

# FY24 Modern Slavery Statement



## FY24 MODERN SLAVERY STATEMENT

**Our Modern Slavery Statement ('Statement') is published in accordance with the *Modern Slavery Act 2018 (Cth)* (the 'Act')**

### Consultation

This Statement has been prepared in consultation with controlled entities (including the Reporting Entities (as defined in the Act) input and endorsement from Fleetwood Australia's Nominations & Diversity Committee, responsible management and members of procurement, risk and compliance, finance, legal, company secretariat and human resources functions.

The process included:

- (1) providing an overview of the reporting requirements under the Act to relevant members and corporate officers involved in the review and endorsement of the Statement;
- (2) detailing information regarding the actions to be taken to address these requirements; and
- (3) seeking feedback with respect to modern slavery matters.

### Modern Slavery Act Reporting Criteria

Criterion	Page
Identify the reporting entity.	2
Describe the structure, business, operations and supply chains of the reporting entity and any entity that the reporting entity owns or controls.	3
Describe the consultation process with any entity that the reporting entity owns or controls.	1
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entity that the reporting entity owns or controls.	5
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, policies, training and remediation processes.	6
Describe how the reporting entity assesses the effectiveness of actions taken.	8
Contains details of the approval by the Board of Fleetwood Australia.	9
Any other information that the reporting entity considers relevant.	8

*Fleetwood Australia was founded in 1964 as a caravan business at the forefront of the popular Australian RV market. Over the past 60 years, Fleetwood Australia has evolved into a nationally recognised brand, becoming a household name for its innovative, sustainable and world leading quality products and service in the modular, community village and RV sectors.*

## Reporting Entity

This Statement is prepared for the Reporting Entities Fleetwood Limited (ACN 009 205 261) and Fleetwood Vic & Qld Pty Ltd (ACN 114 678 349).

This Statement however generally describes the activities of Fleetwood Limited (ACN 009 205 261) and its controlled entities as listed below:

- Fleetwood WA & SA Pty Ltd (ACN 009 306 950);
- Fleetwood VIC & QLD Pty Ltd (ACN 114 678 349);
- Fleetwood NSW Pty Ltd (ACN 127 380 330);
- Glyde Digital Pty Ltd (ACN 050 031 993);
- Camec Pty Ltd (ACN 004 846 584);
- Camec (NZ) Limited (NZBN 9429 038 762 321);
- Northern RV Pty Ltd (ACN 008 763 193); and
- Recreational Vehicle Concepts Pty Ltd (ACN 008 682 513)

(referred to collectively in this Statement as **Fleetwood Australia**).

## Fleetwood Australia – Vision and Values

With a vision to be the leader in reimagining sustainable spaces, Fleetwood Australia is committed to strengthening its modern slavery governance framework. This Statement is made in respect of the period 1 July 2023 to 30 June 2024 and sets out the actions taken by Fleetwood Australia to assess and mitigate modern slavery risks in its business and supply chains.

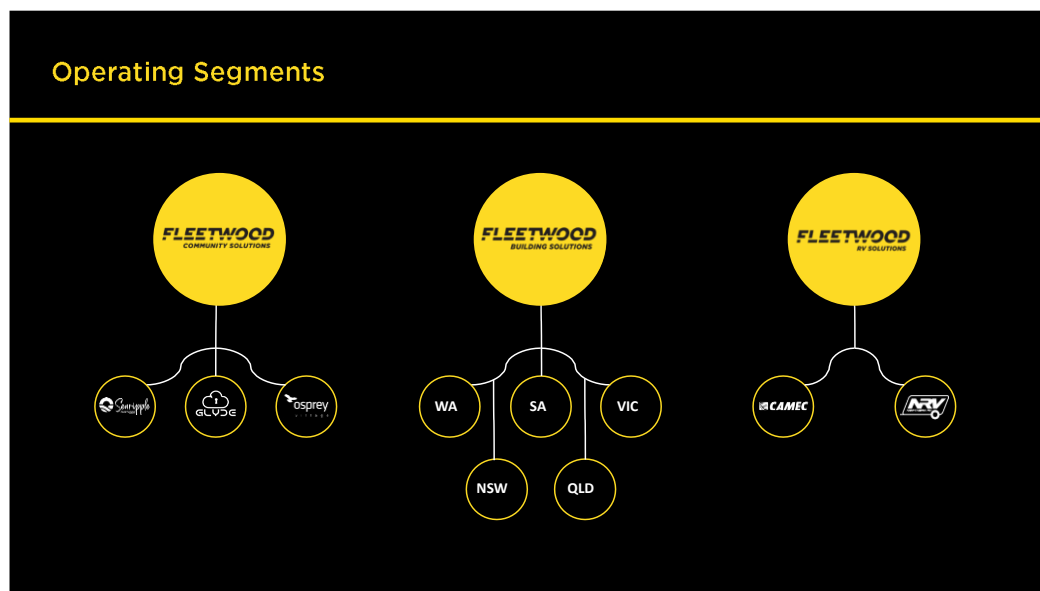
Fleetwood Australia's commitments and actions to address modern slavery are guided by our values, set out below, particularly integrity which promotes speaking up about things that matter.

### Values



## About Fleetwood Australia – Structure & Operations

Fleetwood Australia was established in 1964 and has become an industry leader in each of its markets: *Building Solutions, Community Solutions and RV Solutions.*



**Fleetwood Australia Building Solutions** is a modular construction business with operations in Western Australia, Victoria, New South Wales, South Australia, and Queensland. Fleetwood Australia works with government departments, owners, architects, and engineers to design and build custom modular buildings predominately for the affordable housing, education, corrections, and mining industries.

**Fleetwood Australia Community Solutions** includes Glyde, a keyless lock and energy management system, and Fleetwood Australia's major villages in Western Australia - Searipple Village and Osprey Village.

Searipple Village is one of the largest accommodation villages in Western Australia, offering over 1,300 rooms for remote workforce accommodation. Fleetwood Australia's Osprey Village is owned by the Government of Western Australia Housing Authority, Royalties for Regions and operated by Fleetwood Australia. It offers 293 quality dwellings and provides affordable housing for the South Hedland region.

**Fleetwood Australia RV Solutions** is comprised of two businesses: Camec and Northern RV. Camec imports, manufactures and distributes products to the recreational vehicle industry throughout Australia and New Zealand. Northern RV is based in Victoria and provides services to customers, caravan builders and manufacturers throughout the industry with qualified and licensed tradesmen.

Fleetwood Australia's head office is located in Sydney, New South Wales and its registered office is currently in Perth, Western Australia.

As at 30 June 2024, Fleetwood Australia had 682 employees, 1024 subcontractors, 138 labour hire workers and 14 casuals engaged on an as needs basis.

For further information about Fleetwood Australia, please refer to our website: [www.FleetwoodAustralia.com.au](http://www.FleetwoodAustralia.com.au).



# Group Structure



## **FLEETWOOD** COMMUNITY SOLUTIONS

Operation of accommodation villages;  
Searipple in Karratha and Osprey in  
Port Hedland

## **FLEETWOOD** BUILDING SOLUTIONS

Design, manufacture and supply of  
modular buildings for the education,  
custodial, mining, lifestyle villages,  
commercial, sporting facilities and  
affordable housing



## **FLEETWOOD** RV SOLUTIONS

Creating outdoor comfort as a  
leading of RV, camping parts,  
accessories, caravan and  
motorhome servicing



## Supply Chain

Fleetwood Australia's supply chain consists of goods and services from a broad range of industries that support each of its markets in Building Solutions, Community Solutions and RV Solutions.

Key categories within Fleetwood Australia's supply chain include but are not limited to, construction materials and consumables, recreational vehicle parts and accessories, plant and equipment hire, safety equipment, personal protective equipment / work wear, workforce labour hire, subcontract construction services, technology and hardware, transport, travel and accommodation and general facilities management (including cleaning and other office services).

Fleetwood Australia considers that the risk of exposure to modern slavery practices in our supply chain is greater than in our own operations, particularly in our construction and manufacturing supply chains. The activities that we have undertaken to date seek to obtain a greater understanding of these potential exposures in order to undertake more targeted supplier risk assessments across our supply chain.

In FY24, Fleetwood Australia engaged with over 635 first tier suppliers for Fleetwood Australia's Building Solutions business, 112 first tier suppliers for Community Solutions and 216 first tier suppliers for RV Solutions.

Approximately 98% of Building Solutions' and Community Solutions' procurement spend was from within Australia, whereas only 55% of RV Solutions' procurement spend was from within Australia with a significant portion located overseas.

Given RV Solutions is a much smaller business compared to the Building Solutions and Community Solutions businesses, the statistics illustrate that Fleetwood Australia engages largely with suppliers that are local and Australian based.

## Assessing Risks of Modern Slavery

Given the nature of Fleetwood Australia's supply chain, Fleetwood Australia continues to consider the risk of modern slavery in our first tier, which is predominantly in Australia, to be low.

Fleetwood Australia is committed to reducing the risk of modern slavery and uses risk management approach incorporating culture, people, processes and systems to identify and address modern slavery risks within our operations and supply chain.

We have identified the following areas of modern slavery risk within our operations:

- we acknowledge some imports in Fleetwood Australia's RV Solutions business are from jurisdictions that present a higher risk of modern slavery according to the Global Modern Slavery Index<sup>1</sup>;
- Fleetwood Australia recognises that some of its first tier and second tier suppliers source goods from overseas or extend their supply chain of services by subcontracting. This creates complex supply chains and reduces Fleetwood Australia's ability to trace and monitor supply chains;
- key employees within Fleetwood Australia may not have adequate awareness of and training regarding modern slavery, identification of risks and its impact; and
- whilst most of Fleetwood Australia's precedent and standard form contracts now reflect market standard provisions to address compliance with Australia's modern slavery regime, updates to a small portion of the same remain outstanding.

---

<sup>1</sup> <https://www.globallslaveryindex.org/>

## **Addressing Risks of Modern Slavery**

Fleetwood Australia is committed to addressing and reducing the risk of modern slavery in its operations through the following strategies:

### *Supplier Due Diligence*

Fleetwood Australia maintains supplier due diligence measures to assess modern slavery risks in its supply chain, including:

- *Mandatory tender qualitative assessment:* Suppliers and subcontractors, who engage with Fleetwood Australia on a regular and/or significant basis, are required to participate in a pre-qualification process, providing details of its modern slavery risk assessment policy and strategies in its supply chain. If any supplier or subcontractor fails to demonstrate appropriate modern slavery risk management processes or are unwilling to share the requested information in this regard, Fleetwood Australia can cease engagement of that supplier or subcontractor.
- *Risk Assessment Matrix:* Fleetwood Australia has implemented internal supplier due diligence processes by developing an internal risk assessment matrix. The matrix is a working document to assist Fleetwood Australia map its suppliers and assess risk across its businesses. The matrix continually develops to reflect Fleetwood Australia's understanding of the risks of modern slavery practices in its operations and supply chains. The risk assessment is developed in accordance with best practice and references several key criteria to identify those suppliers at a higher risk of contributing to, or being directly linked to, modern slavery practices, in accordance with the Global Modern Slavery Index.
- *Monitoring Supplier Spend:* Fleetwood Australia utilises an internal dashboard to track its supplier spending. Fleetwood Australia monitors and maintains thresholds for supplier spending as Fleetwood Australia recognises that not all suppliers may have undertaken the mandatory tender qualitative assessment (and therefore, associated modern slavery risk assessment). As a result of this dashboard, Fleetwood Australia has extended its mandatory tender qualitative assessment to additional suppliers.

### *Original Equipment Manufacturers*

Fleetwood Australia actively contracts with Original Equipment Manufacturers (OEMs) to reduce the number of tiers in its supply chain, and in turn mitigate modern slavery risk.

### *International Imports*

Fleetwood Australia undertakes international site/factory inspections to engage with international suppliers and better understand their supply chain. Fleetwood Australia is not aware of any modern slavery breaches by our international suppliers, but we are committed to actively monitor this risk as part of our ongoing modern slavery risk management.

### *Education and Training*

Fleetwood Australia maintains an online training unit to increase knowledge and awareness of modern slavery practices. The module includes information about modern slavery and the relevant laws, how to identify modern slavery risks in our supply chain and business and individual employee responsibilities.

### *Completion of Questionnaires*

Fleetwood Australia completes modern slavery questionnaires for its customers or as a requirement of a tender process. These questionnaires allow Fleetwood Australia to consider points of focus in the industries in which Fleetwood Australia operates and consider the effectiveness of our internal policies and processes. Input is provided by various key procurement, risk and compliance, legal, company secretariat and human resources functions.



During FY24, Fleetwood Australia did not receive any reported concerns of modern slavery practices from our responses to these questionnaires (or otherwise), nor did it identify any instances of modern slavery in its operations or amongst our suppliers.

### *Contract Review*

Most of Fleetwood Australia's precedent standard form contracts and national supply agreements include market standard provisions to address compliance with Australia's modern slavery regime.

Specifically, Fleetwood Australia's contracts include warranties that counterparties comply with modern slavery laws and that they are not engaged in, or will engage in, any conduct that would comprise a modern slavery offence. The warranties also provide a right of termination if parties engage in or allow conduct which would comprise a modern slavery offence.

### *Fleetwood Australia's Employment Framework*

Fleetwood Australia supports a fair and safe workplace by implementing employment conditions and processes in line with, or which go beyond, the *Fair Work Act 2009* (Cth) and market standard employment practices. We conduct periodic employee engagement surveys to better understand and respond to the needs of our workforce.

Fleetwood Australia also has employment policies, processes, procedures and guidelines that reflect current legislation and best practice to safeguard the interests of employees, potential employees and others working for us. Training is designed by our Learning & Development and Compliance Teams and includes compulsory staff induction and ongoing training on key internal policies and procedures.

### *Risk Management*

The Fleetwood Australia Board supports in its oversight of modern slavery risk by its committees including the Nominations & Diversity Committee, Risk Committee and Remunerations Committee.

Each committee plays an important role in monitoring compliance with policies and practices to prevent modern slavery within our direct operations and to address modern slavery risks in our supply chain. The committees are chaired by independent non-executive directors and meet at least twice a year.

The Nominations & Diversity Committee considers and advises on people centric matters relating to non-financial risk, including modern slavery.

We encourage all stakeholders to report concerns or feedback regarding how we manage human rights in our operations and supply chain.

### *Policies*

Fleetwood Australia continues to maintain various policies and associated procedures to improve and support our commitment to addressing modern slavery in our operations and supply chain, including:

- [Fleetwood Australia's Code of Conduct](#), which requires all employees and those we work with to maintain a work environment where human rights are valued. If any human rights violations are reported to or identified by Fleetwood Australia, they will be responded to appropriately; and
- [Fleetwood Australia's Speak Up Policy](#), which encourages all employees and external stakeholders to report any improper conduct including if they become aware of any modern slavery connected to Fleetwood Australia or its supply chain. All complaints are investigated in a fair and objective manner, including the involvement of external parties where appropriate. Fleetwood Australia employees or stakeholders who wish to report improper conduct can do so by making a report to Fleetwood Australia's Whistleblower Officers or via Fleetwood Australia's external and independent whistleblowing service provider.



## Effectiveness of Actions Taken

The establishment of Fleetwood Australia's Supplier Due Diligence strategies, as detailed above, continues to be a positive and effective mechanism to standardise our supplier on-boarding process and to gain insight into our suppliers' compliance with modern slavery requirements. Through this process, Fleetwood Australia has additionally identified that many of its first-tier suppliers are similarly required to comply with modern slavery reporting requirements under the Act. This has provided Fleetwood Australia with certain assurances as to the steps being taken by its first-tier suppliers to assess and address modern slavery risks within its supply chain.

While the positive response to Fleetwood Australia's streamlined national procurement onboarding system has meant limited remedial action has so far been required, we recognise that remediation guidelines may need to be developed, as necessary, as we further progress modern slavery risk assessments throughout its supply chain.

Incorporating reciprocal modern slavery contractual obligations and warranties has been well received by contracting partners and suppliers, within and outside of Australia, and has further demonstrated Fleetwood Australia's commitment to comply with modern slavery laws.

Fleetwood Australia will continue to report on the outcome of these measures and any other measures taken to improve the overall effectiveness of Fleetwood Australia's actions in connection with modern slavery in future Modern Slavery Statements.

## Continuous Improvement and Future Commitments

While Fleetwood Australia considers we have low exposure to modern slavery in our direct operations, we recognise the importance of further efforts to improve the management of modern slavery risk in our supply chain. We also recognise that this is the beginning of an ongoing journey that will continue to evolve over time.

As part of the Board oversight and part of Fleetwood Australia's ongoing commitment to foster a corporate environment that recognises the importance of protecting the human rights of all people, Fleetwood Australia is establishing a Sustainability Committee from 1 January 2025.

The Sustainability Committee will be chaired by an independent non-executive director and have oversight on Environmental, Social and Governance ('ESG') risks and operations at Fleetwood Australia.

The Sustainability Committee will be established to, amongst other things:

- Regularly check ESG risk assessment processes to ensure they remain up to date;
- Oversee monitoring of specific steps taken to address modern slavery risk;
- Track actions taken and measure the impact of our actions; and
- Review the effectiveness of Fleetwood Australia's modern slavery controls and provide a forum for regular engagement and feedback.

We are committed to continuous improvement of our modern slavery management activities and aim to undertake the following key actions in the next 12 months:

- *Improved supplier due diligence and on-boarding* – continue engaging with suppliers to deepen our understanding of Fleetwood Australia's supply chain risks and develop further strategies to investigate second tier suppliers (and further tiers throughout the supply chain). This will help mitigate the risk of working with suppliers who may have second or third tier suppliers located in countries that have been identified as potentially presenting a higher risk of modern slavery;
- *Modern Slavery Questionnaire* – implement a modern slavery questionnaire to issue to suppliers consistently and, where necessary, develop mitigation actions with suppliers to reduce their modern slavery risk;

- *International imports* - actively monitor international imports/exports and modern slavery compliance;
- *Training & Development* – review and update Fleetwood Australia’s modern slavery training module and implement training for key personnel;
- *Contract suites* – ensure all pre-existing and any new contracting frameworks developed in FY25 incorporate modern slavery obligations;
- *Risk Management* – continue modern slavery considerations as part of Fleetwood Australia’s Risk Management framework;
- *Review of modern slavery framework* – formalise the working group governance to review Fleetwood Australia’s modern slavery framework and reporting mechanisms, and incorporate periodic modern slavery discussions into relevant areas of Fleetwood Australia’s organisation, with updates reported to the Sustainability Committee; and
- *Remediation* – develop modern slavery remediation guidelines, as necessary.

## **Approval**

This Modern Slavery Statement was approved by the Board of Directors of Fleetwood Limited on 28th November 2024.



**John Klepec**  
Chair of the Board  
Fleetwood Limited



**Bruce Nicholson**  
Managing Director & CEO  
Fleetwood Limited