

Human Rights & Responsible Business Policy

HVACR Pty Ltd | ABN 43 672 578 264

Version 1.1 | Prepared 10 April 2026

Policy owner and approval authority: Managing Director

Review date: 9 April 2027

1. Purpose and application

HVACR is committed to respecting human rights, providing fair and safe work, preventing exploitation and managing environmental impacts. This policy applies to its directors, employees, managers, procurement and projects, including activities under the ACRO Refrigeration, Shelair and Beer Works brands. It sets the standards required of suppliers, subcontractors, recruitment providers and other parties working for HVACR. Requirements apply proportionately to the work and risks involved and must be communicated through relevant engagements.

2. International principles

HVACR commits to respect the rights expressed in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the ILO fundamental principles and rights at work. Its due diligence approach will be guided by the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

HVACR commits to respect the principles of the Convention on the Elimination of All Forms of Discrimination against Women, the Convention on the Rights of the Child and the UN Declaration on the Rights of Indigenous Peoples. Particular attention must be given to women, children, young workers, Indigenous peoples, people with disability, migrant workers and their families, minorities and others at greater risk of harm.

HVACR will comply with applicable laws and contractual obligations. Where standards differ, it will seek to uphold the higher level of human rights protection without breaching applicable law. This policy does not diminish any legally established right, entitlement or remedy.

3. Director oversight and management responsibility

The Managing Director has governance oversight of human rights and environmental due diligence, approves this policy, allocates resources, reviews significant concerns and monitors corrective action. Managers are responsible for implementation in their areas. Procurement personnel must apply supplier requirements; operational managers must manage site risks; those responsible for payroll and recruitment must check employment conditions. Workers must follow this policy and raise concerns.

Management performance reviews must consider completion of assigned risk assessments, training and corrective actions. No incentive may reward concealing incidents, discouraging complaints or compromising worker rights. Serious matters must be escalated promptly to the Managing Director.

Fair and safe work

4. Freely chosen employment and child protection

Slavery, servitude, forced labour, debt bondage, human trafficking and deceptive recruitment are prohibited. Workers must not pay recruitment fees or deposits to obtain work. Identity documents must remain under workers' control, and freedom of movement must not be restricted. Workers may leave employment subject to lawful notice requirements. If prohibited fees or document retention are identified, corrective action must include reimbursement or return of documents as appropriate.

Verify age and working rights before engagement. Do not use unlawful child labour. Apprentices and young workers must receive lawful duties, suitable training and supervision, and protection from hazardous or age-inappropriate work. If child labour is identified, remediation must protect the child's safety, education and wellbeing rather than simply remove their income without considering the consequences.

5. Pay, working hours and living wages

Pay workers directly, accurately, in full and on time, with clear payslips and lawful deductions. Meet applicable awards, agreements, minimum wages, leave and superannuation obligations. Employment terms must be understandable. Plan work to respect lawful hours, overtime, breaks and rest, and manage fatigue before allocating shifts, travel or production targets.

HVACR commits to pursue a living wage for all employees: remuneration for ordinary working hours sufficient for a decent standard of living for workers and their families. Within 12 months of approval, management must assess ordinary-time pay against a credible, geographically relevant living-wage benchmark, document coverage and gaps, and approve time-bound corrective actions. Review annually. Overtime must not be used to close an ordinary-time living-wage gap. This commitment operates in addition to statutory entitlements.

6. Equal opportunity and worker representation

Prohibit discrimination, harassment, sexual harassment, bullying and violence. Decisions on recruitment, pay, training and promotion must use relevant job requirements and objective criteria. Respect differences in race, colour, sex, pregnancy, family responsibilities, religion, political opinion, nationality, social origin, age, disability, sexual orientation and other legally protected attributes. Provide reasonable adjustments where required. Review comparable work for unjustified pay differences at least annually and rectify any unlawful disparity.

Respect workers' choice to join or not join unions, elect representatives and participate in lawful collective bargaining. Do not intimidate, discriminate against or disadvantage workers because of representation, association or lawful industrial activity. Allow workers access to representatives consistently with applicable law.

7. Health, safety and wellbeing

Identify and control physical and psychosocial risks, consult workers, and provide competent supervision, training and protective equipment. Apply appropriate controls for electrical work, refrigerants, chemicals, heights, plant, manual handling and fatigue. Workers must be able to report hazards and cease unsafe work in accordance with applicable law without retaliation. Supplier and contractor selection must consider relevant safety practices and evidence of competence.

Environment and communities

8. Preventing environmental harm

Prevent harmful soil change, water and air pollution, harmful noise and excessive water consumption that could affect health, food, sanitation or livelihoods. Assess site risks before work, manage spills and emissions, protect drains, and use authorised waste routes. Refrigerant recovery, storage and disposal must be undertaken by appropriately authorised personnel using suitable equipment. Do not knowingly release refrigerants unlawfully. Consider resource efficiency and environmental performance when selecting equipment and materials.

9. Mercury, persistent pollutants and hazardous waste

HVACR commits to the objectives of the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal, and to meeting applicable Australian requirements implementing them.

Minamata: identify potentially mercury-containing lamps, switches, controls and other equipment before removal; use safer alternatives where practicable; prevent releases and arrange compliant storage, transport and recovery or disposal. Do not procure or use prohibited mercury-added products.

Stockholm: do not produce, purchase or use prohibited persistent organic pollutants. Check relevant product information and safety data sheets, and assess suspect legacy equipment or materials before disturbance. Segregate contaminated waste and obtain specialist advice where its composition or disposal route is uncertain.

Basel: classify hazardous waste, use appropriately authorised transporters and facilities, and retain transfer and disposal records. Do not arrange export or import of controlled waste without applicable permits, consents and evidence of environmentally sound management. Require relevant waste contractors and suppliers to meet these controls through written engagement terms.

10. Responsible sourcing of materials

Assess risks associated with metals, minerals, batteries, electronics and other materials in supplied equipment. Where risk warrants, request origin and supply-chain information and use the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas to guide further checks. Do not knowingly source materials connected with forced labour, unlawful child labour or serious abuses. Record limits in traceability and pursue proportionate improvements with suppliers.

11. Land, communities, security and privacy

Do not participate in unlawful eviction or unauthorised appropriation of land, forests or water. Respect lawful tenure, access, cultural heritage and Indigenous rights. Verify site authority before work and escalate disputes. Where Indigenous rights may be affected, undertake appropriate consultation and respect applicable consent requirements.

Do not engage or use public or private security personnel to intimidate people, use unlawful force, undermine worker representation or otherwise abuse rights. Any security engagement must include appropriate instructions, competence checks, lawful-use-of-force requirements and oversight. Respect client and community privacy, protect personal information, and restrict access to legitimate purposes. Bribery, corruption and falsification of safety, product or compliance records are prohibited.

Due diligence and procurement

12. Risk assessment procedure

Managers must assess human rights and related environmental risks before material new supplier engagements or projects, at least annually across operations, and when incidents, acquisitions, new business activities or significant changes arise. Assess HVACR operations, products and services, direct suppliers and risk-relevant indirect supply chains. Include controlled entities and acquisitions where relevant to HVACR's activities.

Identify potentially affected workers, supply-chain workers, customers, site occupants and communities. Consult affected people or legitimate representatives where practicable and safe, particularly where vulnerability or severe impacts are apparent. Use internal records, worker feedback, supplier discussions, product documents, credible external information and specialist advice as needed. Do not treat an absence of complaints as proof of low risk.

Record the activity, affected groups, actual or potential harm, evidence, existing controls and whether HVACR causes, contributes to or is directly linked to the impact. Prioritise the severity of harm by its scale, scope and difficulty of remedy, together with likelihood. Consider business context and influence when selecting actions; commercial or reputational considerations must not displace severe risks to people. Assign an owner, action, deadline and effectiveness measure, then reassess residual risk.

13. Supplier and subcontractor requirements

Communicate this policy to direct suppliers, subcontractors and relevant business partners, and require equivalent expectations to be passed to relevant sub-suppliers. Incorporate proportionate human rights, labour and environmental requirements into new and renewed engagement terms. Require cooperation with reasonable information requests, reporting of material concerns and corrective action.

Written requirements must prohibit forced and unlawful child labour, recruitment fees, identity-document retention, unlawful movement restrictions, discrimination and retaliation; require lawful and timely pay, age checks, safe work and respect for worker representation; and address relevant chemical and waste controls. Do not represent these requirements as agreed for an existing supplier until acceptance or a contract variation is recorded.

Screen suppliers proportionately before engagement. Higher-risk matters require additional enquiries, evidence, worker engagement or specialist review; inspections and audits may be used where justified. Consider supplier capability and corrective performance in selection and renewal. Purchasing prices, lead times and changes must not knowingly encourage unsafe work or exploitation.

14. Corrective action and responsible disengagement

Where HVACR causes or contributes to harm, stop or prevent the harmful activity and provide or cooperate in appropriate remedy. Where harm is directly linked through a business relationship, use commercial influence to secure improvement and consider supporting remediation. Actions may include payment correction, reimbursement of fees, safer work, restoration of rights and environmental clean-up.

Agree corrective actions and deadlines, verify completion and consult affected people where appropriate. Serious or unresolved breaches may justify suspension or termination, subject to contractual and legal requirements. Assess the consequences for affected people before disengagement; do not transfer or worsen the harm. Report matters to authorities where required or appropriate.

Complaints and accountability

15. Accessible grievance mechanism

Employees, affiliated-company workers, direct and indirect supply-chain workers, customers, business partners, local communities and other affected people may report any concern covered by this policy. Reports may be made to a manager or the Managing Director, by calling 1300 227 600 or emailing info@hvacrgroup.com.au. Ask for referral to the Managing Director. These are company contact channels; access must be restricted to those who need the information to respond.

Accept anonymous reports and reports through a representative. Offer reasonable language, literacy, disability or technical assistance. No worker must need a company login to report a concern. Protect confidentiality as far as practicable; do not promise absolute secrecy. Prohibit retaliation against good-faith reporters, witnesses and affected people. A person implicated in a complaint must not control its investigation. Where the Managing Director is implicated, seek independent handling; complainants may also approach appropriate external authorities directly.

16. Response procedure

Address immediate danger first and contact emergency services where necessary. Acknowledge reports within five business days where contact details are available, assess urgency and conflicts, and assign an impartial person to investigate. Provide an initial progress update within 20 business days and further updates while unresolved. These are response targets, not limits on complainants' rights or guarantees of resolution by a fixed date.

Listen to affected people, explain the process and likely timing, preserve relevant evidence, and allow a fair response. Record findings, actions and reasons, communicate the outcome as far as privacy permits, and invite a review if the complainant disputes the handling. Check that agreed remedies are effective. Complaints must not restrict access to courts, regulators, police, unions or other lawful remedies, or require waiver of rights.

17. Communication and training

Following approval, make this policy and reporting channels publicly accessible on the company website and available on request. Communicate it to employees, relevant affiliated entities, suppliers, subcontractors and clients. Include awareness in induction and annual refresher training. Provide additional training for managers, procurement and recruitment personnel, and workers handling chemicals or waste. Keep attendance and acknowledgement records. Seek feedback on accessibility and improve the complaints process where barriers are identified.

18. Monitoring, records and reporting

The Managing Director must review effectiveness at least annually, including training coverage, supplier assessments, wage reviews, complaints, safety incidents, corrective-action closure and recurrence. Record fatalities, lost-time injuries and medical-treatment cases; calculate frequency rates only where reliable hours and definitions are available. Consult workers and affected parties where appropriate and investigate repeated failures.

Keep risk assessments, due diligence, complaints and corrective-action records for at least seven years, subject to applicable privacy, retention and legal-hold requirements. Protect records and restrict access. Prepare an annual management review and publish a proportionate summary of implementation, material risks, actions and progress, safeguarding personal information. Claims about certification, audits, training or performance must be supported by records. Review this policy annually and after significant changes; approval and subsequent revisions must be recorded by the Managing Director.