

MODERN SLAVERY STATEMENT 2025





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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)*.



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.



Jean Francois Milleron
Group CEO
COLAS Australia Group

About COLAS Australia Group

Colas Australia Group Pty Ltd (Colas) was formed in 2008 with the acquisition of SAMI Bitumen Technologies Pty Ltd. Colas 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 6 states. Colas 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.

Colas 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, enrichment treatments, crack sealing and line marking. Our support services range from mix and spray seal design to testing of materials and asset management. Colas has the capability to manage surfacing construction projects and long-term maintenance contracts.

Colas 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 Colas supplied product and processes.



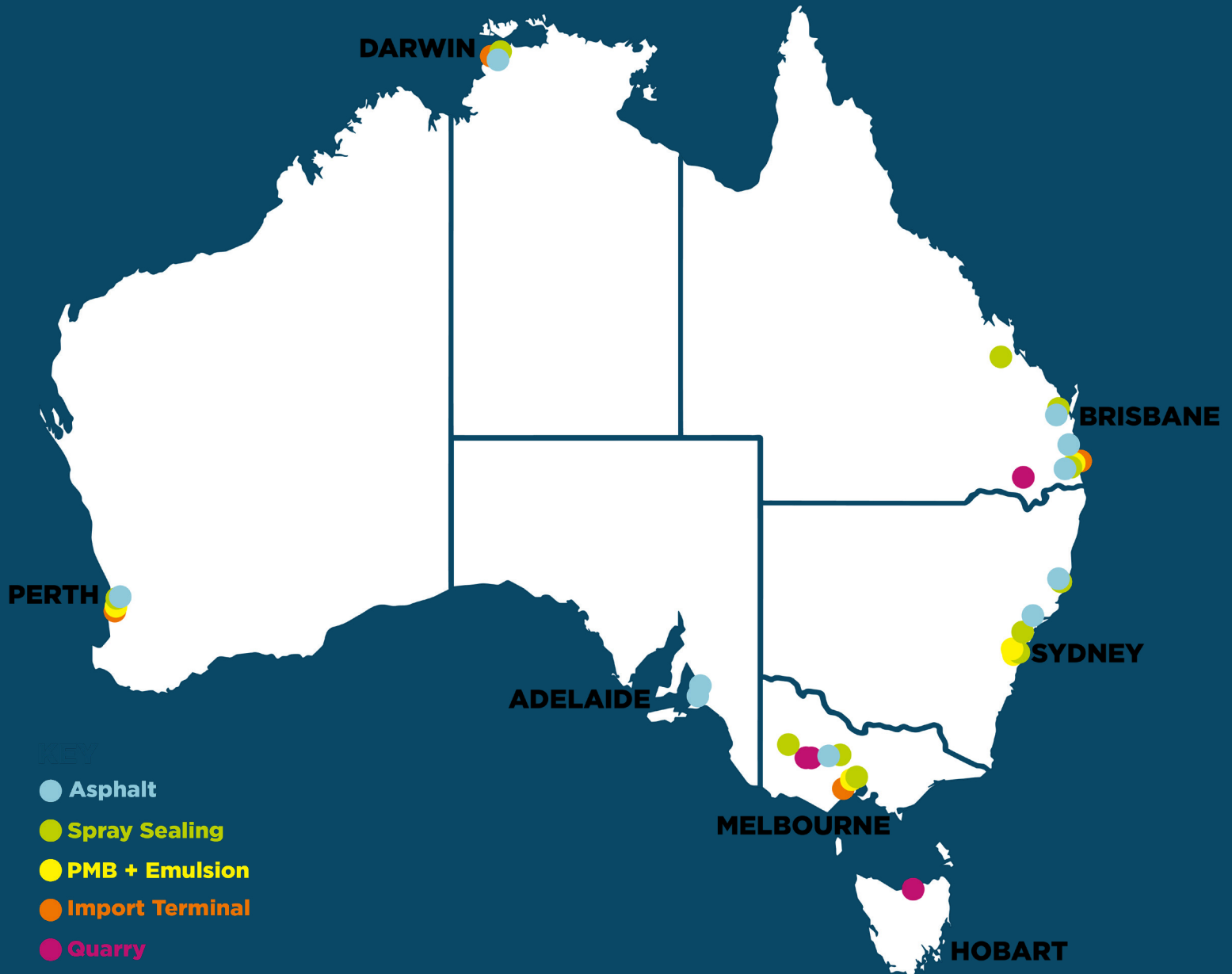


Colas is third party certified by the Australian and New Zealand Regulator/JAS-ANZ accredited certification body to the highest International Standards OH&S ISO45001, Environment ISO14001, Quality ISO9001 that is underpinned by the International Risk Management Standard ISO31000.

Colas is well placed to manufacture and supply aggregates in Victoria and Queensland, hot and cold asphalt products through its national network of static and mobile plants. Colas has several construction teams which can conduct asphalt paving and spray sealing operations through its state-based businesses, namely **Colas Queensland Pty Ltd, Colas New South Wales Pty Ltd, Colas Western Australia Pty Ltd, Colas Solutions Pty Ltd, Colas Contracting Pty Ltd, Hutchison Quarries Pty Ltd, Dust-a-Side Australia Pty Ltd and VSA Roads Pty Ltd** (including **Inroads Pty Ltd, Primal Surfacing Pty Ltd, Centre State Asphalt Pty Ltd, Western Quarries Pty Ltd, Tucker Hill Quarry Pty Ltd, Topcoat Asphalt Contractors Pty Ltd, NT Bitumen and Asphalt Pty Ltd and East Arm Resources Pty Ltd**).

Colas also incorporates **SAMI Bitumen Technologies Pty Ltd** which is one of the largest suppliers of bitumen in Australia, providing a wide range of high-quality products tailored to the evolving needs of its customers. SAMI operates in Darwin, Brisbane, Perth, Sydney, and Melbourne and has a storage capacity exceeding 50,000 tonnes nationally for its bulk products. SAMI supplies all bitumen grades as specified in the Australian Standard from their bulk bitumen facilities.

Where we operate





Reporting Period

This MSA Statement sets out the steps taken by COLAS Australia Group in the reporting period of 1 July 2024 to 30 June 2025 to prevent modern slavery in its business operations and supply chains.



> Our Policies

Colas' 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.

It stipulates that Colas expects the same high standards to be adopted by all of its contractors, suppliers and other business partners. The Directors of Colas accept overall responsibility for ensuring that everyone under Colas' control complies with our Modern Slavery Policy.

Colas' Anti-Corruption Code of Conduct and Code of Ethics includes a stated commitment to maintaining an honest and open environment in relation to all aspects of the company's operations, as well as transparency across activities within any part of the company's business or its supply chain to promote confidence between Colas and its stakeholders. The Anti-Corruption Code of Ethics incorporates a whistleblowing policy and facility, which encourages employees to report concerns in accordance with the procedures of that policy. Colas' whistleblowing platform is available to every Colas employee and suppliers and partners. It provides an unobstructed opportunity to speak out for any ethical issue (including any safety issues). Colas is 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, in any form, may be occurring in any part of Colas' business or supply chain.

Anti-Corruption Colas' Code of Ethics and Code of Conduct also reminds employees that they are expected to perform their duties in accordance with Colas' principles. The Anti-Corruption Code of Ethics and 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 upheld. This includes compliance with the principles of the UN's Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organisation, particularly concerning forced and child labour.

> Risks of Modern Slavery Practices in Operations and Supply Chains of Company

Sector and Industry Risks

Colas has assessed risks related to Australian Modern Slavery Practices in several ways, including procurement, supply chain, labour hire, and its employment strategies. It is reassuring to note that there is very low risk across Colas' operations related to Modern Slavery Act compliance and Equal Opportunity Employment.

Colas recognises that modern slavery risks may arise in:

- **Sector/Industry risks:** Construction and road building, which involve high use of subcontractors, migrant labour, and high-risk services (cleaning, catering).
- **Product risks:** Imported petroleum products (bitumen, fuels), uniforms, PPE, and specialist construction materials sourced from higher-risk jurisdictions.
- **Geographic risks:** While Colas' direct operations are in Australia, supply chains include imports from countries where forced labour and child labour risks are higher.
- **Labour risks:** Labour hire and subcontracting arrangements may expose temporary or migrant workers to risks of exploitation.





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

✓ Colas has implemented a Modern Slavery Strategy embedded in its Integrated Business Management System (**IBMS**), including:

- **Supplier due diligence:** Annual Modern Slavery Supplier Questionnaire for subcontractors and material suppliers.
Procurement controls: Modern Slavery clauses in supplier contracts;
Delegation of Authority Matrix for procurement approvals.
- **HR practices:** Right-to-work checks, ID verification, employment reference checks, and prohibition of document confiscation.
- **Training:** Inclusion of Modern Slavery awareness in onboarding, toolbox talks, and refresher training for staff and suppliers.
Whistleblowing: Group-wide platform available to employees and suppliers with guaranteed protection from reprisal.
- **Communications:** Policy reminders through newsletters, safety meetings, and supplier briefings.
- **Remediation framework:** Where modern slavery indicators are identified, escalation occurs to the Group CEO and legal team; suppliers are engaged to remediate, with disengagement as a last resort; potential victims are referred to support services in line with government guidance.

✓ Colas has taken and continues to take many proactive and holistic steps, both internally and at various levels within our supply chains, to detect and remediate modern slavery risks and to prevent any future instances of worker exploitation. Colas; responsibility is top-down, originating from the Group CEO, management and the workforce. Colas has implemented 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 Colas' 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/Donesafe.
- ✓ For key subcontractors or material suppliers seeking to be included on our key supplier list. Colas uses its Modern Slavery Supplier Questionnaire. This questionnaire includes the same requirement for suppliers to verify the steps they have taken to ensure that slavery and human trafficking are not present in their business or supply chain. Colas will continually improve the questionnaire to reflect changes in all areas, including those related to modern slavery. As part of Colas' consolidation plan with its supply chain, Colas is considering supply chain responses and actions regarding modern slavery.
- ✓ Colas' expectations regarding supply chain behaviour are also reinforced through our Modern Slavery Policy communicated to our suppliers and subcontractors, in conjunction with a reminder of that compliance with our Policy is a prerequisite for working with Colas.
- ✓ Modern Slavery Act awareness is an area of focus between the Colas businesses and their suppliers.
- ✓ Colas' recruitment and selection processes address modern slavery issues by assessing the right to live and work, conducting identity checks (including ensuring that employees can provide evidence of possession of their own identification documents), and verifying references for both permanent and temporary staff.
- ✓ Colas' 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.
- ✓ Colas' employee onboarding process is reviewed and the Modern Slavery Policy is included in employee inductions to make employees aware of their rights and obligations.
- ✓ Periodic training of staff and suppliers as required.

- ✓ Transparent workplace engagement practices, including open access to a group whistleblowing platform, are implemented to encourage reporting and ensure accountability within the organisation.
- ✓ Communication within Colas to relay information regarding combatting modern slavery includes toolbox meetings, safety communications and our company newsletter. Colas is also promoting actions to counter the risk of modern slavery by highlighting key indicators for those working in the construction industry to watch for, recognising that this sector is particularly high-risk for labour exploitation.
- ✓ These measures are subject to ongoing review, and additional measures will be developed and implemented as appropriate, along with relevant performance indicators to measure effectiveness in ensuring that slavery and human trafficking are not present in Colas' 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

Colas annually implements a detailed modern slavery supplier assessment questionnaire, among other measures, 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 centres have allowed Colas to determine there is a low risk within its operations.

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



Future Plans and Goals

Colas will continue to assess all relevant areas related to the Australia Modern Slavery Act and take appropriate actions to eliminate risks.

In subsequent years, these assessments may be modified to reflect the risk rating assigned to each supplier on their assessment responses in the prior year.

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

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 related to these risks.

CAG measures effectiveness through:

✓ % suppliers completing the Modern Slavery Questionnaire.

FY24 completion rate
39%

✓ % new suppliers/contracts containing Modern Slavery clauses.

✓ % employees completing Modern Slavery training.

FY24 completion rate
99%

✓ Internal procurement audits to test supplier checks.

✓ Monitoring of whistleblowing reports and remediation actions.

Future enhancements include independent audits of selected high-risk suppliers and benchmarking against industry peers.





Consultation with Entities Owned or Controlled by Company

This statement was prepared in consultation with all Colas' subsidiaries.

Engagement occurred via:

- Circulation of draft policy updates to subsidiary boards and management.
- Workshops with procurement functions, HR and compliance teams.
- Inclusion of subsidiary-specific data in supplier mapping and risk assessments.

Any Other Relevant Information

Colas is committed to continuous improvement and in FY25 will:

- Extend supplier mapping to Tier 2 for high-risk categories (bitumen imports, PPE).
 - Pilot supplier engagement workshops with selected subcontractors.
 - Collaborate with industry associations to share best practice.
- Strengthen worker voice mechanisms for subcontracted labour.

Approval

This statement has been approved by the board of directors of COLAS Australia Group Pty Ltd on 4 September 2025.



#RESPECT #COMMITMENT

#PIONEERING #SHARING