

Modern Slavery Statement

Introduction

This augural Modern Slavery Statement is made pursuant to the *Australian Modern Slavery Act (Cth) 2018*) and has been approved by the Board of the reporting entity E.B. Mawsons & Sons Pty Ltd.

Mawsons Modern Slavery Act – Statement is for the financial year commencing 1 July 2019 and ending 30th June 2020 (FY2020).

Through active investigation and management of our supply chains Mawsons will satisfy our obligations under Modern Slavery legislation. We will use our best endeavors to ensure that everything we purchase is willingly made by people who are properly rewarded for their work and treated fairly.

Mawsons source, process and deliver scarce natural resources as building products. In doing this we must respect our Environment and Communities and earn the License to use valuable materials in a responsible manner.

In preparing this statement Mawsons has prepared detailed responses to each of the relevant mandatory criteria as set out in the Modern Slavery Act 2018 (Cth).

Criteria 1: Identify the reporting entity

This statement relates to E. B. Mawsons & Sons Pty. Ltd. (ABN 14 004 519 617). Its registered office is located at 141 King George Street, Cohuna, Victoria, 3568, Australia.

In 2008 ASX listed Adelaide Brighton Cement (ADBRI) acquired a 50% interest in Mawsons with family interests retaining 50% ownership. <u>https://adbri.com.au/</u> ; <u>http://www.mawsons.com.au/.</u>

This statement is made under section 14 of the Modern Slavery Act 2018 (Cth) for the financial year ended 30 June 2020.

Criteria 2:

Mawsons structure, operations and supply chains

Our mission is to continue expanding our network and improve our performance to contribute to a prosperous and sustainable future for the communities in which we operate.

Established in 1912, Mawsons are industry leaders in the supply of concrete and quarry products in regional Victoria and southern New South Wales.

Mawsons operate 16 quarrying sites, over 40 concrete plants, 7 Landscape supply centres and a range of mobile hire crushers, screens, drills and rock breakers. To help support all this equipment Mawsons also operate a large, modern workshop facility in Cohuna.

In-house, expert technical and safety professionals ensure that Mawsons' operational teams are supported with the latest industry technology and knowhow to assure clients of the best value and safety outcomes.

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In addition to its fixed quarries and concrete plants Mawsons has great expertise in mobile concrete and quarrying with experienced teams available for projects of all sizes across a very wide geographic area.

Mawsons is vertically integrated supplier of concrete and quarry products. Our internal supply and delivery chains are robust. The vast majority of major suppliers have Australian based operations for supply of raw materials, plant and equipment, personal protective equipment and consumables such as fuels and oils.

Criteria 3:

Risk of modern slavery practices in operations and supply chains

Mawsons has undertaken an analysis of its operations and supply chain to identify potential risks of modern slavery.

Mawsons believes the overall risk level to be low given the scope and location of the Group's operations in Regional Australia, the long-term supply partner relationships and the diligence applied by Mawsons to identify and manage risks in the business.

A number of our key suppliers have provided Modern Slavery Statements required by the Modern Slavery Act 2018 (Cth).

Criteria 4:

Risk mitigation actions taken to assess and address these risks, including due diligence and remediation processes

In developing its risk mitigation policies and plans, Mawsons has referenced the UN Guiding Principles on Business and Human Rights.

We assess the degree of risk to ensure fundamental employee and human rights are upheld. In recognition of the UN Guiding Principles (Principle 17) Mawsons focused on assessing general areas of operations and supply chain where modern slavery risks are likely to be most significant.

This is reflected in our Code of Conduct, Human Resources and Purchasing Policies.

During FY2020 Mawsons implemented a Group wide Social Responsibility Policy embracing commitments to:

- 1. Environmental Protection and Sustainability
- 2. Social Procurement and Local Community Support
- **3.** Modern Slavery Act compliance

Mawsons Code of Conduct

Mawsons has an established set of values including trust, integrity and teamwork. The Code of Conduct Policy encompasses those values and sets out what is expected of Mawsons' employees.

This procedure applies to all Mawsons Managers, Employees, Contractors and Independent Contractors and shall be followed.

Requirements of supply chain partners

Our Purchasing Policy requires purchases of components, materials, equipment or sub-contracted services shall be made from suppliers who are selected on the basis of their ability to meet contractual requirements as described in Mawsons Human Resources – Selection, Engagement and Induction policy, having due regard for local content, and social inclusion and human rights (modern slavery) legislation and considerations.

Mawsons is also a buyer member of Social Traders. <u>https://www.socialtraders.com.au/business-government/st-buyer-members/</u>

A recent risk assessment for direct suppliers was facilitated through a self assessment questionnaire to key supplier entities accounting for over 80% of spend in FY2020.

The largest spend categories were raw materials, plant and equipment and consumables such as fuels and oils.

Human Resource

Mawsons recognises that people are the Company's most valuable asset and as such Mawsons is committed to providing a comprehensive human resource management system.

Mawsons is committed to ensuring that all employees and contractors receive fair and equitable treatment with respect to their employment with the Company in a pleasant, respectful, productive environment free from discrimination, harassment or bullying.

We have a Fair Work Commission (FWC) ratified EBA, and our local industry content is 100% for our operations based in Victoria and New South Wales.

Modern Slavery.

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Criteria 5

Assessing the effectiveness of the actions

As this is the inaugural modern slavery statement for Mawsons, the focus has been on major suppliers through a supplier survey. The survey included a questionnaire comprising 17 questions directly relating to identifying the risk of the modern slavery within supplier organisations.

Mawson also independently verified and reviewed suppliers Modem Slavery Statements published as part of governance and/or were registered with Australian Border force.

Following the compilation of responses and documentary evidence of compliance with the modern slavery act, no suppliers were identified as not conforming and requiring further investigation.

We will review all relevant policies at least annually to ensure continued effectiveness.

We will undertake annual surveys of key suppliers for continued compliance with the Modern Slavery Act 2018 (Cth).

Criteria 6.

The process of consultation with any entities the reporting entity owns or controls

Mawsons sets policies and makes decisions for the Group including all subsidiaries which ensures a consistent approach to addressing modern slavery risks.

We ensure that all relevant areas of the company and its subsidiaries are aware of what actions they need to take and that modern slavery risks relating to these areas and subsidiaries have been identified, assessed and addressed.

The consultation process by, Mawsons has included the following actions:

- Companywide Social responsibility policy incorporating compliance with Modern Slavery Act
- Modern slavery compliance training of senior management
- The reporting of information and analysis about modern slavery risks in the operations and supply chain
- The adoption and implementation of the same risk mitigation actions, due diligence and remediation processes across Mawsons group.

Criteria 7:

Provide any other relevant information - COVID-19 response

In response to the COVID-19 pandemic, Mawsons prioritised the health and safety for all of its employees, contractors and visitors to its sites. Along with prioritising the safety of its people, Mawsons works with its key customers and supply partners to understand and support their response efforts to the COVID-19 pandemic to ensure no increased risk of modern slavery practices within their operations.

Many of Mawsons supply partners have responded with information on the steps they are taking to protect their employees such as:

- the provision of masks and protective personal equipment.
- social distancing guidelines.
- increased cleaning and disinfection of workplace areas.
- contactless deliveries.
- health and education programs.
- temperature and COVID-19 testing.

During the pandemic Mawsons has been able to maintain all existing major supply chains and continue to supply essential infrastructure projects and maintain supply chains consistent with customer needs.

Mawsons have made no material changes to production schedules and continues to be committed to develop a mutually beneficial and sustainable relationship that minimises the risk of modern slavery practices.

This statement was approved by the Mawsons Board of Directors.

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John Mawson Managing Director 25th March 2021