



Modern Slavery Statement

Under the Modern Slavery Act 2018 (CTH)



Reporting Period:
1 July 2024 – 30 June 2025

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Whadjuk Country

BGC acknowledges the Traditional Owners of country throughout Australia and recognises their continuing connection to land, waters and community. We pay our respects to them and their cultures, and to elders both past and present.

BGC Australia

Ground Floor, 67 Walters Drive, Osborne Park, WA 6017



01. Overview of BGC

BGO Transport

Mandatory Reporting Entity

This Modern Slavery Statement is made in accordance with section 13 of the Modern Slavery Act 2018 (Cth) Act.

The mandatory reporting entity under the Act is:

BGC (Australia) Pty Ltd - ABN 62 005 736 005 ("BGCA")

This entity is the ultimate holding company of a number of subsidiaries and is engaged in the manufacturing of core building products for use by other BGC entities and for sale to third parties.

Active Subsidiaries

BGC Construction Pty Ltd - ABN 48 008 783 248

This was a subsidiary of BGCA and was engaged in commercial construction with specific focus on commercial, aged care, regional and fit out projects. It was divested in September 2024.

BGC Residential Pty Ltd - ABN 54 052 543 450

This is a subsidiary of BGCA and is also engaged in the construction of homes and residential buildings.

J-Corp. Pty Ltd - ABN 54 009 063 076

This entity became a subsidiary of BGCA on 30 June 2025. It is engaged in the construction of homes and residential buildings. It also has a number of subsidiaries which are engaged in real estate, mortgage broking, property pest control and flooring products and services.

Midland Brick Pty Ltd - ABN 93 635 664 710

This entity is a subsidiary of BGCA and is engaged in the manufacturing of clay bricks and concrete masonry products for use by other BGC entities and for sale to third parties.

Ventura Home Group Pty Ltd - ABN 70 093 870 618

This is a subsidiary of BGCA and is engaged in the construction of homes and residential buildings.

BGC Concrete Products Pty Ltd - ABN 95 009 397 871

This subsidiary is a landowner of property on which BGC concrete and roof tiles are manufactured.

Historically BGC reported its Modern Slavery Statement as a Joint Statement with Esther Investment Pty Ltd - ABN 68 004 459 536. In FY2025 Esther Investment did not exceed the reporting entity consolidated revenue threshold so has been removed and published as a statement for single reporting entities.

This statement has been approved by the Board of Directors of BGC (Australia) Pty Ltd. The various subsidiary entities noted in part 2 of this statement, have been consulted in the preparation of this statement and are subject to the internal governance frameworks of BGC. This statement was signed by Samuel Buckeridge in his role as Director on 12 December 2025.



Samuel Conrad Buckeridge
Director

About Us

BGC is one of Australia's largest private, family-owned companies. We have operated since the 1960's, beginning with operations in the property development sector.

Our operations and services have diversified over the years to include a broad range of products and services in the construction, manufacturing and transport sectors. These services are further detailed in Part Two of this Statement.

The safety and wellbeing of our staff, contractors and, to the extent it is within our control, our suppliers is a matter of utmost seriousness, as reflected in our zero-harm approach.

This Modern Slavery Statement maps out the various activities that we have engaged in across BGC to identify, assess and address the risks of modern slavery in our operations and supply chains.

During FY25, we focused on the internal and external materials and services supply chain to sustain manufacturing operations and ensure timely residential construction impacted by labour shortages.

The primary objective during this reporting period has been to maintain strong supplier relationships and ensure continuity of business operations, despite the ongoing sales process of the Cementitious businesses and the divestment of the Commercial Construction business.



02. Mandatory Reporting Requirements

Corporate Structure

BGC (Australia) Pty Ltd is limited by shares, incorporated and domiciled in Australia. Its registered office and principal place of business is at Ground Floor, 67 Walters Dr, Osborne Park WA 6017.

During this reporting period, FY25, BGC has divested BGC Construction and had a strong focus on the sale of the Cementitious and Transport businesses – a process that is due to complete in FY26.

BGC (Australia) Pty Ltd, in addition to being much of the manufacturing business of BGC, is the parent company of a number of operational subsidiaries. These subsidiaries engage in various industries including commercial and residential construction, property development and ownership, and manufacturing of building products.

Corporate Structure	
Corporate	BGC (Australia) Pty Ltd - ABN 62 005 736 005
Cementitious	BGC Asphalt - ABN 62 005 736 005 BGC Quarries - ABN 62 005 736 005 BGC Cement - ABN 62 005 736 005 BGC Concrete - ABN 62 005 736 005 BGC Transport - ABN 62 005 736 005 Materials Technology Centre - ABN 62 005 736 005
Bricks and Masonry	Midland Brick (formerly Brikmakers) - ABN 62 005 736 005 Midland Brick Pty Ltd - ABN 93 635 664 710 Blokpave - ABN 62 005 736 005 Blokstone - ABN 62 005 736 005 Harmony Roof Tiles - ABN 62 005 736 005 BGC Concrete Products Pty Ltd - ABN 95 009 397 871
Housing Group	BGC Residential Pty Ltd - ABN 54 052 543 450 Ventura Home Group Pty Ltd - ABN 70 093 870 618 J-Corp. Pty Ltd - ABN 54 009 063 076
Building Products	Affinity Windows - ABN 55 519 847 105 Plumbtechnics - ABN 62 005 736 005 Floortech Flooring Systems - ABN 46 091 509 349 Envirotechnics Pest Management - ABN 33 059 951 281
Commercial Construction	BGC Construction Pty Ltd - ABN 48 008 783 248 – divested in September 2024

Corporate Structure

Cementitious

In our Cementitious unit, we incorporate the following businesses:

BGC Asphalt

Supplying asphalt for highway maintenance, freeways, suburban roads, as well as the civil and defence sectors.

BGC Quarries

Producing crushed aggregate, crushed rock subbase, road base, spalls, ballast, and quarry sand.

BGC Cement

Offering a broad range of cement types, available in both bulk and bagged forms.

BGC Concrete

Supplying structural and decorative concrete, alongside a variety of supporting services.

Transport

Providing internal transportation services for bulk materials such as quarry products, bricks, cement, and concrete, plus external transportation services to clients across industries including building, construction, agriculture, mining, and services.

Materials Technology Centre

Providing construction materials testing, research and development, reporting, and compliance services.



Corporate Structure

Building Products

Building products and services are offered through a variety of businesses and brands:

- Affinity Windows - Manufactures premium windows, doors, and shower screens, and also provides servicing, repairs, spare parts, and kits for windows and doors.
- Plumbtechnics - Delivers plumbing services to both residential and commercial builders.
- Floortech - Specialises in providing suspended flooring systems, including slabs and stairs.
- Envirotechnics - Offers pest management services.

Bricks & Masonry

The Midland Brick brand encompasses several businesses that supply clay bricks, masonry pavers, clay pavers, blocks, retaining walls, roof tiles, and Cultured Stone®.

- Midland Brick
- Blokpave
- Blokstone
- Harmony Roof Tiles



Corporate Structure

Housing Group

The BGC Housing Group (comprising BGC Residential Pty Ltd, Ventura Home Group Pty Ltd, and J-Corp. Pty Ltd) offers home building and residential property services under a variety of brands, including:

- Aussie Living Homes
- GO Homes
- HomeStart
- Now Living
- Smart Homes for Living
- TERRACE Homes
- The Loan Company - divested in October 2024
- Ventura South West

Commercial Construction

BGC Construction was a contractor for large-scale building projects, including apartments, shopping centres, arenas, and aged care facilities. This business was divested in September 2024.



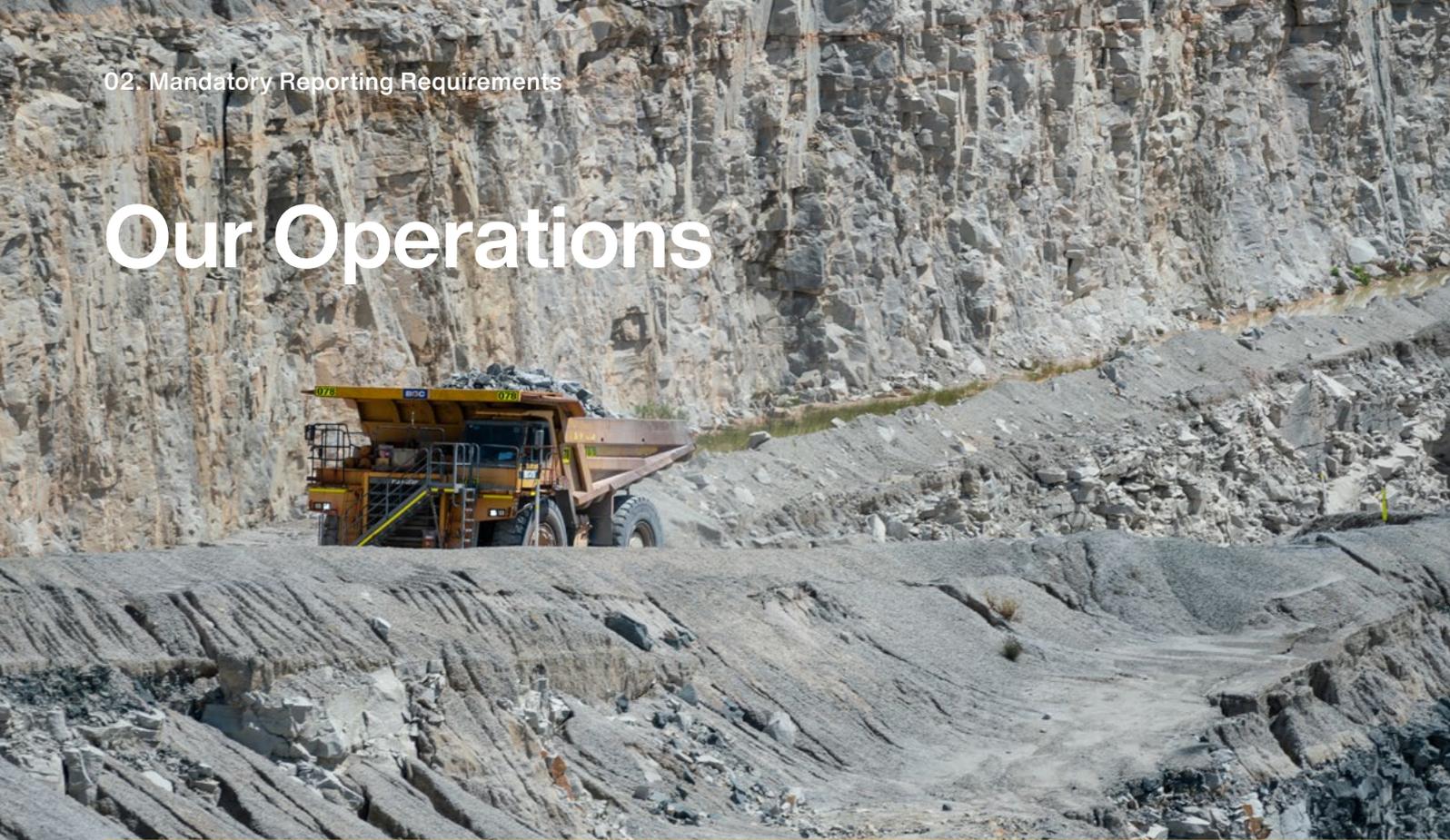
Our Operations



In FY25 BGC remained vertically integrated, controlling the majority of the building process, from quarries through to constructions.

We operate in Western Australia (WA), primarily out of Perth. Our driving purpose is to build the future for more Australians. Our innovative and future focused approach allows us to create ongoing value for customers across our diverse portfolio of business units.

Our Operations



Vertically integrated construction business.

Area of operation is in WA.

Approximately 1,400 FTE employees working across the BGC Group.

BGC is made up of a wide range of manufacturing and residential construction businesses.

BGC comprises a diverse range of manufacturing and residential construction businesses. We supply a variety of products and services used in the building and construction industries, both to our own operations and to external clients.



Construction Materials



Building Products



Transport



Residential Housing



Commercial Projects

Our Supply Chain



At BGC, we are committed to building the future with a focus on sustainability.

This commitment extends throughout our entire supply chain. We have established a business that actively supports Australian suppliers, with a strong focus on those based in Western Australia.

For materials, local sourcing has helped mitigate the risks of geopolitical supply chain disruptions. However, we are still impacted by the materials that our suppliers source internationally.

When it comes to labour, we rely heavily on trade services for construction, meaning that most of our supplier base consists of subcontractors.

Our Suppliers

We have over 6,000 direct suppliers that provide goods and services to our business operations.

- Manufacturing (Cementitious, Bricks & Masonry and Building Products) predominantly source materials and labour.
- BGC Transport procure trucks and subcontractors.
- Housing and Commercial Construction purchase materials and have a large subcontractor base.

We source products and services from a range of categories including, but not limited to, raw materials, construction materials / products, subcontractors and trades, utilities and fuel, professional services, road freight, plant and equipment, consumables and IT services.

Our Supply Chain



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International Suppliers

Supplier Location

The majority of our goods and services are sourced from suppliers registered and located in Australia.

We acknowledge that these suppliers may, in turn, manufacture in or source from overseas locations, for example:

- Fuel
- Bitumen
- Steel products
- Selected number of chemicals e.g., oxides.

Supply of goods and services directly sourced internationally is limited to:

- Wholesale trading providers (tier 1) who in turn source
 - clinker from Indonesia, and
 - granulated blast furnace slag from Japan.
- International shipping companies.
- Packaging materials from Italy.
- Plant and Equipment from Germany
- Pockets of suppliers providing fabricated products from China e.g., metal screens.



**03.
Modern Slavery Risks
in our Operations
and Supply Chains**

Modern Slavery Risks

BGC has identified the following risk areas and is actively mitigating and managing the associated modern slavery risks. Throughout the reporting period, BGC did not identify any instances of actual or suspected modern slavery or related conduct within our operations or supply chains.

We recognise that suppliers located in Asia, particularly those involved in sourcing certain raw material components and conducting specific manufacturing processes, are more frequently associated with practices linked to modern slavery.

We also acknowledge the potential risks faced by workers in the Australian construction industry, given the nature of the work. Additionally, we recognise that the maritime shipping industry presents further vulnerabilities that require identification and appropriate action.

Sourcing of Overseas Produced Clinker

Two of our major Tier 2 suppliers provide clinker products from Indonesia and Malaysia.

The elevated modern slavery risk profile associated with these supply arrangements is due to several factors, including the relatively high level of spend, the geographical sourcing locations, and the nature of the product—labour-intensive raw materials.

Grey Clinker – Indonesia

The main imported input is grey clinker from Indonesia, which forms the bulk of our cement production. Supply is through our Tier 1 trading partner, Global Transit Trading, whose Singapore office manages the arrangement. Established in 2001 and headquartered in France, Global Transit Trading is a long-standing international trading company specialising in cementitious products.

The clinker is produced at the Cilacap (CiL) plant, operated by PT Semen Indonesia (Persero) Tbk (SMGR), Indonesia's largest cement producer. SMGR is 51.2 percent owned by the Government of Indonesia, with the balance held by public investors through its listing on the Indonesia Stock Exchange. This ownership structure, combined with public-company governance, provides a strong foundation of transparency and accountability.

The Cilacap plant was originally established and operated by Holcim, a global leader in cement manufacturing. Given its origins and continued investment under Semen Indonesia, it remains a technically advanced and professionally managed facility. While just outside of the reporting period, this was confirmed at a site visit by two of our personnel in July 2025 who verified that production, safety and workforce standards meet high international benchmarks.

White Cement – Malaysia

White cement is sourced locally through CCL (Adbri), which manufactures it in Australia using white clinker imported from Malaysia. The white clinker is produced by Aalborg Portland Malaysia Sdn. Bhd. (APM), a majority-owned subsidiary of the Cementir Group. APM's plant is located in Ipoh, Perak, Malaysia. It benefits from high-grade limestone reserves, modern production technology and established export logistics.

Adbri Limited, one of Australia's largest construction-materials companies, owns a 30 percent share in Aalborg Portland Malaysia, with the remaining 70 percent held by Aalborg Portland Holding A/S (part of the Cementir Group). Adbri is also a reporting entity under the Australian Modern Slavery Act. This ownership link, together with Cementir's global governance and sustainability standards, provides assurance that both the clinker and finished product are responsibly sourced.

Modern Slavery Risks

Brick Manufacturing

The global brick industry is considered high risk for forced and child labour. This is largely due to the vulnerability of the low-skilled workforce commonly found in the sector, as well as the nature of raw materials used—such as limestone, cement, and other rock products—which are often sourced from countries like Singapore and Malaysia where such risks are more prevalent.

At BGC, we mitigate many of these commonly identified risks by producing our own bricks domestically through our “Midland Brick” business. Our brick factories are some of the largest clay brick facilities in Australia, with five kilns operating during FY25.

Within these facilities, we adhere to best practice safety standards, ensuring a safe and healthy working environment for all workers. The majority of our workforce in these brick plants are either directly employed by BGC or engaged through Australian labour hire agencies that are contracted to us under agreed labour hire terms.

Furthermore, nearly all raw materials used in the production of our bricks are mined directly by BGC in Western Australia, with only a very small proportion sourced externally e.g. additives and coloured oxides.

Modern Slavery Risks

Recognised Vulnerabilities

Australian Construction Sector

We recognise the potential vulnerabilities faced by workers in the broader Australian construction sector. The nature of construction work is often characterised by short-term, temporary labour that is seasonal and subject to cyclical fluctuations.

Due to the temporary and seasonal nature of this work, many builders and subcontractors rely heavily on labour-hire companies to supply low to medium-skilled workers, typically on a temporary basis. These workers may include foreign nationals on temporary visas, which can increase their vulnerability. While Australia provides worker protections and minimum employment conditions, we acknowledge that such protections may not be as robust in other jurisdictions.

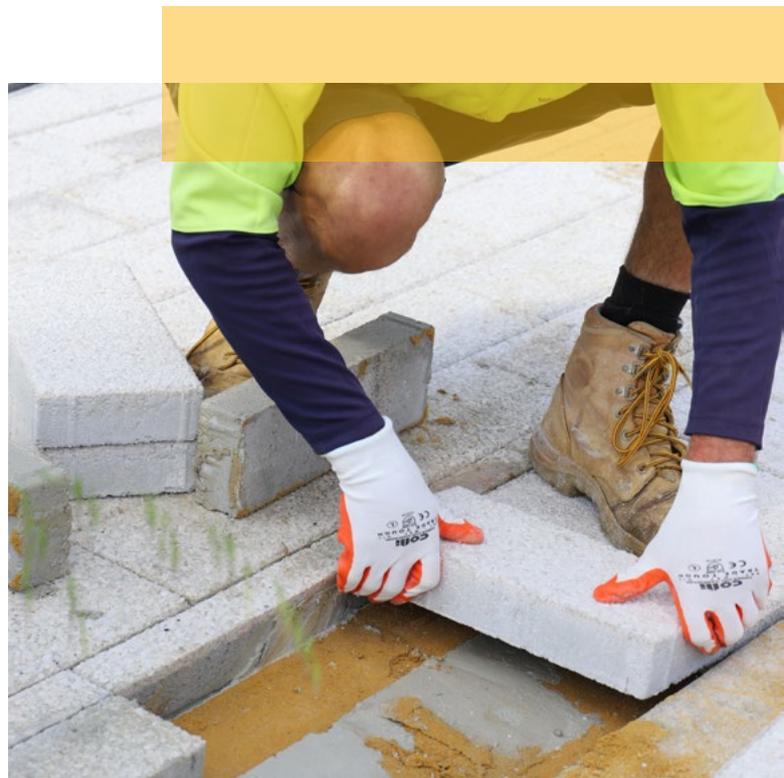
Additionally, structural economic factors—such as tight profit margins and business pressures within the development sector—can further exacerbate these vulnerabilities.

For BGC’s residential construction businesses, a significant portion of work is contracted to independent subcontractors under our standard agreements. These subcontractors may engage local labour-hire agencies, and some may employ workers on temporary visas. We recognise the inherent vulnerability associated with temporary visas, particularly given the current recruitment challenges facing the building industry.

Shipping Industry

The inherent physical and geographical remoteness of shipping operations reduces visibility into working conditions. Seafaring conditions—such as isolation, restricted movement, excessive overtime, and abusive working and living environments—are key indicators of forced labour. The often distant and pressured relationship between seafarers and cargo owners, driven by the need to meet delivery timelines, makes seafarers essential yet vulnerable.

BGC operates a few shipping routes, partnering with established marine transportation service companies. We have cultivated close, long-standing relationships with these operators and ensure that modern slavery requirements are included contractually. While we recognise that we are still in the early stages of identifying and assessing modern slavery risks in the maritime shipping industry, we are committed to taking further steps to identify and address these risks moving forward.





**04.
Actions Taken to
Assess and Address
Modern Slavery Risks**

Addressing Modern Slavery Risks

Addressing modern slavery risks will require a holistic approach that encompasses legislation, corporate responsibility, and a commitment to ethical practices throughout the supply chain.

BGC has been working to address our modern slavery risks (part 3) and most of these initiatives are ongoing across reporting periods. BGC has aimed to address modern slavery risks by:



Governance

- ESG Strategy
- Anti-Slavery Policy
- Sustainability Policy
- Whistleblower Policy
- Supplier Code of Conduct



Supplier Management

- Supplier Performance and Risk Management
- Contract obligations
 - Labour Hire
 - Subcontractors
- Supplier Self-Assessment Questionnaires



Staff Awareness

- Education
- Training

Addressing Modern Slavery Risks

Process of Consultation

BGC's Group Procurement and ESG functions have continued to work closely with business units to identify, assess, and address modern slavery risks based on their specific risk profiles. Key representatives from Procurement, ESG, Legal, Human Resources, and Operations across BGC's Cementitious, Bricks and Masonry, Transport, and Residential Construction business units are involved in this process. Ultimately, BGC's Board reviews and approves this Statement.

Due Diligence

BGC Anti-Slavery Policy

BGC has continued to enforce its Anti-Slavery Policy to further integrate our modern slavery initiatives across the corporate group. We only engage with suppliers who comply with our Anti-Slavery Policy or demonstrate they are actively working towards compliance.

Key features of the BGC Anti-Slavery Policy include:

- A clear definition of modern slavery.
- An outline of how we address modern slavery within our organisation, including conducting risk assessments, introducing new suppliers to the policy, incorporating anti-slavery provisions in supplier contracts, and holding suppliers accountable by reserving the right to terminate the contractual relationship if a policy breach is identified.
- A commitment from our managers to provide relevant training on the Policy. The CEO holds day-to-day responsibility for the implementation of the Policy.
- Strict compliance with the Policy is required from all employees, managers, and directors of BGC.

The Anti Slavery Policy is publicly available on BGC's website.

ESG Strategy

BGC has continued to implement its Board-approved, company-wide ESG Strategy, which integrates Modern Slavery considerations across three of BGC's identified Material Topics. The Corporate ESG department leads efforts to stimulate and coordinate ESG initiatives throughout the Group.

Our Sustainability Policy upholds the fair treatment of our people and everyone within our value chain.

Addressing Modern Slavery Risks

Supplier Management

As part of maintaining robust procurement practices at BGC, Procurement and Commercial teams conduct supplier management activities, including:

- Supplier Onboarding / Qualification
- Supplier Performance Management
- Supplier Risk

Performance reviews are conducted with selected suppliers by business unit commercial managers, who determine the appropriate frequency for these reviews. Modern Slavery risks are assessed as part of these reviews when the following five factors apply. For the FY25 reviews, no suppliers were identified as requiring immediate action.

Factor	Description	When is the Modern Slavery Risk assessed?
Category	Classification of materials or services being procured	Predominantly suppliers providing core (direct) materials and services
Supplier Segmentation	Classification of suppliers e.g.strategic vs non-critical supplier or supplier vs sub-contractor	Commonly strategic and tactical suppliers to ensure operational uptime
Geography	Geographical area of operation	Suppliers providing BGC materials from overseas operations
Spend	Total spend \$ amounts by supplier or (estimated) total contract value	Suppliers where spend is or expected to be > \$1,000,000
Tier	Depth of tiering of suppliers supplying our suppliers in the supply chain - e.g., 1st, 2nd, 3rd tier supplier etc.	Tier 1 suppliers

Addressing Modern Slavery Risks



Supplier Code of Conduct

BGC's Supplier Code of Conduct defines the minimum standards expected from all our suppliers in areas such as ethics, safety, environmental responsibility, and social values.

BGC Goods & Services Contract Template

In FY25, BGC continued to use its Goods and Services template, which includes provisions to address modern slavery. These provisions enable BGC to request accurate and up-to-date information, documents, records, procedures, and processes from suppliers, including the names and details of second-tier suppliers.

The standard BGC contract also requires suppliers to make reasonable efforts to ensure that equivalent clauses addressing modern slavery are included in any supply contracts with BGC's second-tier suppliers.

Additionally, BGC has ensured that the template Goods and Services Contract includes a contractual right to audit suppliers and mandates that suppliers comply with BGC's Supplier Code of Conduct.

Addressing Modern Slavery Risks

BGC Labour Hire Agreement Template

In FY25, BGC continued to use its Labour Hire Agreement template, which explicitly addresses modern slavery. It requires the labour hire agencies we engage to commit to our Anti-Slavery Policy.

To ensure compliance with modern slavery legislation, whether for the purpose of making a Statement or otherwise, both agencies and BGC must provide accurate and up-to-date information, documents, records, procedures, and processes.

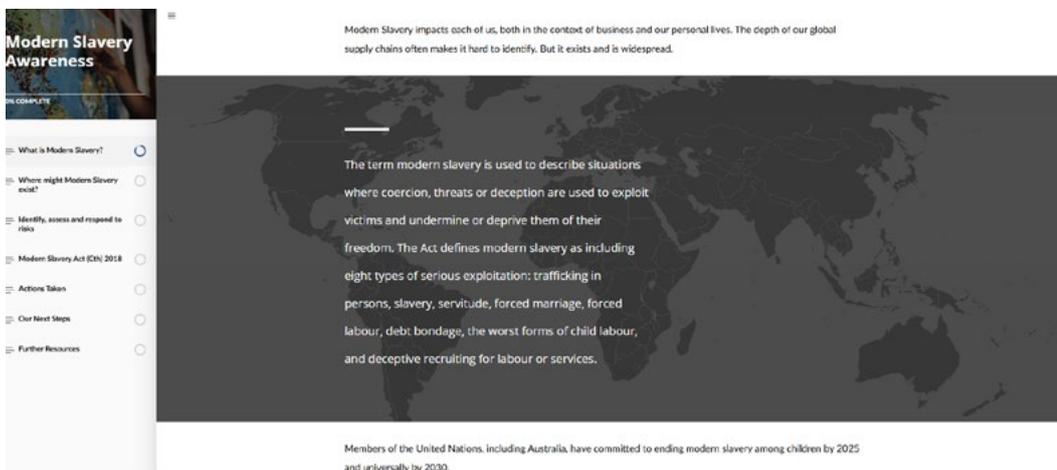
We have preferred labour hire agencies under contract, fulfilling the majority of BGC's labour hire needs.

Subcontractor Trade Agreement Template

Similar to our Labour Hire Agreement, BGC continued to use its subcontractor trade agreement template in FY25. This standard agreement includes provisions to raise the supplier's awareness of Modern Slavery risks and their accountability.

Education and Training

Education and training on Modern Slavery Awareness continued to be delivered across all business units in FY25. All employees are automatically enrolled in an online training program which works through what constitutes modern slavery, how to identify, assess and respond to risks, what actions have been taken by BGC and next steps. Approximately one third of the current workforce completed the course in FY25 with more than 1,200 employees having completed the course to date, which has an average 5/5 star approval rating.



Addressing Modern Slavery Risks

Grievance Mechanism

BGC Whistleblower Policy

BGC's Whistleblower Policy is available to both internal and external stakeholders to report grievances, including those related to modern slavery. The following individuals are encouraged to report concerns:

- Officers or employees of BGC
- Suppliers, consultants and contractors of BGC
- Associates of BGC
- Relatives, spouses and dependents of any of the above

Matters related to modern slavery are considered "reportable matters" and include:

- A breach of any internal policies referring to modern slavery, such as our Anti-Slavery Policy.

- A failure to comply with legal, professional, or regulatory obligations.
- Conduct that could damage our reputation.
- Illegal conduct, or actions constituting dishonest, fraudulent, or corrupt activity.

We ensure protection for Whistleblowers who report modern slavery or related practices, safeguarding them from any detriment. Any retaliatory action is taken seriously and is itself considered a breach of policy. Senior management and the board continually monitor the policy to ensure that grievances are properly addressed.

The Whistleblower Policy is publicly available on BGC's website.

Supplier Modern Slavery Risk Remediation

The remediation process for addressing suspected modern slavery risks with suppliers follows five steps:

1. Report any concerns or suspicions to the General Manager of your business unit.
2. Communicate your concerns to the supplier, requesting clarification and further information.
3. If your concerns are not adequately addressed, or if modern slavery practices are substantiated, contact Group Procurement.
4. Group Procurement will thoroughly investigate the issue with the supplier and request a remedial action plan.
5. If the remedial action plan fails to achieve the desired outcome within an appropriate timeframe, or if the supplier is uncooperative, the General Manager of the business unit and the Head of Procurement will jointly decide to terminate the supplier.

No concerns requiring remedial action plans for suppliers were identified in FY25.



05
Effectiveness of
Actions Addressing
Modern Slavery Risks

Assessing Effectiveness

Qualitative Assessment

Modern slavery risk mitigation is overseen at the Board level and driven by Procurement in collaboration with the ESG function. Together, these functions work to ensure that the modern slavery risk assessment process aligns with BGC Group's ESG Strategy and remains up-to-date and effective.

Quantitative Assessment

In FY25, several indicators were used to assess the effectiveness of our modern slavery risk management efforts. The results for this reporting period are outlined below. In the previous year, we used an application to submit supplier questionnaires. However, due to a low response rate and the cost of the system not justifying the value received, we decided to revert to manual and in-person supplier reviews.

Indicator	FY25
Number of suppliers that underwent performance reviews including the evaluation of modern slavery risks	30
Number of suppliers identified as posing a high modern slavery risk.	0
Percentage of on-site audits undertaken at high and very high risk suppliers' operations requiring a visit within the reporting period	N/A
Number of suppliers that have been removed due to not meeting our modern slavery risk assessment requirements	0
Percentage of current staff completing our Modern Slavery Awareness training	37%



Modern Slavery Statement 2025

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