

30/6/23



MASTER BUILDERS SOLUTIONS and BLUEY TECHNOLOGIES

Modern Slavery Statement

FY 2022

MB Solutions Pty Ltd Australia ABN: 69634934419

Bluey Technologies Pty Ltd ABN: 36115613646

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1. Introduction

This statement relates to MB Solutions Australia Pty Ltd (ABN 69 634 934 419) and Bluey Technologies Pty Ltd (ABN 36 115 613 646) (collectively referred to as **MBS Group Australia** in this document) and is prepared in accordance with the criteria set out in the Modern Slavery Act 2018, relating to or the actions and activities of the MBS Group Australia during the 2022 calendar year. The registered head office of the MBS Group Australia is located at 11 Stanton Road, Seven Hills NSW 2147, Australia.

This statement identifies what modern slavery risks may exist within the business and wider supply chain of the MBS Group Australia, and what actions are to be undertaken to ultimately eliminate any form of association with modern slavery practices. The MBS Group Australia recognises there is no simple solution to eliminate the risks of modern slavery but commits to refine its approach and processes and measure the effectiveness of these over the coming years.

The MBS Group Australia acknowledges that modern slavery practices can manifest in various forms, including forced labour, debt bondage, human trafficking, and child labour. The operations of the MBS Group Australia involve sourcing materials for in-house production and operations as well as procuring a range of external production and services companies.

2. Modern Slavery

Modern slavery describes situations of serious exploitation, where coercion, threats or deception are used to undermine the freedom of victims. The Commonwealth of Australia Modern Slavery Act 2018 (CTH) (**the Act**) has defined practices that constitute modern slavery as:

- Human trafficking
- Servitude
- Forced labour
- Deceptive recruiting for labour or services, and
- Slavery
- Forced marriage
- Debt bondage
- The worst forms of child labour

The Act requires certain entities based, or operating, in Australia to report annually on the risks of modern slavery in their operations and supply chains, and the actions taken to address those risks, to maintain responsible and transparent supply chains.

The senior leadership team of the MBS Group Australia has agreed that improved focus will be given to implementing policies and changing processes to reduce the MBS Group Australia’s exposure to any form of Modern slavery, with zero tolerance given for any modern slavery practices.

3. About the MBS Group Australia

3.1 Company Structure

The MBS Group Australia is a leading provider of innovative chemical solutions for the construction industry, employing over 120 highly qualified individuals locally and part of the global Master Builders Solutions group of companies, which has a global workforce of over 1,000 employees. With annual sales exceeding AUD \$100 million, the MBS Group Australia is committed to delivering cutting-edge solutions that drive growth and efficiency for businesses.

The MBS Group Australia collaborates across areas of expertise and regions to develop and provide advanced chemical solutions for the construction industry. Drawing on the extensive experience gained from countless construction projects worldwide through the broader Master Builders Solutions group, the MBS Group Australia leverages global technologies, and utilises its in-depth knowledge of local building needs, to develop innovations that assist its customers to achieve success and drive sustainable construction.

For further information, please visit the Master Builders Solutions Australia website at <https://www.master-builders-solutions.com/en-au>.

The MBS Group Australia's portfolio includes - concrete admixtures, cement additives, solutions for underground construction, waterproofing systems, concrete repair and protection systems, performance grouts and flooring systems.

3.2 Supply Chain: The MBSA Group Australia's operations and supply chain are managed locally, with limited support from its parent company. This includes general management, finance, human resources, marketing, operations, supply chain, and procurement. MBS has production facilities in Melbourne, Sydney, Adelaide, Perth and Brisbane as well as engaging the services of a number of local toll blending facilities.

As the MBS Group Australia strives to serve the best quality products to its customers, it chooses its suppliers in accordance with very strict procedures, which include but are not limited to the consideration of the quality of each Supplier's product, and the quality of each supplier's core values and delivery and sustainability approaches.

4. Risks of Modern Slavery

The MBS Group Australia acknowledges the potential risks of modern slavery in its operations and supply chain, particularly beyond tier 1 suppliers (being direct suppliers of the MBSA Group Australia), where transparency of conduct and risk gradually diminishes. The following areas have been identified as areas of potential risk of modern slavery impacts in the MBS Group Australia's operations and supply chain, particularly in tier 2 suppliers (being subcontractors engaged by tier 1 suppliers of the MBSA Group Australia) and beyond:

- a) Unknown origin of raw materials or intermediate components used to manufacture imported finished goods, or raw materials purchased through trading companies from high-risk manufacturing countries such as China and India where lower tier suppliers are not visible.
- b) Use of subcontractors or outsourced services where there may be less visibility and control over working conditions and labour practices.
- c) Employment of temporary or agency workers who may be at higher risk of exploitation and not afforded the same protections as permanent workers.

5. Action to Address:

The MBS Global Group promulgated a Code of Conduct in 11 languages (**Code of Conduct**), committing to operating ethically to maximise the long-term sustainability of the broader MBS Group in all countries.

The MBS Group Australia continues to follow the Code of Conduct and is committed to the prevention of modern slavery, servitude, human trafficking, or any forced or compulsory labor anywhere in its supply chain, and expects its suppliers, vendors, and other third parties to share these core values.

The Code of Conduct contains specific provisions addressing human rights, labor and business conduct and expressly states that its suppliers must commit to the prevention of modern slavery, servitude, human trafficking, and any forced or compulsory labor.

Locally, the MBS Group Australia is committed to taking the following actions to address the above identified risks:

5.1 Policies and Procedures:

- Conduct due diligence on the MBS Group Australia's suppliers to understand their labour practices and ensure they act in compliance with the intent of the MBS Group's Code of Conduct and Modern Slavery Reports. This will involve developing an additional framework on top of the standard due diligence process and engaging with suppliers to promote awareness of the MBS Group Australia's expectations regarding ethical labour practices.
- Develop and implement robust local policies and procedures to mitigate the risks of modern slavery occurring in or being associated with the MBS Group Australia's local supply chain and general operations.
- Regularly review and update the MBS Group Australia's local modern slavery policy and due diligence processes to ensure they remain effective in addressing modern slavery risks.

- Establish a local grievance mechanism to enable workers to raise concerns about modern slavery or other labour issues. This will provide a safe and confidential means for workers to report any concerns and enable the relevant stakeholders in the MBS Group Australia to take appropriate action.

5.2 Supply Chain:

- Increase transparency in the MBS Group Australia supply chain by mapping its suppliers, including those at lower tiers, and assessing their modern slavery risks. This will enable the MBS Group Australia to identify any potential issues and take appropriate action to address them.
- Conduct systematic supplier audits to assess their compliance with the MBS Group Australia's modern slavery policy and Supplier Code of Conduct. The MBS Group Australia will also require its suppliers to provide evidence of their efforts to address modern slavery risks in their own operations and supply chain.
- Implement a vendor management procedure to ensure that the MBS Group Australia has an equitable selection of suppliers. All suppliers are required to complete the required forms and go through the multiple stages of approval before becoming a vendor of the MBS Group Australia.

5.3 Staff Training:

- Implement localised training and awareness programs for MBS Group Australia's employees, tailored specifically to address modern slavery risks within the Australian context. The training will emphasise the significance of ethical labour practices, ensuring that both employees and suppliers comprehend these principles and possess the ability to identify and report any instances of modern slavery.
- Equip the procurement department with in-depth training to enable employees and contractors working in that department to make the right decision to mitigate any potential risks of slavery within the supply chain.
- Provide training to the Human Resources department to ensure that during the recruitment process the strict recruitment criteria for the MBS Group Australia is met, including but not limited to all employees having a legal right to work in the country.
- Provide knowledge and skills to warehouse employees and contractors within the MBS Group Australia to enable them to effectively identify any possible modern slavery risks and take appropriate action to mitigate any of those risks.

6. Assessment of the Effectiveness

At the time of this Statement, there have been no reported instances of employees in modern slavery conditions or suppliers engaging in modern slavery practices within the MBS Group Australia. Further, no modern slavery or human trafficking concerns were reported to the MBS Group Australia. However, to ensure the effectiveness of the MBS Group Australia's modern slavery mitigation policies and processes, the MBS Group Australia will undertake the following measures:

- **Monitoring and Reporting:** Establish a reporting framework that enables the MBS Group Australia to track its progress in addressing modern slavery risks in its supply chain and operations. The MBS Group Australia will regularly review and report on its modern slavery policy and procedures to assess their effectiveness and identify any areas for improvement.
- **Supplier Audits:** Conduct systematic supplier audits to assess their compliance with the MBS Group Australia's modern slavery policy and supplier code of conduct. The MBS Group Australia will also require its suppliers to provide evidence of their efforts to address modern slavery risks in their own operations and supply chain.
- **External Review:** Engage external experts to conduct independent reviews of the MBS Group Australia's modern slavery policy and procedures. This will provide the MBS Australia Group with valuable insights into the effectiveness of its approach and help the MBS Group Australia to identify any gaps or areas for improvement.

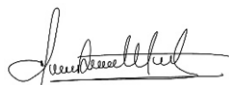
By undertaking the above measures, the MBS Group Australia will be able to assess the effectiveness of its modern slavery mitigation policies and processes and take appropriate action to address any identified issues or gaps.

7. Continuous Improvement

The MBS Group Australia recognises that there is no simple solution to eliminating all risks associated with modern slavery. However, the MBS Group Australia is committed to continually refining its approach and processes and measuring their effectiveness over the coming years to strengthen its resolve to eliminate any potential association with modern slavery practices. The MBS Group Australia is committed to working towards a future where modern slavery practices are eradicated, and human rights are respected, and will continue to take proactive steps towards this.

8. Consultation and Approval

This Statement has been prepared and approved by the board of members of MBS Group Australia, in consultation with the senior executive team representing the reporting entity of the MBS Group Australia, being Master Builders Australia Pty Ltd, and entities under its control, being Bluey Technologies Pty Ltd, pursuant to Section 13 of the Australian Modern Slavery Act 2018, Section 54(1) of the UK Modern Slavery Act 2015, and on behalf of any other subsidiaries and affiliates in the MBS Group Australia and signed on their behalf by:



Diego Martinez-Velandia

CEO and Managing Director (ANZ)

Master Builders Solutions Australia Pty Ltd and Bluey Technologies Pty Ltd

7 August 2023

Date: