FY26 Modern Slavery Statement

Fleetwood Limited (ASX:FWD)



FLEETWOOD

Modern Slavery Statement for Fleetwood Limited (ASX:FWD) for the year ended 30 June 2026.

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 Fleetwood Australia's controlled entities, including the Reporting Entities, and with input and endorsement from Fleetwood Australia's Sustainability Committee, responsible management and members of the 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.	3
Describe the structure, operations and supply chains of the reporting entity and any entity that the reporting entity owns or controls.	4
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.	6
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 and remediation processes.	7
Describe how the reporting entity assesses the effectiveness of actions taken.	8
Contains details of the process of consultation by the Board of Fleetwood Australia and with any entities that the reporting entity owns or controls.	10
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	10

Reporting Entity

This Statement is prepared for the Reporting Entities of Fleetwood Limited (ACN 009 205 261), Fleetwood WA Pty Ltd (ACN 009 306 950) and Fleetwood Aust Pty Ltd (ACN 114 678 349). This Statement generally describes the activities of Fleetwood Limited (ACN 009 205 261) and its controlled entities, as listed below:

- Fleetwood WA Pty Ltd (ACN 009 306 950);
- Fleetwood Aust Pty Ltd (ACN 114 678 349);
- Fleetwood NSW Pty Ltd (ACN 127 380 330);
- Fleetwood Community Villages Pty Ltd (ACN 050 031 993) (formerly Glyde Digital Pty Ltd);
- FWDRVS Pty Ltd (ACN 004 846 584) (formerly Camec Pty Ltd);
- RV Solutions (NZ) Limited (NZBN 9429 038 762 321) (formerly Camec (NZ) Limited);
- 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 Limited is governed by a Board of Directors comprising five Non-Executive Directors with a broad range of skills and experience.

Fleetwood Australia Vision, Purpose and Values

Guided by our values, we deliver innovative solutions that help people and businesses thrive. Our actions to address modern slavery are guided by our values, particularly integrity.

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 reporting period 1 July 2025 to 30 June 2026 and sets out the actions taken by Fleetwood Australia to assess and mitigate modern slavery risks in its business and supply chains.

About Fleetwood Australia – Structure & Operations

Over 62 years, Fleetwood Australia has evolved into a nationally recognised brand, delivering solutions that support growing communities and help people and businesses thrive.

Fleetwood Australia was established in 1964 and, during the reporting period from 1 July 2025 to 30 June 2026, operated in three key markets:

- Building Solutions;
- Community Solutions; and
- Recreational Vehicles (RV) Solutions.

For further information about Fleetwood Australia, please refer to our website: https://www.fleetwood.com.au



FY26 Operating Divisions

FLEETWOOD COMMUNITY SOLUTIONS

Building tomorrow's communities, today

We believe in building smarter community spaces and in supporting the growth of communities across every corner of Australia. Fleetwood Community Solutions is at the forefront of innovation, delivering modular accommodation and village solutions that help businesses, government and people thrive, today and into the future. As Australia's leading provider of modular villages and housing, we partner with clients to build, own and operate high-quality mining camps, community housing, flagship transient workforce accommodation, lifestyle villages and defence accommodation, scaling with Australia's evolving needs.

FLEETWOOD BUILDING SOLUTIONS

The better way to build

We believe in building smarter spaces for tomorrow. Fleetwood Building Solutions is the only Australian-owned and operated national modular building company, delivering innovative, sustainable spaces across Australia. As the nation's leading offsite manufacturing and construction partner, we are proud to be a trusted supplier across a wide range of sectors and industries demonstrating our commitment to quality, efficiency and reliability. In the housing sector, we are an approved housing provider for WA Lifestyle Villages, the Department of Housing Western Australia and Q-Build Modern Methods of Construction (MMC) program in Queensland. In the education sector, we are an approved provider for the Victorian School Building Authority (VSBA), the Department of Education in Queensland and more recently the Department of Education in Western Australia.

FLEETWOOD RV SOLUTIONS

Making everywhere home

We believe in creating smarter solutions for travellers. RV Solutions under the trusted Camec brand, is a leading supplier of RV and camping parts, accessories and servicing, to support RV owners, manufacturers and the wider industry across Australia and New Zealand.

Vision	To be the leader in reimagining sustainable spaces
Purpose	To create innovative spaces so people can thrive
Values	Safe Together, collaboration, integrity, accountability, growth through innovation



Supply Chain

Fleetwood Australia's supply chain consists of goods and services from a broad range of industries that support each of its markets. 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
- general facilities management (including cleaning and other office services)

Assessing Risks of Modern Slavery

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

Fleetwood Australia considers 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. Given the nature of our supply chain, we consider the risk of modern slavery in our predominantly Australian first-tier supply chain to be low:

- In FY26, Fleetwood Australia engaged with approximately 531 first tier suppliers for Fleetwood Australia's Building Solutions business, 39 first tier suppliers for Community Solutions and approximately 200 first tier suppliers for RV Solutions; and
- Approximately 99% of Building Solutions' and Community Solutions' procurement spend was from within Australia.

During the reporting period, we identified the following areas of modern slavery risk within our operations:

- 15% of RV Solutions' procurement spend was from within Australia with a significant portion located overseas. 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[1] . 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;
- 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;
- Fleetwood Australia has identified that the work practices of subcontractors that predominantly provide labour should be scrutinised and assessed in greater detail due to the potentially higher risk of modern slavery when compared with suppliers that provide materials only; and
- Whilst we have improved awareness of modern slavery risks amongst Fleetwood Australia's Executives and key work areas during the reporting period, additional training will be beneficial to increase awareness and identification of modern slavery risks amongst all levels, as part of inductions and our employee training program.

1 https://www.globalslaveryindex.org/



Addressing Risks of Modern Slavery

Fleetwood Australia is committed to addressing and reducing the risk of modern slavery in its operations. During the reporting period, Fleetwood Australia progressed its FY26 initiatives as follows:

The Sustainability Committee continued to review the effectiveness of Fleetwood Australia's modern slavery controls;

In January 2026, Fleetwood Australia implemented a Modern Slavery Policy to address modern slavery risks in our operations and supply chain, a copy of which is available on Fleetwood Australia's website: https://www.fleetwood.com.au/investor-centre/corporate-governance;

RV Solutions undertook an analysis and audit of its new overseas suppliers engaged by Camec in FY26 during the reporting period, through VTrust Inspection Services. No evidence of modern slavery was identified;

Reviewed and consolidated supplier questionnaires across Building Solutions, Community Solutions and RV Solutions, with a focus on establishing a consistent approach to measuring modern slavery risks among our suppliers;

Contracting frameworks established in FY25 were further developed in FY26 to address compliance with Australia's modern slavery regime, with a right for Fleetwood Australia to terminate the contract, in the event of non-compliance; and

Increased awareness and ongoing discussion of modern slavery compliance and risk identification amongst Fleetwood Australia's Executives and key work areas, including procurement and human resources.

Fleetwood Australia continues to maintain the below measures to assess and mitigate modern slavery risks in its supply chain, including:

Supplier Due Diligence

- **Mandatory tender qualitative assessment:** Suppliers and subcontractors that engage with Fleetwood Australia on a regular or significant basis are required to participate in a pre-qualification process and provide details of their modern slavery risk assessment policies and strategies within their supply chains. If a supplier or subcontractor fails to demonstrate appropriate modern slavery risk management processes, or is unwilling to share the requested information, Fleetwood Australia may cease engaging that supplier or subcontractor; and
- **Monitoring supplier spend:** Fleetwood Australia monitors supplier spend and maintains thresholds for supplier spending, recognising that not all suppliers may have completed the mandatory tender qualitative assessment and associated modern slavery risk assessment. As a result of this monitoring, 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 and factory inspections to engage with international suppliers and better understand their supply chains. Fleetwood Australia is not aware of any modern slavery breaches by its international suppliers, but remains committed to actively monitoring this risk as part of its ongoing modern slavery risk management.

Completion of Questionnaires

Fleetwood Australia completes modern slavery questionnaires for its customers or as part of tender processes. These questionnaires allow Fleetwood Australia to consider areas of focus in the industries in which it operates and to assess the effectiveness of its internal policies and processes.

Input is provided by key procurement, risk and compliance, legal, company secretariat and human resources functions.

During the reporting period, Fleetwood Australia did not receive any reported concerns of modern slavery practices through its responses to these questionnaires or otherwise, nor did it identify any instances of modern slavery in its operations or among its 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 not 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 Human Resources teams and includes compulsory staff induction and ongoing training on key internal policies and procedures.

Risk Management

The Fleetwood Australia Board supports oversight of modern slavery risk through its committees, including the Sustainability Committee, Risk Committee and Remuneration & Nominations 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 Sustainability 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

In addition to the Modern Slavery Policy, 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

Fleetwood Australia is committed to reducing modern slavery risks associated with overseas procurement. The audit by VTrust Inspection Service of all new overseas suppliers engaged by Camec in FY26, has provided valuable insight and assurance regarding its new international suppliers' compliance with Australia's modern slavery standards.

Fleetwood Australia continued to maintain rigour around modern slavery standards of its Camec suppliers until it exited the RV Solution's segment with the divestment of Camec in September 2026.

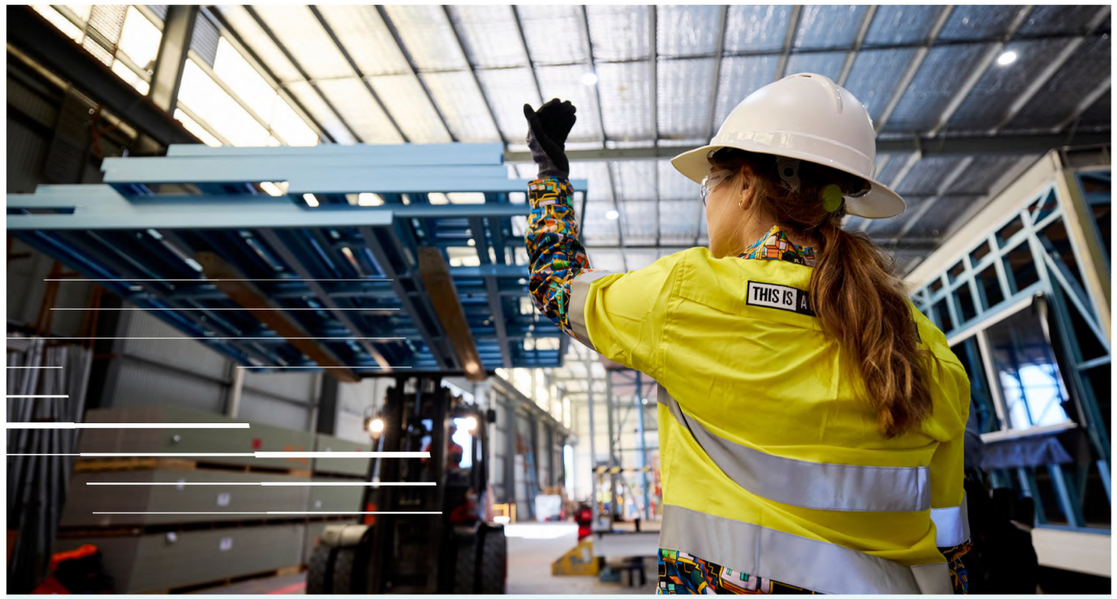
Fleetwood Australia has taken the insights and assurances learnt through the VTrust audits into the overseas procurement across its other business segments.

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 onboarding process and to gain insight into our suppliers' compliance with modern slavery requirements. Through this process, Fleetwood Australia continues to be assured that many of our first-tier suppliers are taking steps to assess and address modern slavery risks within their supply chains.

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

Growing awareness across Fleetwood Australia of modern slavery compliance and risk mitigation has facilitated more informed discussions regarding subcontractor engagements and collaboration between project teams and the procurement team.

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

Whilst Fleetwood Australia considers we have low exposure to modern slavery in our direct operations, we recognise the importance of continued efforts to improve the management of modern slavery risk in our supply chain.

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

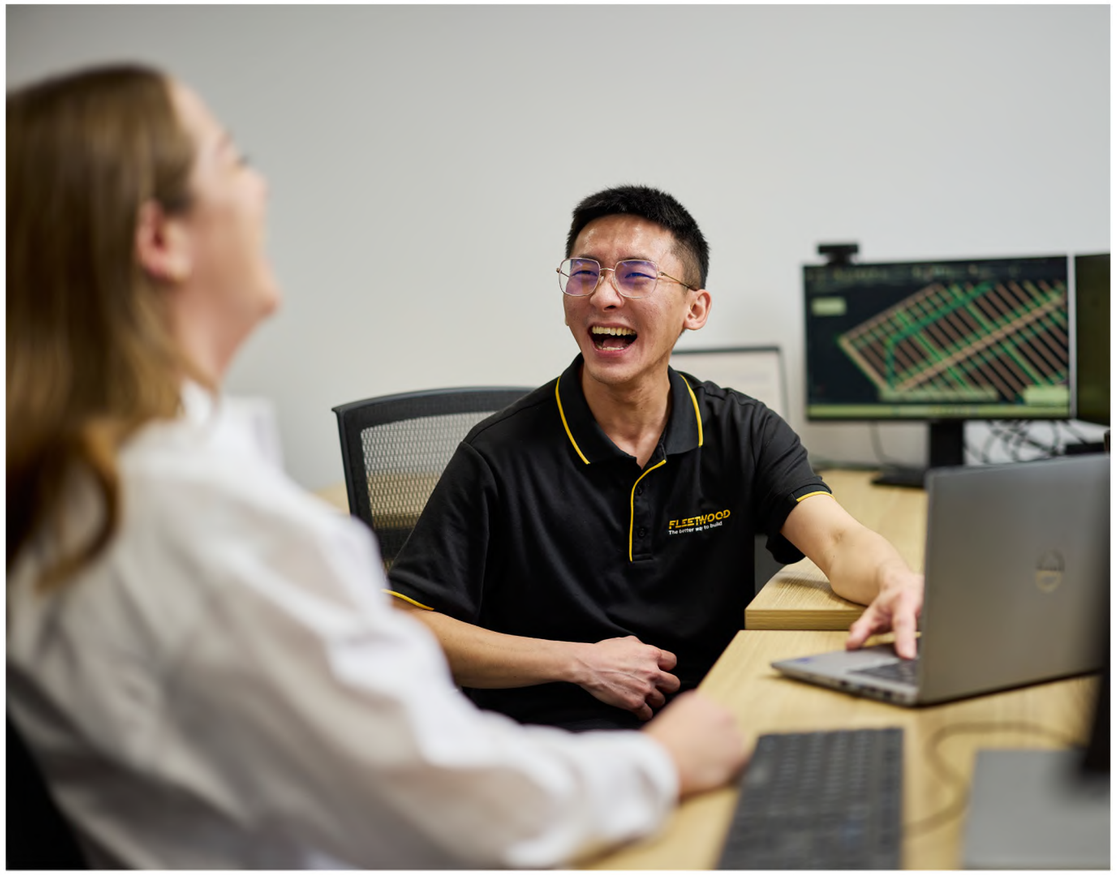
- **Supplier questionnaire:** Further develop a standard questionnaire across Fleetwood Australia to support a consistent weighted scoring assessment of modern slavery risks and supplier compliance, including consideration of second and further tiers within suppliers' supply chains, and to develop mitigation actions with suppliers to reduce their modern slavery risk where necessary.
- **Supplier risk assessment matrix:** Further develop the matrix to map Fleetwood Australia's suppliers and assess risk across its businesses, reflecting Fleetwood Australia's understanding of current modern slavery risks in its operations and supply chains.
- **Establish supplier corrective action plans:** Where gaps are identified through supplier questionnaires, require the supplier to address them within agreed timeframes. Track overdue actions and escalate unresolved issues to the Sustainability Committee.
- **International suppliers:** Undertake audits of key overseas suppliers and actively monitor international imports and modern slavery compliance.
- **Training & Development:** Review and update Fleetwood Australia's modern slavery training module and implement training for relevant personnel.
- **Remediation Protocol:** Develop a clear internal process for responding if modern slavery indicators are identified, including escalation, supplier engagement, remediation expectations and when to suspend or terminate supply.
- **Contract suites:** Continue to focus on our contracting frameworks by ensuring all pre-existing frameworks and any new contracting frameworks developed in FY27 incorporate modern slavery obligations.
- **Risk Management:** Continue incorporating modern slavery considerations as part of Fleetwood Australia's Risk Management framework and incorporate ongoing modern slavery discussions into relevant areas of Fleetwood Australia's organisation, with updates reported to the Sustainability Committee where relevant.

Approval

This Modern Slavery Statement was approved by the Board of Directors of Fleetwood Limited on 25 September 2026.

John Klepec
Chair of the Board
Fleetwood Limited

Andrea Pidcock
Chief Executive Officer
Fleetwood Limited



FLEETWOOD

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