

ANNUAL MODERN SLAVERY STATEMENT

SCHRÉDER AUSTRALIA PTY LTD (SCHRÉDER AUSTRALIA)



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INTRODUCTION

Schröder SA, headquartered in Belgium, is the leading independent outdoor lighting solutions provider worldwide and is the parent company of Schröder Australia.

At Schröder Australia, we believe that lighting can empower people, impact lives, support communities, and transform spaces cities and the planet. We are experts at using light to its fullest potential, to bring meaningful moments to people in public spaces.

Schröder SA was founded in 1907 in Belgium with the workshops of Jules Schröder and Co.

Since then, Schröder has had a reputation for innovation developing a variety of electronic technologies such as electronic boxes, panel boards and the PQ range which included reflectors of electropolished aluminium. Schröder's first laboratory was equipped with a two angle reflectometer which allowed Schröder to measure the characteristics of road surfaces so as to distribute light in the most efficient manner. This made Schröder a pioneer in luminance lighting calculations.

Other innovations included the introduction of the Z range in 1970, marking the beginning of tightness standards for water and dust across the industry as well as the introduction of the Saturn in 1972 which heralded the future of urban lighting ranges by coupling photometry and design. In 1985, Schröder invented the SealSafe system which revolutionised long term tightness levels and in 2010 a full range of LED luminaires was developed. In 2015, Schröder was the first company to create an interactive luminaire that enables WiFi connectivity and EV charging.

Because of Schröder's strong reputation, it has been given several prestigious and high-profile projects, assisting with the Brussels World Fair, lighting Paris Orly airport, lighting the Champs-Élysées in Paris, the Colosseum in Rome and providing lighting for the Channel Tunnel connecting the UK with Europe. Moreover, Schröder has won a number of prizes including the Smart City Prize in Longson reflecting how smart lighting technology is key when it comes to enabling connectivity in the city of tomorrow.

In 2020, Schröder Australia acquired two businesses in Australia – Sylvania Lighting and Austube consolidating its market position in Australia.

Schröder is committed to the prevention of modern slavery and to eliminating risks associated with modern slavery in its supply chain.

MANDATORY CRITERIA ONE AND TWO:

IDENTIFY THE REPORTING ENTITY AND DESCRIBE ITS STRUCTURE, OPERATIONS AND SUPPLY CHAINS

This modern slavery statement has been prepared for Schröder Australia Pty Ltd (ABN 17604331937) (Schröder Australia) as a single reporting entity. Austube Schröder (ABN 17639100324) is a wholly owned subsidiary of Schröder Australia. Both companies are owned by a parent company, Schreder SA, which is headquartered in Belgium.

Schröder Australia has an operations facility in Rydalmere, New South Wales and interstate sites for commercial activities located in Western Australia, Victoria, South Australia and Queensland.

In all, Schröder Australia employs 99 employees across Australia and Austube Schröder employs 29 employees.

Schröder Australia produces and sells high quality, large scale commercial lighting solutions. For the most part this consists of outdoor public lighting luminaires and indoor linear extrusion lighting.

Schröder Australia employees are engaged in different roles across production, warehousing, distribution, quality control, sales, marketing, customer service as well as finance and management functions (such as IT, corporate governance, and Human Resources).

Schröder Australia sources components and products from Australia, China, Malaysia, South Korea, and various European countries. In terms of the various categories of products and components, the following are the source countries:

Category of Component/Product	Countries from which they are sourced
Roadway	Australia, China, Vietnam, Ukraine, Hungary, Spain and South Korea
Sports/Industrial	Australia, China, Hong Kong, Mexico, and Italy (indirectly from Tunisia)
Austube	Australia, China, Italy, Poland, Malaysia, Singapore, Portugal, Austria, Serbia
SCS	Australia, Philippines, Portugal, Spain, China, Latvia, Mexico and Singapore

MANDATORY CRITERION THREE:

DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY AND ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS.

Schröder Australia recognises that certain products and components may pose a higher risk of modern slavery than others, especially in circumstances where the production of products and components are likely to be labour intensive. We are also aware of heightened risks in certain geographical areas.

The following table describes the risks associated with various characteristics of the industry:

CATEGORY OF RISK	WHY THE RISK EXISTS AND WHAT MAY INDICATE A RISK
Industry Sector	<p>Because of the labour intensive nature of production in our sector, there may be risks associated with production.</p> <p>A risk may be indicated by price points for components or products that are below generally accepted market standards.</p>
Product and Services Risks	<p>As certain products and components are produced in labour intensive products processes, there may be risks associated with this production.</p> <p>A risk may be indicated by price points for components or products that are below generally accepted market standards.</p>
Geographic Risks	<p>As noted above, we source products and components both domestically and from overseas. We consider that the modern slavery risks from our locally sourced suppliers are very low considering Australia's strong workplace relations system.</p> <p>We also consider that the risks associated with our European and South Korean suppliers to be low.</p> <p>Schröder Australia is aware of certain geographical risk factors associated with China, Philippines, Vietnam, Malaysia and Singapore. However, there is no indication that this applies to any of our suppliers in these countries.</p>
Entity Risks	<p>Schröder Australia is aware that because some of our suppliers are not based in countries with strong workplace regulations, there may be increased risks associated with such entities. However, Schröder Australia has never been made aware of our</p>

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	overseas suppliers engaging in any labour practices that fall within the definition of modern slavery.
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Schröder Australia has not identified any way in which it may cause, contribute (directly or indirectly) or be linked (either directly or indirectly) to modern slavery practices. We note in this regard that in assessing the costs of products and the industry risks, contracts are usually agreed on an agreed set price against volume on a 6-12 month basis and that third party costs are not project driven.

MANDATORY CRITERION FOUR:**DESCRIBE THE ACTIONS TAKEN BY THE REPORTING ENTITY AND ANY ENTITIES THAT THE REPORTING ENTITY OWNS OR CONTROLS TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILLIGENCE AND REMEDIATION PROCESSES**

Schröder Australia's overall approach is governed by a Modern Slavery Policy (**Policy**). The policy makes it clear that suppliers are expected to comply with the Responsible Business Alliance (**RBA**) Code of Conduct (a copy of which is given to all suppliers). This RBA Code of Conduct establishes standards to ensure that working conditions in the electronics industry/ industries and its supply chains are safe, workers are treated with respect and dignity, and that business operations are conducted in line with environmental and ethical considerations.

the Policy also makes clear that all Schreder Australia and employees, and the Schröder Australia supply chain shall observe and abide by the standards on Human Rights included in the RBA Code of Conduct, including:

- Freely chosen employment;
- Young workers;
- Working hours;
- Wages and benefits;
- Humane treatment;
- Non-Discrimination/Non-harassment;
- Freedom of Association

Schröder Australia's key suppliers are required to acknowledge the Schreder Suppliers Code of Conduct, which is based on the RBA Code of Conduct, and are subject to an assessment according to the Schröder Sustainable Risk Assessment Method.

All suppliers to Schröder Australia are also sent the Sustainability Code of Conduct.

When Schreder Australia engages suppliers, those suppliers are:

- provided with a letter which outlines that Schröder Australia prohibits human trafficking, compulsory prison labour, child labour or slave labour and physical abuse of workers in its supply chain operations;
- informed that Schröder Australia reserves the right to conduct or have conducted by a third party on its behalf, audits of suppliers' facilities and business practices, to monitor our direct suppliers' compliance with applicable laws. Further, that suppliers are expected in such circumstances to provide auditors with reasonable access to any facilities and all documentation that may be required to demonstrate compliance with applicable laws.

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- informed that Schröder Australia reserves the right to suspend or terminate relationships with suppliers in circumstances where there is non-compliance with applicable laws.

Schröder Australia and Austube Schröder employees engaging with the Schröder SA or Schröder Australia supply chain who become aware of or are concerned about modern slavery risks can raise concerns. Such disclosures are protected by the Schröder Whistleblower policy.

Schröder Australia rolled out modern slavery training in 2023 to all of our internal staff and they are required to proactively identify and raise concerns about modern slavery risks.

Schröder Australia and Austube Schröder over the past 12 months have completed a performance review of suppliers who they do more than AUD\$100K of business with annually. As part of that review all suppliers were required to complete a questionnaire of their internal practices which included a section on the suppliers practices around modern slavery. All of our suppliers were assessed as compliant with modern slavery laws as per the RBA Code of Conduct. Additionally, the same questionnaire is used with all new suppliers and new suppliers are not approved for use unless they pass the modern slavery requirements. Schröder Australia and Austube Schröder will continue to conduct these annual suppliers performance reviews to ensure our suppliers remain compliant with the RBA Code of Conduct.

Schröder Australia has not received any complaints or allegations of modern slavery risks in relation to suppliers in its supply chains.

MANDATORY CRITERION FIVE:

DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Schröder Australia Pty Ltd currently assesses the success of its processes as being shown by a lack of complaints being made or issues being raised.

As part of the supplier performance reviews which have been completed Schröder Australia and Austube Schröder have not had to suspend or cease relationships with any suppliers due to noncompliance with modern slavery requirements as all suppliers have been assessed as compliant.

As outlined above, there are internal avenues for staff to raise concerns about modern slavery issues in the supply chain. During the reporting period, no such complaints have been raised.

Were an issue to be raised which led to suspicion that a modern slavery risk existed in a supply chain, Schröder Australia would thoroughly investigate any such complaints with a view to assessing whether such a modern slavery risk actually exists and whether in the circumstances there is a case for remediation and what can be done to improve processes. Such reviews would be conducted by Schröder Australia's Human Resources team and legal advisors and overseen by our board and senior leadership team.

MANDATORY CRITERION SIX

DESCRIBE THE PROCESS OF CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS

All supply chain procedures which apply to Schröder Australia also apply to Austube Schröder. Moreover, the control of supply chains is a merged responsibility between the two businesses. This is to ensure uniform processes are in place to identify and reduce risks of modern slavery across our business operations.

In 2024 Schröder Australia and Austube Schröder will appoint designated officers within the supply chain teams of both entities to assess and review our processes and procedures. The designated officers will consult with each other on best practice to be followed by both entities.

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of

SCHRÉDER AUSTRALIA PTY LTD (SCHRÉDER AUSTRALIA)

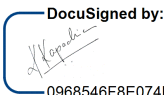
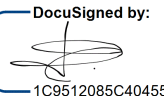
as defined by the *Modern Slavery Act 2018 (Cth)*¹ (“the Act”) on 30 May 2024

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of

SCHRÉDER AUSTRALIA PTY LTD (SCHRÉDER AUSTRALIA)

as defined by the Act²:

 <p>DocuSigned by: Kaushal Kapadia 0968546F8E074B6...</p>	Kaushal Kapadia – Regional Director - Schröder APAC
 <p>DocuSigned by: Johan Van de Velde 1C9512085C40455...</p>	Johan Van de Velde – Chief Legal Officer, Director Schröder Australia

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	3
b) Describe the reporting entity’s structure, operations and supply chains.	3
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	4
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	6
e) Describe how the reporting entity assesses the effectiveness of these actions.	8
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	9
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	

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- * If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.
 - ** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.
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1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.
 2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.