

MODERN SLAVERY STATEMENT

This statement is made and published on behalf of Fletcher Building (Australia) Pty Limited and its subsidiaries pursuant to s.14 of the Modern Slavery Act 2018 (Cth) (Aust). References to "Fletcher Building", "we", "us", "our" are to these bodies, together with the related entities that carry on the Fletcher Building business in Australia.

Overview

Fletcher Building Limited ("Fletcher Building") is a global manufacturer and distributor of building products in Australia and New Zealand and is a construction contractor and residential developer in New Zealand. Fletcher Building is listed on both the NZX and ASX. Fletcher Building (Australia) Pty Limited ("Fletcher Building Australia") is Fletcher Building's holding company for its Australian businesses.

The Australian businesses manufacture and distribute high-quality building materials for a broad range of industries across Australia. They employ people at manufacturing, distribution and sales sites across Australia. The businesses manufacture products used to build homes, buildings and infrastructure, including insulation, plasterboard, laminate surfaces, steel roofing, and plastic and concrete piping. The Australian operations span more than 300 operating sites across the country.

The Australian businesses include Laminex, Iplex Pipelines, Fletcher Insulation, Tradelink, Oliveri Solutions, Stramit, Rocla and Australian Construction Products.

Our approach

We are committed to achieving the highest standards of ethical behaviour in the conduct of our business and activities. We support and respect the protection of human rights and endeavour to make sure that Fletcher Building is not complicit in human rights abuses. To this end, we will not tolerate slavery or human trafficking or abusive or unfair treatment in any part of our own business, or in any of our supply chains. Our policies and practices in relation to procurement, human resources and corporate responsibility, support this commitment.

Our operations and supply chain

In determining the actions, Fletcher Building Australia has taken to address the risk of Modern Slavery existing within our own supply chains, a risk-based approach has been developed to ensure risk appropriate actions are taken. Our risk assessment and associated actions are outlined below:

Workforce (including labour hire) risk: i.e. any person in Fletcher Building's workforce, whether employees or temporary labour hire workers, are subject to conditions which might be considered to constitute modern slavery. *Our risk assessment concluded:* the risk was higher for labour hire workers although Fletcher Building has only a small portion of its total workforce employed as temporary workers, and all within Australia or New Zealand.

Supply Chain risk: i.e. suppliers of goods and support services for our production and distribution sites and/or office locations may subject their staff and contract workers to conditions that could be considered to constitute modern slavery. *Our risk assessment concluded:*

Suppliers of goods: i.e. the suppliers of raw materials and finished goods used in our supply chain such as raw materials (e.g. resins, steel, concrete), finished goods for resale (e.g. Sinks, taps), consumables (e.g. personal protective equipment) and hired assets (e.g. forklifts, trucks) present for the most part a low risk as the vast majority are sourced from within Australia. Those suppliers which manufacture overseas present a higher risk.

Service providers: i.e. the suppliers of services to enable our sites and office locations to operate such as catering, security, and cleaning as well as freight and travel service providers present a low risk as the services are performed exclusively in Australia.

Site, office, and home locations: i.e. the manufacturing, distribution, and retail sites together with the offices and private homes we work from present a low risk as they are all located within Australia.

Technology providers: i.e. IT hardware, software and print services that support our business are generally considered low risk given the maturity of the industry, strong supplier reputations and professional nature of the services rendered.

Policies and procedures

We have a zero-tolerance approach towards modern slavery and all forms of discriminatory and/or exploitative behaviour and treatment, whether this is in our own business or in those that supply to us; this stance is made very clear in all our policies and procedures. The most relevant policies and procedures we have in place, and the steps that we have taken to mitigate against any risks of modern slavery, include:

- Our Supplier Code of Conduct that sets out the conduct we expect of our contractors and suppliers, and explicitly states we will not tolerate slavery or human trafficking;
- Our Human Rights Policy outlines how Fletcher Building will uphold and monitor human rights within our business operations;
- Our Sustainability Policy that confirms our commitment to uphold human rights within our business and across our supply chain;
- Our Terms and Conditions of Purchase of Goods or Services that aims to ensure all goods and services acquired on behalf of Fletcher Building are acquired in line with procurement best practice, at the lowest acceptable risk profile and with proper consideration of the social, environmental and ethical impacts of such activity;
- Our Global Whistleblowing Protection Policy that allows staff, customers, suppliers, or others to raise any concern(s) they may have about any individuals or organisations who interact with us;
- Employee Code of Conduct sets out the behaviours and conduct we expect of our employees and temporary workers across our businesses.

Procurement and supplier due diligence

Recognising the greatest risk of modern slavery is in our supply chain; specifically, the supply of goods, we have taken the following actions and are embedding these actions in our ongoing procurement activity.

- *New framework:* We have completed a high-level risk review across all Australian procurement activity and created a scalable framework to identify, track, escalate and remediate modern slavery risks across our businesses.
- *New and existing resources:*
 - *Risk assessment tool:* We have implemented a new risk assessment tool to support our review of supplier compliance with Australian legislation by providing both historical and current information based upon tailored filters relevant to our businesses.
 - *Supplier Questionnaire:* We have created a user-friendly questionnaire to be used for (i) all new suppliers and (ii) existing suppliers operating in high risk industries / geographies or otherwise identified as higher risk to us. The questionnaire requires suppliers to self-assess against the Fletcher Building Supplier Code of Conduct
 - *Third Parties:* We use trusted third parties to support our risk assessments via the provision of supplier information and the performance of independent reviews.
- *New processes:*
 - We have created a risk assessment process for both existing and new suppliers that ensures any identified risks are escalated quickly to key decision makers.
 - *New suppliers:* our supplier onboarding process includes a risk-based assessment of new suppliers and requires the completion of the supplier questionnaire.
 - *For existing suppliers:* we have identified those suppliers operating in high-risk industries, geographies or similar and required the completion of the supplier questionnaire.
- *Contractual protections:* Our updated supplier contract terms include warranties that suppliers comply with all Fletcher Buildings required 'attributes' including applicable laws, regulations, and Fletcher Building's Supplier Code of Conduct and in an ethically compliant manner including with our standard business practices terms. These terms cover, amongst other things, labour and workplace management and address matters such as child, forced and involuntary labour; fair pay and working conditions; and training, learning and development opportunities.

Impact of Covid-19

We do not believe the Covid-19 pandemic caused any increased modern slavery risks across our supply chain or operations, nor did Covid-19 materially impact Fletcher Building's ability to complete the activities outlined in this statement. We have worked hard to maintain our supplier relationships and where required open new and transparent lines of communication in respect to the risks of Covid-19 on our supply chain and partners.

We have introduced further safety measures into all our sites and offices to ensure we are compliant with Australian government regulations for Covid-19 and ensure we meet the continued health and wellbeing of our people, contractors, partners, and customers.

Training our people

In 2020, we conducted several Modern Slavery sessions for our procurement community for all senior procurement managers, recognising the important role that procurement staff play in reducing the risk of modern slavery via the management of new and existing suppliers. Our approach stresses, amongst other things, Fletcher Building's zero tolerance on slavery and human trafficking and reinforcing the policies and procedures we have in place.

Future plans

We plan to further embed our new policies, processes and procedures across our Australian organisation in 2021 and 2022 with a focus on (i) training our people to ensure the identification (and where required mitigation) of modern slavery risks; and (ii) align our new modern slavery practices with our audit process to test and improve our practices over time.

Approval

This statement was approved by the board of Fletcher Building (Australia) Pty Limited for and on behalf of the relevant entities:

- Amatek Holdings Pty Limited
- Amatek Industries Pty Limited
- Amatek Investments Pty Limited
- Austral Bronze Crane Copper Pty Limited
- Australian Construction Products Pty Limited
- Bandelle Pty Limited
- Baron Insulation Pty Limited
- Crane Enfield Metals Pty Limited
- Crane Group Pty Limited
- Crane Share Plan Pty Limited
- Crevet Pipelines Pty Limited
- Crevet Pty Limited
- CTCI Pty Limited
- EE-Fit Pty Limited
- EFA Technologies Pty Limited
- FBHS (Aust) Pty Limited
- FBSOL Pty Limited
- Fletcher Building (Australia) Pty Limited
- Fletcher Building Products Australia Pty Limited
- Fletcher Insulation Pty Limited
- Gatic Pty Limited
- Geraldton Independent Building Supplies Pty Limited
- Iplex Pipelines Australia Pty Limited
- Iplex Properties Pty Limited
- Key Plastics Pty Limited
- Kingston Bridge Engineering Pty Limited
- Laminates Holdings Pty Limited
- Laminex Group Pty Limited
- Laminex Overseas Holdings Pty Limited
- Laminex US Holdings Pty Limited
- Milnes Holdings Pty Limited
- Morinda Australia Pty Limited
- Northern Iron and Brass Foundry Pty Limited
- Oliveri Solutions Pty Limited
- Polymer Fusion Education Pty Limited
- Rocla Australia Pty Limited
- Rocla Concrete Pipes Pty Limited
- Rocla Industries Pty Limited
- Rocla Pty Limited
- Rocla Vic Pty Limited
- S Cubed Pty Limited
- Stramit Corporation Pty Limited
- Tasman Australia Pty Limited
- Tasman Building Products Pty Limited
- TBP Group Pty Limited
- Thomas Street Pty Limited
- Tradelink Pty Limited

Approved by Fletcher Building (Australia) Pty Limited on 23 March 2021.



Signed by Chief Financial Officer (Fletcher Building Australia), Matthew Brodie, being designated and responsible director of Fletcher Building (Australia) Pty Limited.