



MODERN SLAVERY

**YEAR ENDING
30 JUNE 2025**



MODERN SLAVERY1

YEAR ENDING 30 JUNE 2025 1

Introduction 3

Bianco Reinforcing Group Governance, Operations, and Supply Chains..... 4

Risks of modern slavery practices, operations and supply chains. 6

Effectiveness of these actions. 8

Other information that Bianco Reinforcing Group considers relevant. 10

Bianco Reinforcing Pty Ltd
P (08) 8360 1111
E reoadmin@biancoreo.com.au

Introduction

This statement has been prepared by Bianco Reinforcing Pty Ltd (ABN 88 087 147 251) to meet the mandatory reporting criteria and requirements under the Modern Slavery Act 2018 (Cth) (hereinafter referred to as the 'Act'). This is Bianco Reinforcing's second Modern Slavery Statement in relation to the financial year ending 30 June 2024 30 June 2025.

All references to Bianco Reinforcing, Bianco Reinforcing Group, Group, our, we and us are references to Bianco Reinforcing Pty Ltd (ABN 88 087 147 251) and its subsidiaries Bianco Transport Pty Ltd (ABN 75 640 214 366) and R.B.S.C Pty Ltd (ABN 31 124 828 637).

This statement summarises the steps taken by Bianco Reinforcing Group to identify, mitigate and manage the risk of modern slavery in its operations and supply chains.

CONSULTATION

This statement has been prepared in consultation with senior management and the managing director of Bianco Reinforcing Pty Ltd.

Stakeholders including senior management from Bianco Transport Pty Ltd were approached for comment and to provide input, to ensure accuracy and relevance.

COMMITMENT TO OBJECTIVES

Bianco Reinforcing Group's Safety & Sustainability objective of 'zero harm' extends to exploitative practices such as slavery, and slavery-like practices, forced and child labour, debt bondage, and human trafficking. We are committed to identifying our own modern slavery risks, working with suppliers and contractors to ensure their practices are aligned with the Act and our own expectations concerning modern slavery and human rights, and addressing those risks through remediation, contract management and good governance.

APPROVAL

This statement was approved by resolution of the management and director (being the relevant principal governing body) of Bianco Reinforcing Pty Ltd and Bianco Transport Pty Ltd.



Peter Gregg

Managing Director, Bianco Reinforcing Group



Bianco Reinforcing Group Governance, Operations, and Supply Chains

GOVERNANCE

Bianco Reinforcing Group is committed to maintaining the highest standards of ethical governance and business practices, ensuring compliance with legislation, industry regulations and best practices. Certification with internationally recognised standards is foundational to our operations. Maintaining ISO 9001 (Quality Management), ISO 45001 (Occupational Health and Safety), and ISO 14001 (Environmental Management), reinforces our commitment to continuous improvement and responsible business conduct.

Additionally, our certifications with ACRS for reinforcing steel manufacturing and distribution and Sustainable Steel Australia ensure our commitment to employee safety, training and ethical treatment, while also ensuring the reinforcing steel industry adheres to high standards of environmental and social responsibility and sustainability. These governance frameworks reinforce our commitment to ethical operations, fostering accountability, sustainability, and continuous improvement across our business and supply chain.



OPERATIONS

Bianco Reinforcing Group is an Australian privately owned manufacturer and distributor of steel reinforcing materials and associated products and services to the Civil, Construction, and Building industries. The main business activities are in Gepps Cross, South Australia. Our full range of products and services are available to metropolitan and regional South Australian customers, we also supply a selection of product to interstate customers. With over 150 staff, Bianco Reinforcing has secured its market leading steel reinforcing suppliers' position throughout South Australia by providing quality product and logistics with superior customer service.

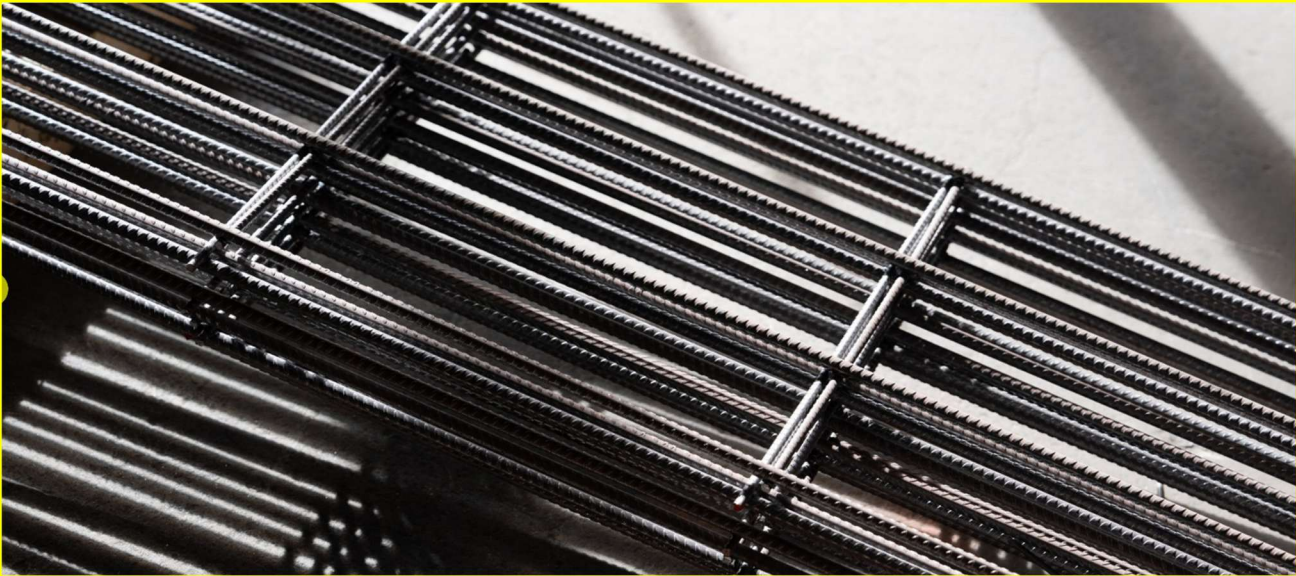
SUPPLY CHAINS

To manufacture our products Bianco sources materials from Australia, Indonesia, Malaysia, Singapore, and Vietnam. Materials are also purchased from local wholesale importers and resellers who themselves may have imported these items.

Along with materials, the Group’s local supply chain also includes the purchase of products and services required for the day-to-day operations. The table below outlines our main supply categories.

Category	Description
Materials	The largest component is the procurement of material used to produce reinforcing steel products
Plant & Equipment	Supply, maintenance, professional servicing and calibration
Logistics	Fleet, fuel, parts and maintenance, to deliver our products to customers
Utilities	Includes electricity and water used by our offices and factories
Services	Includes professional services such as IT, cleaning, travel, marketing, and other head office operating costs such as office supplies and consumables
Uniforms & Personal Protective Equipment	Consists of branded and unbranded clothing and personal safety items

Bianco prioritises engagement with local manufacturers and businesses to support South Australian and Australian economic development



Risks of modern slavery practices, operations and supply chains.

Bianco Reinforcing periodically reviews its structure, operations and supply chain for risks of modern slavery. Risks of modern slavery practices applicable to the Group come from:

- Supporting modern slavery through our supply chain
- Causing modern slavery in our workforce
- Contributing to modern slavery downstream to our customers and community

SUPPLY CHAIN

Bianco Reinforcing Group’s risk assessment of our supply chain focused on reviewing volume and spend of our categories and the country of origin. Only one category was found to have a significant impact on our modern slavery risk, reinforcing steel material, called materials from hereon, as volume far exceeded any other supply category to render other categories insignificant.

The assessment supports the conclusion that the risk of modern slavery within Bianco’s local business operations and procurement within Australia is low. Bianco Reinforcing recognizes that there is an increased risk within its international supply chain because it purchases materials for manufacturing operations from moderate risk suppliers. Suppliers of materials are therefore of particular interest when conducting our procurement functions and carrying out Modern Slavery Assessments.

Currently the percentage of materials from suppliers operating internationally does not make up a majority of the total annual volume. This is demonstrated in the below table.

Risk Rating	Countries from which we purchase materials	Supply of materials (%)
Very High	None identified	0
High	None identified	0
Moderate	Indonesia, Malaysia, Singapore, Vietnam	<10
Low	Australia	>90

Note: country risk rating is adopted from the Global Slavery Index 2023 data

Bianco Reinforcing Group have assessed the risk of modern slavery within our supply chain as low to moderate because the majority of our supply chain is prioritised to Australian businesses, a low-risk country. We will continue to focus on import procurement of materials to lower our modern slavery risk.

During the 2024-25 FY minimal materials were purchased from international suppliers, materials from international suppliers remain in our inventory.

EMPLOYEES

Bianco Reinforcing Group is dedicated to the safety of our employees. Our culture is underpinned by our objectives of 'Zero Harm' to our team, the environment and greater community, and 'Continuous Improvement' to achieve this. Our goal is to maintain a safe and fair workplace for our team members and our operations.

Bianco Reinforcing Group's staff are engaged under employment contracts that are in accordance with Fair Work Australia. We comply with the applicable employment legislation and industrial awards. We also comply with superannuation, leave and other entitlement requirements.

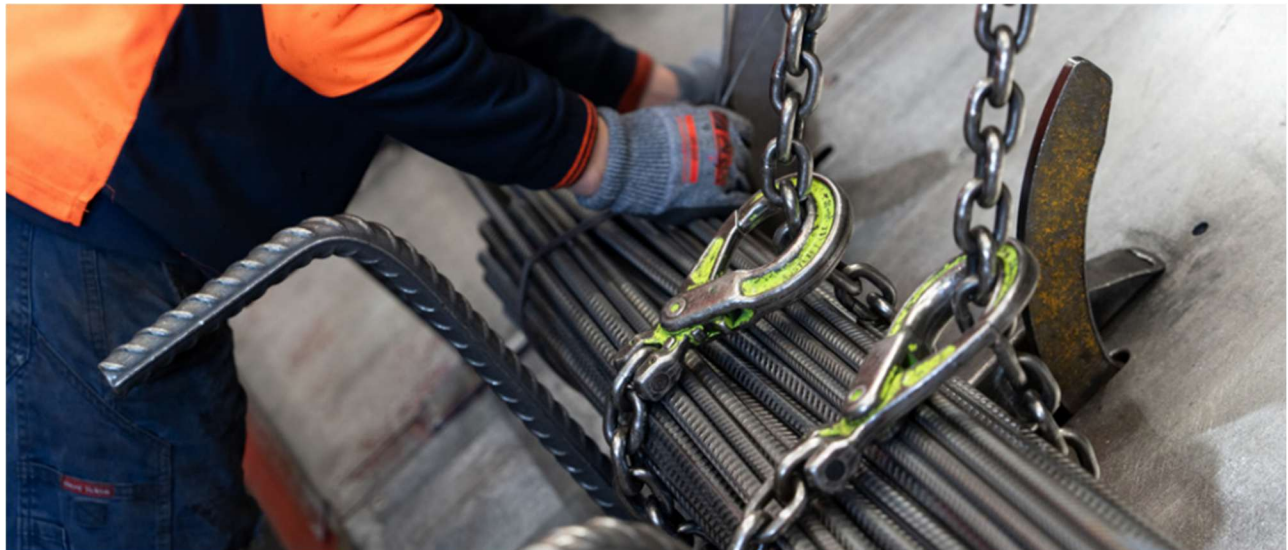
Our staff engagement is guided by the following company policies:

- Recruitment and Selection Policy
- Equal Opportunity Policy
- Code of Conduct Policy
- Training & Development Policy
- Grievances in the Workplace Policy

Additionally, employees are inducted in the following policies and related processes:

- Work Health & Safety Policy
- Environmental Policy
- Carbon Reduction Policy

Migrant workers, especially those without the legal rights to work in Australia, are at the greatest risk of modern slavery practices within Australia. We confirm our employees have the right to work in Australia with the Department of Home Affairs' Visa Entitlement Verification Online System, as well as regularly consulting with applicable employees to ensure the Group and employee are meeting the requirements and obligations of the visa.



Bianco Reinforcing Group have assessed the risk of modern slavery within our workforce as negligible because we operate in a low-risk country and maintain quality human resources policies and procedures.

Effectiveness of these actions.

Addressing modern slavery as related to Bianco Reinforcing Group is always evolving. We are focused on continually improving our risk detection and mitigation methods and engaging with suppliers who either have modern slavery policies in place or in other ways demonstrate a commitment to mitigating the risks of modern slavery in their supply chain.

We currently manage our modern slavery risk in the following ways outlined in our Modern Slavery Action Plan. It is difficult to provide an effectiveness rating for any one activity so we have instead chosen steps and goals to achieve.

Some of Bianco Reinforcing Group's key actions in our commitment to reducing modern slavery practices from our suppliers are:

- Working with brokers to ensure they understand the expectations we have of them to operate in accordance with all applicable modern slavery laws.
- Maintaining positive and open relationships with brokers and suppliers so we can monitor the relationship, and suppliers will have a reasonable expectation that we will require the opportunity to ask questions in relation to their operations, also that the suppliers feel able to disclose to us challenges they may be facing in complying.
- Working in preference with suppliers who can demonstrate inspection by, or accreditation or membership with, respected international ethical standards and accrediting entities.
- Where practicable we aim to visit suppliers to further enhance working relationships and review their processes.

Bianco Reinforcing Group are continuously working on developing and improving our procurement practices to identify modern slavery risks, ensure we can actively manage modern slavery risk assessments in our processes and build sound practices into our supply chain, both prior to contracting and by monitoring and managing during the contract relationship to enable identification and management of supply chain concerns on an ongoing basis.



MODERN SLAVERY ACTION PLAN



Completed



Focus for future years

Action	Description	Status
Supply chain mapping	materials suppliers have been assessed	<input checked="" type="checkbox"/>
	Suppliers other than materials suppliers deemed high risk have been assessed	
	The full supply chain is mapped	
	The full supply chain map is continually reviewed	
Suppliers and reviews	Modern Slavery criteria added to Supplier Evaluation and Performance Monitoring processes	<input checked="" type="checkbox"/>
	Supplier Code of Conduct Policy published and implemented	<input checked="" type="checkbox"/>
	Materials and high risk suppliers reviewed annually to reassess modern slavery risk	
Audits and inspections	Desktop audits conducted on Suppliers to confirm compliance with the Purchasing and Supplier Code of Conduct Policies	
	On-site inspection and audits of Suppliers to confirm compliance with the Purchasing and Supplier Code of Conduct Policies	
	Relevant personnel or teams or external providers conduct audits as required	<input checked="" type="checkbox"/>
Remediation	Group commitment to working with suppliers to remediate any identified high-risk activities or products	<input checked="" type="checkbox"/>
Complaints mechanism	Implement a confidential and anonymous whistleblower mechanism for workers and the supply chain to raise concerns with protection from reprisal	<input checked="" type="checkbox"/>
	Implement a defined process for investigating and reporting on issues raised through the whistleblower mechanism	
Review	The Group annually reviews its modern slavery risk assessment and statement	<input checked="" type="checkbox"/>

Other information that Bianco Reinforcing Group considers relevant.

During the 2024-25 FY, Bianco Reinforcing Group did not receive any reported concerns of modern slavery practices, nor did we identify any instances of modern slavery in our operations or amongst our suppliers. Even though no cases have been reported, we continue to promote the awareness and mitigation of modern slavery.

Bianco Reinforcing does not engage in any aspect of modern slavery and will not condone such behaviour in our supply chain. We acknowledge our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices and are committed to taking all reasonable and practical steps to ensure that there is no modern slavery in our business or supply chain.

We continue to take steps to develop and enhance our processes to ensure that all our suppliers, both local and international, meet the required standards for ethical practices in our supply chain.





Bianco Reinforcing Pty Ltd
P (08) 8360 1111
E reoadmin@biancoreo.com.au