

MODERN SLAVERY STATEMENT

2024/2025

FREDON

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01

ABOUT THIS STATEMENT

This Modern Slavery Statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) (the Act) by Fredon Industries Pty Ltd (ABN 12 003 361 297) on behalf of its controlled entities (collectively referred to as "Fredon", "we", "us" or "our"). It outlines the actions taken by Fredon during the reporting period to assess and address the risks of modern slavery in our operations and supply chains.

02

CEO MESSAGE



Scott Olsen, Chief Executive Officer

At Fredon, we're committed to upholding human rights and protecting the dignity of every person connected to our operations and supply chains. Modern slavery remains a concerning issue, and it's a reminder that businesses like ours need to stay vigilant, informed, and take a proactive approach to managing risk and driving change.

While our operations are based in a country with strong regulatory frameworks, we understand that risks can still exist. These risks may come through where we source materials, how we use subcontractors, or through labour hire arrangements.

We are making real progress. We continue to deliver training to our Employees and conduct informal supplier audits as well as regularly reviewing and updating our procurement policies and governance processes. These steps are part of our broader commitment to doing the right thing and holding ourselves accountable.

We know that the best outcomes happen when we work together. That's why we're committed to collaborating with our suppliers and industry partners to improve transparency and ensure our expectations are clearly communicated and followed.

This is not a one-off exercise. Addressing modern slavery is an ongoing responsibility, and we're committed to continuing this work and doing it properly.

Sincerely,

Scott Olsen
Chief Executive Officer

WHO WE ARE

Fredon Group is a leading provider of Electrical & Communications, HVAC (Heating/Ventilation/Air Conditioning), Security, Technology Services and Facility Service and Maintenance solutions.

- Engineering/design
- Delivery of large construction projects
- Client services/special projects
- Technology and security integration
- Scheduled preventative maintenance
- Building services integration and off-site prefabrication
- Industrial and Infrastructure projects



1968

Established



Privately

Owned



1500+

Staff



\$711M

Turnover

We provide services to a wide range of clients in sectors including commercial, government, defence, health and aged care, industrial, mining and resources, infrastructure and education. Our track record of major projects, innovation and numerous industry awards demonstrates that we offer industry leading project management and technical expertise.

Fredon is 100% Australian owned and operated and has delivery capabilities Australia wide and in New Zealand.

Our core capabilities include a wide range of services that can be delivered on a design & construct, construct only or full turn-key basis to cover the facilities lifecycle.

We have upheld an enviable reputation, boasting high-quality workmanship, value for money, outstanding safety performance and outstanding client satisfaction. Our WHS, Quality Assurance, Procurement and Project Management systems have been developed to ensure scalability to the highest standards and most complex requirements.

Our parent company, Fredon Industries Pty Ltd has 17 reporting entities.

OFFICE LOCATIONS

FREDON HAS 10 OFFICES ACROSS AUSTRALIA AND 1 IN NEW ZEALAND



NSW
SILVERWATER
(HEAD OFFICE)

VIC
FAIRFIELD
HEATHERTON
FOOTSCRAY

WA
BAYSWATER

ACT
FYSHWICK

QLD
UNDERWOOD
BRISBANE CBD
GOLDCOAST

SA
NORTH PLYMPTON

NEW ZEALAND
AUCKLAND

VALUES

We promote the following values across our business and encourage our employee to conduct themselves in alignment with our values.



Excellence

In design, delivery & service



Innovation

Through design, education & sustainability



Integrity

In everything we do



People

Empowered to perform

OUR STRUCTURE

OPERATIONS & SUPPLY CHAIN

ENTITIES

Fredon Industries Pty Ltd is the parent company of the Fredon Group and operates across Australia and New Zealand under three key brands: Fredon, Aserve, and Sturdie. The group comprises the following 17 entities:

- Fredon Industries Pty Ltd (Parent Company)
- Fredon Infrastructure Pty Ltd
- Fredon (VIC) Electrical Pty Ltd
- Fredon (WA) Electrical Pty Ltd
- Fredon QLD Pty Ltd
- Fredon ACT Pty Ltd
- Fredon Air Pty Ltd
- Fredon Air (NSW) Pty Ltd
- Fredon Air (VIC) Pty Ltd
- Fredon Air (WA) Pty Ltd
- Fredon Air Service Pty Ltd
- Fredon Technology Pty Ltd
- Fredon Technology (VIC) Pty Ltd
- Aserve Victoria Pty Ltd
- Aserve Technology (VIC) Pty Ltd
- Sturdie Trade Services Pty Ltd
- Sturdie Queensland Pty Ltd
- Fredon Air NZ Limited

These entities operate under a shared governance framework and integrated management systems covering safety, quality, procurement, finance, and compliance.

MAIN OPERATIONS

Fredon has over 1,500 employees nationally, with our operations covering:

- Providing electrical and HVAC contracting solutions to the construction industry
- Providing servicing and maintenance of electrical, HVAC and AV assets
- Supporting Services (Finance, IT, HR, HSEQ, Procurement, Marketing, Commercial)
- Providing electrical contracting solutions for infrastructure projects
- Providing AV and security contracting solutions
- Providing customised and preventative maintenance
- Providing electrical contracting for minor construction and fit outs
- Providing AV contracting solutions for service, maintenance and fit outs

SUPPLY CHAIN

Fredon's supply chain is wide-ranging and supports the delivery of construction, maintenance, and technology services. It includes both goods and services sourced from domestic and international suppliers. Our supply categories include:

- Electrical Switchboards, Cable & Accessories
- Commercial Lighting
- Data & Communications
- Audio Visual Products
- Plant and Equipment Hire
- Ductwork & Sheetmetal
- Mechanical Services & Commercial HVAC
- Access Control & Security supplies
- Stationery, Office Supplies & PPE
- Technology (hardware and software)
- Labour hire & subcontractors on our projects
- Recruitment agencies

MODERN SLAVERY RISK

IN OUR OPERATIONS AND SUPPLY CHAIN

Fredon acknowledges that modern slavery can occur in every sector and industry, and we are committed to identifying and addressing risks across our operations and supply chains.

RISK OVERVIEW

In the 2024–2025 financial year, Fredon’s total procurement and subcontractor spend was approximately \$461 million, comprising:

- \$254 million in materials and product procurement
- \$207 million in subcontractor engagement

Our procurement activities are primarily domestic, with over 99.9% of spend directed to Australian-based suppliers and subcontractors. However, we recognise that many of our Australian suppliers may source goods or components from overseas markets, particularly from regions with known modern slavery risks such as China, Southeast Asia, and the Pacific.

Fredon’s active supply chain includes more than 1,500 suppliers, and our procurement covers a wide range of goods and services, including labour hire, switchgear, lighting, HVAC components, cabling, technology hardware, PPE and office supplies.

IDENTIFIED RISK AREAS

We have identified the following areas in our operations and supply chain that may pose elevated risks of modern slavery:

- \$254 million in materials and product procurement
- Imported goods: Products such as lighting, HVAC components, cabling, and IT hardware are often manufactured in countries where forced labour and poor working conditions are more prevalent.
- Labour hire & subcontracting: These services may involve vulnerable workers, including migrant and temporary labour, which can increase the risk of exploitation, particularly if labour hire companies do not have strong governance or employment practices.
- Offshore sourcing through local suppliers: Even though our direct procurement from overseas suppliers is low (<0.1%), indirect sourcing through Tier 1 Australian-based suppliers introduces potential risk from deeper tiers of the supply chain.

OPERATIONAL RISK

Fredon’s direct operations are conducted in Australia and New Zealand, where there are strong legal frameworks, industrial relations protections, and regulatory oversight. As such, the risk of modern slavery within our direct operations is considered low. However, subcontractor and labour hire arrangements in the construction industry remain an area of focus due to the potential for underpayment, unsafe working conditions, or lack of employment transparency.

MITIGATION AND CONTROLS

Fredon’s expectations are also reinforced through our supplier and subcontractor onboarding processes and contractual documentation. These require compliance with relevant Australian laws, including the Modern Slavery Act, and adherence to our Code of Conduct and Procurement Policy. Further detail on these measures is outlined in Section 06.



06 ACTIONS WE HAVE TAKEN TO

ADDRESS MODERN SLAVERY RISK

Fredon is committed to preventing and addressing modern slavery risks within our operations and supply chain. The following actions were undertaken in the reporting period:

POLICY FRAMEWORK

We maintain a suite of policies and procedures that reinforce ethical and lawful conduct, including:

- Modern Slavery Policy – Outlines our commitment to identifying and addressing modern slavery risks and complying with the Modern Slavery Act 2018 (Cth).
- Supplier and Subcontractor Code of Conduct – Requires all suppliers and subcontractors to comply with applicable laws and demonstrate ethical practices.
- Code of Conduct – Sets behavioural expectations for all personnel working with or for Fredon.
- Workplace Anti-Bullying, Anti-Discrimination and Anti-Harassment Policy – Supports respectful and safe work environments.
- Speak Up (Whistleblower) Policy – Provides a confidential external reporting mechanism for raising concerns, including suspected modern slavery.
- Workplace Grievance Policy – Enables employees to report and resolve grievances in a fair and timely manner.

The following policies were reviewed and updated during the reporting period to ensure continued alignment with legislation and best practice:

- Speak Up Policy (Whistleblower)
- Code of Conduct
- Workplace Anti-Bullying, Anti-Discrimination and Anti-Harassment Policy
- Sexual Harassment Policy

SUPPLIER & SUBCONTRACTOR ENGAGEMENT

- New Supplier Onboarding: All new suppliers and subcontractors must complete onboarding via our procurement portal, which includes agreeing to our Supplier Code of Conduct and declaring compliance with Australian laws, including the Modern Slavery Act.
- Ongoing Declarations: Subcontractors are required to submit monthly statutory declarations confirming compliance with applicable state and federal legislation.
- Contractual Obligations: All supplier and subcontractor agreements include provisions requiring compliance with the Modern Slavery Act and other relevant laws.
- Conducting informal random audits with suppliers to ensure adherence and compliance with Australian legislation including the Modern Slavery Act.

GRIEVANCE MECHANISMS

Fredon provides a third-party whistle blower hotline, available 24 hours a day, 7 days a week, to enable employees and stakeholders to report concerns confidentially and anonymously, including any suspected unethical or illegal conduct. This service is actively promoted within the business and is monitored to ensure that all reports are addressed in a timely and appropriate manner.





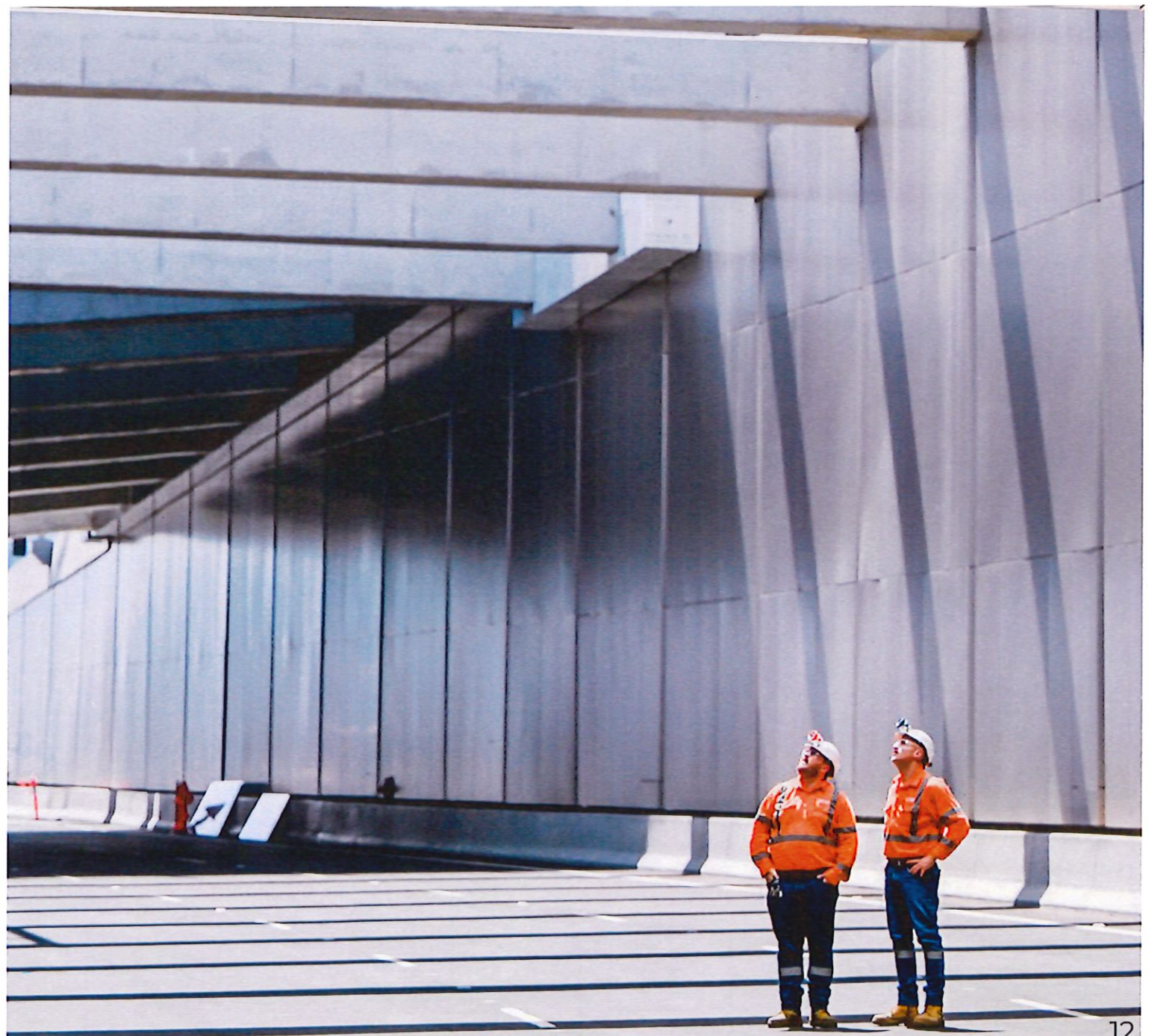
07 ASSESSING THE

EFFECTIVENESS OF OUR ACTIONS

Fredon is committed to the continuous improvement of our approach to identifying and addressing modern slavery risks. We regularly review and refine our internal processes, procedures and policies to ensure they remain effective in mitigating risks within our operations and supply chain. We conduct informal audits on a selection of suppliers to assess their compliance with our expectations and contractual obligations. Our procurement processes and contract documentation are also subject to ongoing evaluation and development to ensure they continue to align with modern slavery requirements. Should deficiencies be identified, we will implement corrective action plans to support continuous improvement. In addition, we remain focused on raising awareness within the business by engaging with and educating our management team and new leaders about modern slavery reporting obligations and compliance with the Act.

REMEDIATION PROCESS

If modern slavery risks or potential instances of non-compliance are identified within our supply chain, Fredon is committed to taking prompt and responsible action. We will report the matter to the appropriate authorities where required and will engage directly with the relevant supplier or subcontractor to develop a corrective action plan. This plan will outline specific remediation steps and establish a mutually agreed timeline for implementation. Our aim is to support improvement and accountability while protecting the rights and welfare of affected individuals. Where necessary, we will review the ongoing relationship with the supplier to ensure alignment with Fredon's ethical standards and legal obligations.



NEXT STEPS: LOOKING AHEAD

Fredon is committed to the continuous improvement of our practices in identifying, assessing, and addressing modern slavery risks. In the next reporting period, we will take further steps to strengthen our modern slavery risk management framework.

MODERN SLAVERY AWARENESS TRAINING

We will continue to deliver Modern Slavery Awareness Training, targeted at leaders and relevant team members involved in procurement activities. This training provides an awareness of modern slavery indicators, legal obligations under the Modern Slavery Act 2018 (Cth), and Fredon's internal reporting and response procedures.

By building capability in these areas, we aim to better equip our staff to identify and manage potential risks.

SUPPLY CHAIN ASSESSMENT

As part of our Modern Slavery Risk Management Strategy, we conduct regular assessments of our suppliers and subcontractors to ensure compliance with the Modern Slavery Act 2018 (Cth) and our Supplier Code of Conduct. A formal survey is currently being developed for the purpose of:

- Proactively assessing modern slavery risks within our supply chain.
- Evaluating compliance with Fredon's ethical sourcing and labour rights policies.
- Identifying areas where support or improvement is required.

Once developed and finalised, the Survey will be distributed to Fredon's current supply chain.

The questions align with Fredon's Modern Slavery Policy and will help us enhance our assessments of suppliers and subcontractors.

| Fredon Modern Slavery Policy Area | Survey Alignment |
|---------------------------------------|--|
| Supplier & Subcontractor Compliance | Adherence to Fredon's Supplier Code of Conduct and the Modern Slavery Act. |
| Modern Slavery Risk Assessment | Understanding the suppliers' internal risk evaluations, high-risk country sourcing, and due diligence processes. |
| Labour Rights & Ethical Sourcing | Evaluation of fair wages, workplace conditions, freedom of association, and anti-child labour policies. |
| Whistle-blower Mechanisms & Reporting | Assessing the availability of anonymous reporting systems for modern slavery concerns. |
| Remediation Process | Ensuring suppliers have a corrective action plan in place if risks are identified. |
| Continuous Monitoring & Training | Learning about policy updates, compliance audits, and supplier education on modern slavery. |
| Contractual Obligations | Requires supplier declaration of compliance with modern slavery laws |

CONSULTATION PROCESS & APPROVAL

This statement was prepared by Fredon's Human Resources Team in consultation with our Executive Team, Commercial, Procurement and Health, Safety, Environment and Quality teams who actively participate in overseeing the process and tools that formulate our risk management approach.

This Modern Slavery Statement was approved by the Board of Directors of Fredon Industries Pty Ltd and is signed by Scott Olsen, Chief Executive Officer, as a responsible member of the entity's principal governing body.



Scott Olsen

Chief Executive Office

