among employees.

To provide a high level of understanding of the risks and dangers of human rights abuses, all Fronius employees will be given access to a statement in similar terms to this statement, which will be published on the Fronius website.

#### 2.5 Outlook

Fronius is continuing to work on preventing servitude, forced labour, trafficking of human beings and other forms of slavery in the supply chain. Fronius is committed to forming close relationships with all persons including partners, and to foster the protection of human rights.

#### 2.6 Approval

This statement for Fronius Australia Pty Ltd. was approved by the board of Fronius International GmbH as the parent entity on 17.1.2024.

ppa. Thanos Andly

Thomas Herndler, MAS Fronius International GmbH, COO

Mariella Doppelbauer Fronius Australia Pty Ltd., CEO

## 3. Change Notification

#### **Revision 01**

No changes, Initial publication (January 12<sup>th</sup> 2021)

#### **Revision 02**

Additional chapter "2.6 Approval" (March 5<sup>th</sup> 2021)

#### **Revision 03**

- Additions to chapter "2.3 Due Diligence" (November 30<sup>th</sup> 2021)
- Additions to chapter "2.4 Awareness & Employees" (November 30<sup>th</sup> 2021)

#### **Revision 04**

- Additions to chapter "1 About Fronius" (January 20<sup>th</sup> 2023)
- Additions to chapter "2.2 Slavery and human trafficking statement" (January 20<sup>th</sup> 2023)

#### **Revision 05**

- Additions to chapter "1 About Fronius" (December 15<sup>th</sup> 2023)
- Additions to chapter "2.2 Slavery and human trafficking statement" (December 15<sup>th</sup> 2023)
- Additions to chapter "2.3 Due Diligence" (December 15<sup>th</sup> 2023)