

Modern Slavery Statement

Rollease Acmeda Holdings Pty Ltd FY2023

This statement covers the activities of Rollease Acmeda Holdings Pty Ltd (ACN 602 994 016) and its owned and controlled entities during the year ended 31 December 2023 | period 1 July 2022 to 31 December 2023.

References in this statement to 'Rollease Acmeda', 'we', 'our' and 'us' are references to the Rollease Acmeda Holdings Pty Ltd and its owned and controlled entities.

This modern slavery statement is submitted under the *Modern Slavery Act 2018* (Cth) (**the Act**) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This statement has been approved by the Directors of Rollease Acmeda Holdings Pty Ltd on the 20th December 2024.

About us

At Rollease Acmeda, one of our core values is consideration. We are respectful and we show empathy, integrity, and kindness for each other, our partners, and our community.

Our structure

Rollease Acmeda is a proprietary company registered in Victoria, Australia, and our registered office is located at 110 Northcorp Boulevard, Broadmeadows, Melbourne, VIC 3047, Australia.

Rollease Acmeda is ultimately owned by JM Franchise Holdings Inc., a corporation registered in Delaware, United States. JM Franchise Holdings Inc. and its subsidiaries conduct a diversified range of business activities across the automotive, financial services, franchising and specialty distribution industries.

Rollease Acmeda itself has a number of owned and controlled entities, including:

- Rollease Acmeda Pty Ltd (ACN 602 498 395); and
- G.C.M Pty Ltd (ACN 006 258 288); and
- Rollease Acmeda S.r.L.

Rollease Acmeda also had two owned and controlled entities that were deregistered during the reporting period; Waypoint Distribution Pty Ltd (ACN 080 564 665) and Waypoint WA Pty Ltd (ACN 612 609 692).

Our operations

We are innovators of precision window covering hardware systems, machinery and automated shade solutions.

We supply an ever-expanding range of innovative designs, based on industry trends and client needs. The ranges currently include: rollers, cassette rollers, external rollers, awnings, verticals, venetians, romans and soft shades, panels and curtains. Additionally, we provide motorisation, automation and child safety options to suit all of our systems. From a manufacturing perspective, we supply, as well as service, a variety of manual and automatic, punching and cutting tools and machinery.

We engage 127 employees and 2 contractors.

In 2022 Rollease Acmeda Holdings Pty Ltd changed its annual accounting period from an Australian financial year to a calendar year. The transition period of 1 July 2022 – 31 December 2022 has therefore been included in this statement for completeness.

Globally, the broader Rollease Acmeda group employs over 200 staff worldwide, spanning the USA, Australia and Europe, to serve several thousands of customers in over 40 countries.

Our supply chain

We work with 40 suppliers from a number of countries including: Australia, Indonesia, China, Taiwan, Hong Kong, Japan, Germany, Italy and The United States of America,

Our suppliers are primarily located in Indonesia and China accounting for 55% of overseas suppliers total spend.

The main types of goods and services that we procure are

- raw materials for the delivery of cutting edge window furnishing solutions.

We engage our suppliers on short and long term supply agreements.

We also have a number of indirect suppliers, including hardware, office supplies, personal protective equipment and tools suppliers.

Modern slavery risks

We recognise that modern slavery may impact our business activities, and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

Risk assessment methodology

We utilised a risk assessment methodology which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location and specific entity risk. These risk factors are based on the risk indicators and information published in:

- the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities (**Commonwealth Guidance**);
- the Walk Free Foundation's [Global Slavery Index 2023](#) (**GSI 2023**);
- International Labour Organization (Global Estimates of Modern Slavery: Forced Labour and Forced Marriage 2022) (**ILO Global Estimates of Modern Slavery**); and
- Australian Council of Superannuation Investors' 'Modern Slavery Risks, Rights & Responsibilities' report 2019 (**ACSI Report**).]

Our initial risk assessment has indicated that our operations and supply chain have a low potential for modern slavery risks. Our risk profile is summarised in the table below.

Risk profile

Risk	Description of risk
Sector /Industry	Risk of unskilled labour through seasonal workforces, such as those experienced in China post New Year holiday periods.
Product / Service	Suppliers of electronic and textiles are in a cost competitive industry where there is a potential to cut costs by compromising labour standards.

Actions to assess and address risk

We understand the importance of working collaboratively with our associates, suppliers and the broader industry to combat modern slavery. That is why during our first reporting period we introduced a number of steps to assess and address modern slavery in our operations and supply chains.

Governance and accountability framework

The governance and accountability framework is managed and approved by the Rollease Acmeda Executive Leadership Team (ELT). Policies approved by the ELT are then implemented by HR.

Policies and procedures

Our governance framework includes the following policies and procedures to ensure we have strong frameworks to enable us to assess and address modern slavery risks, including:

- Code Conduct
- Respectful Workplace Policy

Assessing our effectiveness

We are committed to reviewing the effectiveness of our actions including modern slavery reviews conducted in Senior Leadership meetings, along with development of a Business Code of Conduct and Supplier Assessment and Review process that will include sections related to modern slavery.

Some examples of ways in which we measure our effectiveness include:

- regularly reviewing our modern slavery processes, with senior management meeting annually to consider whether we are appropriately identifying and evaluating our modern slavery risks, and
- when commencing a new operation or engaging a new supplier, assessing whether our existing risk management processes remain appropriate.

We also monitor our performance against a number of key performance indicators. These include:

- the percentage of employees who have completed training on modern slavery;
- the number of our suppliers who have committed to our Supplier Code of Conduct; and
- the number of suppliers you have asked to complete a detailed questionnaire

Looking forward

We will continue to review and consider the steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

In 2024, we will be introducing the following policies:

Conflict of Interest
Whistleblower Policy
Anti-Corruption, Anti-Bribery Compliance Policy
Code Business Conduct Global
Sanctions Regime Policy

Training

In 2024, we will be conducting targeted training for the Respectful Workplace Policy. Refresher training for the Respectful Workplace Policy will be conducted yearly thereafter.

We are further developing our modern slavery framework, and we recognise there are further steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

Going forward, we will focus on:

- developing an ongoing review process of assessing and addressing modern slavery risk through senior management reviews.
- introducing clauses in our standard form contracts to address modern slavery obligations.
- including clauses regarding modern slavery into new and ongoing supplier assessment and reviews.
- maintaining regular supplier visits to ensure they are complying with modern slavery and business requirements relating to our supplier code of conduct.
- developing an action plan to focus and prioritise our actions for future reporting periods;
- establishing the roles and responsibilities of people in our business who will be responsible for developing a modern slavery framework;
- developing a modern slavery policy for our business that establishes our commitment to addressing modern slavery risks;

In order to assess the effectiveness of these actions, we will:

- when commencing a new operation or engaging a new supplier, assess whether our existing risk management processes remain appropriate;
- monitor the number of suppliers committing to our policies and procedures;
- track the percentage of employees who have completed training on modern slavery; and
- monitor the number of contracts with modern slavery clauses included

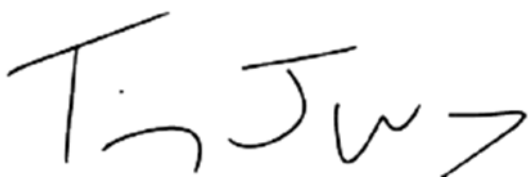
Consultation

We have consulted with each of our owned and controlled entities in the preparation of this Modern Slavery Statement, including by discussing the details of this Modern Slavery Statement and how we intend to further develop our modern slavery framework in the future.

Approval

This statement was approved by the board of Rollease Acmeda Holdings Pty Ltd in their capacity as principal governing body of Rollease Acmeda Holdings Pty Ltd on the 20th December 2024.

This statement is signed by Tim Way in their role as director of Rollease Acmeda Holdings Pty Ltd on 20th December 2024.

A handwritten signature in black ink, appearing to read 'Tim Way', with a stylized flourish at the end.

Tim Way
Director of Rollease Acmeda Holdings Pty Ltd
20th December 2024

Statement Annexure

Mandatory criteria

This statement complies with the mandatory criteria for a modern slavery statement outlined in section 16 of the *Modern Slavery Act 2018* (Cth). The below table indicates where each requirement is addressed in this statement.

Requirement	Page Number
(a) Identify the reporting entity.	Page 1
(b) Describe the structure, operations and supply chains of the reporting entity.	Pages 1 & 2
(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.	Pages 2
(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Pages 3
(e) Describe how the reporting entity assesses the effectiveness of such actions.	Pages 3
(f) Describe the process of consultation on the development of the statement with any entities that the reporting entity owns or controls (if a joint statement has been made under section 14, also describe the process of consultation with the entity giving the statement).	Pages 4