

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 June 30, 2021 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 continues to work 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, Dowell employees approximately 740 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 Advisory Board as the principle governing body for Dowell.

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

In addition to Dowell's window and door operations, Dowell also has a small plastics manufacturing division. Operating under the same ABN and trading as Wunderlich Plastics, the facility has 12 full time employees and operates from a site in NSW. The division's largest customer is the Dowell

window and door divisions. For the purposes of this statement, any reference to Dowell is intended to also encompass the Wunderlich Plastics division. For the avoidance of doubt, Wunderlich Plastics is not a separate entity and is governed by the same management structure as Dowell.

Supply Chains:

Dowell deals almost exclusively with Australian based supplier entities with Dowell directly importing less than 1% of its material requirements.

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 directly from two China based entities.

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.

Within the Plastics division, approximately 90% of Dowell's purchases are for raw materials for injection moulding and extrusion manufacture are sourced exclusively from Australian based entities, with the remaining purchases being made up of all locally sourced items such as consumables, spare parts etc.

Dowell has continued its 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, as well as the expectations of the Modern Slavery Act.

Dowell has ensured that all supply agreements entered into or renewed throughout the reporting period, recognises the Modern Slavery Act as an essential term of any agreement and enforces 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 in our previous statement, 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.

Within the 2021 Financial Year, Dowell commenced sourcing glass directly from an overseas supplier in response to the local agent for these goods ceasing to operate. As such, the obligations which previously fell to the local agent to ensure compliance with the Modern Slavery Act will not fall more directly with Dowell and is being managed accordingly. This supplier was however captured in our review in the previous financial year via the Australian Agent.

Actions taken to mitigate the risk to Modern Slavery:

Dowell continues to carefully select its major supply chain partners and would normally routinely visit and inspect our offshore supply chain partners or those of our Australian suppliers. With international travel restrictions curtailing these activities, these visits have transitioned to regular, virtual meetings. The agendas for these meetings include employee safety and well-being based on the principles of the Modern Slavery Act.

Dowell will also continue to administer a bi-annual survey of its suppliers to request details of and confirm compliance with the requirements of the Modern Slavery Act. This is due to be administered again in the 2022 Financial Year.

Separate to these measures, Dowell continues to favour local Australian suppliers and agents to minimise likelihoods of Modern Slavery Act breaches. Wunderlich has ceased activities as an importer of some material sourced within the Asian market and transitioned to domestically sourced material as an example.

At the time of writing this statement, no further risks have been identified.

Effectiveness of Current Measures:

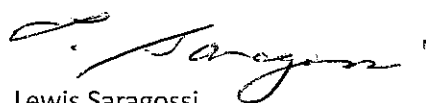
Dowell is confident of their current practices around supplier vetting and clear setting of obligations of suppliers regarding employee welfare resulting in an extremely low risk of such suppliers being in direct breach of the provisions of the Modern Slavery Act.

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

Should there be any queries with anything included herein, please refer to our Chief Executive Officer, Mr Jeff Rotin (jeff.rotin@dowell.com.au) or the undersigned.

This statement was approved by the Advisory Board of Dowell in their capacity as principal governing body of Dowell Windows Pty Ltd.

This statement is signed by Lewis Saragossi in his role as Managing Director of Dowell Windows Pty Ltd.



Mr. Lewis Saragossi
Managing Director

Dated 20/12/24