

# MODERN SLAVERY STATEMENT

PUBLISHED 19 JUNE 2024







## ABOUT THIS STATEMENT

This Modern Slavery Statement (“the Statement”) has been prepared in accordance with the Australian Modern Slavery Act 2018 (Cth) (the Act) and sets out the approach of Holcim (Australia) Pty Ltd and its holding companies, Holcim (Australia) Holdings Pty Ltd and Holcim Participations (Australia) Pty Ltd (together referred to as Holcim), to identify and address modern slavery risks in its operations and supply chain for the financial year ending 31 December 2023.

In accordance with section 14 of the Act, this is a joint statement covering Holcim (Australia) Pty Ltd (ABN 87 099 732 297) and its holding companies Holcim (Australia) Holdings Pty Ltd (ACN 003 433 118) and Holcim

Participations (Australia) Pty Ltd (ACN 122 401 405), subsidiaries Excel Concrete Pty Ltd (ACN 010 891 773), Broadway & Frame Premix Concrete Pty Ltd (ACN 106 469 363) and Vic Mix Concrete Pty Ltd (ACN 669 886 720).

The Statement is Holcim’s fourth modern slavery statement and covers the period 1 January 2023 to 31 December 2023.

The term “suppliers” includes suppliers of goods and services, and includes providers of labour hire.

Holcim’s registered office is Level 40, 100 Miller Street, North Sydney NSW 2060.

[www.holcim.com.au](http://www.holcim.com.au)

<sup>1</sup>The term modern slavery is used to denote practises defined in the Modern Slavery Act 2018 (Cth) and includes eight types of serious exploitation, being: servitude, slavery, forced labour, forced marriage, the worst forms of child labour, debt bondage, deceptive recruiting for labour or services and trafficking.

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## **Acknowledgement**

Holcim acknowledges the Traditional Owners and Custodians of Country. We pay our respects to the past, present and future Traditional Custodians and Elders of this nation, and extend that respect to all Aboriginal and Torres Strait Islander peoples.

# 01 INTRODUCTION



**George Agriogiannis**  
CEO Holcim Australia

**Holcim Australia is part of the Holcim group, global leaders in innovative and sustainable building solutions. With a workforce of over 2,780 individuals directly and indirectly employed across our quarries, manufacturing, and concrete operations, we understand the responsibility we bear in helping to combat modern slavery and human trafficking.**

At Holcim, we are committed to upholding the human rights of all individuals within our sphere of influence. Whether they are part of our direct workforce, embedded within our supply chain, or associated with our contractors, we advocate for a world where every person enjoys freedom and equality, regardless of their location or role.

Our dedication to responsible sourcing extends beyond mere compliance; it is woven into the fabric of our operations. We prioritise safe and sustainable work practices for everyone involved in our business and supply chain. Through continuous assessment of human rights risks and the refinement of our policy frameworks and processes, we remain vigilant in addressing issues related to human rights, modern slavery, and environmental sustainability.

This Modern Slavery Statement outlines Holcim's sustained support of Australia's Modern Slavery Act objectives. We actively engage with employees, suppliers, and stakeholders to understand and mitigate risks within our business and supply chain. By fostering collaboration and transparency, we strive to create a future where modern slavery is eradicated, and human dignity is upheld in every corner of our operations.



# MODERN SLAVERY

**The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive victims of their freedom.**

Practices that constitute modern slavery include eight types of serious exploitation:

1. trafficking in persons;
2. slavery;
3. servitude;
4. forced marriage;
5. forced labour;
6. debt bondage;
7. deceptive recruiting for labour or services; and
8. the worst forms of child labour.

The worst forms of child labour refers to situations where children are subjected to slavery or similar practices, used in illegal activity or engaged in work that is harmful to their health, safety, physical or mental development.

It is a confronting reality that even in the present day, men, women and children all over the world remain victims of modern slavery.

According to the Walk Free Foundation's Global Slavery Index<sup>2</sup> (the Index) there are an estimated 49.6 million people living in modern slavery on any given day in 2021, where such persons were tricked, coerced, or trapped into modern slavery worldwide. Supply chains account for approximately 29 million victims in the Asia Pacific region<sup>3</sup>, with at least 41,000 people living under slavery conditions in Australia.

Advances in logistics capabilities, operations and the ability to connect business with cheaper and faster supply chains, has exposed business, and business relationships, to the risks of modern slavery, far beyond the local, regional or national, to have a global impact.

Forced labour exploitation is also prevalent in construction and manufacturing industries. By unknowingly engaging vulnerable workers through labour agencies, or procuring materials or industrial equipment through third party suppliers, high risk industries, countries, and businesses inadvertently increase their risk of becoming part of the value chain that relies on exploitation.

The index highlights that there are a number of countries where Holcim sources or procures materials from, which may have a high risk for human rights abuses. This underscores the importance for Holcim of our awareness and proactive engagement in the assessment and refinement of our internal measures and processes to combat the issue of modern slavery across our operations and supply chains.



<sup>2</sup>Walk Free Foundation Global Slavery Index 2023

<sup>3</sup>Walk Free Foundation Global Slavery Index 2023 - Prevalence & Number

# 02 ABOUT US

## BUILDING PROGRESS FOR PEOPLE AND THE PLANET

Holcim is an integrated supplier and manufacturer of building materials and solutions, which has been in operation in Australia for over 100 years.

Through more than 233 quarries, premix concrete plants and precast concrete manufacturing facilities, Holcim provides materials and solutions including concrete, aggregates, road pavement materials, manufactured and natural sand, and precast concrete pipes and products.

Holcim partners with customers on projects that range from small and local, to large, technically challenging infrastructure projects in the construction of homes, towns, and cities, in which we live and work.

### THE HOLCIM GROUP

The Holcim Group, legally known as Holcim Limited (Holcim Ltd), is a Swiss multinational company of which Holcim is 100% owned by Holcim Ltd. Headquartered in Switzerland, Holcim Ltd is the world's largest construction materials producer and manufacturer, operating in over 70 markets, and employing approximately 63,000 people (full-time equivalent) globally.

Our corporate values form part of who we are and how we aim to operate. They offer guidance when confronted with challenging situations, and the spirit with which we operate.

#### High Performance

High performance with high integrity is key to our sustainable success.

#### Acting with Integrity

Holcim strives to create an environment where honesty and accountability flourish and compliance is a central focus. We expect our employees to have the courage to take the right decisions based on our ethical principles and to uphold them, even when under pressure.

#### Everyone, Everywhere

Every employee, director, and officer (Employees) in all wholly owned Holcim companies and all joint ventures under our control must follow the Business Code of Conduct (the Code). In companies over which we have control, we seek the adoption of the standards of behaviour reflected in the Code. All persons, including service providers, subcontractors, and business partners, are required to act consistently with the Code.

## Holcim Related Entities in Australia

Holcim Ltd operates in Australia directly through Holcim (Australia) Pty Ltd, as well as through its controlled wholly owned entities:

- Broadway & Frame Premix Concrete Pty Ltd;
- Excel Concrete Pty Ltd; and
- Vic Mix Concrete Pty Ltd,

(Holcim Related Entities).

With reference to section 16(1) of this Act, we confirm that as these entities operate in accordance with Holcim's standards, process and controls, no separate consultation was required in relation to those entities when preparing this Modern Slavery Statement.

## Holcim Joint Ventures in Australia

Holcim also has non-controlling interests in a number of other entities including:

- Cement Australia Pty Ltd;
- Penrith Lakes Development Corporation Ltd; and
- Metromix Pty Ltd,

which are not reported on in this Statement.

## Holcim Executive Structure

Our operations are such that the Chief Executive Committee Sponsor or Group Executive Committee, when required, review, endorse and approve the creation of policies, directives, and statements as and when required, as well as subsequent updates and changes to existing policies and directives, to ensure they remain consistent with current business and industry standards.



## Holcim Corporate Offices

### HEAD OFFICE

Sydney  
Level 40, 100 Miller Street  
North Sydney NSW 2060

### STATE OFFICE - NSW

7-9 Irvine Place  
Bella Vista NSW 2153

### STATE OFFICE - QLD

18 Little Cribb Street  
Milton QLD 4064

### STATE OFFICE - SA

1 Coglin Street  
Brompton SA 5007

### STATE OFFICE - VIC

Level 3,  
290 Burwood Road  
Hawthorn VIC 3122

### STATE OFFICE - WA

Level 4,  
233 Adelaide Terrace  
Perth WA 6000

# HOLCIM'S OPERATIONS

## HOLCIM'S PRODUCT CATALOGUE

Holcim proudly operates across the Australian continent supplying quality products for a diverse range of customers and applications, from concrete for residential homes, to pavement materials and concrete pipes for road construction, to on-site concrete batching for large mining and infrastructure projects.

### Ready-mix Concrete

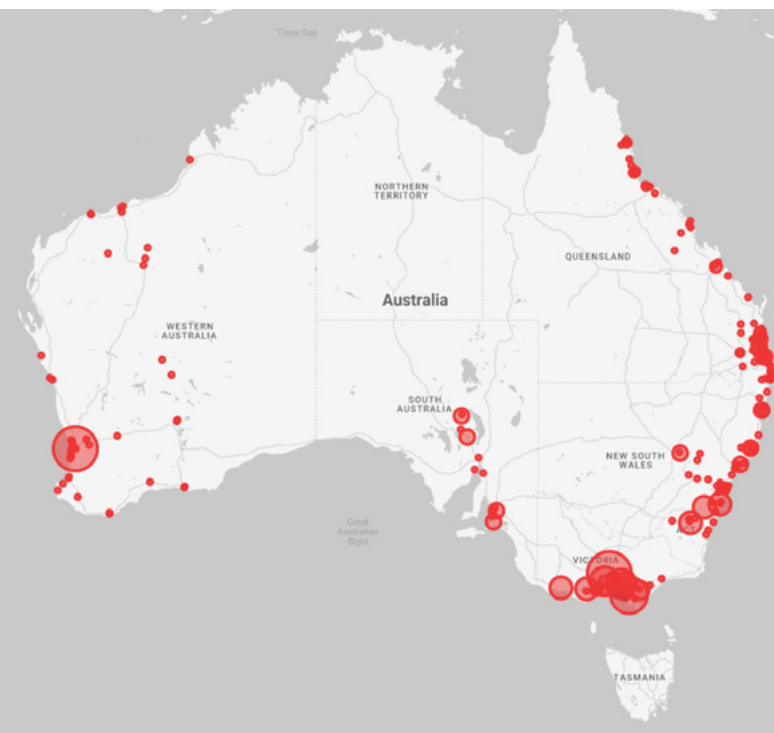
Formed from a mix of cement, aggregates, additives and water, ready-mix concrete is delivered in specially designed mixer trucks. Holcim offers an extensive array of premix products designed to achieve specific properties based on their application, transport and construction requirements, including mobile and on-site batching to service major projects.

### Aggregates

A range of products are available from Holcim's operations, including rail ballasts, aggregates, gravels, road pavement materials, natural sands, and recycled products from construction and demolition materials products.

### Humes Precast Concrete Pipes and Products

Products such as concrete culverts, sleepers and stormwater pits, are supplied from our 12 manufacturing facilities across the country and are integral in the construction of roads, bridges, railways and other infrastructure to support construction and infrastructure projects across our towns and cities.



Our products are supplied via a network of more than:

- 713+** Mixer Trucks
- 150** Concrete Batch Plants (both mobile and on-site facilities)
- 12** Precast Concrete Manufacturing Facilities
- 70** Quarry Operations, dealing with Aggregates and Sand
- 2,280+** Employed people directly across the Australian market
- 300+** Employed people indirectly as Labour Hire across the Australian market
- 200+** Contractors engaged by Holcim as a Third Party



# 03 RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

**WE ARE COMMITTED TO RESPECTING AND PROTECTING HUMAN RIGHTS WHEREVER WE CONDUCT BUSINESS.**

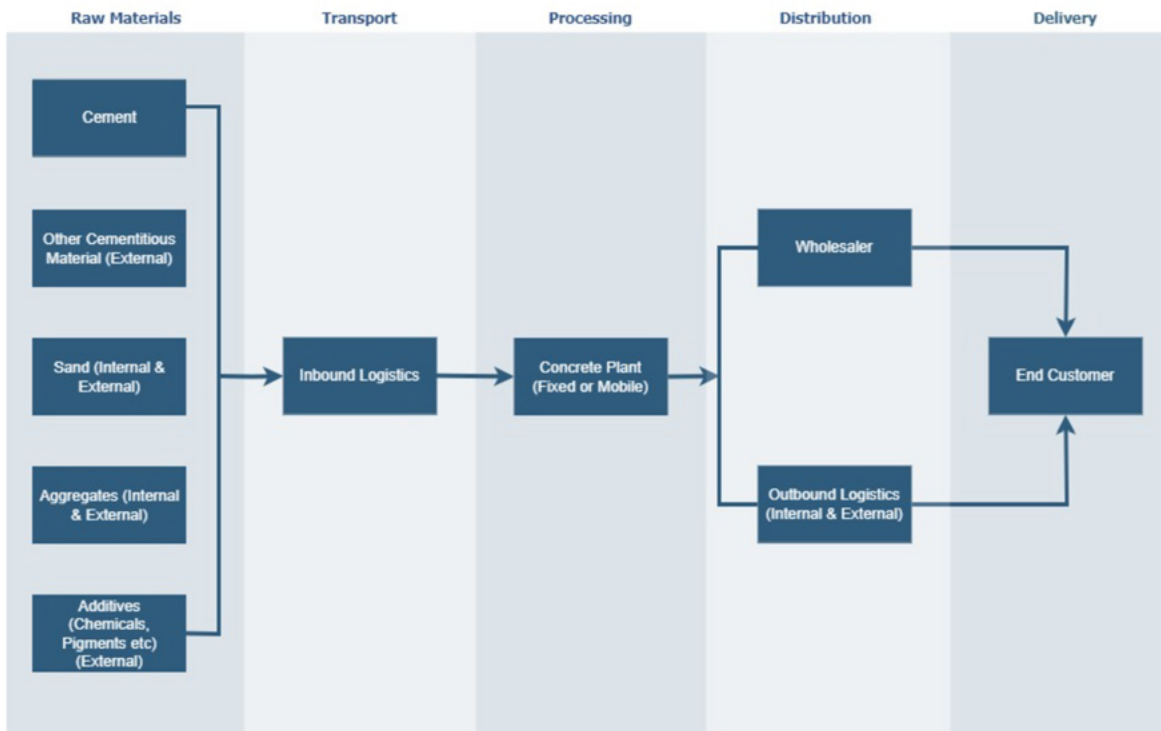
In the Financial Year 2023, which is a calendar year for Holcim's accounting purposes, Holcim's procurement spend was over \$1,900,000,000, with primary categories of spend in logistics, cement, maintenance services, mechanical equipment and facility management. This spend was consistent with previous years.

Over 9,000 registered vendors, located across 22 countries, resulted in 99% of purchases being made from companies registered in Australia and New Zealand. Of those vendors, 5655 suppliers were based in Australia, and 709 suppliers were based in New Zealand and engaged in the period from 1 January 2023 to 31 December 2023. A further 454 'one-time' Australian and New Zealand suppliers were engaged in that same period.

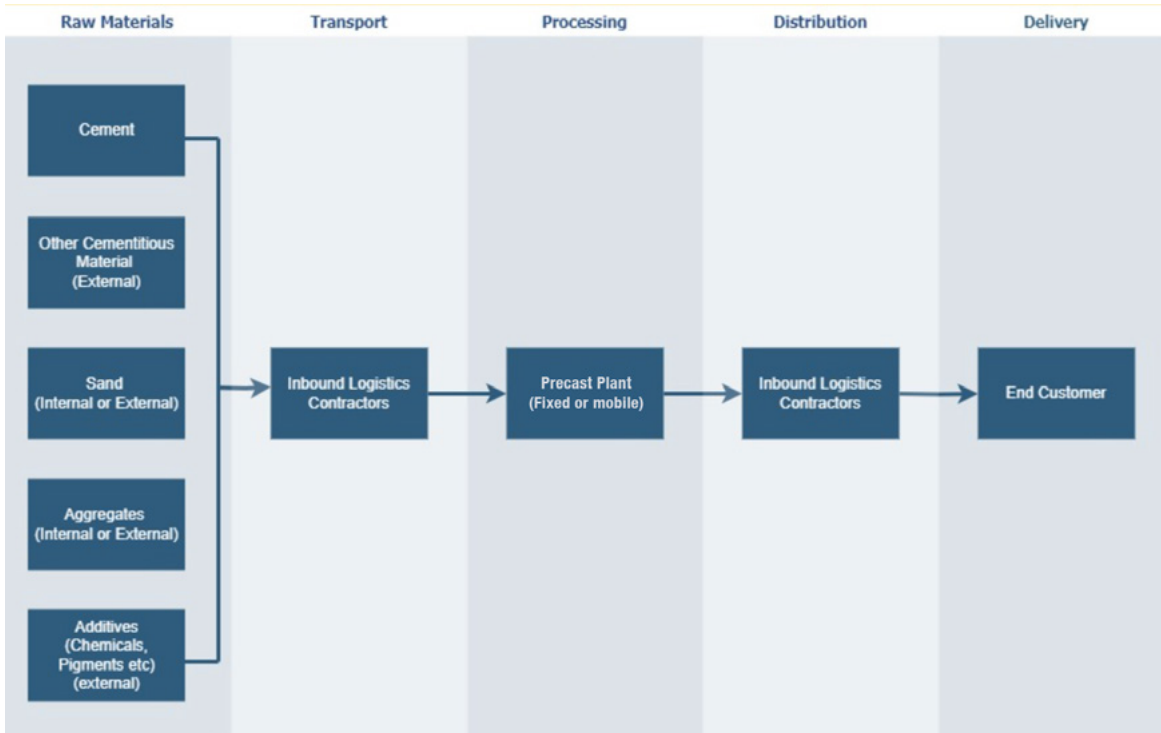
| Supplier Origin Country  | Suppliers Engaged | Supplier Origin Country | Suppliers Engaged |
|--------------------------|-------------------|-------------------------|-------------------|
| Australia                | 5655              | Denmark                 | 3                 |
| New Zealand              | 709               | Italy                   | 3                 |
| United States of America | 18                | Belgium                 | 2                 |
| Switzerland              | 14                | Spain                   | 2                 |
| United Kingdom           | 7                 | Canada                  | 2                 |
| Germany                  | 7                 | South Korea             | 2                 |
| Singapore                | 6                 | Japan                   | 1                 |
| India                    | 5                 | Taiwan                  | 1                 |
| France                   | 4                 | Sweden                  | 1                 |
| Netherlands              | 4                 | Philippines             | 1                 |
| China                    | 3                 | Malaysia                | 1                 |

# HOLCIM'S SUPPLY CHAIN

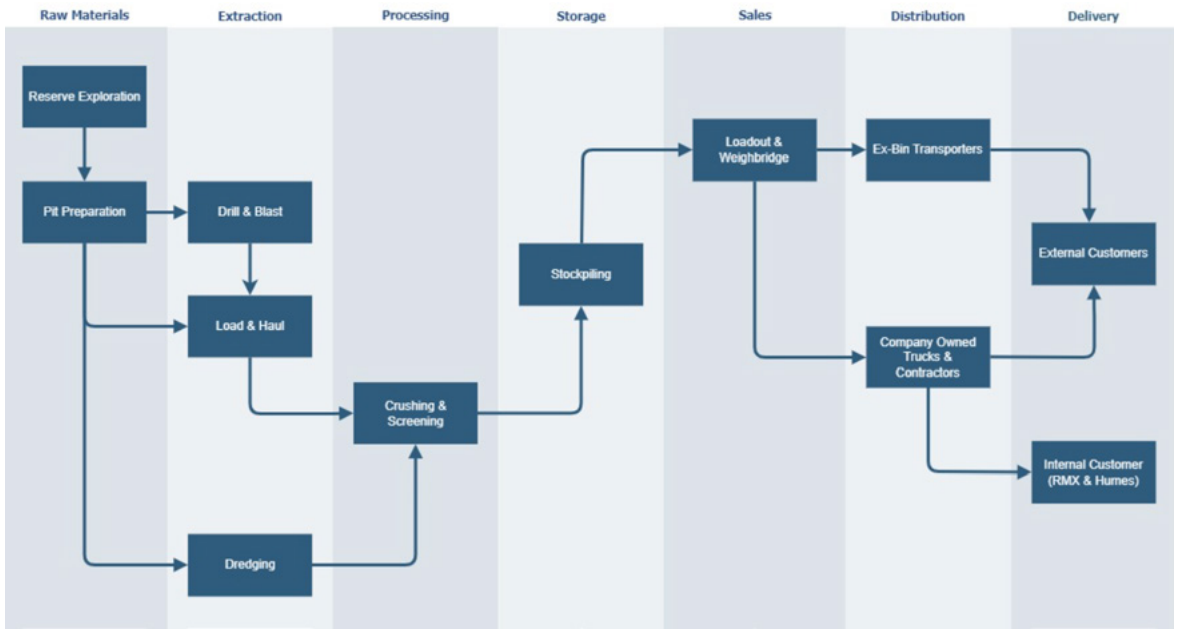
## Ready-mix Supply Chain



## Humes Precast Supply Chain



# Aggregates Supply Chain





# SUPPLY CHAIN RISK MANAGEMENT PROCESSES

**Our business manages supplier tendering, onboarding and relationships through a centre-led procurement function with a Head of Procurement, as well as Category Managers.**

**Holcim applies various supplier-related risk assessment processes to ensure compliance and security in its operations and supply chains. Examples of these processes are provided below.**

## The Third Party Due Diligence Process

In 2023, Holcim launched its Third Party Due Diligence Process (TPDDP), which we now conduct on a routine basis to ensure compliance and security when dealing with suppliers.

Our scoping checks for the year focused on suppliers in both Australia and New Zealand, particularly in categories such as environmental and legal services, due to their high likelihood of interacting with public officials. Also examined were suppliers of security services, all of which fall under scope of Holcim's TPDDP.

The TPDDP for Holcim Group begins with a data and scope check, identifying third parties interacting with public officials or if they are suppliers or service providers for various security services, including the transportation of sensitive materials. The next step involves a risk assessment where details about the third party are gathered using an internal questionnaire and evaluated for risk levels using the SYMFACT tool.

Following the risk assessment, a screening process is conducted using SYMFACT and any raised flags are analysed. Holcim then sends an invitation to the third party to complete an external questionnaire on SYMFACT, followed by another round of screening and flag analysis based on the new information.

The approval process involves multiple layers of review: initial

submission by the originator, supervisor review, compliance team feedback, and security team comments, culminating in final approval. Throughout the process, thorough documentation of all results is maintained to ensure compliance and security standards are met.

## The Supplier Due Diligence Process

Holcim's supplier due diligence process is aligned to OECD Guidelines for Multinational Enterprises on responsible business conduct. This is a risk based due diligence process summarised in 3 main steps:-

- 1. Identify** - Know who the supplier is, supplier screening / prioritisation of products/ services, relationship, and country risk
- 2. Prevent** - Verify compliance, Supplier Code of Conduct via a self - assessment questionnaire, fact finding, site audits (breaches, extractive materials, high risk contractors
- 3. Mitigate** - Address non-compliance for any breaches to Environment, Social and Governance standards.

## Supply Chain Modern Slavery Management Process

The Supply Chain Management Process prioritises the review,

assessment and management of higher-risk Tier 1 suppliers, who must complete a Modern Slavery Supplier Questionnaire and, if necessary, undergo an onsite audit.

Any supplier who fails to meet these requirements may be deactivated from the Holcim procurement database. Additionally, suppliers must accept modern slavery management provisions, adhere to Holcim's Code, and collaborate with Holcim to address any concerns that an audit may uncover

## Supplier Selection and Contract Management

Holcim determines and documents selection of suppliers through criteria, including non-financial criteria such as:

- Company structure and ownership
- Supplier's quality system and certification
- Licences held
- Safety policy, procedure and supplier history of performance
- Reputational and compliance risks
- Industrial and project expertise

Where products or services require technical or engineering to verify the technical requirements and the quality, the relevant functions must be consulted.

A formal written contract is required for high risk or high value engagements.

# UNDERSTANDING RISKS IN HOLCIM'S BUSINESS AND SUPPLY CHAIN

**WE PARTNER WITH SUPPLIERS TO ADDRESS CLIMATE CHANGE, DRIVE A CIRCULAR ECONOMY, PUSH THE BOUNDARIES OF DIGITISATION AND IMPROVE LIVING STANDARDS FOR ALL.**

## **Our Corporate Procurement Categories and Management**

Sustainable procurement at Holcim is based on the standards and principles enshrined in the UN Global compact Ten Principles, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

## **Holcim Sustainable Procurement Directive**

The Holcim Sustainable Procurement Directive, effective January 2024, outlines principles to ensure sustainability in Holcim's supply chain, focusing on environmental, social, and governance (ESG) factors, and health and safety

(H&S) standards. It integrates Holcim's Accounting and Reporting Principles framework and applies to all suppliers and their employees across Holcim's global operations. The directive mandates sourcing decisions based on commercial, technical, and sustainability dimensions, aligning with various group policies such as compliance, human rights, and environmental protection.

Key processes include supplier relationship management, supply chain due diligence, and managing climate and nature impacts. Holcim employs a risk-based approach for due diligence, involving supplier screening, compliance verification, and ongoing performance monitoring. This approach ensures adherence to the Supplier Code of Conduct and involves collaboration across functional teams to manage risks and opportunities related to

ESG/H&S performance. Specific programs address high-risk areas such as transportation, fuels and energy, packaging, and extractive materials, promoting continuous improvement and responsible resource management.

Holcim enforces sustainability through contractual terms, performance tracking via Supplier Scorecards, and transparent communication of its policies and performance. The directive supports sustainable procurement practices aligned with ISO 20400 standards and includes tools such as the Holcim Integrity Line for grievances. By embedding ESG and H&S considerations into procurement, Holcim aims to enhance its positive impact on people and the planet while maintaining high operational standards globally.



## Supplier Categories

We integrate development into our procurement strategy, our day-to-day operations and relationships with suppliers. All Holcim Group companies are required to identify, prevent and manage risks pertaining to climate change, Health, Safety and Environment (HSE), Security and Resilience (S&R), Social Responsibility, Human Rights, Business Ethics and Legal Compliance in their supply chain.

The categories listed below are an example of Holcim's lower lever Procurement Category and Standard Classification, defined subcategories, which Holcim uses to categorise its spend worldwide. In this regard, the below table provide insight into Holcim's percentage spend within Supplier Categories:

| Supplier category*      | Spend % |
|-------------------------|---------|
| Logistics Services      | 23%     |
| Cement and Clinker      | 23%     |
| Mining                  | 7%      |
| Production Services     | 9%      |
| Equipment & Consumables | 7%      |
| Raw Materials           | 11%     |
| Facility Services       | 5%      |
| General Services        | 5%      |
| Corporate Services      | 4%      |
| Energy                  | 4%      |
| Others                  | 2%      |

## Labour Hire Management

Holcim engages with around 15 labour hire suppliers; 75% of the labour hire spend is for the workforce in Holcim's operations through five providers, with the remainder for offices and administration. Costs below are approximations.

| Sector       | Total Spend AUD (2023) |
|--------------|------------------------|
| Corporate    | \$400,000              |
| Concrete     | \$1,600,000            |
| Aggregates   | \$6,300,000            |
| Humes        | 17,500,000             |
| <b>Total</b> | <b>\$25,800,000</b>    |

## Application of Holcim's Risk Assessment Process

By applying our Risk Assessment Process Holcim has identified areas of procurement that are considered higher risk for human rights and labour risks. These are:

- mining, mining subcontracting;
- production services, engineering services;
- production of mining equipment; and
- facility services, including cleaning and production of personal protective equipment and uniforms.





# HOLCIM'S INTERNAL CONTROLS MECHANISM

**THROUGH WORKFORCE PARTICIPATION AND TRAINING, WE REGULARLY EXPLORE AND UNDERSTAND OUR WORKFORCE AND THE ASSOCIATED SUPPLY CHAIN TO INFORM POLICIES, DIRECTIVES AND COMPANY WIDE TRAINING.**

## Holcim's Internal Controls

Our approach to providing a workplace free of modern slavery, is outlined in our Human Rights Directive and supported by practical internal guidance, processes, and platforms, as well as by our Minimum Control Standards compliance, which is regularly assessed by our Internal Control department.

All of our direct employees are engaged under employment contracts or enterprise bargaining agreements that are in accordance with Fair Work Australia's National Employment Standards (NES).

### People and Culture Team

Through our People and Culture team we have controls in place for recruitment, onboarding new employees, reviewing employees' wages and salary agreements, and verifying corresponding payments.

### Employee Induction, Onboarding and Continuous Training

Our employee onboarding process includes employment checks managed by our People and Culture team, and ensuring that all new employees hold valid visas and working rights.

Our employee induction processes also ensure that new employees confirm that they have read and understood our policies and minimum standards.

### Enterprise Agreements

The Following Table indicates the % coverage of our workforce by enterprise agreements:

| Business Unit             | Covered Enterprise Agreement | Labour Hire Award | NES and individual agreements |
|---------------------------|------------------------------|-------------------|-------------------------------|
| Aggregates                | 86.11%                       | 9.26%             | 4.63%                         |
| Commercial                | 57.14%                       | 14.29%            | 28.57%                        |
| Concrete                  | 93.82%                       | 2.61%             | 3.57%                         |
| Corporate                 | 33.33%                       | 3.33%             | 63.33%                        |
| Finance & Shared Service  | 70.67%                       | 2.67%             | 26.67%                        |
| Humes                     | 75.87%                       | 21.75%            | 2.38%                         |
| People & Culture          | 75.00%                       | 0.00%             | 25.00%                        |
| Safety & Health           | 68.18%                       | 0.00%             | 31.82%                        |
| Technical and Engineering | 82.67%                       | 0.00%             | 17.33%                        |
| <b>Grand Total</b>        | <b>83.02%</b>                | <b>11.15%</b>     | <b>5.83%</b>                  |

## Enterprise Agreements

Current Enterprise Agreements include:

### NSW:

Holcim (Australia) Pty Ltd Newcastle Transport Agreement 2020  
Holcim (Australia) Pty Limited Dubbo Aggregates Enterprise Agreement 2022  
Holcim (Australia) Pty Limited Albion Park Quarry Enterprise Agreement 2022  
Holcim (Australia) Pty Limited Lynwood Quarry Enterprise Agreement 2023  
Holcim (Australia) Pty Ltd - NSW / ACT Staff Enterprise Agreement 2019  
Humes Blacktown Enterprise Agreement 2022  
Humes Tamworth Enterprise Agreement 2023  
Holcim (Australia) Pty Limited Salt Ash Enterprise Agreement 2022

### QLD:

Humes Ipswich Enterprise Agreement 2022 - 2025  
Holcim (Australia) Pty Limited Brisbane and Gold Coast Aggregates Enterprise Agreement 2024

### QLD/NT:

Holcim (Australia) Pty Ltd Queensland & Northern Territory- Staff Agreement 2021

### SA:

Holcim (Australia) Pty Ltd South Australia- Staff Agreement 2021  
Holcim (Australia) Pty Limited Glenshera Enterprise Agreement 2023

### VIC:

Holcim (Australia) Pty Limited Melbourne Concrete Production Agreement 2022  
Holcim (Australia) Pty Ltd South West / Gippsland Concrete Victoria 2023  
Holcim (Australia) Pty Ltd- Victoria- Staff Agreement 2020  
Holcim (Australia) Pty Limited Melbourne Aggregates Enterprise Agreement 2021  
Holcim (Australia) Pty Limited Country Victoria Aggregates Agreement 2022  
Humes Laverton Agreement 2023  
Humes Echuca Victoria Enterprise Agreement 2024  
Holcim (Australia) Pty Limited Lang Lang Enterprise Agreement 2022

### WA:

Holcim (Australia) Pty Limited Gosnells Quarry Agreement 2021  
Holcim (Australia) Pty Ltd - Western Australia Staff Agreement 2022

## Group Policy Framework

Holcim globally maintains a Human Resources policy that covers all countries including Australia. The policy outlines Holcim's commitment to fair, equitable and non-discriminatory practices in relation to hiring. In particular the requirement that a diverse candidate pool is provided as part of the selection and hiring process is explicitly mentioned.

The same principles are explicitly mentioned regarding Talent and Succession processes and the expectation is that the principles of fairness, equality and diversity are implemented as per the Code of Business during the execution of these processes.

## Local Policy Framework

As per the Group Policy Framework, an Australian specific [Diversity and Inclusion Policy](#) has been developed to ensure Australian alignment with both the Group Framework, but to also reiterate Holcim Australia's commitment to complying with National and State based legislation.

Standards embedded in our policy landscape reduce the likelihood of modern slavery within our supply chain and throughout our business.

# 04 ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISKS

**OUR COMMITMENT  
TO HUMAN RIGHTS  
IS EMBEDDED IN OUR  
CORPORATE SOCIAL  
RESPONSIBILITY POLICY  
AND REINFORCED BY OUR  
PARTICIPATION IN THE UN  
GLOBAL COMPACT.**

## **Holcim's Policy Framework**

Through the Human Rights Management Approach and Policy Framework outlined in this Statement, Holcim aims to understand and address the potential to cause, contribute to, or be directly linked to modern slavery through its operations or supply chains.

Holcim is committed to respecting and promoting human and labour rights in our operations, business activities, business relationships and in the communities where we work. Respect for human rights is fundamental to the way we carry out business and our ability to operate.

## **Guiding Principles**

Our commitment is aligned with the principles and values contained in the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, with the internationally recognised rights in the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the UN Convention on the Rights of the Child, as well as applicable laws. Where national law and international human rights standards differ, we will seek to follow the higher standard where possible.

## **UN Sustainable Development Goals**

Our commitment to understanding and addressing modern slavery risks within our business and supply chain relate to 'Target 8' of the United Nations (UN) Sustainable Development Goals, being the promotion of decent work and economic growth, and directly to

*'Target 8.7': "Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking (by 2030) and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms."<sup>4</sup>*



The Holcim Ltd approach to human rights due diligence is fully aligned with the UN Guiding Principles on Business and Human Rights.

## **UN Global Compact and World Business Council**

As a signatory of the UN Global Compact for more than 20 years (since 2003), Holcim Ltd is fully committed to respecting and promoting human rights.

In February 2020, ex-CEO Jan Jenisch signed the Call to Action for Business Leadership on Human Rights by the World Business Council for Sustainable Development, joining 40 other world leaders in sending a clear message on the need to elevate companies' ambitions concerning human rights.<sup>5</sup>

<sup>4</sup>Sustainable Development Solutions Network - Sustainable Development Goals

<sup>5</sup>The United Nations 'Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework', 1 January 2012.



## Human Rights Due Diligence

Holcim's parent company, Holcim Ltd, is committed to respecting and promoting human and labour rights in our operations, business activities, business relationships and in the communities where we work. Respect for human rights is fundamental to the way Holcim carries on business.

This commitment is aligned with international human rights standards, including the UN Guiding Principles on Business and Human Rights, the principles contained within the Universal Declaration of Human Rights, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, UN Convention on the Rights of the Child and the International Labour Organisation (ILO) Core Conventions on Labour Standards.

## Relevant Statements and Memberships

Holcim has pledged or signed up to several international calls to action for human rights such as the UN Women's Empowerment Principles, the WASH pledge, and the 2021 End Child Labour Action Pledge.

We support the implementation of regulatory frameworks that require mandatory human rights and environmental due diligence, as stated in our [Advocacy Positions Leaflet](#).



# HOLCIM'S HUMAN RIGHTS MANAGEMENT APPROACH



Holcim Ltd proactively manages human rights through its Human Rights Management Approach, supported by a Human Rights and Social Policy, as well as an internal Human Rights Directive, which outlines the mandatory requirements for all Holcim Ltd country operations.

Our due diligence approach is based on thorough assessments which are carried out at country and site levels, as well as risk-based due diligence in our supply chain. We carry out human rights assessments on a three-year cycle, and more frequently in countries and sites designated high-risk or where we see a need for urgent review.

The policy was developed following an extensive, global survey and interviews with Holcim managers, as well as input from external human rights experts and

other stakeholders, including civil society and community representatives.

The Chief Executive Officer and the Chief Sustainability and Innovation Officer (member of the executive committee) of Holcim Ltd, have the overall responsibility for the policy; oversight and performance reviews are carried out by the Board's Health, Safety and Sustainability committee; chief executive officers and executive committees in countries where we operate take responsibility and are accountable for assessing and addressing local human rights issues.

The group-wide human rights management approach is risk based and fully aligned with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

The Human Rights Management Approach is based on:

- |                                      |  |
|--------------------------------------|--|
| <b>1. Policy Commitment</b>          | Human Rights and Social Policy embedded in related policies and processes.                   |
| <b>2. Identify Risks and Impacts</b> | Conduct impact / self assessments.   |
| <b>3. Address Adverse Impacts</b>    | Integrate findings in functions, processes. Prioritise salient issues, develop action plans. |
| <b>4. Monitor and Communicate</b>    | Track effectiveness of responses. Communicate on performance.                                |
| <b>5. Grievance and Remedy</b>       | Global, country and community level grievance mechanism.                                     |

We integrate the results of our due diligence into our internal systems and enterprise risk management (ER1M) processes, develop action plans and track progress. We communicate and work with our stakeholders on how to address impacts and seek solutions to the issues raised.

## BUSINESS ENVIRONMENT RISK ASSESSMENT

The Business Environment Risk Level determines if a Self-Assessment or an Impact Assessment is required.

The risk level of each country where Holcim is present, with regard to business-related human rights issues, is determined based on the UN Human Development Index (HDI) and the Freedom House Index (FH).

The business environment is rated as follows:

- Business environment - High-risk: if the FH rating is “not free” or HDI < 0.70
- Business environment - Medium-risk: if the FH rating is “partly free” or HDI < 0.79
- Business environment - Low-risk: if the FH rating is “free” and HDI ≥ 0.79.

Based on the Business Environment Risk described above:

- Operations in low-risk business environments conduct a Self-Assessment consolidated at Country level.
- Operations in high-risk business environments conduct an Impact Assessment for each cement plant and grinding unit and consolidate at Country level.

As per this methodology, the Business Environment Risk for Australia is considered to be low.

## SELF-ASSESSMENT WORKSHOP

The self-assessment is a half-day risk mapping and prioritisation workshop where the full local Executive Committee participates. Led by the sustainability specialist, Executive Committee members discuss and determine the materiality of a minimum of 7 salient risks, depending on the likelihood of a negative impact and the potential consequences to people. After the risk-mapping and prioritisation exercise, the local Executive Committee, together with the sustainability specialist, develop an action plan to address the identified high and medium human rights risks.

This workshop was conducted with the Holcim Executive Committee team in November 2023, led by the local Head of Sustainability. While the human rights assessments are required by Holcim to be undertaken on a 3 year cycle, Holcim undertakes the assessment on an annual basis.

## SALIENT RISKS

As a minimum, the Human Rights Assessment covers 7 salient risks, which may cause, contribute to, or which could directly link our global operations to modern slavery risks. When other salient risks are identified, they are added to the assessment.

Holcim seeks to proactively identify, cease, prevent or mitigate such risks. The Human Rights Assessment is completed in a local context, and the following 8 risks are considered during the review of local operations in Australia:

1. Health and Safety
2. Working conditions in our operations and in our supply chain
3. Discrimination and harassment
4. Security-related abuses and violations
5. Child labour in high-risk supply chains
6. Dust and other emissions
7. Climate change and its impact

### Additional: Rights of Indigenous people

These are our main areas of focus. We continue proactively to assess and address other potential or actual risks to people caused or contributed to by our business operations. These are outlined in our Human Rights Directive.

## GRIEVANCE MECHANISMS

Holcim Ltd’s Human Rights Management Approach is complemented by a global “Integrity Line”, a whistle-blowing mechanism enabling employees, suppliers and others to report any integrity-related concerns in 38 languages. It is a safe, confidential way to report possible [Code](#) violations or raise compliance-related questions.

Our site-level grievance mechanisms, human rights assessments and local stakeholder engagement also cover suppliers at a local level. We respect the right of all workers to speak up and raise grievances without fear of retaliation.

With an established confidential complaint and grievance mechanism available to employees, suppliers and others which encourage individuals to voice concerns without retribution, Holcim will continue to monitor any reports related to modern slavery and human rights.

No reports relating to modern slavery were made during the reporting period.

# HOLCIM LTD'S POLICY GOVERNANCE FRAMEWORK

Through a comprehensive set of policies and processes, Holcim delivers and reports on commitments and standards to uphold human rights, as well as ensure that fair working conditions are central in its operations and supply chains.

The following policies set out how Holcim's employees should interact with business partners, suppliers, communities and other stakeholders. They form part of Holcim's core values and its main objective is to set out the company's human rights and social commitment. These policies are publicly available and subject to regular review.

## **Corporate Citizenship Policy**

This Policy outlines the Holcim Ltd Group and country-level commitment to act as a responsible partner with all its stakeholders to improve the quality of life of the members of its workforce, their families and the communities related to site operations. It extends to conducting business consistent with sustainable development principles in its own operations as well as requiring the same from its suppliers and customers.

## **Human Rights Directive**

The objective of the Human Rights Directive is to ensure systematic identification, prevention and mitigation of human rights risks (referring mainly to the areas of employment practices and community impacts of Holcim's practices and those of its contractors and suppliers) throughout the Holcim Ltd Group. This methodology also supports countries in identifying opportunities related to the operations, to set priorities and to plan effective follow-up actions.

## **Sustainable Procurement Directive**

The sustainable procurement approach at Holcim aims to create shared value for society while managing supply chain risks impacting company reputation and supply disruption.

The contribution for creating shared value for society is driven by:

- Ensuring consistent application of environmental, social and health and safety standards across the supplier base;
- Creating a healthy and safe environment for contractors;
- Assuring a transparent, compliant and fair business relationship with suppliers that enhances local economy and wealth for all parties; and
- Aligning with United Nation Global Compact Principles and OECD Guidelines.

This document was updated in January 2024 and deepens Holcim's focus on human rights and health, safety and environment standards.

## **Supplier Sustainability Management Standard**

Holcim expects suppliers to meet the social, environmental and health and safety standards and to respect and promote human rights. These expectations are established in its Supplier Code of Conduct. Holcim aims to address risks in these areas which in turn can cause supply disruption and impact reputation. The organisation also aims to capitalise on opportunities for creating shared value for society.



# CODE OF BUSINESS CONDUCT FOR SUPPLIERS

At Holcim, we clearly and actively communicate our human rights expectations of employees and business partners, and require suppliers to adhere to the standards described in the Code of Business Conduct for Suppliers and to apply the same principles in their supply chain.

Holcim seeks to promote high standards in sustainability across its entire value chain, ensure reliability of its strategic sourcing and engage in long-term relationships with suppliers that are committed to sustainable development. Our goal is to partner with suppliers to deliver value-for-cost procurement for the Holcim Group and our customers and to demonstrate responsible supply chain management.

Sustainable development is integrated into Holcim's procurement strategy, its day-to-day operations and relationships with suppliers. All Holcim Ltd Group companies are required to identify, prevent and manage risks pertaining to health and safety, social responsibility and environment in their supply chain.

In late 2021, the Supplier Code of Conduct was refreshed to ensure its continued relevance against modern slavery, including explicit expectations of suppliers around working conditions, forced labour and child labour, among others.

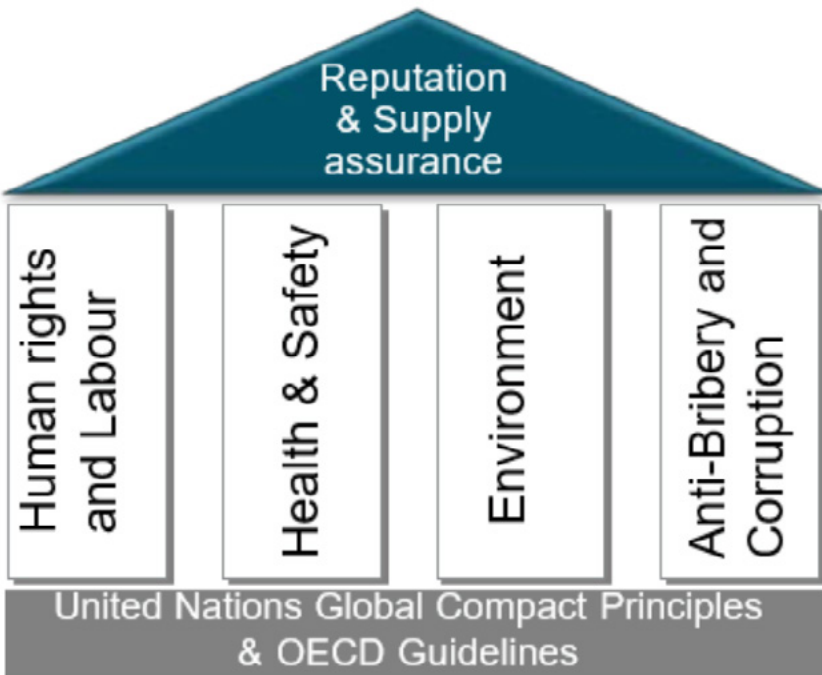
The Supplier Code of Conduct is provided to all suppliers as part of the tendering and onboarding process and suppliers must

acknowledge and adhere to the requirements of this Code. The Code is also publicly available on Holcim's website.

## Supplier Sustainability Management Standard

The Suppliers Sustainability Management Standard contains a process for identifying and qualifying supplier risk for new, as well as existing suppliers.

Suppliers must meet minimum standards when assessed on the following pillars:



### Human Rights and Labour

- Fair working conditions
- Freedom of association
- No forced labour
- No child labour
- No discrimination

### Health and Safety

- Health and Safety performance of suppliers and their employees and contractors
- Management of Health and Safety risks

### Environment

- Environmental regulatory compliance
- Management of environmental impacts

### Anti-Bribery and Corruption

- Compliance with local and international anti-corruption laws and good business practices
- Risk-based management practices to prevent bribery and corruption in the supply chain

# SUSTAINABLE PROCUREMENT STRATEGY

**HOLCIM IS COMMITTED TO CREATING VALUE FOR ALL ITS STAKEHOLDERS. THE PRINCIPLES OF SUSTAINABLE DEVELOPMENT - VALUE CREATION, ENVIRONMENTAL PERFORMANCE, AND RESPECT FOR HUMAN AND LABOUR RIGHTS - ARE INTEGRAL TO OUR BUSINESS STRATEGY.**

## HOLCIM LTD PROCUREMENT SUSTAINABILITY DIRECTIVE

The United Nations Principles on Human Rights and Business state that as part of their responsibility to respect Human Rights, companies must carry out due diligence to ensure that their commercial partners also respect these rights.

Holcim follows the Holcim Ltd Procurement Sustainability Directive which defines six steps to implement the sustainable procurement approach (Sustainability Steps):

|               |   |  |
|---------------|---|--|
| <b>Step 1</b> | <b>Communicate the Sustainable Procurement Policy to Holcim-relevant employees</b>  | This Policy forms a key part of the on-boarding of relevant employees and provides the foundation for the on-going processes and reporting related to Holcim’s sustainable sourcing program.   |
| <b>Step 2</b> | <b>Communicate the Supplier Code of Conduct to all current and potential new suppliers conducting business with Holcim</b>  | <p>The Supplier Code of Conduct is provided to all suppliers of Holcim during the tendering process. Suppliers are required to confirm their understanding and adherence of these requirements before proceeding with the tender process.</p> <p>Supplier contracts contain a clause regarding conditions reflecting environmental, social and health and safety standards.</p> <p>The Supplier Code of Conduct is available on the Holcim website.</p>  |
| <b>Step 3</b> | <b>Prioritise the supplier base to identify potential “high risk” suppliers following the methodology defined in the Holcim Sustainable Procurement Recommendation.</b> | <p>This risk matrix includes an analysis of risks to human rights and labour, health and safety, and environment.</p> <p>Holcim has localised the Holcim Ltd Group risk analysis matrix to reflect the local operating environment following an evaluation of:</p> <ul style="list-style-type: none"> <li>• Sector and industry risk;</li> <li>• Products and services risks;</li> <li>• Geographical risks; and</li> <li>• Labour and regulatory indicators.</li> </ul> <p>Holcim conducts a review of potential and new suppliers against this matrix, and reviews existing suppliers regularly.</p> |

|                      |   |  |
|----------------------|---|--|
| <p><b>Step 4</b></p> | <p><b>Conduct supplier assessment by executing continuous evaluation of risk exposure through supplier self-assessment / fact finding / audits accordingly.</b></p>                         | <p>Suppliers in categories that are indicated as high risk are sent a self-assessment questionnaire which is evaluated. Any answers flagged as medium or high risk are followed up by requesting additional information until the matter is resolved either by email/phone communication. To date there have been no high risk responses received from Holcim’s suppliers.</p> <p>During the reporting period the self-assessment questions were reviewed in light of responses received in the previous reporting period.</p> <p>There is a separate due diligence process that is conducted when using labour hire companies to ensure that relevant employment standards and practices are upheld at all times.</p> |
| <p><b>Step 5</b></p> | <p><b>Mitigate identified risk (ultimately supply disruption and company reputation) adhering to the consequence management approach defined in the Sustainable Procurement Policy.</b></p> | <p>The remediation process is if a high risk response was returned, or there was any other indication of high risk identified with a supplier, Holcim would follow the process of investigating through visits or audits and may take measures such as suspending or discontinuing the relationship if satisfactory standards were not met.</p>  |
| <p><b>Step 6</b></p> | <p><b>Monitor “supplier” sustainability performance. Report overall “country” sustainable procurement performance through the annual Sustainable Procurement Scorecard.</b></p>             | <p>Holcim conducts ongoing dialogue with suppliers, analysing performance periodically and conducting ongoing supplier sustainability performance measurement. If applicable, the Holcim procurement team would monitor improvement plans applying consequence management as required.</p>   |



# 05 ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

**In alignment with the Sustainability Steps, Holcim has undertaken the following activities relating to the requirements of the Act, during the reporting period, Holcim has:**

- rolled out an online modern slavery training module to build awareness and understanding; and
- developed a modern slavery management operating procedure that formalises the processes and procedures adopted by Holcim in supporting the identification, assessment and management of modern slavery risks and issues within its supply chains.

Over the next two years the following actions are proposed to drive continuous improvement in our alignment with the Holcim Sustainable Procurement Directive:

- Holcim will be moving to the Holcim Global Supplier Prequalification tool in Quarter 3 of 2024. All new suppliers will undergo this pre-qualification process and be required to requalify annually throughout

the duration of the business relationship. This qualification process involves acknowledgement and acceptance of the Supplier Code of Business Conduct, along with the submission of the completed Global Prequalification questionnaire, which will include modern slavery-specific questions. The answers provided are subject to satisfactory acceptance by Holcim. All current suppliers will also go through this qualification (and annual requalification) process.

- Continue our knowledge development and sharing with other industry participants and industry groups through presentations, webinars and forums in order to increase awareness, promote the exchange of best practices and identify high risk areas and potential solutions.
- Ensure staff and suppliers' awareness around the use of Holcim's Integrity Line to report on any conduct that does not align with our Supplier Code of Conduct, including any alleged or perceived modern slavery issues.

## SUPPLIER QUALIFICATION PROCESS

In 2022, Holcim launched the supplier qualification tool. The tool enables a more efficient process around the collection and reporting of responses to self-assessment questionnaires.

During the period 2023 to 2024, Holcim has been able to assess exposure on the following key elements to enable higher levels of confidence around supplier selection processes, utilising data sources such as Dow Jones Compliance Risk and adverse media monitoring, Achilles (Labour, Health & Safety Risk) and Dun & Bradstreet (financial risk):

- International sanction lists;
- Fraud/regulatory issues/corruption;
- Financial stress;
- Sustainability.



# NEW PREQUALIFICATION AND VENDOR ONBOARDING SYSTEM LAUNCH

In September 2024, Holcim is set to launch a new system designed to streamline supplier prequalification and vendor onboarding processes. The innovative system will enhance efficiency, ensure compliance with the relevant Minimum Control Standards, and provide a range of benefits to our procurement and operations teams, as well as our vendors.

The key features and benefits of the new system are:

## **Centralised Platform:**

The new system will serve as a unified platform for procurement, operations, and vendors. This centralisation aims to foster better communication, coordination, and data sharing among all stakeholders involved.

## **Streamlined Onboarding:**

By promoting standardisation and reducing operational discrepancies, the system will simplify the onboarding process for new vendors. This will lead to a more consistent and efficient approach to bringing new suppliers on board.

## **Enhanced Tracking and Compliance Reporting:**

One of the standout features is the improved ability to track and report compliance. Vendors will be required to acknowledge our terms and conditions and adhere to our Code, ensuring a higher level of transparency and accountability.

## **Regulatory Alignment:**

The system is designed to ensure alignment with all relevant compliance and regulatory standards, helping us maintain our commitment to operational excellence and regulatory adherence.



## **MODERN SLAVERY QUESTIONNAIRES**

During the reporting period, Holcim has undertaken a preliminary investigation into existing modern slavery practices, control procedures and questionnaires received from our client and commercial partners across our supply chain.

It was noted that there has been an increase in attention to the provision of modern slavery questionnaires, within the tender process. The depth of detail our client and commercial partners have sought, has remained relatively limited, however we anticipate that there will be an increased focus on modern slavery for the 2024-2025 period.

## **SOCIAL ENTERPRISE**

Holcim is committed to creating value through partnerships. Our Corporate Social Responsibility (CSR) strategy recognises the importance of partnering with organisations that strengthen our business - while building and contributing to human, social and natural wealth.





## HABITAT FOR HUMANITY AUSTRALIA

Habitat for Humanity Australia is part of Habitat for Humanity, an international not-for-profit that originated in the USA in 1976 - driven by the vision of a world where everyone has a safe and decent place to live. In Australia, Habitat for Humanity provides shelter solutions for vulnerable groups and responds to natural disasters with their Bushfire Recovery Program which has assisted families to rebuild homes, communities and hope.

In 2023, Holcim Australia became an Impact Partner, delivering shelter solutions for vulnerable groups and low-income families. Our employees participated in the Brush with Kindness volunteering program to paint and

refurbish crisis accommodation and transitional shelters for women and children escaping domestic violence and homelessness.

Under the partnership Holcim also donated building materials for use on projects that empower families to build a stronger future.

In addition, as part of our commitment to our people and local communities, Holcim has invested in social initiatives to support local charitable projects and not-for-profit organisations across Australia.



### Case Study - Wirrawee Gunya, Habitat for Humanity Australia

In May 2024, Holcim had the privilege of attending the opening of a new Western Sydney refuge for emergency transitional accommodation for Indigenous women and children escaping domestic violence.

The safe space, Wirrawee Gunya, will offer culturally sensitive support to Aboriginal victim-survivors and is staffed by skilled Aboriginal women. Through our partnership with Habitat for Humanity Australia, Holcim donated concrete and materials for the construction of the refuge.

Providing accommodation and outreach for 80 Aboriginal women and their children each year, the refuge, an initiative of the NSW government, aims to reduce the rate of family and domestic violence experienced by Aboriginal women and children. Services will be delivered by women's accommodation service – DV West.

DV West's Aboriginal Services & Development manager said Wirrawee Gunya offers a secure environment and support to connect to culture and community.



# 06 PROCESS OF CONSULTATION

In the period 2023 to 2024, Holcim's Modern Slavery Working Group, comprised of senior executives from People & Culture, Legal, Sustainability and Procurement, and chaired by the EGM of People & Culture, met four times, to monitor and review the work undertaken to strengthen our approach to modern slavery in light of the Act.

The representatives of the Modern Slavery Working Group, along with key personnel from Holcim were responsible for drafting this Modern Slavery Statement.





# 07 APPROVAL

This Modern Slavery Statement 2024 was approved by the Board of Directors of Holcim (Australia) Pty Ltd on 19 June 2024 and the Board of Directors of Holcim (Australia) Holdings Pty Ltd and Holcim Participations (Australia) Pty Ltd on 19 June 2024, in accordance with the requirements of the Act.

Signed



**George Agriogiannis**  
**Chief Executive Officer**  
Holcim (Australia) Pty Limited  
Holcim (Australia) Holdings Pty Ltd  
Holcim Participations (Australia) Pty Ltd

19 June 2024

