



# Modern Slavery Statement 2025

Fletcher Building (Australia) Pty Ltd

# Modern Slavery Statement 2025

Fletcher Building Australia is pleased to present its Modern Slavery Statement for the FY25 reporting period, summarising the Australian division's ongoing efforts to address modern slavery risks within our operations and supply chain. This statement reflects the strength of our governance structures and our commitment to maintaining ethical standards, transparency, and continuous improvement across all business activities.

## Acknowledgement of Country Statement

Fletcher Building honours the 65,000-year history of this nation. We recognise that Aboriginal and Torres Strait Islander peoples, have cared for, and conserved this land since the Dreaming.

Their ties to the land, animals, oceans, and rivers are intrinsic to their being. Fletcher Building respects the Traditional Custodians of the land on which we operate, work, and live.

We honour Elders past and present and we are dedicated to a bright future as we move forwards on our road towards reconciliation.

Artist: Elaine Chambers Hegarty



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# At a glance

Fletcher Building Group  
Revenue FY25:

**\$7,196\* m**

Australian Revenue  
FY24:

**\$1,794\* m**

Suppliers to  
Australian Businesses:

**6,357**

High Risk  
Suppliers:

**293**

High Risk  
Countries:

**12**

High Risk  
Spend: (AUD)

**\$1,008m**

Percentage of Suppliers  
which are High Risk:

**5%**

This statement is made and published on behalf of Fletcher Building (Australia) Pty Limited and its subsidiaries pursuant to s.14 of the Modern Slavery Act 2018 (Cth) (Aust) (the Act). References to "Fletcher Building", "we", "us", "our" are to these bodies, together with the related entities that carry on the Fletcher Building business inside Australia.

\*From Fletcher Building Limited Annual Report 2025 using the Fletcher Building Group currency which is New Zealand dollars.

# Our structure, operations and supply chain

During this year's reporting period, Fletcher Building Australia was a division of the Fletcher Building Group and was made up of Fletcher Insulation, Iplex, Laminex, Oliveri, Stramit and Tradelink.

As mentioned in last year's statement, Tradelink was sold to Metal Manufactures Pty Limited in September 2024 and as a result this statement covers the supply chain and operations of Fletcher Building Australia, Fletcher Insulation, Iplex, Laminex, Oliveri, and Stramit.

These businesses manufacture products used to build homes, buildings and infrastructure – including insulation, particleboard, laminate surfaces, steel roofing, plastic piping and sinks.

## Employment Standards

We are committed to high employment standards that recognise the well-being and rights of our employees. All employees

sign contracts that comply with Australian law, consistent with fair treatment and legal protection. Additionally, Fletcher Building Australia adheres to its Human Rights Policy, which reinforces employment policies covering workers' rights including safe working conditions, fair wages, non-discrimination, and a robust process for addressing grievances.

## Corporate Shared Services

Fletcher Building Australia together with the five business units share certain aspects of its supply chain. These shared services include software and technology solutions, and other services such as electricity, waste management, fleet management and employment agencies.

## Countries

Australia, China, Ireland, New Zealand, Singapore, Vietnam, United Kingdom, United States of America.



# Fletcher Insulation

Fletcher Insulation is a leader in the production of thermal and acoustic insulation products. Its manufacturing facilities across Australia are dedicated to crafting glass wool, polyester, and reflective foil laminates. These products cater to a variety of applications, from residential to commercial and industrial.

Its supply chain includes sourcing and importing a diverse range of raw materials - resin, borax, soda ash, sand, dolomite, feldspar, glass cullet, urea, ammonium sulphate and various traded goods – Rockwool, XLPE foam and Glass wool products from multiple countries.

## Operations and Supply Chain

### Products Manufactured

Fletcher Insulation manufactures glass wool and related products.

## Products and Raw Material

### Products

Fletcher Insulation purchases various packaging materials, consumables, spares, capital equipment and traded goods.

### Countries

Australia, China, Malaysia, Taiwan, Thailand, United Arab Emirates, United States of America, Vietnam.

### Materials

Fletcher Insulation sources resin, borax, soda ash, sand, dolomite, feldspar, glass cullet, urea, ammonium sulphate, dyes, adhesives, foil laminates and fabric laminates.

### Countries

Australia, China, New Zealand, South Korea

## Organisations, industry bodies or other group membership

- Insulation Council of Australia and New Zealand (ICANZ)



# Iplex

Iplex specialises in the manufacturing and distribution of plastic piping systems designed for water, gas, electric and industrial uses. Operating several manufacturing facilities across Australia, Iplex offers a wide variety of pipes, fittings, and associated products. Its supply chain includes third party finished goods, sourcing resin and raw materials like polyethylene, polypropylene, and PVC from international suppliers across multiple countries.

## Operations and Supply Chain

### Products Manufactured

Iplex manufactures a variety of pipes including PVC, PE, PP, pipe and fittings.

## Products and Raw Material

### Products

Iplex purchases GRP, metal pipe, metal fittings, valves, rubber, PVC fittings.

### Countries

Australia, China, India, Poland, Thailand, United Arab Emirates, Vietnam.

### Materials

Iplex sources PVC, PE, PP resins, additives and fillers.

### Countries

Australia, China, Costa Rica, South Korea, Taiwan, Thailand, United Arab Emirates, Vietnam.

## Organisations, industry bodies or other group membership

- Australian Water Association (AWA)
- Plastics Industry Pipe Association of Australia (PIPA)



# Laminex

Laminex's supply chain involves the sourcing of raw materials such as resin, paper, and wood from a network of suppliers, primarily based in Australia. This supply chain supports Laminex's status as a leading manufacturer and distributor of decorative surfaces. These materials are used for cabinetry and construction projects in both residential and commercial sectors.

## Operations and Supply Chain

### Products Manufactured

Laminex manufactures a variety of boards, including particle board, low-pressure melamine, and high-pressure laminate. These materials are utilised in the production of cabinetry (doors and drawers), benchtops, wall panels, building products, and toilet and shower partitions.

## Products and Raw Material

### Products

Laminex purchases a range of componentry and or goods for resale.

### Countries

Australia, Brazil, Chile, China, Germany, Indonesia, Italy, New Zealand, South Korea, Malaysia, South Africa, Spain, United States of America.

### Materials

Laminex sources resin, wood fibre, and paper.

### Countries

Australia, South Africa, Thailand, China, France, Germany, Japan, Malaysia, New Zealand, Spain, United States of America.

## Organisations, industry bodies or other group membership

- Engineered Wood Products Association of Australasia (EWPPAA)
- EPD Australasia
- Forest & Wood Products Australia FWPA
- Green Building Council Australia (GBCA)
- Housing Industry Association Limited
- Living Future Institute of Australia (LFIA)



# Oliveri

Oliveri manufactures and markets kitchen and laundry sinks and distribute sinks, taps, accessories and bathroom products across Australia. It sources stainless steel and other materials from global suppliers. This year, Oliveri completed the transition of its internal distribution operations in Qld, NSW and WA to third-party logistic providers, now operating in Leppington, NSW, Yatala, Qld and Bibra Lake, WA.

## Operations and Supply Chain

### Products Manufactured

Oliveri manufactures pressed kitchen and laundry sinks.

### Products and Raw Material

#### Products

Oliveri purchases fabricated kitchen sinks, water filter systems, kitchen and bathrooms tapware, kitchen tapware, Bathroom Vitreous China, granite kitchen sinks, packaging and accessories.

### Countries

Australia, China, Italy, United States of America

### Materials

Oliveri sources steel and packaging.

### Countries

Australia, Finland, Japan, Taiwan

### Organisations, industry bodies or other group membership

- Australian Stainless Steel Development Association (ASSDA)
- Housing Industry Association (HIA)
- Plumbing Merchants Association



# Stramit

Stramit manufactures and distributes steel construction materials, providing roll-formed steel roofing and structural components. With several manufacturing sites across Australia, Stramit's supply chain includes steel and other essential raw materials from both local and global suppliers.

## Operations and Supply Chain

### Products Manufactured

Stramit manufactures roll-formed steel roofing and structural products.

### Products and Raw Material

#### Products

Stramit procures steel accessories and various roofing-related products, such as fasteners, brackets, roller door motors, and insulation.

### Countries

Australia, China, New Zealand, South Africa, Thailand.

### Materials

Stramit sources steel.

### Countries

Australia, Japan, South Korea, Taiwan.

### Organisations, industry bodies or other group membership

- Australian Garage Door Association
- Australian Steel Institute
- Housing Industry Association
- Standards Australia



# Our modern slavery risk assessment

We are committed to upholding ethical standards in our operations and supply chains, so our customers can trust our business practices. At Fletcher Building Australia, we use a risk-based approach to tackle modern slavery and address risks within our supply chains.

## Identification of modern slavery risks

### Our methodology for identification of modern slavery risks includes these key factors:

#### Supplier location:

Regional factors like culture, politics, and regulations can impact modern slavery risks. We conduct periodic reviews of supplier regions to stay informed about global conditions and apply extra monitoring in higher-risk areas.

#### History of modern slavery-related risks:

Industries with a predisposition for low-cost labour, child labour, forced labour, human trafficking or a historical tendency towards unethical behaviour are reviewed on an ongoing basis. We utilise the Dow Jones reporting tool to monitor these suppliers and the countries they operate in. Should we receive information that indicates a potential or real concern, this information is provided to the relevant business unit's procurement teams who will discuss the concerns with the relevant supplier.

The Dow Jones reporting tool monitors regulatory, competitive, and financial issues, as well as social and labour concerns like discrimination, human

rights violations, disputes, and workplace safety at the country level. This supports our commitment to seeking to prevent modern slavery and maintain a transparent, responsible business environment.

#### Expenditure with suppliers:

Suppliers are categorised according to expenditure, and further information is requested when anticipated spend exceeds AUD \$500,000.

#### Direct or indirect supply:

We differentiate how procurement methods impact our supply chain transparency by categorising them as direct or indirect supply. Direct procurement, such as sourcing raw materials or services, offers greater control and clarity. In contrast, indirect procurement of finished goods often involves longer supply chains with multiple tiers, which can reduce our direct oversight.

Implementing multiple identification points, allows Fletcher Building Australia to maintain oversight and ethical standards, enabling us to be proactive in addressing potential risks of modern slavery across our diverse supply chains.

### Ethixbase360 Dashboard and Supplier Risk Monitoring

To enhance our approach to identifying and managing modern slavery risks, Fletcher Building Australia has developed a digital dashboard through Ethixbase360. This platform enables real-time visibility across our supply chains and supports proactive risk management. The dashboard provides a centralised view of supplier engagement, including the status of supplier onboarding and the progress of responses to our Modern Slavery Questionnaire. It also generates supplier risk scores based on multiple indicators, allowing procurement teams to prioritise suppliers that may pose a higher risk.

The dashboard facilitates the identification of high-risk suppliers by analysing factors such as industry, geography, and historical risk data. It supports ongoing due diligence by capturing and reporting the outcomes of periodic reviews and assessments. In addition, the platform integrates perceived risk indicators sourced from external tools such as Dow Jones, highlighting potential

# Our modern slavery risk assessment (continued)

concerns including corruption, fraud, human rights violations, and labour disputes. A key feature of the dashboard is its ability to map the countries from which raw materials are sourced, enabling geographic risk analysis and supporting ethical sourcing decisions.

Importantly, the dashboard promotes transparency across our supply chains by providing visual aids that assist users in identifying and mitigating modern slavery risks. These visual tools allow for intuitive navigation of complex data, making it easier to detect patterns, flag anomalies, and take informed action.

## Audits

We maintain supply chain integrity using an internal

auditing system. Suppliers are audited by Fletcher Building Australia representatives or third parties and must demonstrate that they meet our standards.

Periodic audits are maintained throughout the duration of any contract to monitor compliance.

## Employee and Customer Engagement

Fletcher Building Australia engages an external provider to operate our Global Whistleblowing Protection Service, which includes a free confidential phone service known as 'FBuCall'. This service can be used by any Fletcher Building personnel, customer, supplier, or other individual to report suspected

unacceptable, unethical, or illegal behaviour. By offering this grievance mechanism, FBuCall enables concerns to be addressed promptly and appropriately, maintaining the integrity and accountability within our operations.

While we focus on education and awareness as our primary tool for employees to understand and reduce risks of modern slavery in our supply chain, any breach of our policy on human rights is treated seriously and intentional breaches are a disciplinary offence.

## Our Actions

Our risk assessment and associated actions for our businesses are outlined below:

## Modern Slavery Risks

## Actions Taken

Regional influences (cultural, political, regulatory conditions)	Annual reviews of geographical locations, additional monitoring for higher-risk areas
Industries with low-cost labour or historical unethical behaviour, including child labour, forced labour, and human trafficking	Regular review of the data and information from the Dow Jones and Ethixbase360 reporting tool, reporting concerns to procurement team, supplier contracts include requirement to adhere to the Fletcher Building Supplier Code of Conduct
High expenditure with suppliers	Categorising suppliers based on expenditure, seeking additional information for significant spend
Indirect procurement of finished goods	Implementing robust auditing systems, collaborating with third-party service providers for thorough assessments
General modern slavery risks in supply chains	Established auditing systems, ongoing periodic audits, independent third-party assessments
Unethical behaviour reporting	Operating Global Whistleblowing Protection Service (FBuCall)

# Our governance, policies and procedures

## Risk Management Governance

Fletcher Building’s risk management framework is aligned with ISO31000: 2018 Risk Management - Principles and Guidelines Standard. By adopting this risk management framework, we have in place processes to identify, assess, control, monitor and report key risks.

The risk management framework is based on the three lines of defence model, as shown in Figure 1 below. As part of its risk management responsibilities, the Audit and Risk Committee (ARC) receive regular reports of existing and emerging key risks, and reviews the adequacy of internal controls to identify, monitor and manage Fletcher Building’s material strategic, financial, operational and emerging risks.

The Safety, Health, Environment and Sustainability Committee (SHES) receive updates on modern slavery risks, provides strategic direction where required, and endorses the Modern Slavery disclosure report on behalf of the Board.

### 1st Line of Defence:

Responsibility for operational risk management sits with the managers in the individual business units and the divisional Chief Executive which our risk management and assurance processes support through our corporate and governance functions.

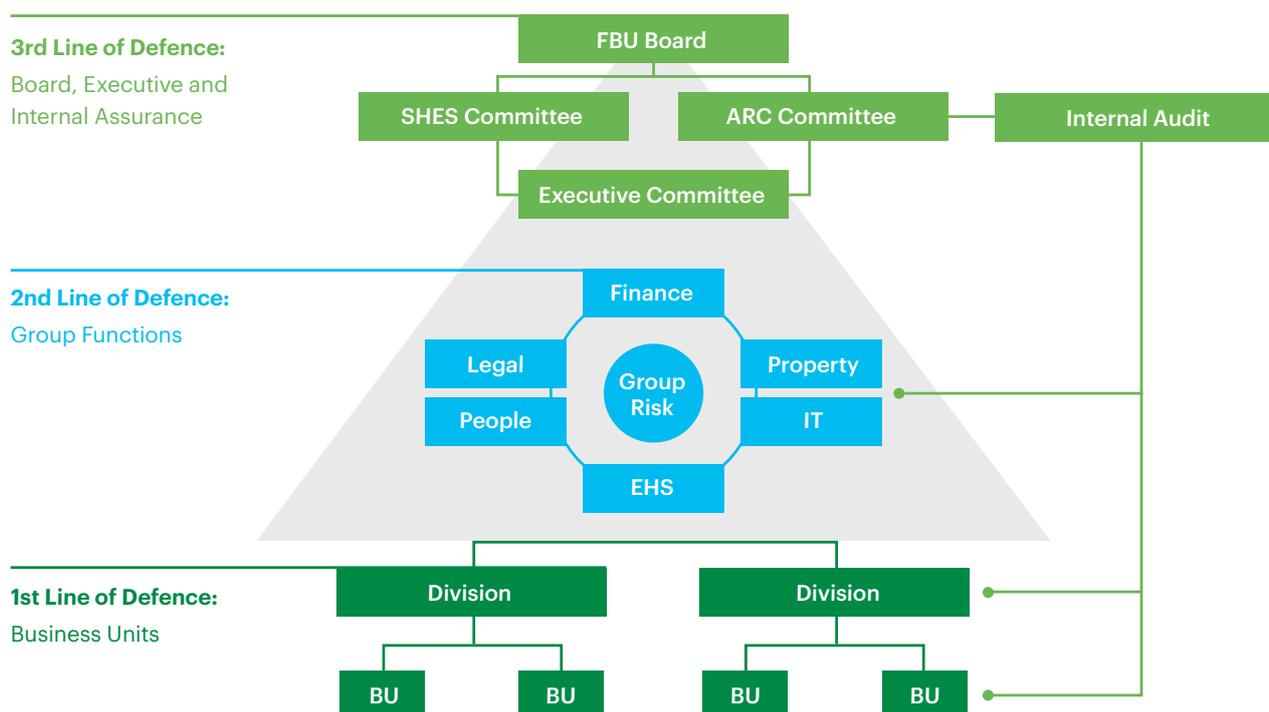
### 2nd Line of Defence:

In addition to the dedicated group functions, we have an established Steerco. The Australian Modern Slavery Steering Group (which includes members from across Procurement, Supply Chain, Finance and Legal) is responsible for developing and implementing initiatives that address and seek to minimise the risk of modern slavery in our businesses via a set of policies and procedures.

### 3rd line of Defence:

Risk management and assurance processes are overseen by the ARC and the Executive Committee. A dedicated Internal Audit team takes a risk-based approach to auditing key business activities and reports directly to the ARC.

Figure 1



# Effectiveness of our actions to prevent modern slavery

During this reporting period, Fletcher Building Australia continued its engagement initiatives with the business units in relation to our modern slavery procedures. This included reviewing, auditing, engaging with, and educating business unit operations, procurement teams and supply chain.

During this reporting period, we decreased our exposure to potential modern slavery practices:

- **High-Risk Suppliers:** The number of suppliers to our Australian businesses decreased from 7,275 to 6,357, while the number of high-risk suppliers declined significantly from 523 to 293, reducing the proportion of high-risk suppliers from 7% to 5%.
- **Risk Exposure:** While the number of high-risk countries increased from 9 to 12, our high-risk spend decreased from \$1,366 million to \$1,008 million.

This improvement was the result of a combination of factors including divestment of Tradelink as well as continual improvement in our procurement and risk assessment practices.

As proposed in the previous statement, we also enhanced our education of small business suppliers to help them better understand modern slavery and its impacts:

- **Educating suppliers:** We developed new material for suppliers with more detailed information about what modern slavery is and why it is important to assess operations and supply chains.
- **Small suppliers:** We also supported suppliers (that were not required to submit a modern slavery statement) by responding to their questions and providing guidance on modern

slavery. These discussions often covered best practices for identifying and addressing modern slavery risks within their operations and supply chains. In some instances, this support led suppliers to develop their own modern slavery policy for the first time.

Our assessment of the effectiveness of the educational initiative is positive as it shows engaging with suppliers improved the understanding of their modern slavery obligations and improved our confidence that information received from suppliers is accurate.

Fletcher Building Australia will continue this initiative during the next reporting period, alongside other engagement activities with business units.

## Future Plans

In June 2025, Fletcher Building Group announced a strategic restructuring of its Australian operations to be implemented during the upcoming reporting period. This is anticipated to impact the governance and operational approach to modern slavery, shifting to increased business unit accountability and decentralised management and audit of supply chain.

For the upcoming reporting period, Fletcher Building Australia will focus on maintenance of key processes, controls, and safeguards related to modern slavery obligations. We will review and adjust our modern slavery protocols as required to address gaps resulting from organisational changes and meet regulatory requirements across the business units.

# List of companies

While preparing the annual statement, Fletcher Building Australia consulted the five businesses within the Australian Division. The consultation process involved information gathering, where each business reviewed and provided data on its operations to identify and address modern slavery risks. Additionally, each business was required to review and approve the statement.

This statement was approved by the Board of Fletcher Building (Australia) Pty Limited for and on behalf of the relevant entities:

Amatek Holdings Pty Ltd	Geraldton Independent Building Supplies Pty Ltd
Amatek Industries Pty Ltd	Iplex Pipelines Australia Pty Ltd
Amatek Investments Pty Ltd	Iplex Properties Pty Ltd
Bandelle Pty Ltd	Key Plastics Pty Ltd
Baron Insulation Pty Ltd	Kingston Bridge Engineering Pty Ltd
Crane Enfield Metals Pty Ltd	Laminex Group Pty Ltd
Crane Group Pty Ltd	Milnes Holdings Pty Ltd
Crevet Pipelines Pty Ltd	Morinda Australia Pty Ltd
Crevet Pty Ltd	Northern Iron and Brass Foundry Pty Ltd
CTCI Pty Ltd	Oliveri Solutions Pty Ltd
EE-Fit Pty Ltd	Polymer Fusion Education Pty Ltd
FBHS (Aust) Pty Ltd	S Cubed Pty Ltd
FBSOL Pty Ltd	Sonata Acoustic Panels Pty Ltd
Fletcher Building (Australia) Pty Limited	Stramit Corporation Pty Ltd
Fletcher Building Products Australia Pty Ltd	Tasman Australia Pty Ltd
Fletcher Industries Australia Pty Ltd	Tasman Building Products Pty Ltd
Fletcher Insulation Pty Ltd	TBP Group Pty Ltd
Gatic Pty Ltd	Water Filters Australia Pty Ltd

This Modern Slavery Statement was approved by the Board of Fletcher Building (Australia) Pty Ltd.



**Fraser Hopkins**

Director of Fletcher Building (Australia) Pty Ltd.

