



GUNLAKE GROUP

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



FY 2023

GUNLAKE GROUP OPPOSES ALL FORMS OF SLAVERY AND FORCED LABOUR IN ITS OPERATIONS AND THE OPERATIONS OF ITS SUPPLIERS.

This Modern Slavery Statement is made on behalf of Gunlake Group pursuant to the Modern Slavery Act 2018 (Cth). Gunlake Concrete NSW Pty Limited, form part of this group. This statement sets out the actions taken by Gunlake to address modern slavery and human trafficking risks in our business and supply chain for the financial year ending 2023. Gunlake is taking proactive measures to establish and develop the company's policy, supply chain and culture in accordance with the Act.

Gunlake's core business is the supply and delivery of ready-mix concrete in the greater Sydney area and the supply and delivery of Quarry products. The company operates from six sites across NSW, mainly in the greater Sydney area with their head office in Double Bay, NSW. Gunlake is largely a vertically integrated company whose core products are mostly produced inhouse from mining operations in its quarry at Marulan, NSW south of Sydney. Gunlake also uses a small number of other suppliers that are largely based in the NSW area. The Gunlake Group are an Australian owned, family company spanning four generations in the quarrying and concrete industry with strong relationships with their suppliers, customers, and employees. They have an excellent reputation within the industry, best practise in quality, work health and safety, and environmental standards. Gunlake's supplier selection is carried out with these same principals and are carefully selected by:



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- ◆ Anonymous reporting for suspected breaches.
- ◆ Requesting more information from suppliers, and their health and safety standards, and employment conditions.
- ◆ Risk assessment for supply chain risks and workforce risks.
- ◆ Requiring improvements to substandard practices.
- ◆ Sanctioning suppliers that fail to improve their performance in line with our requirements.

Gunlake Group recognises the importance of protecting human rights and are committed to protecting the rights of all people including its employees, the communities in which the Company operates, its customers, and those within its supply chain.

Modern slavery has the potential to exist in the supply chain through a variety of circumstances including:

- ◆ Forced labour
- ◆ Child labour
- ◆ Debt bondage
- ◆ Human trafficking
- ◆ Discriminatory employment practices

MEASURES TAKEN TO ASSESS, ADDRESS & MANAGE THE RISK OF MODERN SLAVERY

At Gunlake, we have a zero-tolerance approach to modern slavery, and we are committed to keeping our suppliers accountable to prevent slavery and human trafficking in our operations and supply chain. We consider our supply chain low risk. Supply chain risks will be investigated as part of ongoing continuous improvement measures. One key focus of senior management will be to work collaboratively with Gunlake's suppliers, that our expectations and standards are understood and upheld.

DUE DILIGENCE

Gunlake Group are committed to only working and engaging with suppliers locally who demonstrate their alignment with The Gunlake Group's core company values. We work alongside and hold our suppliers accountable to collaborate with us to tackle the issue of modern-day slavery and prohibit human slavery and slavery like practices, human trafficking, and child labour.





POLICIES

1. Anti-bribery and corruption policy.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Code of conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
4. Diversity and Inclusion. This policy ensures that employees are treated equally in all employment matters including recruitment, selection, promotion, training and development, performance review and termination. It also applies to remuneration practices, benefits, and all other conditions of employment.

MOVING FORWARD, CONTINUOUS REVIEW AND IMPROVEMENT

Assessing our practices and procedures against the requirements of the Modern Slavery Act 2018 (Cth).

Gunlake's aim is to create an enhanced and evolved understanding of modern slavery risks within our business operations and supply chains.

POLICY REVIEW

Gunlake will continue to review the current policy framework to identify, assess and address any modern slavery risks across the organisation.

TRAINING

Gunlake will provide modern slavery education and training to its procurement staff.

ENGAGEMENT AND COLLABORATION

Gunlake will continue to engage and collaborate with suppliers to manage their business and supply chain in an ethically and socially responsible manner.

ASSURANCE

Gunlake recognises that tackling the issue of modern slavery requires an ongoing and continuing commitment. Gunlake will continue to engage and collaborate with internal and external stakeholders in addressing modern slavery risks, as well as strengthening the group's ability that modern slavery risks are identified and acted upon.



This Modern Slavery Statement was approved by the Directors of The Gunlake Group.

Signed for and on behalf of the Directors of Gunlake Group.

Simon O'Neil

Simon O'Neil

Director

Gunlake Concrete NSW Pty Limited

Julian O'Neil

Julian O'Neil

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Edward O'Neil

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