



Modern Slavery Statement 2025



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Introduction

This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 (Cth) and covers the activities of Bowen & Pomeroy Pty Ltd ABN 78 004 174 887 and its related bodies corporate (collectively referred to as Bowens). This policy sets out actions taken by Bowens to address modern slavery and human trafficking risks in our business and supply chain for the financial year ending 30 June 2025.

This is our sixth statement and describes our actions over the past year to strengthen our policies and our continued efforts to detect and ensure we have an appropriate response to those risks.





Our Structure, Operation and Supply chains

Bowens Timber & Hardware

Established in 1894, Bowens is a fourth-generation family-owned Australian business, supplying one of the largest varieties of quality timber and building supplies in Australia. With Delivery, Click + Collect and 19 stores plus a warehouse throughout Melbourne and Regional Victoria, Bowens offers an extensive range of building materials, hardware and on-site hire products suitable for all stages of the building process. Bowens also provides a wide range of services, on-site experience and in-depth knowledge to help trade, home renovators and aspiring DIYer's get the job done.

Timbertruss

The Bowens Group also includes Timbertruss, Australia's leading prefab manufacturer, specializing in Roof Trusses, Wall Frames, Posi Struts and Cassette Floor Panels, Next Gen Walls and Fire Rated Boundary Walls. Timbertruss is a major supplier of timber trusses throughout the east coast of Australia

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with manufacturing facilities in both Geelong and Brisbane. Timbertruss offers high-quality, precision-made timber trusses from reliable and sustainable timber sources, ensuring a trusted prefabricated solution for the building industry.

Timbertruss Design

The Bowens Group includes a small wholly owned subsidiary formed in India in July 2020. Timbertruss Design provides architectural, detailing and designing services for prefabricated structures manufactured by Timbertruss in Australia.

Supply Chain

The Bowens Groups supply chain includes trading stock and manufacturing inputs that are sourced widely within Australia and a smaller portion directly sourced overseas, including China, Malaysia, Indonesia and the USA. Staff are employed across Victoria and Queensland, and services are procured for various operational needs including but not limited to IT, marketing, hospitality, travel and transport, postal, and building and maintenance services.



Identifying and addressing risk – Employees

At Bowens we prioritise employment compliance, recognising its importance in creating and maintaining a fair and equitable workplace.

- a. Enterprise Agreements:** We have two enterprise agreements covering our divisions in Victoria. The Enterprise Agreements outline the terms and conditions of employment, helping to mitigate risks associated with non-compliance and ensuring transparency.
- b. Compliance with Legislation:** In addition to enterprise agreements, our employees are also protected under various federal awards and the National Employment Standards (NES) as outlined in the Fair Work Act. This comprehensive framework helps us address and minimize employment-related risks.
- c. Regular Audits:** We conduct regular audits to verify compliance with all applicable industrial instruments. This proactive measure allows us to identify potential issues early and take corrective actions as needed.



d. Policy Review and Updates: Our policies are regularly reviewed and updated to reflect changes in legislation and best practice. This ensures that our employees are always informed of their rights and responsibilities.

e. Training and Development: We provide comprehensive training for our staff on all relevant Bowens policies and compliance requirements. This not only fosters a culture of compliance but also empowers employees to understand their entitlements and obligations.

By implementing these measures, Bowens effectively identifies and addresses employee-related risks, ensuring a compliant and supportive workplace for all staff.



Identifying and addressing risk – Supply Chain

Following an initial review of our supply chain, we have identified that there exists the potential for modern slavery in certain higher risk geographies. This includes a small number of direct overseas suppliers, and second and third tier suppliers based overseas. The potential for risk is also identified in industries from which we procure services within Australia, that may have higher proportions of high-risk business models, such as transport, hospitality and building maintenance.

Actions taken to address risk

During the reporting period, the Bowens Modern Slavery Risk management team has continued to ensure our board, senior management and Merchandising team are aware of our obligations to address Modern Slavery risk in our Supply Chain and has provided training to new members of those groups throughout the year. We have continued to progressively roll out our Modern Slavery questionnaire, and Modern Slavery due diligence and acknowledgement form to our existing supply chain, in addition to ensuring all new inventory suppliers complete this process prior to commencing our trade with them.

While we did not identify any incidents or risks of modern slavery in our supply chain, Bowens takes its responsibility seriously and will continue to further review and strengthen our policies and processes, continue to undertake staff risk management training and further rollout our supplier questionnaire and acknowledgement form to our supply chain.





Assessing the effectiveness of our actions

Bowens Modern Slavery Risk management team has continued to meet regularly to plan and implement the continued strengthening of our policies and processes to identify and appropriately address Modern Slavery risk, undertake ongoing audits on the effectiveness of those processes and update when required.

87% of all our inventory purchases during the year ended 30th June 2025, were placed with suppliers with whom we have had dialogue on our obligations to address Modern Slavery risks and these suppliers have confirmed their understanding by completing our Modern Slavery questionnaire and Due diligence and Acknowledgment form.

During the year we further expanded our communication around Modern Slavery risk to include our Expense and Operational Supplier pool. 45% of Expense and Operational purchases were placed with suppliers that have confirmed their understanding by completing our Modern Slavery questionnaire and Due Diligence and Acknowledgement form.

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Training on the risks of Modern Slavery in our supply chain for all those within the group with a responsibility for procurement has continued during the year. This measure is aimed at ensuring those team members are appropriately skilled in identifying risk factors and have the tools to address and minimise those risks. 99% of all those in procurement roles within the Bowens Timber & Hardware operation have completed their training.

We recognize that this review and assessment of effectiveness is ongoing and will broaden and strengthen over time.



Consultation with entities owned or controlled

Bowens has continued to work closely with its subsidiary in India to address the Group's obligations around Modern Slavery risks. A full time HR resource is employed to ensure compliance with all applicable regulations relating to employing in India and to address any related risks of modern slavery.

We did not identify any incidents or risks of modern slavery at our subsidiary in India. Bowens takes our responsibilities seriously and will continue to consult with this subsidiary to further strengthen practices to address any risks of modern slavery in our operations and related supply chains in India.



Approval

This Modern Slavery Statement was approved by the Board of Bowen & Pomeroy Pty Ltd.

Yours faithfully

John Bowen

Managing Director

Date 23rd October 2025