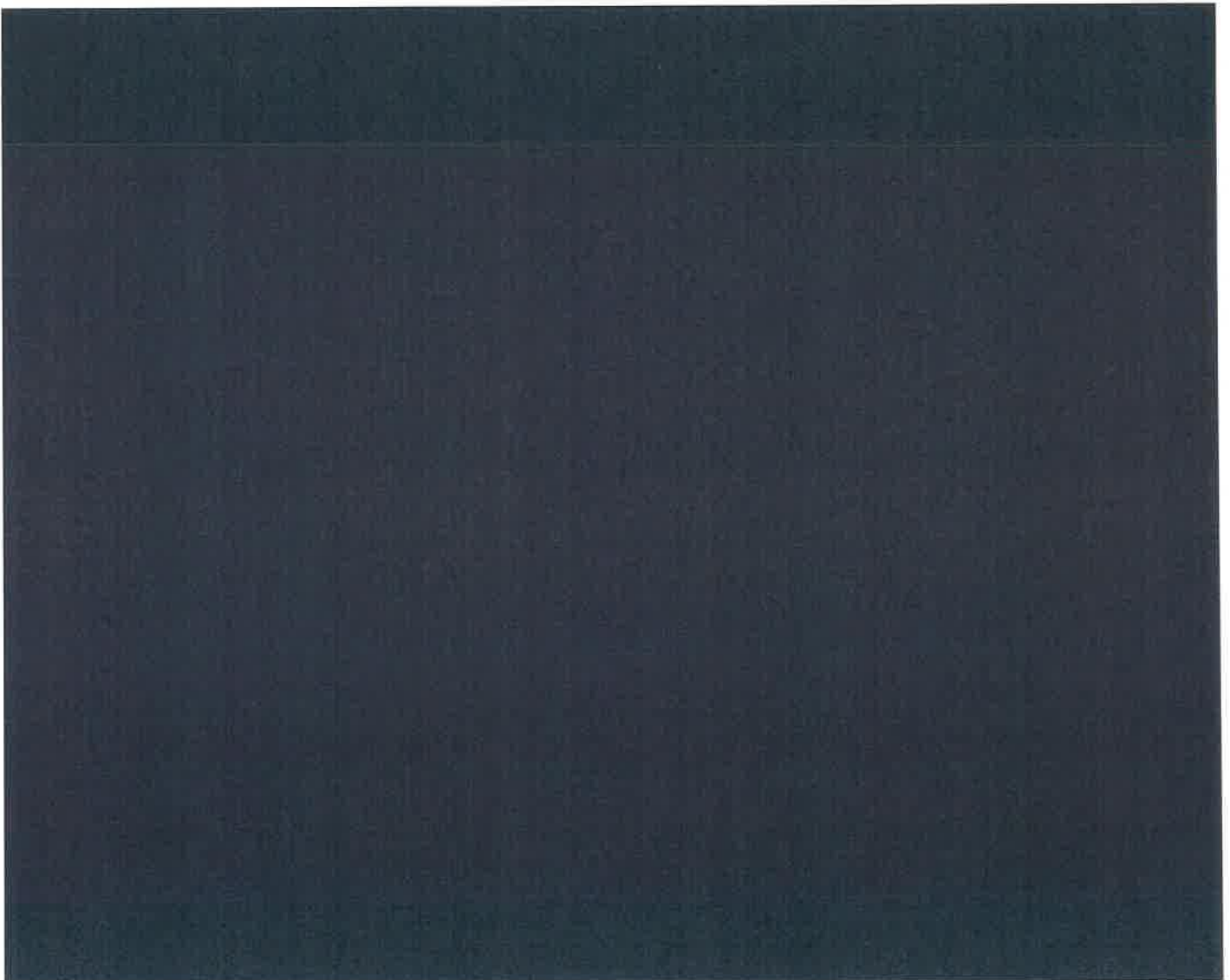




WE OPEN THE WAY

# COLAS AUSTRALIA GROUP MODERN SLAVERY ACT STATEMENT 2023



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## Message from our Group CEO

At COLAS Australia Group we take pride in conducting our business responsibly and to the highest ethical standards. We recognise that modern slavery, in its various forms, causes suffering to communities and individuals globally. We accept our moral as well as legal obligation to prevent modern slavery, and to comply with the necessary obligations imposed by the Modern Slavery Act 2018 (Cth) (the Act).

Our Ethics and Compliance Group Code of Conduct, Group Whistleblowing Platform and Modern Slavery Policy also considers in making procurement decisions and management of modern slavery risks.

In FY2021 we began the assessment of modern slavery risks in our supply chains by introducing our Modern Slavery Supplier Questionnaire which is risk assessed and reviewed annually.



This statement was approved by the board of directors of COLAS Australia Group Pty Ltd.



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Thierry Madelon  
**Group CEO COLAS Australia Group**

## About COLAS Australia Group

COLAS Australia Group (CAG) was formed in 2008 with the acquisition of SAMI Bitumen Technologies. CAG has continued to expand its operations throughout Australia with the acquisition of several local companies and is now supported by over 500 employees across 15 work sites in 5 states. CAG is a leading provider of sustainable pavement construction and maintenance solutions across Australia. We design, construct, maintain and operate a wide variety of road and port projects for public and private sector clients.

CAG offer a range of products and services to support flexible pavement needs during its life cycle. The products range from quarry materials and bituminous binders to asphalt mixes. Our construction and maintenance services include binder deliver, asphalt milling and paving, spray sealing, Microsurfacing, enrichment treatments, crack sealing and line marking. Our support services range from mix and spray seal design to testing of materials and asset management. CAG has the capability to manage surfacing construction projects and long-term maintenance contracts.

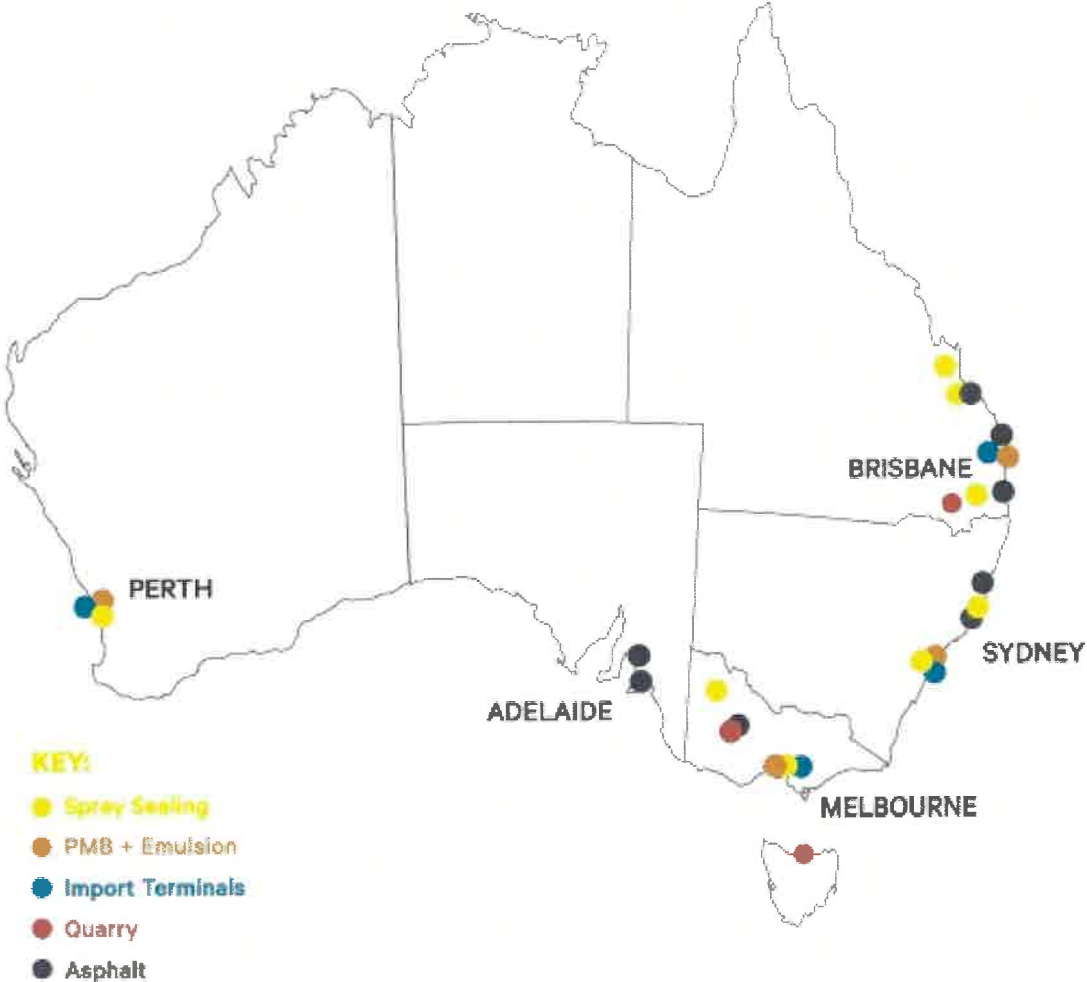
CAG operates NATA registered laboratories with comprehensive inventory of bitumen and asphalt testing equipment in developing innovative solutions to maximise the performance of proprietary asphalt mix and spray seal designs and to optimise the benefits from CAG supplied product and processes.

CAG is third party certified by the Australian and New Zealand Regulator/JAS-ANZ accredited certification body to the highest International Standards OH&S ISO45001, Environment ISO14001, Quality ISO9001 that is underpinned by the International Risk Management Standard ISO31000.

CAG is well placed to manufacture and supply aggregates in Victoria, hot and cold asphalt products through its national network of static and mobile plants. CAG has several construction teams which can conduct asphalt paving and spray sealing operations through its state-based businesses, namely COLAS Queensland, COLAS New South Wales, COLAS Western Australia, Hutchison Quarries and VSA Group (Includes Inroads, Primal Surfacing, Centre State Asphalt, Western Quarries, Topcoat Asphalt and East Arm Resources).

COLAS Solutions, as a stand-alone national business, can offer pavement preservations treatments such as Microsurfacing (Colmat), mineral filled polymer modified emulsions (Sealcoat) and crack sealing. These treatments, if applied timeously, can extend the life of the existing pavements so that their life costs are reduced.

# Where we Operate?



## **Reporting Period**

This MSA Statement sets out the steps taken by COLAS Australia Group in the reporting period of 1<sup>st</sup> July 2022 to 30<sup>th</sup> June 2023 to prevent modern slavery in its business operations and supply chains.

## **Impact of Pandemic**

CAG recognizes that the impacts of the pandemic may increase the vulnerability of workers in local, national, and global supply chains to modern slavery. The ongoing disruptions caused by the pandemic, including required business shutdowns and travel limitations, may also limit our capacity and the capacity of certain entities in our supply chain to assess and address modern slavery risks, including by preventing key activities, such as face-to-face employee training and on-site supplier audits. CAG continues to assess and address new or increased modern slavery workplace risk factors resulting from the pandemic and continues to work with its suppliers on the impacts of the pandemic on their operations and supply chains to ensure that CAG maintains ongoing transparency into the modern slavery risks in its full supply chain.

## **Our Policies**

CAG's Modern Slavery Policy sets out our commitment to implementing and enforcing effective systems and controls to ensure that modern slavery is not occurring anywhere in our business or supply chains, and stipulates that CAG expects the same high standards to be adopted by all of its contractors, suppliers and other business partners. The Directors of CAG accept overall responsibility for ensuring that all under CAG's control comply with the Policy. Primary responsibility for implementing the Policy lies with our Group CEO, who works closely with the human resources, WHSEQR compliance, procurement teams and other relevant parts of the business.

CAG's Ethics and Compliance Group Code of Conduct includes a stated commitment to maintaining an honest and open environment in relation to all aspects of the company's operations, and transparency across activities within any part of the company's business or its supply chain to promote confidence between CAG and its stakeholders. The Ethics Policy also encourages employees to report concerns in accordance with the company Whistleblowing Policy.

CAG's Group Whistleblowing platform stipulates that every CAG employee has a responsibility to speak out if they reasonably suspect malpractice within the company. CAG is also committed to ensuring that no employee suffers any detrimental treatment as result of reporting in good faith a concern about any wrongdoing or breaches of law, including any suspicion that modern slavery of whatever form may be taking place in any part of CAG's business or supply chain.

CAG's Ethics and Compliance Group Code of Conduct also reminds employees that they are expected to perform their duties in accordance with Group principles. The Ethics and Compliance Group Code of Conduct states that the principle of respect for persons shall be a key principle governing the actions of employees, requiring mutual respect, trust and dignity to be observed, including compliance with the principles of the UN's Universal Declaration of Human Rights and with the fundamental conventions of the International Labour Organisation in particular concerning forced and child labour.

## **Risks of Modern Slavery Practices in Operations and Supply Chains of Company**

### ***Sector and Industry Risks***

CAG has assessed risks related to Australian Modern Slavery Practice in several ways including procurement, supply chain, labour hire and its employment strategies. It is pleasing to know that there is very low risk across CAG operations related to MSA and Equal Opportunity Employment.

### ***Product and Services Risks***

As part of our normal risk management framework under the umbrella of Integrated Business Management Systems (IBMS), the product and services risks are low.

### ***Geographic Risks***

CAG operations are only across Australia and complies with the Australian Legal, Regulatory and Legislative Requirements.

## **Actions Taken by the Company to Assess and Address Modern Slavery Risks**

There are many pro-active and holistic steps that CAG has taken and continues to take, internally and at various levels within our supply chains, to detect and remediate modern slavery risks and to prevent any future instances of such worker exploitation.

CAG responsibility is a top down from the Group CEO, Management, and workforce. CAG has put in place a robust modern slavery strategy that includes the following key risk management components:

- ✓ Delegation of Authority Matrix outlining the procurement framework.
- ✓ Formal Policies and Procedures for Internal Business Operations and External Suppliers to Reduce Modern Slavery Risks as part of CAG IBMS.
- ✓ CAG's Modern Slavery Policy and Statement are published on our website and are also available to company employees on our Data Management System/Skytrust.
- ✓ In maintaining our key supplier List of subcontractors and material suppliers delivering to site, CAG's procurement team within its integral audit acceptance procedures checks

on the steps taken by key suppliers to ensure that slavery and human trafficking is not present in their business or supply chain.

- ✓ Transparent Internal and External Automated Reporting Processes
- ✓ For key subcontractors or material suppliers seeking to be included on our key supplier List. CAG uses its Modern Slavery Supplier Questionnaire, which includes the same requirement for suppliers to verify the steps they have taken to ensure that slavery and human trafficking is not present in their business or supply chain. As appropriate CAG will continually improve the Questionnaire to reflect changes in all areas including regarding modern slavery, and as part of CAG's consolidation plan with its supply chain, CAG is considering supply chain responses and actions in relation to modern slavery.
- ✓ CAG's expectations regarding supply chain behaviour are also being reinforced through our Modern Slavery Policy to our suppliers and subcontractors, in conjunction with a reminder of that compliance with our Policy is a prerequisite to working with CAG.
- ✓ Modern Slavery Act awareness is an area of focus between the CAG procurement team and our suppliers.
- ✓ CAG's recruitment and selection processes address modern slavery issues in the context of assessment of right to live and work, identity checks (including ensuring that employees can provide evidence that they are in possession of their own identification documents), and verification of references for permanent and temporary staff.
- ✓ CAG's compliance with relevant employer obligations, such as regulations governing minimum and living wage, gender pay gap reporting and pension automatic enrolment duties, serve to underpin the steps we are taking to ensure modern slavery is not present in our business.
- ✓ CAG's employee onboarding process has been reviewed and the Modern Slavery Policy is now included in our employee inductions to make our employees aware of their rights and obligations.
- ✓ Periodic Training of Staff and Suppliers as required.
- ✓ Transparent Workplace Engagement Practices, including Open Access to Group Whistleblowing Platform
- ✓ Communication within CAG to relay information regarding combatting modern slavery includes toolbox meetings, Safety communications and our company newsletter. CAG is also using to promote actions to counter the risk of modern slavery, including highlighting pointers for those working in the construction industry to look out for, recognising that this is a high-risk sector for labour exploitation.
- ✓ These measures are subject to ongoing review and additional measures will be developed and implemented as appropriate, with relevant performance indicators to



measure effectiveness in ensuring that slavery and human trafficking is not present in CAG's business or supply chain.

- ✓ Ongoing Monitoring of the Modern Slavery Act and its compliance to continually improve our processes.

### ***Program Highlights in the Reporting Period***

CAG annually implements among other things, a detailed modern slavery supplier assessment questionnaire to help us understand which parts of our business operations may present modern slavery risks. The responses to the questionnaire from various business lines and operations centers allowed CAG to determine there was low risk within its operations.

CAG will continually improve its Australian MSA corporate governance processes in subsequent years to build on and enhance CAG's ability to address this important issue and to reflect changes in the company's business operations, suppliers, and marketplace.

### ***Future Plans and Goals***

CAG will continue to assess all relevant areas related to the Australia MSA and take appropriate actions to eliminate risks. In subsequent years, these assessments may be modified to reflect the risk rating assigned to each supplier in response to their assessment responses in the prior year.

### **Assessment of Effectiveness of Actions Taken by the Company**

CAG is committed to monitoring the effectiveness of its ongoing actions to assess and address modern slavery risks, including tracking a range of qualitative and quantitative indicators of these risks.

### **Consultation with Entities Owned or Controlled by Company**

CAG has consulted with all its Subsidiaries to ensure compliance with the Australia MSA Act, and it's included in this submission.