

VENTORA GROUP – MODERN SLAVERY STATEMENT

INTRODUCTION

VENTORA Group Pty Ltd (ACN 087 012 226) and its wholly owned subsidiaries (**VENTORA/we/our**) is owned by an affiliate of Platinum Equity Advisors, LLC.

This statement has been prepared by VENTORA to meet the requirements of the Modern Slavery Act 2018 (Cth) (**the Act**) and covers the financial year reporting period from 1 January 2024 to 31 December 2024 (**the Reporting Period**). VENTORA is the relevant reporting entity for the purposes of the Act. VENTORA takes its commitments under the Act very seriously. As a company, we are committed to conducting business in a lawful, ethical, and responsible manner and expect our supply chain partners to share this commitment.

OUR STRUCTURE

VENTORA is an Australian company with headquarters in Sydney. It employs over 4,500 employees and comprises of 41 manufacturing and supply facilities across Australia, Asia and the Pacific. Within the VENTORA structure there are 31 wholly owned subsidiaries including the brands Corinthian®, Stegbar®, A&L®, Trend® and Breezway®, among others.

OUR OPERATIONS

As a group, VENTORA is a leading manufacturer of high-performance interior and exterior building products, offering one of the broadest selections of windows, interior and exterior doors, and wall systems to service the residential, renovation & market, multi-residential and commercial building and construction industry.

OUR SUPPLY CHAIN

Designing and manufacturing a wide variety of products and solutions to support the construction industry requires a far-reaching and diverse supply chain.

VENTORA sources materials from over 1,400 suppliers of which the top categories of spend are on materials such as aluminium extrusions, locks, timber, hardware furniture and glass. Our materials and products are sourced from more than 40 countries outside Australia, including Indonesia, China, Malaysia, Taiwan, New Zealand, Thailand and Singapore.

VENTORA also sources non-trade (operational) goods and services such as hire fleet, stationery and energy.

Our supplier relationships have been built and maintained over many years, ensuring consistent quality and reliability.

IDENTIFYING THE RISK OF MODERN SLAVERY IN OUR SUPPLY CHAIN

In the building materials industry, it can be challenging to provide assurance that the original production of raw materials is managed ethically, responsibly, and in accordance with local and international laws. Many of these activities occur deep within the industry's supply chains and therefore can be beyond many company's direct control. VENTORA's value of "building businesses ethically and safely" ensures employees are doing what is right, whilst at the same time prioritising safety, which is at the forefront of business decisions.

VENTORA seeks to work collaboratively with all suppliers across all sectors to achieve our ethical sourcing objectives, including in respect of modern slavery.

ASSESSING AND ADDRESSING MODERN SLAVERY RISK

Over this reporting period, we have continued to assess the supplier's compliance with our ethical standards by:

- ensuring preliminary screening processes are undertaken prior to engaging in business with a supplier. Our supply chain risk assessment process evaluates over 1,400 suppliers across 40+ countries. It integrates modern slavery due diligence, supplier surveys, and other compliance screening tools to evaluate and mitigate operational and reputational risks. Our preliminary assessment of each supplier is based on several parameters such as:
 - Geography
 - Known risks in their geographic location
 - The commodity purchased
 - The level of manual labour required for the assembly of parts
 - The supplier's ownership structure
 - Supplied product quality performance
 - The nature of the business transaction
- regularly undertaking reviews of existing Procurement contracts and VENTORA standard contract templates to ensure that they include relevant clauses on Modern Slavery.
- reviewing and updating our Supplier Code of Conduct to include an express obligation on our suppliers to assess and address the risk of modern slavery in their supply chain. To reiterate, these expectations are:
 - Respect for human rights, including anti-discrimination, anti-harassment, and anti-abuse policies and practices;
 - Compliance with all applicable labour laws, including anti-slavery legislation and regulations;
 - Prohibition of underage or involuntary labour;
 - Payment of wages that meet or exceed the minimum legal requirement or relevant industry standards, whichever is higher, and
 - Respect for employees' rights to freedom of association and collective bargaining, in accordance with applicable laws.
- actively investigating suspected modern slavery violations (whether directly reported to VENTORA's Legal department, HR department or via our confidential ethics and compliance helpline).
- continuing to carry out due diligence of its supplier's compliance with our requirements for responsible sourcing. This included ensuring that all suppliers had signed and returned our Supplier Code of Conduct. This code of conduct is required to be signed by all suppliers and their employees as a mandatory pre-requisite for doing business with VENTORA. The full code is available on our website at <https://www.ventora.com.au/supplier-information/>.

VENTORA will terminate its relationship with Suppliers that are unable to demonstrate compliance with our requirements or lack the willingness to take steps to address identified issues of concern.

VENTORA'S PROCESS FOR ASSESSING THE EFFECTIVENESS OF ADDRESSING MODERN SLAVERY RISKS IN ITS SUPPLY CHAIN

It is imperative that VENTORA's systems and processes are designed to properly monitor the effectiveness of the measures we take to address modern slavery risks.

VENTORA's monitoring process during the Reporting Period involved requesting suppliers to complete a self-assessment questionnaire. Targeted questions were asked from each supplier regarding:

- the written policies and procedures established within their organisation related to modern slavery;
- the degree of due diligence carried out by the organisation for modern slavery risks within its supply chain;
- their awareness of the occurrence of any actual modern slavery within their supply chains; and
- the employment and recruitment practices of the organisation (including the use of any labour hire agencies and brokers).

The response from each supplier was then collated through a dedicated mailbox for review and appraisal by the Legal department. Based on the nature of the response, the Legal department made recommendations to the Procurement team on measures that should be taken to mitigate the identified risks.

Because of an increase in the total spend with certain suppliers compared to previous years, VENTORA extended its scope for this Reporting Period review to include these new suppliers. VENTORA also considered any changes to regions, locations and industries that carry a higher risk of modern slavery when selecting the relevant suppliers for assessment.

Based on the results of this questionnaire, VENTORA is not aware of, nor have we detected any human rights violations within its supply chain for the reporting period.

CONTINUOUS IMPROVEMENT INITIATIVES

VENTORA has undertaken a thorough review of its past processes for risk assessing modern slavery in its supply chains and is making changes to its processes to further improve visibility and objectivity of this supply chain risk for the upcoming reporting period.

In line with this commitment, VENTORA will:

- automate the process for modern slavery survey requests, collection, analysis and reporting of responses using a specialised software solution;
- prepare a Modern Slavery Policy and associated compliance training sessions for our employees to complete, to further raise awareness of modern slavery risks and the actions they can take to address them;
- encourage direct suppliers assessed as "high-risk" to put in place their own modern slavery risk compliance policy applicable to its own supply chains. Those policies should contain, at a minimum, a set of standards and processes to prevent modern slavery practices;
- encourage suppliers to undertake formal vulnerability assessments of its workers to slavery and human trafficking as a part of its recruitment process;
- encourage high-risk suppliers to engage with voluntary certification or audit schemes to assist in modern slavery risk reduction (e.g. SEDEX/SMETA, FSC, PEFC);
- increase the size of our information gathering and assessment campaign to include a larger number of suppliers and continue to work on increasing visibility across all supply chains in assessing risk;
- partner with our key suppliers to implement a continuous risk mitigation and assessment program designed to monitor and reduce their unmitigated risk of modern slavery; and
- continue to update all relevant supplier agreements and internal policies to ensure explicit reference to obligations and expectations surrounding modern slavery within VENTORA supply chains.

VENTORA has already commenced implementing several of the above changes, including introducing a specialised third-party software solution known as iPro (an Australian-based software company that specialises in developing B2B solutions for risk and compliance management, focused on Modern Slavery Assessments), to

assist in the gathering of information, assessment and identification of modern slavery risk. This tool will also enable monitoring our continuous improvement actions for the next reporting period using clear objective risk criteria set out by Australian Law and the ILO Conventions. A numerical risk rating, measuring both inherent and unmitigated supply chain risk for each supplier in both trade and operational supply chains, is provided by the tool to track progress on actions taken over time to track the effectiveness of our continuous improvement actions each year.

To date, VENTORA has commenced assessment of its first batch of suppliers (selected by proportion of total spend in 2024) and is already seeing strong engagement by those suppliers. As VENTORA expands its ongoing assessment of suppliers, the scope of its mitigation actions will be adjusted based on the number of suppliers identified with unmitigated risk and the types of risks identified.

VENTORA has also recruited a Compliance Officer, a newly created role. The Compliance Officer reports directly into the Chief Legal Officer, and one of their primary functions will be to ensure regulatory compliance across the organisation and rapid awareness of any legislative changes. They will be responsible for ensuring oversight on the implementation of measures to assess and address modern slavery, including the continuous improvement actions as set out above.


The implementation of iPro for the 2025 reporting period and analysis of VENTORA's systems and processes has been a key continuous improvement introduced to increase the quality of our monitoring and reporting.

CONSULTATION WITH OTHER CONTROLLED ENTITIES

Entities controlled by VENTORA all share the same directors and report through to the VENTORA CEO. Controlled entities all use the same assessment framework and through the actions detailed above are made aware of the Act, their responsibilities relating to the Act and are trained and committed to operating the company in an ethical manner.

VENTORA and its group entities remain committed to abolishing modern slavery by continuing to raise awareness, improve our due diligence processes, and take appropriate actions, in line with the intent of the Act and our Code of Conduct and Ethics.

This statement was approved by the board of VENTORA Group Pty Ltd and is signed by its authorised person Scott Kelly, CEO of VENTORA Group Pty Ltd.

Signed by:

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Scott Kelly
Chief Executive Officer