

## Modern Slavery Policy

This Modern Slavery Policy (“**Policy**”) applies to Fleetwood Limited and each of its subsidiaries (“**Fleetwood**”).

### 1. Overview

---

This Policy reflects Fleetwood’s commitment to:

- a) communicating with suppliers to encourage alignment with Fleetwood’s expectations of responsible human rights practices;
- b) identify and eliminate, to the best of our ability, any modern slavery taking place in our business operations and supply chain;
- c) maintaining an effective grievance procedure that allows internal and external stakeholders to submit identified Modern Slavery risks in the supply chain without fear of intimidation or retaliation; and
- d) demonstrating continuous improvement in this regard through our annual reporting under the Modern Slavery Act.

We are committed to acting ethically and with integrity in all business dealings and relationships, and where possible, to ensure modern slavery is not taking place in our own business or supply chain.

Fleetwood also expects its Business Partners to share our commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within their organisation or within their supply chain.

You must ensure that you read, understand and comply with this Policy.

### 2. Scope

---

This Policy applies to all persons working for us or on our behalf in any capacity, including Employees and Business Partners.

Compliance with this Policy is mandatory for all Employees. Any Employee who breaches this Policy will face a disciplinary process, which could result in the termination of their employment.

Fleetwood may terminate our relationship with Business Partners if they are in breach of this Policy.

You must notify the General Counsel & Company Secretary as soon as possible if you believe or suspect that a conflict with this Policy has occurred or may occur in the future.

Queries regarding implementation or interpretation should be directed to the Policy owner.

The most current version of this Policy will be located on the intranet and Fleetwood website (<https://www.fleetwood.com.au/>).

### 3. Purpose

---

This Policy sets out Fleetwood’s expectations for its Employees and Business Partners regarding modern slavery. It also sets out measures taken by Fleetwood to address modern slavery in its business and supply chains.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any Business Partner at the earliest possible stage.

## 4. Policy statement

---

Fleetwood is conscious that human rights must be respected and upheld across all of its operations, its business relationships and throughout its supply chain. This includes the rights of all people - our employees, contractors, local communities and suppliers.

Fleetwood will strive to prevent any detrimental impact on human rights resulting from its operations, business relationships, and through its supply chain, and if prevention is unsuccessful, it will seek to remedy any detrimental impact commensurate with its level of involvement. We believe that our business can only prosper when we protect and respect human rights

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and debt bondage, whether adults or children, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

Fleetwood does not tolerate behaviour that is in breach of the law, our Code of Conduct, or our corporate policies.

Fleetwood takes a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure to the best of our ability that modern slavery is not taking place in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains consistent with our disclosure obligations under Australian modern slavery legislation.

We expect the same high standards from all of Business Partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude or debt bondage, whether adults or children, and we expect that our Business Partners will hold their own suppliers to the same high standards.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it and the issue of modern slavery in supply chains, including any areas of our business and supply chains which are identified as at risk of modern slavery practices.

## 5. Governance

---

Fleetwood's Sustainability Committee is responsible for overseeing development, monitor execution, review effectiveness, and advise the Board on Fleetwood's goals, strategies, policies, and commitments related to environmental, social and governance matters, including human rights, community and social impact.

The Sustainability Committee is responsible for reviewing and recommending Fleetwood's annual modern slavery statement be approved. The Board is responsible for approving our annual modern slavery statement and ensuring that it complies with our disclosure obligations under Modern Slavery Act.

The Executive General Manager- People, Safety & Risk has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness and dealing with any queries about it. The Executive General Manager- People, Safety & Risk responsibilities extend to:

- a. monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in our operations under Modern Slavery Act;
- b. working with Employees to monitor and consult with our Business Partners to identify risks of modern slavery practices in our supply chains;

- c. developing measures to assess and address any risks of modern slavery practices, including through due diligence in our contractual relations;
- d. monitoring the effectiveness of those measures;
- e. developing appropriate training materials and programs for our employees to comply with this Policy;
- f. preparing our annual modern slavery statement in accordance with our disclosure obligations under the Modern Slavery Act; and
- g. providing regular updates to the Sustainability Committee on the above measures.

The General Counsel & Company Secretary is responsible for notifying the Chair of the Sustainability Committee of any believed or suspected breaches of this Policy and overseeing the investigation of any notified believed or suspected breach.

## **6. Compliance**

---

If you believe or suspect a breach of this Policy has occurred or that it may occur, you must notify the General Counsel & Company Secretary or report it in accordance with our Speak up Policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the General Counsel & Company Secretary or Executive General Manager – People, Safety and Risk.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform the General Counsel & Company Secretary or Executive General Manager – People, Safety and Risk.

## **7. Communication and awareness of the policy**

---

We will provide regular training to Employees on this Policy. This will include training on how to identify modern slavery practices and the particular parts of our business and supply chains which are subject to a greater risk of modern slavery practices.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and understand the issue of modern slavery in supply chains, including any areas of our business and supply chains which are identified as at risk of modern slavery practices.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all Business Partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 8. General

### 8.1. Definitions

Defined Term	Definition
<b>Board</b>	means the board of directors of Fleetwood
<b>Business Partners</b>	means all suppliers, contractors, external consultants, third-party representatives, suppliers, distributors and business partners
<b>Employees</b>	means: <ul style="list-style-type: none"> <li>a) the Board of Fleetwood and each Director;</li> <li>b) all employees of Fleetwood, whether permanent or casual, full-time or ongoing, trainees or apprentices, interns, agency workers, volunteers and agents; and</li> <li>c) all contractors acting on behalf of Fleetwood.</li> </ul>
<b>modern slavery</b>	<p>describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Coercion, threats and deception can be explicit or implicit.</p> <p>The Modern Slavery Act defines modern slavery as including eight types of serious exploitation; trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services.</p> <p>Under Australian law, modern slavery is defined in the Act. In the event of any inconsistency, the definitions in the Act take precedence over this policy.</p>
<b>Modern Slavery Act</b>	means Modern Slavery Act 2018 (Cth) and any other Australian modern slavery legislation.

### 8.2. Related Policies and Procedures

This Policy is to be read in conjunction with Fleetwood's policies, procedures and charters including those as set out below:

Document Name	Description
<b>Code of Conduct</b>	Sets out the standard of conduct and behaviour that we expect and require of our people
<b>Speak Up Policy</b>	Set out sets out the framework and procedures for employees and others (such as contractors or suppliers) to report wrongdoing, unethical behaviour, or illegal activities within an organisation without fear of retaliation.
<b>Sustainability Committee Charter</b>	Sets out the roles and responsibilities of the Sustainability Committee in reviewing, monitoring and making recommendations to the Board of Fleetwood regarding the Fleetwood's ESG strategy, policies, and processes, including regarding human rights.

### **8.3. Review**

This Policy will be reviewed at least once in every 3 years to ensure that it meets best practice standards and the needs of Fleetwood.

This Policy was first approved by the Board on 29 May 2025 and may be reviewed and amended by the Board at any time.