

NOVEMBER 2021



MODERN SLAVERY STATEMENT

alspec[®]
ALUMINIUM SYSTEMS
SPECIALISTS

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ALUMINIUM SYSTEMS
SPECIALISTS



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About Us - Aluminium Holdings Pty Ltd

At Alspec, we are guided by our core values, one of them is keeping our people and others safe. Key to living this purpose is being a responsible and ethical business.

Aluminium Holdings Pty Ltd ('Alspec') ABN 59 002 302 310 is a private company incorporated under laws of Australia, with has a registered office at 3 Alspec Place, Eastern Creek, NSW 2766

Since 1971, Alspec has been a distributor of rolled, extruded, and fabricated Aluminium products which form aluminium systems, and related supporting products. Alspec has a level of vertical integration, whereby we design, extrude, fabricate, distribute, and retail for customers primarily in Australia and for some export markets.

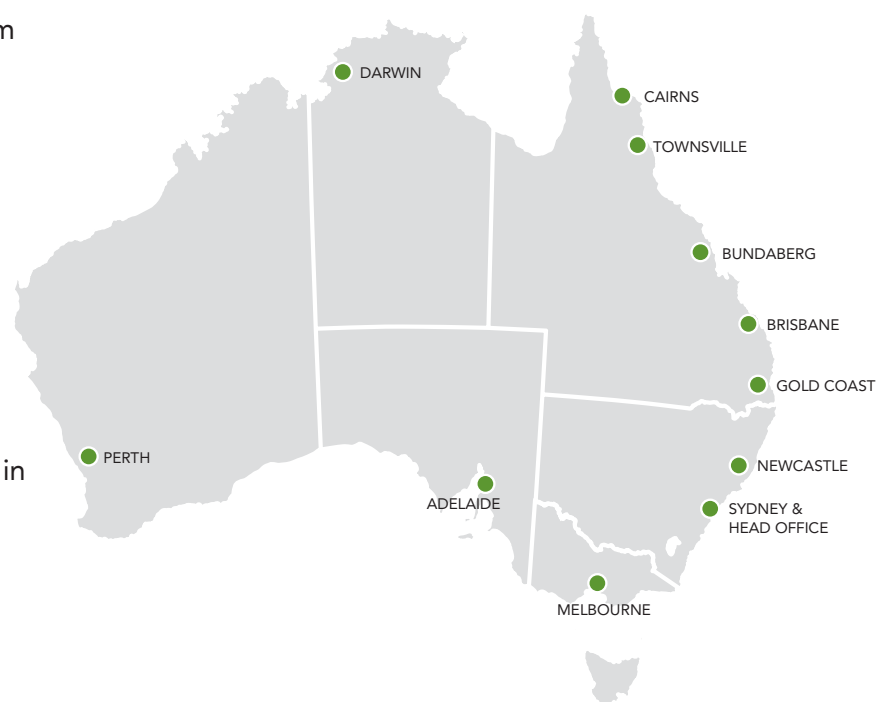
Aluminium Holdings includes the following related entities:

- Aluminium Specialties Group Pty Ltd
ABN – 63 001 252 259
- Aluminium Façade Systems Pty Ltd
ABN – 52 641 120 658
- Omnitest Pty Ltd
ABN – 93 637 528 584
- Jazz Property Pty Ltd
ABN – 654 10800 327

Our Structure and Operations

Alspec is a leading distributor of Aluminium framing systems in Australia and has a network of 14 branches with distribution reach to 95% of the country covering all Australian States and territories. Our subsidiaries are wholly owned by Alspec with a couple of joint ventures.

Our primary product lines are extruded products aluminium products suitable for the assembly of doors window frames, are sourced from a variety of independent extruders both domestically, and overseas in the Asia pacific, including China, Thailand, Malaysia, and a limited range is available from Europe and out of the United States.



Understanding Modern Slavery Risks in Our Operations and Supply Chain



For our commercial operations, Alspec hires directly 100% of its workforce locally, covering Administration, Sales, Marketing, Research and Operations and Logistics, during peak seasonal workloads there is an extension to use Labour Hire agencies, for which due diligence checks have been performed.

From a product sourcing perspective, Alspec balances the domestic requirements against domestic available capacity, and given the level of government infrastructure spend over the past 2 years, there has been an increased utilisation of Australian based manufacturing.

In 2020 there were zero reported incidents with local suppliers or Alspec identities advising of forced labour, coercion, or intentional underpayment.

We consider that domestic suppliers would be a low risk of breaching modern slavery requirements and have therefore focussed our efforts on assessing the risks presented by overseas suppliers.

Alspec considers that our supply chain, and in particular the network of suppliers we use around the world to manufacture Alspec products as posing the most significant risk of modern slavery practices.

We recognise that to ensure a satisfactory level of compliance across such a large number of suppliers will be an ongoing process that will require ongoing diligence and commitment, and this is a new area for Alspec looking to follow both the intent and remain compliant with the Modern Slavery Act 2018 in Australia.

As a consequence, we have implemented a Supplier Code of Conduct that comprehensively details our expectations of suppliers when it comes to the protection of basic human rights.

Supplier audits have also been undertaken in person in a number of our overseas suppliers.

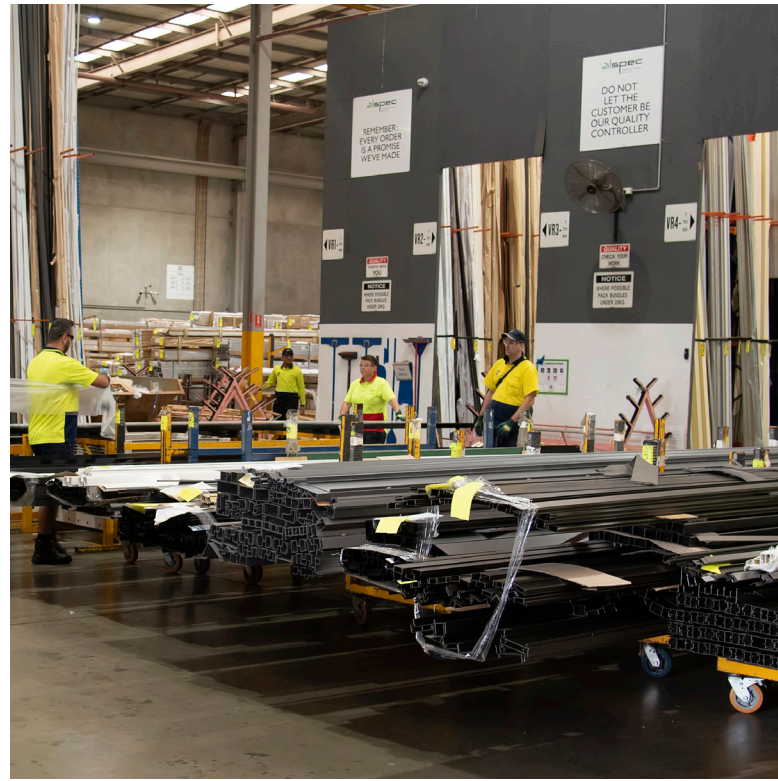
As part of our due diligence process, we have identified some potential risks via our third party suppliers.

Assessing and Addressing our Modern Slavery Risks

Abroad, upon review of the Modern Slavery index, Aluminium fabricated products have not been highlighted as a risk area identified by the global slavery index, but Alspec has implemented several audit and process tools to ensure that we do as much as possible to eliminate the risk of modern slavery in the way that we conduct our business in a sustainable and ethical way.

Information sessions will be cascaded to purchasing leads in our branch network to drive awareness of the intent, and requirements of the Modern Slavery Act in 2021.

Alspec is committed to fostering a culture of good corporate governance and ethical behaviour.



The Whistleblower Policy established in 2020 sets out Alspec's approach to managing disclosures by whistleblowers. It is a key part of Alspec's risk management and corporate governance framework and supports Alspec's Core Values and Code of Conduct.

This Policy aims to:

- Ensure that individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected;
- Ensure that there is a transparent process around receiving, handling and investigating disclosures; and
- Encourage a culture of compliance with our legal and ethical obligations.

Workers for suppliers to Alspec can notify of any significant concerns that would deem to be breaches of the modern slavery act to assist in formal supplier relationship management, the breaches of this act are deemed to be both anti-competitive, and unethical and are inconsistent with our Supplier code of conduct.

The intention is to work with that supplier to provide notice to investigate and provide notice to remedy an identified breach as appropriate.

A register of top suppliers and potential review can be provided to the reporting entity of any alerts of concerns which have been formally reported.

Assessing the effectiveness of our actions



We are committed to a process of continuous improvement around our actions on Modern Slavery and to put in place measures to understand the effectiveness of our actions.

In the first year of reporting, we have focussed on updating our procurement policies and procedures to address the risk of modern slavery practices in our supply chains; and also drive awareness throughout our sourcing practices.

In our second year and beyond, we will seek to: gain a better understanding of our second and later tiers of our supply chain in relation to the supply of our major raw material; incorporate a modern slavery clause into our labour hire contracts & transport agreements. Value the adequacy of our supplier risk assessment processes as part of our commitment to continuous improvement.

Review any reports made via our reporting channels in relation to adverse human rights impacts.

This statement was approved by the Board of Aluminium Holdings Pty Ltd (Alspec) in their capacity as principal governing body of Aluminium Holdings Pty Ltd on 17 August 2021.

Paul Nakhle

Our Values

Alspec is proud of our history and reputation, and have a history of ethical and sustainable employment, and sourcing over 45 years.

Our core values shared with our Employees and Staff are built on our R.E.S.P.E.C.T.

The recommendations of the eradication of modern slavery and the act are consistent with our core values.

Addressing Modern Slavery risks is a complex and challenging undertaking and needs to be a process of continuous improvement. Above all, we want to ensure we continue to have a victim-centred approach in all our activities, along with actionable remediation plans where issues are identified.

Our first Modern Slavery Statement has sought to establish a baseline which we can look to strengthen and refine in future years. Our aim is to continually improve, demonstrating progress from this initial statement.

VALUES R.E.S.P.E.C.T

Resilience

- Instead of finding reasons to fail, we seek reasons to succeed.
- We seek support from others as we cannot always succeed alone.
- A resilient mindset allows us to approach problems with an optimism that others do not exhibit.
- We take criticism constructively and not personally.

Excellence

- We are passionate about our people, process, product and service excellence.
- Excellence is not just a value but a discipline and way of life in Alspec.
- We relentlessly seek ways to improve and perfect all that we do.
- Accepting challenge without fear.

Safety

- Keeping our people and others safe is the Alspec way of life.
- We empower our employees to always place theirs and others safety before profits.
- Safety will always be our first filter to stop doing anything that compromises it.
- Execution of everything safely comes first, comes second and comes third.

People

- We communicate effectively, openly and honestly.
- We listen to each other and share the right of opinion.
- We will always collaborate with our people and have fun.
- We share in responsibility, success, support and a strong sense of family and community.
- We provide careers opportunities not employment through continuous training and development programs.

Environment

- Act as a role model to others both internally and externally on our stewardship of the environment we influence.
- Ensure open and transparent dialogue on what we do and why environmentally.
- Lead industry competence in the reduction of our carbon footprint by embracing continuous environmental business improvement initiatives.
- Eliminate non-biodegradable waste through recycling initiatives.
- Measure our impact positive and where relevant negative impact.

Customer

- We aim to exceed our customer's expectations.
- Customer loyalty must always be earned and never expected.
- We commit to and deliver to promise.
- We all exist to service the needs of our customer both internal and external.

Trust

- We act with absolute uncompromised honesty and integrity.
- We abide by or exceed relevant all industry legislation and product standards.
- We will always adhere to the rule of law.
- We accept responsibility for our actions.



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