

# Bremick Modern Slavery Statement 2024

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## 1. Introduction

This Modern Slavery Statement (the **'Statement'**) relates to the financial year ended June 30<sup>th</sup>, 2024, and is made in accordance with the requirements of the Australian Commonwealth Modern Slavery Act 2018 (the **'Act'**).

It describes the actions and initiatives undertaken by Bremick Pty Ltd and its consolidated subsidiaries (collectively referred to as **'Bremick', 'the Company', 'we', 'us', or 'our'**). It outlines our commitment to identifying, assessing, and addressing the risks of modern slavery in our operations and supply chains.

Bremick align our understanding of modern slavery with the definition provided in the Act, which identifies eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour services, and the worst forms of child labour.

We are committed to respecting the human rights of all individuals connected to our operations, supply chains, and the communities in which we operate, and we continuously strive to improve our practices and reduce the risk of serious exploitation affecting these groups, ensuring all workers are treated fairly, ethically and with respect.

## 2. Overview

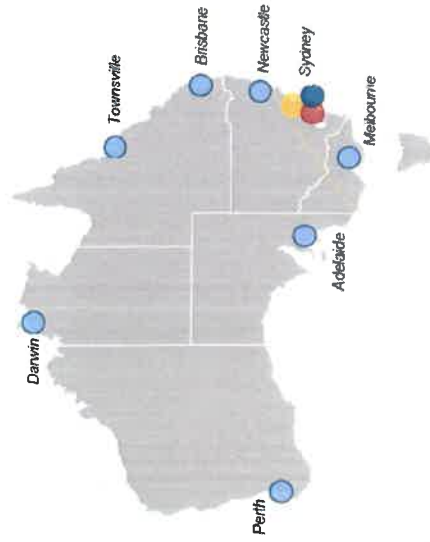
### Structure

Bremick Pty Ltd (ABN 68 000 496 131) is a privately-owned Australian company headquartered in Rosebery, New South Wales. We are a leading manufacturer and distributor of fasteners and hardware in Australia and New Zealand, offering an extensive range of products including stainless steel fasteners, socket screws, self-drilling screws, and masonry anchors.

Bremick operates across Australia, China, and New Zealand. Bremick's operating facilities include:

## Australia

- NATA accredited quality control laboratory and manufacturing facility at our national distribution centre in Sydney
- Sales and distribution centres
  - Adelaide
  - Brisbane
  - Darwin
  - Melbourne
  - Newcastle
  - Perth
  - Sydney



## China

- Manufacturing facilities



- Sales and distribution centres
  - Auckland
  - Christchurch



## Key:

- Regional Distribution Centres
- Manufacturing Sites
- National Distribution Centre
- 3PL Distribution Centre
- Head Office

## New Zealand

## ***Operations***

Bremick specialises in the manufacturing and wholesale distribution of high-quality fasteners and ancillary products, catering to a diverse range of industries, including industrial, roofing, building, construction, petrochemical, and retail trade markets. We are a trusted supplier renowned for our commitment to quality, durability, and innovation.

Bremick is organised and managed by a central Senior Management Team (SMT) located in Sydney, Australia. The SMT manage dedicated management teams that are responsible for following Bremick key functions:

- **Manufacturing** – Responsible for all aspects of innovative product design & quality production manufacturing to regulatory requirements at all locations.
- **Operations** – Responsible for the implementation and sustainment of efficient and safe warehousing operations at all locations.
- **Procurement** – Responsible for developing & maintaining reliable & responsible supply lines for raw materials, components, coatings, packaging & finished goods.
- **Sales** – Responsible for Australasian sales enquiries, sales generation and ongoing customer support.

## ***Supply Chain***

Bremick is a diverse manufacturing and distribution business with a complex international supply chain.

We source goods and services from numerous countries around the world, with most major Tier 1 suppliers concentrated across China and Southeast Asia. This diverse sourcing strategy enables access to a wide range of materials and components, supporting the company's extensive product lineup.

During this reporting period we have numerous Tier 1 suppliers providing a range of goods and services, including:

- Finished goods for sale (e.g., fasteners and ancillary goods) – Majority of our Suppliers
- Inputs for in-house manufacturing (e.g., bulk raw materials) – Minority of our Suppliers
- Operating goods and services (e.g., marketing materials and packaging) – Minority of our Suppliers
- Bremick Procurement source product raw materials including steel, coating materials, packaging cardboard & plastic packaging, and finished and semi-finished products to support our product range.
- Bremick have a supply base that covers Australasia, China, Southeast Asia, India, Europe, UK, and US locations.

Bremick's supply chain is expertly managed by our dedicated in-house Manufacturing & Supply Procurement team. This central function plays a pivotal role in ensuring our supply chain operates efficiently and effectively. The team is responsible for overseeing and managing all aspects of procurement, production, and supply chain processes to ensure that materials, goods, and services are delivered on time, within budget, and meet quality standards. The team's

responsibilities also include management of our modern slavery procedures, which includes actions to source goods and services in a responsible, sustainable & socially aware manner.

### 3. Risks

As a large international manufacturing business, Bremick operates in a sector identified by 'Walk Free' as having a high risk of modern slavery. We recognise the potential for exposure to these risks within both our internal operations and within our supply chains. Relevant possible risks are discussed in this section, with the mitigation and management of these risks in the following section, 'Actions'.

#### **Operations**

We assess the likelihood of modern slavery activities occurring within our direct operations in Australia and New Zealand to be low. Our view is supported by the fact that these jurisdictions have robust legal frameworks, labour protections, and enforcement mechanisms. In addition, we take mitigation and management actions against this as described in 'Actions' below. However, we acknowledge that risks can still exist, particularly within the manufacturing sector. We consider that potential areas of exposure for Bremick's Australia and New Zealand operations include, but are not limited to:

- **Labour hire and contracting** – There is a higher risk of modern slavery in employment of labour hire staff given Bremick does not have complete oversight of the recruitment and management practices in such cases. Risks arising from labour hire firms operating without proper oversight may include migrant labour exploitation, deceptive recruitment practices, and other forms of worker exploitation. Bremick utilises permanent & casual labour throughout our operations. Where labour hire or contractors are needed within the Australian operations, they are covered by either award rates & labour hire company agreements or agreed written contracts. The proportion of AU labour hire across Bremick is on average a very low percentage of the total labour pool. Labour hire is not used in our overseas manufacturing operations.
- **Manufacturing working conditions** – The risk of severe exploitation in Bremick's domestic Australian manufacturing practices is very low, but we are conscious that other forms of exploitation may exist, such as excessive overtime.

We assess the likelihood of modern slavery within our direct operations in China to be low. We acknowledge that China is a higher risk jurisdiction, as detailed by Walk Free's Global Slavery Index, and we implement practices to mitigate and manage these risks. Potential areas of exposure for Bremick's China operations include, but are not limited to:

- **Forced labour** – The risk of forced labour in China's manufacturing sector includes the risk of coercion, exploitation, or violations of international labour standards. We acknowledge these possible risks and implement strict control practices within our own operations to mitigate them and protect our employees and other stakeholders in this region.
- **Manufacturing working conditions** – We consider that the potential risk of severe exploitation in Bremick's international manufacturing practices is low, although higher than in our domestic operations. We acknowledge the interplay of high production demands, cost pressures, and

inconsistent enforcement of labour and safety standards contributes to higher risk in the region. To mitigate this risk Bremick implement controls to ensure we operate responsibly.

### ***Supply Chain***

Bremick recognises that the risk of modern slavery extends far beyond our direct domestic and international operations and into our supply chain. We consider that the following can be drivers for possible exposure to supply chain risks, and we focus our monitoring and management processes on these accordingly:

- **Forced labour** – The extraction of metals and alloys used in fastener & ancillary goods production and downstream manufacturing processes are risk areas for exploitation, including forced labour and unsafe working conditions.
- **Low skilled and migrant worker exploitation** – Workers, particularly those engaged in lower-skilled tasks, may be vulnerable to exploitation through low wages, informal labour arrangements, and/or deceptive recruitment practices.
- **Supply chain complexity and opacity** – Lack of transparency in the supply chain can make it challenging to identify and address modern slavery risks. Outsourced manufacturing processes can also increase potential exposure to modern slavery risks.

## **4. Actions**

Bremick implements robust governance practices to assess and manage modern slavery risks across our operations and supply chain.

Our commitment to responsible operations and procurement is outlined in our Responsible Procurement Policy, with detailed operating processes documented in our Modern Slavery Internal Procedure guidelines. These frameworks support the systematic identification of potential modern slavery risks within our operations and supply chain, and implementation of procedures to mitigate them. This includes the regular review of policies, procedures, and due diligence processes so they continue to address emerging risks and maintain high standards of ethical practice. These practices are overseen and managed by our Manufacturing & Supply Procurement team.

To improve our understanding and effectively address these challenges, we tailor our risk assessment approach to our direct operations and to our supply chain management.

### ***Governance***

Bremick's global operations and supply chain are governed by top-down internal policies and procedures that facilitate the identification and monitoring of risk. At a global level, key elements of our processes include:

- **Governance Policies and Procedures** – Our approach to modern slavery risk management is documented in our 'Bremick Modern Slavery Internal Procedure'. This procedure contains key elements of our approach to addressing Modern Slavery, providing clear direction to our Manufacturing and Supply Purchasing Team. The document also provides important links to the Modern Slavery and Human Trafficking Branch of the Attorney-General's Department information and guides. This internal procedure provides guidance for Manufacturing & Supply Procurement on Bremick's responsibility to respect human rights in our operations and supply chains.
- **Accountability and Responsibility** – Modern slavery work instructions and procedures within Bremick are utilised day to day by the sourcing and supply team who hold direct

relationships with the suppliers and are overseen by the Manufacturing Executive Purchasing.

- **Stakeholder Training and Awareness** – The Purchasing team engage in ongoing & thorough modern slavery training activities to keep them up to date on the latest internal policies and procedures as well as receiving any updates from the Modern Slavery and Human Trafficking Branch of the Attorney-General's Department.
- **Auditing and Regulatory Compliance** – Bremick complies with Australian legislation on employees work conditions and wages which are auditable at any time against Enterprise Bargaining Arrangements and state level awards.

### **Operations**

In addition to our global governance procedures, we implement bespoke practices within our internal operations. These practices include:

#### **Risk Assessment and Monitoring**

- **Employee Screening** – All new Bremick employees go through a thorough interview and onboarding process.
- **Employee Onboarding** – Our onboarding process includes checks to confirm that all required regulatory employment requirements are met, and that appropriate residency and work rights laws are complied with. Including tax file information, age details and licences that confirm role suitability.

#### **Risk Management**

Once the risks we need to control for have been identified, we aim to implement practices that safeguard all individuals connected to our operations and the communities in which we operate.

- **Manufacturing Management Processes** –
  - **Domestic Manufacturing Management** – We consider that the risks of modern slavery in our Australian and New Zealand facilities are very low given the nature of our businesses in these locations, the application of internal & external regulatory policies as well as the strong regulatory environment which applies in these countries.
  - **International Manufacturing Management** – We also consider that the risks of modern slavery risks in our own offshore manufacturing facilities are low. These manufacturing facilities are governed by policies & procedures developed by the Australian management team that have driven an overall culture of compliance, ensure prompt employee wage payments, adherence with local laws and promotion of a safe work environment. The Australian management team provide ongoing oversight of these locations including frequent interactions, as well as a regular supplier visitation program.



### ***Supply Chain***

Ultimately, the greatest risk of modern slavery exposure is within our supply chain, given we operate with a complex international supply chain. Accordingly, we implement bespoke practices to assess and manage this risk across our supply chain. At a global level, key elements of our processes to identify risks across our supply chain include:

#### **Risk Assessment and Monitoring**

- **Supply Chain Mapping** – Mapping activities are undertaken to understand the source of key inputs within third party suppliers. In some cases, suppliers for key inputs are specified by Bremick. Such suppliers are generally large international suppliers.
- **Supply Chain Risk Assessments** – To ensure we have a reasonable view of risk; we complete supplier risk assessments to review suppliers against typical indicators of risk. These assessments cover the following areas, and the outcomes are used to define the following steps in the risk mitigation process:
  - **Sector/Industry Risk** – Considers the sector-specific risk exposures of various goods and services in our supply chain, including a review of the common risk factors associated with the sector e.g., seasonal labour exposure, unsafe working conditions, forced labour in raw material extraction etc.
  - **Product/Services Risk** – Considers the risk associated with the goods or services being sourced based on how they are used, made, or distributed.
  - **Geographic Risk** – Considers the risk associated with the location of the goods or services being sourced. This assessment goes beyond looking at a country level risk and considers local regulation, transparency, and supplier engagement.
  - **Supply Chain Model Risk** – Considers how the risk of modern slavery in the supply chain is influenced by various factors related to the structure and practices of the supply chain model e.g., complexity, transparency, sub-contracting etc.
- **Direct Supplier Screening and Monitoring** –
  - **Supplier Screening** – Bremick conduct supplier due diligence questionnaires across all nominated suppliers to understand their visibility across their own supply chain, assess their supplier's policies and procedures, identify who has accountability for managing modern slavery risks, and the training undertaken by their staff. This questionnaire enables the Operations & Procurement team to minimise the exposure to modern slavery risks to their supply chains.
  - **Supplier Monitoring** – In the FY24 year, we stepped up our approach to risk monitoring across our supply chain. This included a major focus of identifying and onboarding a specialist expert advisor to support our efforts to improve supplier monitoring. Following a tender process, we engaged a specialist vendor to provide guidance and an online tool to facilitate more comprehensive supplier monitoring capabilities. This tool provides us with live information relating to the modern slavery risk profiles of our suppliers.

The use of external specialist support providers enhance our internal risk identification processes. This external support has provided a secure, continuously updated package of supplier surveys issued to the initial supplier focus group. The initial supplier focus group represents over 10% of our supplier

base. The supplier survey results showed areas where high, medium and low risks were identified. Where high and/or medium risks were noted, an independent entity surveillance was carried out to assure there were no red flags.

### **Risk Management**

Bremick's Procurement team utilise the data and information gathered through the risk assessment and monitoring stage to implement management practices, which include:

- **Implementation of Supplier Code of Conduct** – Bremick's Supplier Code of Conduct outlines the standards and expectations we have for all of our suppliers of product and/or services in conducting business with Bremick. The Supplier Code of Conduct details our requirements for all suppliers to comply with all applicable laws, regulations, and industry standards and to uphold fundamental human rights, including the elimination of forced Labour, child Labour and discrimination in any form.
- **Supplier Screening** – Bremick obtain a list of potential supply options that procurement survey to understand the suppliers' strengths and capabilities. Selected suppliers are then visited & reviewed for suitability, with the selected supplier receiving product orders.
- **Ongoing Supplier Engagement** – We continue to identify additional suppliers to take part in this survey and review as part of our ongoing modern slavery focus. The outcomes of these survey results will determine the engagement approach for interactions with the suppliers and will facilitate meaningful dialogue between both parties to ensure suppliers meet expectations
- **Supplier Site Visitation** – Key Supplier interaction & site visitation is an ongoing activity performed by the Bremick Purchasing team. Regular site visitation for key suppliers is an important aspect of understanding key supplier activities as they relate to modern slavery requirements.
- **Know Your Supplier (KYS) Protocol** – Many supplier relationships have been held for long periods of time with regular contact & visitation programs undertaken by senior Bremick staff. Generally, Bremick Procurement managers and their teams have established long term relationships with key suppliers. Key suppliers both new & long term have regular contact with Bremick Procurement teams either via phone, video meetings and / or face to face visitation.
- **Enhanced Supplier IDD** – Supplier survey responses are received and analysed Bremick has the option to utilise a further independent verification. When a supplier has survey responses that warrant further clarification / review Bremick engages an external provider to carry out Internal Due Diligence (IDD) supplier reviews.

## **5. Effectiveness**

Bremick has and will continue to work to prevent modern slavery throughout our supplier base and has a continual improvement approach to all business operations to ensure the processes and policies remain current and compliant. It is expected that data supporting the effectiveness of these actions will be more widely available over time, as the duration and extent of monitoring of the actions identified in Section 3 & 4 continues through FY24/25 and beyond.



Bremick will continue to monitor and assess the effectiveness of its actions through:

- Regularly reviewing supplier onboarding compliance with the *Bremick Modern Slavery Internal Procedure*
- Monitoring the number and range of suppliers who have been issued with, and completed, the relevant supplier risk identification questionnaires
- Monitoring and reviewing any whistleblower feedback from staff for potential issues

Further to this, Bremick has an ongoing process to review its processes and policies to make these more effective. For example, Bremick's processes and policies are routinely assessed by management to confirm the effectiveness and to make sure that they are working effectively, are current and provide our team members with clear guidance on modern slavery.

## 6. Improvement

Bremick has an ongoing commitment to enhancing and advancing our modern slavery management practices. We recognise the gravity of the issue and are dedicated to continuous improvement, implementing robust measures to identify, prevent, and address risks of Modern Slavery within our operations and supply chains. Our approach is rooted in improving transparency, diligence, and a proactive approach to ensure the highest standards of ethical conduct throughout our business practices.

We are also committed to the continuous review and improvement of the risk identification and management processes. This is evident in the additional work being completed post this 2024 end of financial year reporting period which includes:

- Ongoing external legal advice on our processes to ensure they meet and exceed market standards.
- Continuing to actively use third party specialist software tools to provide current and accurate modern slavery assessment processes.
- Key supplier engagement, and
- Regular internal team engagement to ensure they have current knowledge of all Bremick modern day slavery processes and procedures.

As outlined above in this statement, we have implemented a number of processes in this and subsequent reporting periods that will continue to improve our approach to modern slavery management practices. This includes the external support services we subscribe to, as their supplier survey content is reviewed annually, and when required, updated to suit changes.

## 7. Consultation

This Modern Slavery Statement relates to the financial year ended June 30th 2024 and is made in accordance with the requirements of the Australian Commonwealth Modern Slavery Act 2018.

It is approved by the principal governing body of Bremick, being its Board of Directors.

Approved by Bremick's Board of Directors, 4 December 2024

Signed in accordance with the requirements of the Australian Commonwealth Modern Slavery Act 2018.



Luke Hawksford  
CEO



Anabel de Saxe  
COO