



Modern Slavery Statement 2024

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Heidelberg Materials Australia Modern Slavery Statement 2024

1. Reporting Entities

This Modern Slavery Statement (Statement) is a joint statement made by Heidelberg Materials Australia Group Holdings Pty Ltd (HMAGH) and Heidelberg Materials Australia Holdings Pty Ltd (HMAH) and their wholly owned subsidiaries (together, HMA) for the financial year ended 31 December 2024. HMA operates the Heidelberg Materials, Hymix, Alex Fraser, Suncoast Asphalt and Pioneer North Queensland brands as part of the HMA group of companies in Australia.

2. Structure, operations and supply chain

HMA is a leader in building and construction materials with an extensive production and logistics network across Australia. HMA is principally engaged in the supply of a comprehensive range of pre-mixed concrete, aggregates and sand. It also produces road base, asphalt and sustainable and recycled construction materials for civil construction and infrastructure projects. In addition, it operates one landfill. HMA has approximately 3,600 employees in Australia. HMA is part of the Heidelberg Materials group, which employs over 51,000 people in more than 50 countries. Heidelberg Materials AG is one of the world's largest integrated manufacturers of building materials and solutions with leading market positions in cement, concrete and aggregates.

3. Risk of modern slavery in the operations and supply chain

The vast majority of HMA's suppliers (and supply chain) are Australian based. As such, products and materials are largely sourced only from Australia. HMA's supply chain also draws on certain supplies via the wider Heidelberg Materials group. Owing to the global nature of some of Heidelberg Materials' suppliers, HMA recognises that the risk of modern slavery can vary depending on geographic as well as sector-specific factors.

HMA conducts enhanced due diligence on selected supply chains considered to present potentially greater degree of risk of modern slavery and we have developed processes to continuously review our policies and mitigate these risks.

In its supply chain, HMA has:

- conducted a review of any suppliers which operate in countries which have a higher risk of modern slavery;
- reviewed the Modern Slavery Statements of a number of major suppliers to understand if any modern slavery risks have been identified;
- engaged with new suppliers and renewing suppliers to better understand their supply chain and identify any modern slavery risks;
- issued questionnaires and implemented assessment tools for high risk vendors;
- taken part in a Heidelberg Materials global human rights risk assessment which includes modern slavery risks;
- implemented Integrity Next.

In its operations, HMA has strong human resources controls in place for employees and subcontractors. The employee induction process includes awareness of the principles of modern slavery and modern employee rights and responsibilities. In addition, checks are made to ensure all new employees have valid residency status.

4. Actions taken

HMA operates under a Heidelberg Materials group compliance framework which commits the companies to the eight core labour standards of the International Labour Organisation (ILO), the OECD guidelines for multinational enterprises, the UN's Universal Declaration of Human Rights and the UN Guiding Principles for Business and Human Rights. These principles have also been incorporated into the Heidelberg Materials Policy Statement on Human Rights, which was reissued in July 2023 as part of an update to its human rights policy. HMA has a Human Rights Coordinator who has responsibility for monitoring and coordinating human rights compliance management at HMA, in collaboration with the procurement, health and safety, human resources and environmental areas of the business.

HMA follows a Code of Business Conduct which can be found at www.heidelbergmaterials.com (Code of Business Conduct). This commits HMA to conducting business strictly in accordance with all applicable laws and regulations. HMA is committed to fair employment practices and to following all applicable labour and employment laws.

HMA's standard contractual terms of purchase require suppliers and relevant third parties to comply with a specific Supplier Code of Conduct, a copy of which can be found at www.heidelbergmaterials.com/en/procurement (Supplier Code of Conduct). The Supplier Code of Conduct requires vendor compliance with the international social accountability standard SA 8000 and principles of the ILO.

HMA has again conducted a risk assessment of all large suppliers and those suppliers with links to countries with an elevated risk. It has issued the Supplier Code of Conduct to existing major suppliers, new suppliers and renewing suppliers. Modern slavery compliance requirements are included in all tender documents and HMA also actively discusses modern slavery compliance with its major suppliers during contract management meetings.

Key requirements from the Supplier Code of Conduct in respect of modern slavery are as follows:

- Suppliers must not use child labour in any stage of manufacturing. Suppliers are requested to operate in accordance with the ILO convention recommendation of minimum age for admission to employment.
- Compensation and benefits must comply with fundamental principles relating to minimum wages, overtime hours and legally mandated benefits.
- No form of forced or compulsory labour may be used and employees shall be free to leave employment on reasonable notice.
- Suppliers are expected to adhere to the right of employees to freedom of association and recognition of employees' rights to collective bargaining, in accordance with local law.
- Workers must have safe and healthy working conditions that meet or exceed applicable standards for occupational health and safety.
- Suppliers must require their own direct suppliers to adhere to the principles of the Supplier Code of Conduct and exercise diligence in verifying that these principles are being adhered to in their supply chains.
- Suppliers must not use any form of slavery and practices akin to slavery, serfdom or other forms of domination or oppression in the workplace, including forced prison labour.

HMA has also developed a Sustainability Policy which confirms HMA's objective to adhere to human rights and labour standards and co-operate proactively in an open and transparent manner with all its stakeholders. It also confirms that HMA does not engage in modern slavery of any form and will not engage with organisations that do.

HMA also supports the United Nations Sustainable Development Goals which includes Development Goal 8 which aims to "promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all". Heidelberg Materials is a signatory to the United Nations Global Compact on human rights, labour, environment and anti-corruption which supports the elimination of all forms of forced and compulsory labour and the effective abolition of child labour. Additionally, HMA is a member of Social Traders which support and develops a social procurement marketplace to address disadvantage in the Australian community and Supply Nation, which promotes sourcing from indigenous-owned businesses.

In its operations, HMA has in place a Contractor Administration Management System (CAMS) which allows HMA to monitor its subcontractors and their businesses.

5. Assessing effectiveness

The Heidelberg Materials group has been running a risk assessment survey in respect of child labour and human rights violations since 2013. HMA has also completed its own human rights risk assessment and will be undertaking this annually.

HMA suppliers are evaluated through rigorous due diligence processes during tender and appraisal processes. This includes acceptance against the Code of Conduct and the Supplier Code of Conduct. Specific diligence is required by the standard appraisal procedure in respect of modern slavery, health and safety and corporate social responsibility, including diligence in respect of working conditions, employee pay and labour standards. The Master Data team at HMA's Shared Services Centre carries out many wide-ranging background checks to assist in any risk assessment.

The Heidelberg Materials group has a global pre-qualification program for its suppliers and contractors to assess suppliers' ability to fulfil Heidelberg Materials' requirements with regard to sustainability and corporate social responsibility. Questions are asked and documentation requested in areas relevant to modern slavery including voluntary employment, child labour, freedom of association and human rights and welfare.

HMA and the Heidelberg Materials group also have in place an Incident Reporting & Case Management Policy which sets out how employees or external parties can raise concerns on various matters including modern slavery. As part of this, it has a confidential and anonymous compliance hotline (SpeakUp) for reporting any incidents of non-compliance with any law or policy including the Supplier Code of Conduct, human rights and core labour standards such as discrimination and child labour. It enables both internal and external whistle-blowers to provide information about possible human rights violations and infringements of labour standards, as well as in relation to infringements of other laws. Every report is investigated. In addition, HMA provides for online stakeholder (internal and external) feedback and an emergency phone support for employees to report any issues or non-compliance. As in previous years, there were no instances of child labour or forced labour reported or alleged within HMA's business or supply chains in 2024.

HMA has made available specific modern slavery training as a further enhancement to its protocols. Approximately 800 employees who are in people management positions have completed this training. This is in addition to general compliance training that HMA has in place.

The procedures of HMA are regularly assessed against best practice. Part of this assessment is a review of the extent to which modern slavery can be identified and eliminated from its business and supply chain.

HMA also carried out a more detailed assessments of existing suppliers via its Integrity Next portal which features an integrated risk assessment module which will further enhance HMA's supplier vetting process in relation to modern slavery and ensure our corporate social responsibility requirements are met.

6. Consultation with other entities

HMA has consulted with the entities covered by this statement by:

- engaging with the directors of the subsidiaries and providing them opportunity to review this statement - there is commonality of directors across all wholly owned companies;
- ensuring that the statement is reviewed and approved by the modern slavery working group who has oversight over the operations and supply chain of the subsidiaries and obtaining feedback from stakeholders across the subsidiaries.

This statement does not include the modern slavery risks of joint ventures not managed or operated by HMAGH. A full list of wholly owned entities which HMAGH manages and operates is set out in the HMAGH 2024 Annual Report and the HMAH 2024 Annual Report submitted to ASIC.

7. Looking ahead

HMA is committed to combatting all forms of modern slavery. It will continue to:

- improve the way HMA identifies and addresses modern slavery risk in its operations and supply chain;
- analyse high-risk/high-impact suppliers, plan diligence steps for these suppliers and collaborate with other key stakeholders as part of a global Heidelberg Materials human rights risk assessment;
- reinforce compliance by suppliers of the Code of Conduct and Supplier Code of Conduct;
- review policies to ensure best practice;
- ensure the risk assessment is evolving to identify modern slavery risks during tenders;
- review and revise training opportunities across the business; and
- update induction and onboarding practices.

This statement was approved by the board of directors of Heidelberg Materials Australia Group Holdings Pty Ltd and the board of directors of Heidelberg Materials Australia Holdings Pty Ltd on 26 June 2025.



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