



JELD-WEN Australia Pty Ltd

Corporate Office  
Level 3, 78 Waterloo Road  
MACQUARIE PARK NSW 2113  
02 9886 3400 Tel  
[www.jeld-wen.com.au](http://www.jeld-wen.com.au)

## JELD-WEN AUSTRALIA – MODERN SLAVERY STATEMENT

### 1. INTRODUCTION

JELD-WEN Australia Pty Ltd (ACN 087 012 226) (**JELD-WEN Australia**) and its wholly owned subsidiaries within the Australasia region (**we/our**) is making this statement in accordance with the Modern Slavery Act 2018 (Cth) (the **Act**). JELD-WEN Australia 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.

This statement covers our financial year ended 31 December 2021 unless otherwise stated.

### 2. OUR STRUCTURE, OPERATIONS, AND SUPPLY CHAIN

JELD-WEN Australia operates in the Australasia region and is part of JELD-WEN Holding, Inc., which is headquartered in Charlotte, North Carolina.

In the Australasia region, JELD-WEN Australia has 31 wholly owned subsidiaries within its structure. As a group, JELD-WEN Australia 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 & remodelling market, multi-residential and commercial building and construction industry in Australia. This statement relates to the business activities of JELD-WEN Australia.

JELD-WEN Australia has approximately 41 facilities in the Australasia region and employs approximately 4,500 employees. We procure materials such as aluminium extrusion, timber, glass, locks, hardware furniture and related plastic components from countries such as Australia, Indonesia, Malaysia, China, Taiwan, New Zealand and Finland.

### 3. IDENTIFYING THE RISK OF MODERN SLAVERY

In the building products industry, it is difficult to provide assurance that the original production of raw materials is sourced responsibly, because some of these processes occur so far up our supply chain, and, therefore, are beyond JELD-WEN Australia's direct control. Nevertheless, JELD-WEN Australia's value of "building businesses ethically and safely" ensures employees doing what is right while prioritizing safety is at the forefront of business decisions.

In line with this value, JELD-WEN Australia is committed to eliminating modern slavery throughout its business and supply chains. We expect the same commitment from our suppliers and other business partners. These expectations are set out in the company's global Supplier Code of Business Conduct, which includes:

- Respect for human rights through appropriate anti-discrimination, anti-harassment and anti-abuse policies and practices;
- Compliance with all applicable regional and local labour laws, anti-slavery rules and regulations;
- No underage or involuntary labour; and
- Employee rights of freedom of association and to bargain in accordance with applicable laws.

JELD-WEN Australia requires suppliers and their employees to commit to this Supplier Code of Business Conduct as a condition of doing business with the company. Our Supplier Code of Business Conduct is available on our website at <https://www.jeld-wen.com/en-us/supplier-information>.



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### **Risk Assessment of our Supply Chain**

Prior to engaging in business with a supplier, and throughout the term of the relationship, we assess that supplier's compliance with our ethical standards. Our preliminary assessment is based upon geography, the commodity purchased, the level of manual labour required for the assembly of parts, the supplier's ownership structure, supplier quality performance and the nature of the business transaction. This risk assessment is performed by JELD-WEN Australia with input from external stakeholders.

JELD-WEN Australia reserves the right to conduct audit procedures to assess vendor supply chains and to confirm compliance with our requirements for responsible sourcing. Continued non-compliance or lack of willingness to take steps to address issues of concern can result in the termination of the supplier relationship.

Our management team reviews our exposure to various supply chain risks to assess whether our policies and procedures appropriately identify and address such risks. We evaluate our suppliers and identify high-risk suppliers on several parameters, including known risks and country location.

To improve supply chain visibility and identify where there are risks of contributing to or being indirectly linked with modern slavery related practices within its supply chains, our suppliers are required to complete a self-assessment questionnaire designed to capture supplier information and identify potential modern slavery and human/labour rights issues in their supply chain. With the large number of suppliers in our supply chain, we recognise there could be a potential risk in our supply chain. The regional legal and procurement teams work closely in the assessment of our suppliers and to date, we are not aware of or have detected any human rights violations in our supply chain.

## **4. RISK MANAGEMENT AND DUE DILIGENCE**

To address the risks of modern slavery in our business, we have undertaken or will undertake the following actions:

- We recognise that modern slavery takes various forms, such as slavery, servitude, debt bondage, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.
- The issue of modern slavery is addressed annually in our Code of Business Conduct and Ethics and other compliance training sessions that our employees are required to complete.
- Our employees are required to adhere to our Code of Business Conduct and Ethics that informs them about the requirements of supply chain transparency with respect to modern slavery. Employees and suppliers who suspect any modern slavery violations are required to report this activity to the company's legal department, HR department or to our confidential ethics and compliance helpline.
- JELD-WEN continues to assess the risks of modern slavery being present in our supply chain by using tools such as the self-assessment questionnaire and by risk rating our current suppliers and assessing their compliance.

## **5. CONSULTATION WITH OTHER CONTROLLED ENTITIES**

There is a commonality of interest among directors across JELD-WEN Australia and its subsidiary entities, as well as regular updates with the senior leadership team who have been made aware of the Act and are committed to operating the company in an ethical manner.

## **6. ONGOING ASSESSMENT OF RISK**

We monitor the effectiveness of our actions to remove the risk of modern slavery from our operations and supply chain by:



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- Further extending our supply chain review to include additional suppliers that we have not reviewed in the preceding two years.
- Investigating any reports received from employees, the public, or law enforcement agencies that indicate the existence of modern slavery practices.
- Monitoring for changes to global trade and economic sanctions; and
- Using tools such as the Global Slavery Index to improve our understanding of the modern slavery risks we may face.

If a violation of our standards is identified and the supplier fails to immediately and satisfactorily remediate the issue, that supplier will risk the immediate termination of all existing and future business with JELD-WEN.

## 7. CONTINUOUS IMPROVEMENT

JELD-WEN is committed to continuous improvement of our systems and processes to reduce the risk of modern slavery in our supply chain. The continuous improvement JELD-WEN will undertake includes, but is not limited to:

- Training of employees who have direct responsibility with the supply chain to ensure their understanding of the Modern Slavery Act and its importance.
- Excluding ourselves from trade with countries subject to trade and economic sanctions.
- Conducting a risk assessment of the remaining supplier base to identify their exposure to modern slavery.
- Continuously reviewing our supply base and their responses to our questionnaire. Any suppliers deemed to be of risk will go through an audit process to identify and reduce the risks of modern slavery being present in our supply chain and assessing these suppliers' compliance with our policy.
- Updating our supply contracts to include obligations to comply with applicable modern slavery laws and regulations.

JELD-WEN Australia will continue to work with parties throughout its supply chains to prevent any contribution that they may have to modern slavery. We will continue to raise awareness among our employees and those we do business with, improve our due diligence processes to effectively identify any risk which may arise, and take appropriate actions in line with the objectives of the Act and our Code of Business Conduct and Ethics.

This statement has been approved by the board of JELD-WEN Australia Pty Ltd.

DocuSigned by:  
  
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David Cutajar  
Director