

# 2023 JOINT MODERN SLAVERY STATEMENT



for Cement Australia Holdings Pty Ltd and Cement Australia Partnership

The "MADE Right Here" logo, which includes a white silhouette of Australia above the text "MADE" in bold white capital letters and "Right Here" in a white script font, all set against a dark background.

**MADE**  
Right Here



# AN AUSTRALIAN ICON...

Cement Australia has provided the cement for many of Australia's most significant projects.

## Introduction

Cement Australia Holdings Pty Ltd (ACN 001 085 561) and the Cement Australia Partnership ("Cement Australia") are each reporting entities under the *Modern Slavery Act 2018 (Cth)*.

This Modern Slavery Statement is made by Cement Australia for the year ended 31 December 2023.

### Our Core Values

Cement Australia's core values of trust, honesty, courage, respect, fairness and caring provide a platform of doing business with suppliers, customers, and stakeholders.

Being the leading supplier of cement products and services in Australia, it is important we never lose sight of our customers, our people, and our communities. With a world-class reputation and an unmatched depth of experience, we deliver a broad range of competitive products and services – from bulk and packaged cement products to alternative fuels and waste management.

### Our Modern Slavery Commitment

Our suppliers play a critical role in supporting Cement Australia to be responsive, reliable and deliver results.

We work with suppliers who collaborate with us and share our core values.

**It is Cement Australia's Policy to conduct business ethically, respecting the rights of all to be free from the practices of Modern Slavery.**

We aim to:

- ✓ raise awareness of modern slavery practices to internal and external stakeholders through communication and training;
- ✓ implement systems designed to understand and monitor the risk of modern slavery;
- ✓ promote the use of our Whistleblower Framework as a mechanism for employees, suppliers, and contractors to report grievances confidentially; and
- ✓ engage suppliers and other stakeholders who share and uphold our commitment to mitigating modern slavery.



# Structure, Operations & Supply Chain

## Structure

Cement Australia Holdings Pty Ltd is owned by controlled entities of Holcim Group Ltd (Switzerland) and HeidelbergCement AG (Germany) in the proportions of 50% and 50% respectively.

Separately, a partnership has been formed between controlled entities of Holcim Group Ltd and HeidelbergCement AG with interests held in the Cement Australia Partnership in the same proportions of 50% and 50% respectively.

Cement Australia Holdings Pty Ltd and the Cement Australia Partnership all operate under the same policies, procedures and systems including human resources, procurement and risk management. They also contract with the same suppliers of goods and services.

Accordingly, they will be referred to as Cement Australia throughout this Statement. A reference to Cement Australia also refers to their respective controlled entities.

In order to prepare this joint statement, we engaged with each of the reporting entities covered by this Modern Slavery Statement and consulted the entities we own or control.

This includes the following entities:

### Joint Ventures

- ✓ Port Kembla Milling Pty Ltd
- ✓ Ecocem Pty Ltd
- ✓ Ecocem Operations Pty Ltd

### Cement Australia Holdings Pty Ltd controlled entities

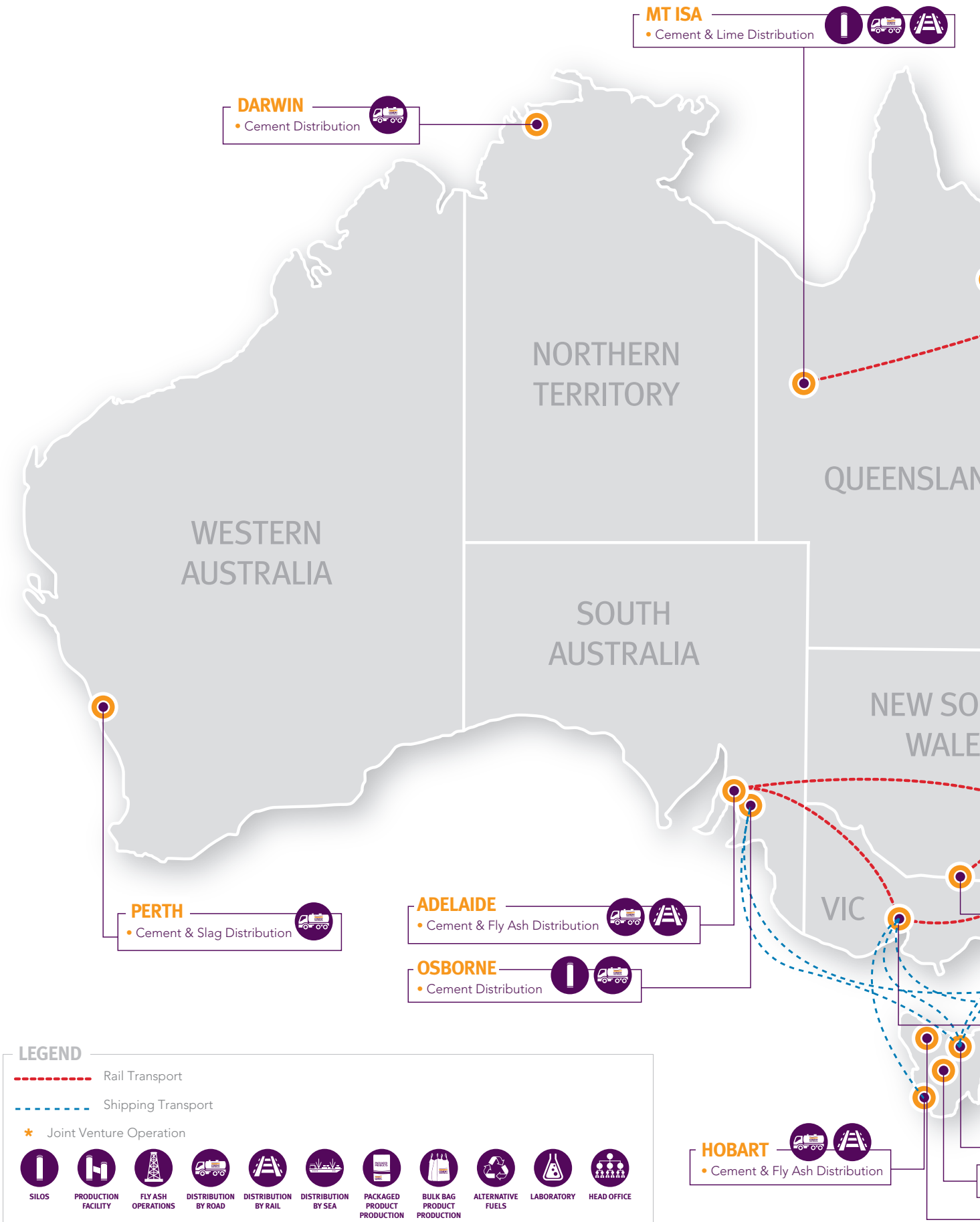
- ✓ Cement Australia (Coal) Pty Ltd
- ✓ Cement Australia (Darra) Pty Ltd
- ✓ Cement Australia (Exploration) Pty Ltd
- ✓ Cement Australia (Goliath) Pty Ltd
- ✓ Cement Australia (Queensland Transport) Pty Ltd
- ✓ Cement Australia (Queensland) Pty Ltd
- ✓ Cement Australia Packaged Products (Qld) Pty Ltd
- ✓ Cement Australia Packaged Products Pty Ltd
- ✓ Cementco Investments Pty Ltd
- ✓ Geocycle Pty Ltd  
(environmentally friendly industrial waste disposal services)
- ✓ Geocycle SBF Pty Ltd  
(environmentally friendly industrial waste disposal services)
- ✓ Kimbolton Coal Pty Ltd
- ✓ Pacific Lime Pty Ltd
- ✓ Pozzolanic Enterprises Pty Ltd
- ✓ Pozzolanic Holdings Pty Ltd
- ✓ Pozzolanic Industries Pty Ltd
- ✓ The Cornwall Coal Company Pty Ltd

**DARRA**

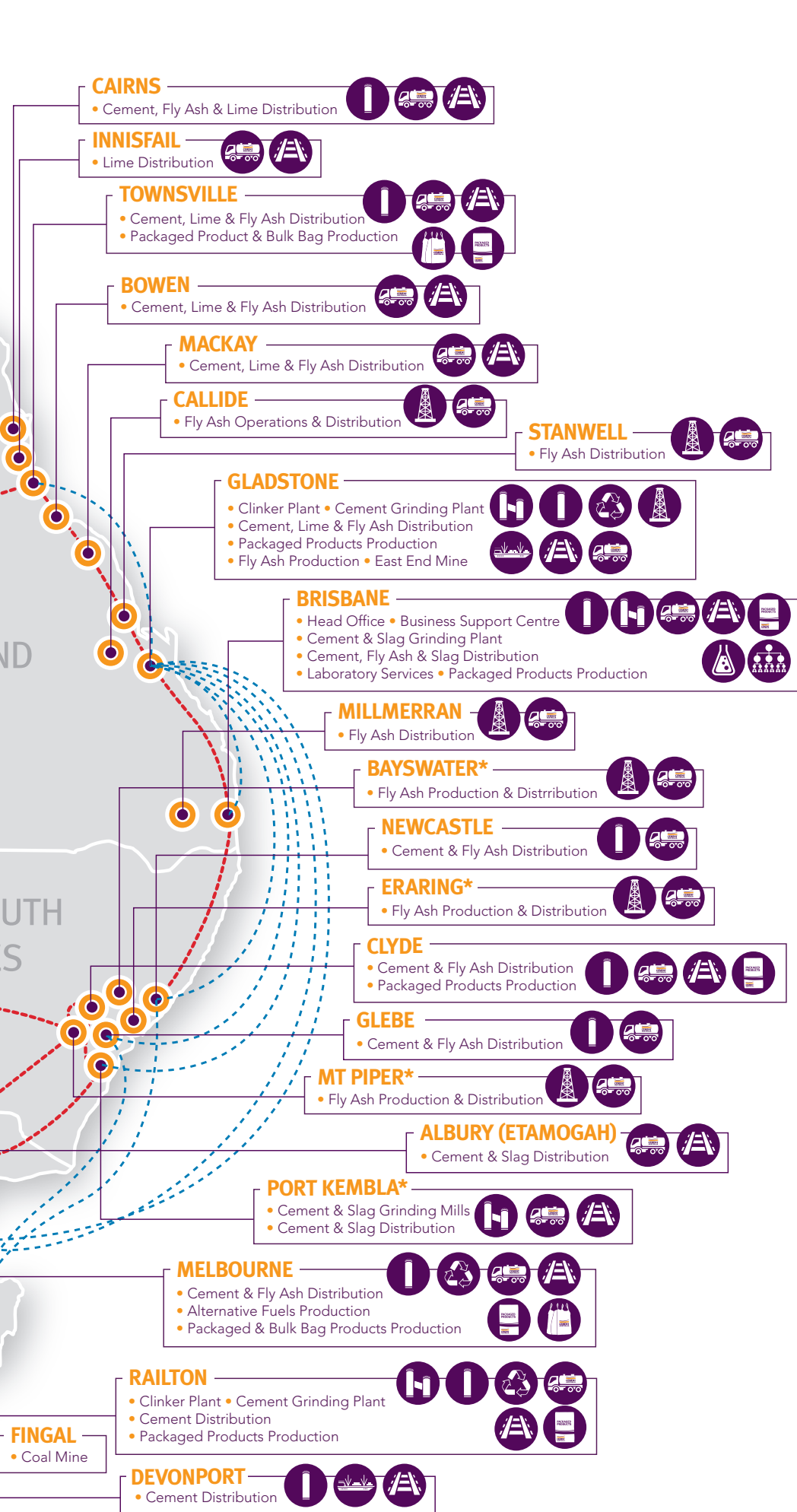
Registered Office:  
18 Station Ave  
Darra, Queensland

**900+**  
**EMPLOYEES**  
across Australia

# Our National Network







**24 SITES**  
across Australia

**56 SILOS**  
holding bulk product

**28 DISTRIBUTION CENTRES**  
across Australia

**6 MILLION TONNES**  
of cementitious material processed each year



## Operations

Cement Australia's main business involves the manufacture and sale of cement and cementitious products in Australia.

Cement Australia manufacture high performance General Purpose cement and General blended cements including customised blends for special applications. In addition, we supply concrete-grade fly ash and Ground Granulated Blast Furnace Slag along with high-grade lime products in bulk and packaged forms.

Cement Australia have manufacturing plants located in Queensland, New South Wales and Tasmania as well as numerous distribution depots up and down the East Coast of Australia. Cement Australia do not operate in any jurisdiction other than Australia.

Cement Australia also operate an environmentally friendly industrial waste business under the legal entity Geocycle SBF Pty Ltd. The waste is processed at our facility in Dandenong, Victoria and destroyed in our two clinker kilns located in Gladstone, Queensland and Railton, Tasmania.

## Supply Chains

Cement Australia has a mix of short term and long term contracts with suppliers depending on the type of goods or services being procured.

These include contracts for supply of raw materials, employment contracts, procurement contracts for the supply of goods and services to Cement Australia's operating sites and contracts with transport, rail and shipping companies.

Cement Australia sources the majority of its raw materials, such as the limestone used in cement manufacturing, from within Australia.

In some instances, where Australia does not have the manufacturing capacity, Cement Australia source plant and equipment for our manufacturing sites from overseas countries. This plant and equipment is sourced mainly from Europe. Cement Australia undertake due diligence on suppliers of plant and equipment from overseas to ensure that the workshops where the goods are fabricated and the materials used are reputable.

Cement Australia also has a large distribution network for the distribution of our products to the market. This includes rail contracts, contracts with road transport operators and contracts with shipping provider companies.



# Risks of Modern Slavery Practices

## in the Operations & Supply Chains of Cement Australia

### Operations

Cement Australia consider our operations to be low risk on account of the strong employment procedures and processes followed by Cement Australia.

This includes a Recruitment, Selection and Appointment Procedure which sets out:

- ✓ The process to be used when employing staff members appointed from overseas including holding the required work visas;
- ✓ Any recruitment agencies used by Cement Australia must have signed written contracts in place; and
- ✓ An in-depth Pre-Employment Screening process.

Cement Australia also have in place a Remuneration Procedure which applies to all employees, including fixed or maximum term contractors, that sets out annual remuneration reviews for employees.

In addition, Cement Australia has a Whistleblower Framework in place that provides confidential access to advice and guidance to all employees, officers of Cement Australia or other individuals that provide goods or service to Cement Australia, their families and their dependents.

### Supply Chains

#### 2021

In 2021, Cement Australia continued to work with existing suppliers providing goods and services to Cement Australia undertaking a deep dive into our supply chain and logistics with a spotlight on our contract drivers of vehicles. The majority of Cement Australia's contract drivers operate as owner/operator businesses.

In addition, Cement Australia has a comprehensive heavy vehicle telemetric system to ensure compliance with national heavy vehicle laws which monitors fatigue and speed. This system is used to ascertain whether any drivers (employed or contracted) are working long hours or are under pressure to complete deliveries quickly.

On account of these factors the risks of Modern Slavery in contract and employed drivers was assessed as low.

Cement Australia also set up an automatic email to any new suppliers which included a requirement to complete the Modern Slavery Questionnaire. Weekly results from these questionnaires are reviewed for any red flags indicating that there may be some Modern Slavery risk.

#### 2022

In 2022, Cement Australia undertook further work to address Modern Slavery risks by focusing on working with internal stakeholders to deep dive into procurement procedures as well as the effectiveness of the Modern Slavery policy.

Cement Australia updated its Procurement Key Performance Indicators (KPIs) to include Modern Slavery compliance as a KPI for quarterly meetings with suppliers. Cement Australia also updated its procurement tender precedents and assessment schedules to capture suppliers' understanding of and compliance with Modern Slavery laws and principles.

Cement Australia made its Modern Slavery Policy available to the public on the Cement Australia website along commenced work on preparing a supplier pamphlet to increase its supplier's understanding of Modern Slavery red flags.

Cement Australia also dedicated efforts towards reviewing its Modern Slavery policy and the effectiveness of the internal communication of this policy. By working with the Human Resources department, recruitment processes and training has been strengthened to ensure relevant employees are trained on Modern Slavery and how to identify red flags within operations and supply chains.



# Cement Australia Actions

## to Address Modern Slavery Risk 2023

In 2023 Cement Australia completed the following actions to address the risks of modern slavery practices in its operations and supply chains:

- ✓ updated its procurement procedure to incorporate the new Supplier's Guide to Modern Slavery pamphlet in its new supplier onboarding pack as well as distributing to all current suppliers of Cement Australia;
- ✓ expanded the Cement Australia Modern Slavery online training module to additional staff;
- ✓ conducted due diligence for recruitment agencies engaged by Cement Australia including improved terms and conditions to cover modern slavery risks;
- ✓ updated its procurement procedure to ensure team members engage in ongoing monitoring of modern slavery questionnaire responses;
- ✓ worked with suppliers who pre-dated the introduction of the Modern Slavery Questionnaire to ensure they were supplied with and completed the Questionnaire, resulting in full coverage of our supplier network; and
- ✓ initiated a deep dive into import shipping supply chains from high-risk countries.





# Looking Forward



Cement Australia acknowledges that the *Modern Slavery Act* is intended to allow companies to take a continuous improvement approach to Modern Slavery risks.

Cement Australia will continue to work with internal and external stakeholders as well as suppliers to assess the effectiveness of our approach in 2024.

## In 2024 Cement Australia plans to:

- ✓ review its Modern Slavery Questionnaire and distribution process to identify areas for improvement with a focus on increasing efficiency and clarity when engaging with suppliers to ensure ongoing supplier engagement;
- ✓ complete its deep dive into import shipping supply chains for materials from high-risk countries;
- ✓ develop a comprehensive procurement process for responding to any suspected or reported incidents of modern slavery with Cement Australia's supply chain;
- ✓ assess the effectiveness of Cement Australia's current Modern Slavery training for employees and, if appropriate, implement improvements to the training to ensure key staff can identify and take steps to reduce the risk of modern slavery practices in its supply chain;
- ✓ initiate the mapping of a key supplier's tier 2 supply chain to identify any downstream risks of modern slavery practices; and
- ✓ review and update Cement Australia's Supplier Guideline to ensure it remains fit for purpose and to provide greater clarity around whistleblower reporting by suppliers.



# Approval of the Modern Slavery Statement

This Modern Slavery Statement has been approved by the Board of Cement Australia Holdings Pty Limited and the Cement Australia Partnership.

Rob Davies, CEO of Cement Australia, has been authorised to sign the Modern Slavery Statement as the responsible member.

Signed:



**Rob Davies**  
CEO Cement Australia

*[Published March 2024]*