

Acrow Formwork and Scaffolding Modern Slavery Statement

1. Introduction

This is the second Modern Slavery Statement (the “Statement”) for Acrow Limited and covers the period of 1 July 2023 to 30 June 2024 (“Reporting Period”).

This Statement applies to Acrow Limited and the Acrow Group of Companies, including:

Acrow Holdings Pty Limited
Acrow Formwork and Scaffolding Pty Ltd
Acrow Screens Pty Ltd
Acrow Screens (QLD) Pty Ltd
Acrow Industrial Group Pty Ltd
Uni-span Height Safety Pty Ltd
Uni-span Australia Pty Ltd
Uni-span Formwork Solutions Pty Ltd
MI Scaffold Pty Ltd
Benchmark Scaffolding & Edge Protection Pty Ltd
Acrow Group Investments Pty Ltd

This Statement has been produced in accordance with the Australian *Modern Slavery Act 2018* (Cth) and the United Kingdom *Modern Slavery Act 2015* (UK).

The Group’s vision is to be the leading provider of smart integrated systems, dynamic front-line support and a continuous cost-effective focus to help our customers achieve peak performance with zero harm. This is underpinned by our values that are fundamental to who we are and how we operate and are supported by our Code of Conduct.

This Statement outlines the steps Acrow Group has taken to identify and address the risks of modern slavery to its business operations and supply chain.

Acrow Group is fully committed to preventing modern slavery and human trafficking in our operations and supply chains across all jurisdictions in which we operate. The Group is also committed to continuously improving its processes and policies with respect to the identification and elimination of modern slavery.



2. Business Structure

Our structure

Acrow Limited is an Australian incorporated company and is listed on the Australian Securities Exchange. Acrow Limited is the parent company of the Acrow Group of Companies and has a total of 11 subsidiaries across Australia. More information about the principal can be found in Acrow Limited corporate website www.acrow.com.au.

All companies in the Acrow Group follow policies and processes set by Acrow Limited or its subsidiaries.

Our operations

Acrow Limited operates in 14 locations across Australia, managing over 50,000 tonnes of formwork and scaffolding equipment as well as maintaining highly experienced in-house engineering, safety and project management professionals.

We are proud to promote a national network with local knowledge, ensuring staff on the ground in each location understand the local market intimately, but also drawing on the skills and experience from other parts of the business when required, in order to deliver effective results. In doing so, our best practices are adhered to at all times.

Acrow boasts an impressive portfolio of projects.

Acrow Limited is used by many of the country's leading corporations and service providers. As at 30 June 2024, Acrow Limited had over 1,300 customers and employed over 650 employees. The majority of our workforce are based in Australia.

Additional information on our activities, performance, products and services can be found on our website www.acrow.com.au

Our Group Cultures & Values

SMART

- Open to change.
- Embrace new ideas.
- Sharing best practice.
- Set industry standards.
- Continuous improvement.
- Proactive approach.
- Solution focused.

CAN-DO

- Safety first.
- Can be trusted to deliver what was promised.
- We are determined.
- We are open, honest and always constructive.
- We strive to be the best.

PARTNERS

- Our customers are at the heart of everything we do.
- We are confident in ourselves and others.
- We are always happy to help each other out.
- We are one team.



We believe these values underpin Acrow Limited as an organisation as well as our approach to modern slavery and human rights issues. We are committed to acting ethically throughout our organisation by complying with all applicable legal obligations and we take a zero-tolerance approach to any form of modern slavery.

3. Acrow Limited Modern Slavery Risks

Acrow Limited has assessed the risk of modern slavery within our direct business operations as low, given the level of control we have over our operations and our comprehensive labour management. However, we recognise that we may indirectly be exposed to these risks through our supply chain and partner network.

We have not been made aware of any allegations of human trafficking / slavery activities against any of our subsidiaries, suppliers or partners. If an allegation were to be made, we would take the appropriate actions immediately which would include informing the relevant authorities.

Higher risk spend categories via our supply chain and partner networks

We have identified the following procurement categories that may have a higher risk of modern slavery:

- Equipment suppliers/steel/timber etc
- Facilities service providers (e.g., cleaning services, office maintenance, waste management and security)
- Information & Communication Technology (ICT) infrastructure and hardware

Higher risk locations

Based on information sourced from the Global Slavery Index^[1], we believe that our higher-risk locations may be the following, however we do not believe we have any material exposure.

- India
- China
- UAE

4. How Acrow Limited has addressed its Modern Slavery Risks

Our employees

We use reputable recruitment agencies when sourcing employees who are required to comply with the relevant labour laws of Australia.

Acrow Limited has strong processes in relation to the recruitment, onboarding and rewarding of all our direct employees. We regularly monitor the hours that they are working and have programs in place to address their wellbeing. On an annual basis, salaries are reviewed to ensure that they are consistent with the market and that all legal obligations are met. Relevant jurisdictions have policies in place in relation to the payment of overtime when additional hours are required to be worked.

Acrow Limited believes in the principles of “integrity”, and this is used as a baseline for ongoing self-auditing and reporting for key areas of compliance. We seek to weave them into the fabric of our daily work at Acrow Limited. In doing so, we co-create a dynamic and purposeful company culture that we can be proud of and want to belong to.

Training

All new Acrow Limited employees undergo onboarding and compliance training that covers obligations under Acrow Limited policies on topics such as:

- Code of Conduct



- Anti-Harassment and Bullying
- Anti-Corruption and Anti-Bribery
- Grievance Policy
- Equal Employment Opportunity and Anti-Discrimination Policy
- Whistle blower Policy
- Overtime and Leave Policy

The above policies provide an infrastructure for exposing unethical or illegal behaviour which may present concerns under modern day slavery and trafficking legislation and regulations, thereby mitigating the risk that Acrow Limited has internal compliance issues.

On an annual basis, all staff are required to complete refresher training on the above policies to ensure knowledge is kept up to date.

In addition, our Code of Conduct sets out guidelines for expected behaviour of our employees and to not knowingly participate in any unethical or illegal activity and provides a reporting procedure if an employee becomes aware of any actual or potential violation of the Code. Our whistle-blower policy is also in place to enhance communication and empower our staff to promote safety, security and ethical behaviour.

All policies are made available to employees via our Internet.

Our supply chains and partner network

Acrow Limited strives to do business with customers, partners and suppliers of sound business character and reputation. Acrow Limited does not knowingly support any public or private organisation which espouses unethical or discriminatory policies or practices.

As of 30 June 2024, the Groups supply chain comprised over 18 direct suppliers across 7 jurisdictions globally.

What we buy:

Our procurement generally consists of the following:

- Steel, Formwork and Scaffold suppliers, Timber Suppliers, Transport and labour Suppliers.
- Information and Communications Technology (ICT) – This includes software, cloud platform services, hardware, computer systems, telecommunication devices, video technology and network technology. The majority of our suppliers are top tier companies such as Microsoft.
- Facilities – Acrow Limited has offices and employees in 14 different locations with corresponding spend on facilities services including cleaning services, office maintenance, energy and utilities, waste management and security, as well as furniture supplies, consumables and stationery.
- Marketing – This includes spend on online marketing, advertising agencies, events, travel and entertainment.
- Professional Services – This includes spend on consulting, audit, advisory, and legal services.

Who we partner with:

The Group has several different types of partners including construction Companies; developers, distributors, advisories and service providers, integration partners, and original equipment manufacturing (OEM) partners.

An Acrow Limited Partner is defined as all Acrow Group business partners (and all personnel or representatives employed or engaged to provide services to those business).



Acrow Group recognises that its Partners may operate in different legal and cultural environments and Acrow Limited Partners must comply with the fundamental legal and ethical principles described in the Code of Conduct which is a condition of a Acrow Group Partner agreement.

Acrow Group expects all its Partners to perform their work with honesty, truthfulness, and integrity. The Code of Conduct articulates the policy of the Group, and our expectation of Acrow Group Partners to comply with all applicable laws, human rights and labour standards.

5. Recent developments and looking forward

Our supply chain

In accordance with our corporate Values, we are pleased to report we have not identified an increased risk of modern slavery to workers in our supply chain for the reporting period.

The Year Ahead

We are committed to assessing the risks in our operations to ensure the steps we take to protect against modern day slavery and human trafficking are relevant and effective. As such, in the financial year ending 30 June 2024 we aim:

- To further assess and review our existing supplier and partner network's compliance with the law and their reputation.
- To ensure our policies and recruitment processes are appropriate to protect against modern day slavery and human trafficking.
- To further enhance and communicate our position against modern day slavery, include specific clauses regarding compliance with Modern Slavery legislation for all new partner and supplier contracts.

6. Consultation and Board Approval

Our Modern Slavery Statement was reviewed and circulated to the directors of Acrow Formwork and Scaffolding for comment prior to its formal approval by the Board on 29 November 2024.



Steven Boland
Acrow Limited CEO and Managing Director
29 Nov 2024

