



MODERN SLAVERY POLICY

Modern Slavery Policy

ASP Access Floors, referred to in this policy as ASP, is committed to respecting human rights and acting ethically and with integrity in its business dealings and relationships.

This policy outlines ASP's commitment to identifying, assessing and addressing modern slavery risks within its operations and supply chains. It is informed by the Modern Slavery Act 2018 (Cth).

ASP does not tolerate modern slavery. We recognise that risks can arise in any country or industry and are committed to continually improving our understanding and management of those risks.

DEFINITION

Modern slavery describes serious exploitation where coercion, threats or deception undermine a person's freedom. These practices may be explicit or implicit.

Modern slavery includes:

- Slavery.
- Servitude.
- Forced labour.
- Trafficking in persons.
- Forced marriage.
- Debt bondage.
- Deceptive recruiting for labour or services.
- The worst forms of child labour.

The worst forms of child labour involve serious exploitation of children, including enslavement and work likely to harm their health, safety or morals. This does not include all work undertaken by children.

For the purposes of this policy, modern slavery has the meaning given in the Modern Slavery Act 2018 (Cth). If there is any inconsistency, the statutory definition takes precedence.

SCOPE & RESPONSIBILITIES

This policy applies to ASP's directors, employees and business operations. ASP expects its suppliers, contractors and business partners to uphold equivalent standards and communicate these expectations throughout their own supply chains.

ASP's directors oversee this policy. Managers are responsible for supporting its implementation within their areas of responsibility, particularly procurement, manufacturing, logistics and installation.

Employees must not engage in or facilitate modern slavery and must report suspected breaches or concerns.

OUR BUSINESS & SUPPLY CHAINS

ASP is an Australian family-owned business headquartered in Sydney, New South Wales, specialising in the design, manufacture, distribution and installation of raised access flooring systems.

ASP supplies and installs access flooring in Australia and supports international markets through its business operations and network of authorised distributors and installers.

ASP's access flooring products are manufactured in China. Its supply chains include raw materials, manufactured components, finished products, freight and logistics, installation services and other goods and services used in its operations.

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IDENTIFYING RISKS

ASP recognises that modern slavery risks may arise within its own operations and at different levels of its supply chains.

Factors that may increase risk include:

- Manufacturing or sourcing in locations with weak labour protections or enforcement.
- Complex supply chains with limited visibility of subcontractors and material sources.
- Labour hire or recruitment arrangements involving excessive recruitment fees, debt or misleading employment terms.
- Workers facing language barriers, insecure migration status or restricted access to support.
- Withholding wages, identity documents or freedom of movement.
- Weak supplier governance, procurement controls or grievance processes.
- Commercial pressures that contribute to exploitative working practices.

ASP will take a risk-based approach to assessing suppliers and business activities, prioritising areas with greater potential for worker exploitation.

RISK MANAGEMENT & SUPPLIER EXPECTATIONS

ASP is committed to taking reasonable and proportionate steps to prevent and address modern slavery risks. These steps include, as appropriate:

- Considering modern slavery risks when selecting and reviewing suppliers and contractors.
- Communicating our expectations regarding ethical recruitment and employment practices.
- Requesting relevant information about suppliers' labour practices, policies and supply chains.
- Seeking clarification or supporting evidence where concerns are identified.
- Incorporating appropriate modern slavery requirements into relevant procurement and contractual arrangements.
- Building awareness among employees involved in purchasing, supplier management and installation.
- Reviewing identified risks and following up on agreed corrective actions.

ASP expects suppliers and contractors to ensure that work is freely chosen, workers can leave employment subject to lawful notice requirements, and recruitment or employment practices do not involve coercion, deception, debt bondage or the withholding of identity documents.

Suppliers and contractors are expected to cooperate with reasonable enquiries and notify ASP promptly of suspected modern slavery connected with the goods or services they provide.

REPORTING CONCERNS

Employees, suppliers, contractors and other affected parties are encouraged to report suspected modern slavery or breaches of this policy to an ASP director or manager. If a concern involves a particular manager, it should be raised with another manager or a director.

Concerns will be taken seriously and handled sensitively, with confidentiality maintained as far as reasonably practicable.

ASP will not tolerate retaliation against anyone who raises a concern in good faith or assists with an investigation.

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RESPONDING TO CONCERNS & REMEDIATION

Where a concern is identified, ASP will assess the information available and take appropriate action, prioritising the safety and wellbeing of affected people.

Depending on the circumstances, this may include seeking specialist advice, engaging with the supplier, requiring corrective action or referring the matter to appropriate authorities.

Where ASP has caused or contributed to harm, it will provide for or cooperate in appropriate remediation. Where harm is directly linked to ASP through a business relationship, ASP will seek to use its influence to support an appropriate response.

ASP may suspend or end a business relationship where serious concerns are not adequately addressed. Before doing so, ASP will consider the potential consequences for affected workers.