

### Introduction:

**This statement, pursuant to s54(1) of the Modern Slavery Act 2015 (UK) and the Australian Modern Slavery Act 2018, describes the steps taken by Dowell during the financial year ended December 31, 2020 to address modern slavery and human trafficking across the business and our global supply chains and also sets out our plans for future improvements**

Dowell significantly values good corporate governance, as well as compliance with laws, regulations and ethical practices. Dowell is a values-based organisation, using the principles of Excellence, Integrity, Collaboration and Endurance to guide everything that we do.

The Modern Slavery Act 2018 (Cth) aims to combat modern slavery in global supply chains which includes any circumstance of exploitation, including, but not limited to, slavery, servitude, forced labour, child labour, human trafficking, abuse of power, threats, withholding of wages and deprivation of freedom.

Dowell is committed to ensuring modern slavery is not present in any of its supply chains and is working closely with its suppliers to ensure they too align with the principles and values both of Dowell and the Modern Slavery Act.

### Entity Details:

Company Name: DOWELL WINDOWS PTY LTD  
ABN: 78 004 069 523  
Registered Address: 1084 Kingsford Smith Drive, Eagle Farm, QLD, 4009

### Company Overview and Structure:

Dowell Windows Pty Ltd (Dowell) is a wholly Australian owned manufacturing company, originally incorporated in 1860 and celebrating its 160<sup>th</sup> year of continuous operation in 2020. Dowell employs approximately 700 people

Dowell locally designs, fabricates, sells and delivers aluminium and timber windows and doors and associated products and services to a wide range of customers including major project builders, small and medium builders, tradespeople, owner-builders and the general public. Dowell's products are predominantly used in the low and medium density residential housing market.

Dowell operates from 20 locations nationally, with eight major manufacturing facilities. Dowell locations are present in South-East Queensland, New South Wales, Victoria, Tasmania, South Australia and Western Australia.

Manufacturing and Sales operations are managed via regional general managers, supported by key national functional managers in the areas of human resources, marketing, product development, finance, procurement and information technology, all of whom form the senior management team of the business, reporting directly to the CEO. The CEO reports to the Managing Director and the Advisory Board.

Dowell's current CEO joined the company in October 2017.

In addition to Dowell's window and door operations, it also wholly owns a small plastics manufacturing company, Wunderlich Plastics with 9 employees which operates in NSW and whose largest customer is Dowell.

### **Supply Chains:**

Dowell deals almost exclusively with Australian based supplier entities with Dowell directly importing less than 1% of its material requirements. This will further reduce in FY21.

Dowell's largest material purchases relate to aluminium extrusion, timber and glass, being the key components of window and door products. These materials and the associated hardware items such as handles, latches and other fixtures represent over 70% of our total external purchases, including labour hire, transport, utilities and other non-material expenditure.

Dowell's two main aluminium extrusion suppliers are both Australian based companies, with Dowell's extrusion materials being manufactured within Australia. Dowell's two largest glass suppliers are also Australian based companies who manufacture Dowell's glass requirements within Australia. Dowell also sources glass products from Australian entities who procure glass products for Dowell from overseas processors, namely China.

Timber materials are also sourced from Australian companies, however, depending on species and specifications may either be sourced and processed locally or from overseas.

Dowell's largest hardware and component supplier is also an Australian based manufacturing company. Products from this supplier are manufactured from locally produced and imported products.

In the past two years, Dowell has made a concerted effort to put in place formal supply agreements with its main suppliers to clearly articulate the obligations of both parties in the supplier-customer relationships. These agreements deal with among other things the obligation for suppliers to adhere to all laws, regulations, and awards relating to their employee's remuneration and safety.

During the year ended December 31, 2020, a number of those supply agreements have included a formal requirement of the supplier to understand and implement the expectations of the Modern Slavery Act

Dowell has identified that moving forward it will seek to further develop such supply agreements to recognise the Modern Slavery Act as an essential term of any agreement and to enforce the obligation for Dowell's suppliers to require the same undertakings from their suppliers and supply chain partners.

### **Identified Risks Relating to Modern Slavery:**

Dowell identifies its most likely risk of exposure to Modern Slavery Act breaches to be via third-line supply chain partners to its main Australian-based suppliers. As mentioned previously, this could arise where Dowell is sourcing materials and/or services from Australian-based companies who in turn directly source these goods and services from overseas and in particular, developing countries where human rights violations and/or other employment related breaches may not be actively policed or punished.

**Actions taken to mitigate the risk to Modern Slavery:**

Dowell has sought to carefully select its major supply chain partners with these exposures and routinely visits and inspects the offshore supply chain partners of our Australian suppliers. The objectives of such inspections are to verify product quality and employee safety however it is acknowledged that more formal enquiries regarding broader employee welfare matters require further development and will be a further focus in the next financial year.

In addition to the above, Dowell has administered specific Mandatory Slavery Act surveys and declarations to all suppliers with which it spends \$45,000 per annum or greater to further establish whether any other potential exposures exist. At the time of writing this statement, no such further risks have been identified.

**Effectiveness of Current Measures:**

Dowell is confident that its current practices around supplier vetting and clear setting of obligations of suppliers regarding employee welfare result in an extremely low risk of such suppliers being in direct breach of the provisions of the Modern Slavery Act. Further, where practical to do so, Dowell has directly met, visited and corresponded with third-line offshore supply chain partners to verify that dealings are with ethical and professional entities.

However, and as acknowledged above, Dowell continues to develop its procedures and processes in relation to interrogation of third-line supply chain partners. Whilst Dowell is confident its current measures protect against breaches by its immediate suppliers, current measures provide less comfort around non-direct supply chain entities and as such this will be the subject of further work.

In relation to this statement, I confirm that it has been approved by the principle governing body being the Board of Directors of Dowell Windows Pty Ltd of which the undersigned is the Chairman on 3 February 2021.

For and on behalf of:  
DOWELL WINDOWS PTY LTD



LEWIS SARAGOSSI  
**CHAIRMAN OF DIRECTORS**  
3 February 2021