

JaybroGroup

Annual Modern Slavery Statement

FY 2023/2024



December 2024

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Introduction and Overview

At Jaybro Group Pty Ltd, we are committed to upholding human rights and maintaining the highest ethical standards across every facet of our business. This Modern Slavery Statement outlines the steps we have taken during the financial year ending June 30, 2025, to identify, assess, and mitigate modern slavery risks within our operations and supply chains, as required by the *Modern Slavery Act 2018*.

As a leading supplier of essential products and services to the construction and civil sectors in Australia and New Zealand, we recognize the potential for modern slavery risks in the complex global supply chains that support our diverse operations. From construction consumables to safety products and geosynthetics, we source materials from a broad network of suppliers, and we take seriously our responsibility to prevent human rights abuses at every level.

This statement provides an overview of our structure, operations, and supply chains, and details the specific actions we have taken to address modern slavery risks. It reflects our commitment to transparency, ethical business practices, and continuous improvement, ensuring our policies and processes are effective in safeguarding against all forms of modern slavery, including human trafficking, forced labour, and child exploitation.

Approved by our Board of Directors, this statement demonstrates our dedication to ethical governance and responsible supply chain management. It is integral to our values and mission as we strive to be a trusted partner in infrastructure development across Australia and New Zealand.

About Jaybro Group

This Modern Slavery Statement is submitted on behalf of Jaybro Group Pty Ltd (ACN 159 122 488), with its registered office at 29 Penelope Crescent, Arndell Park, New South Wales. Jaybro Group is a prominent supplier of essential products and services to the civil and construction sectors in Australia and New Zealand, with operations extending across multiple locations and encompassing a diverse portfolio of products.

In addition to Jaybro Group Pty Ltd, this statement covers several entities within the Jaybro Group that are fully owned subsidiaries and form part of the group's integrated supply and service model. These entities include:

- Global Synthetics Pty Ltd – Supplying geosynthetic solutions for civil and environmental applications.
- Jaybro NZ Ltd – Providing infrastructure supplies within New Zealand.
- Cadia Group Pty Ltd – Distributing specialized plumbing and civil products.
- Delnorth Group Pty Ltd – Manufacturing safety signs and roadside products.
- Link Plus Pty Ltd – Specializing in civil and electrical safety equipment.
- Safe Direction Pty Ltd – Manufacturing and distributing road safety barriers and fencing.
- Specialised Force Pty Ltd – Supplying industrial tools and equipment for heavy-duty applications.
- Plastics Solutions Australia Pty Ltd – Offering custom plastic solutions for infrastructure needs.

Collectively, these entities are referred to as the “Jaybro Group” and operate under a unified approach to governance, risk management, and compliance. Each entity aligns with Jaybro Group's commitment to ethical practices and contributes to our efforts to manage and mitigate modern slavery risks.

This statement outlines our comprehensive approach to assessing and addressing the risk of modern slavery across all entities within the Jaybro Group, reflecting our shared commitment to maintaining integrity, responsibility, and respect for human rights within our operations and supply chains.

Our Structure, Operations and Supply Chain

Structure

Jaybro Group Pty Ltd operates as a key supplier to the civil and construction sectors in Australia and New Zealand, with its head office located at 29 Penelope Crescent, Arndell Park, New South Wales. Jaybro Group is structured to support its extensive portfolio of products and services through a network of subsidiaries, which include Global Synthetics Pty Ltd, Jaybro NZ Ltd, Cadia Group Pty Ltd, Delnorth Group Pty Ltd, Link Plus Pty Ltd, Safe Direction Pty Ltd, Specialised Force Pty Ltd, and Plastics Solutions Australia Pty Ltd. These subsidiaries enable Jaybro Group to deliver comprehensive solutions across multiple segments, including civil consumables, roads, geosynthetics, concrete technologies and specialised equipment.

Operations

Jaybro Group's operations are centred around sales, distribution, and manufacturing to meet the infrastructure and safety needs of its customers with 40 distribution sites across Australia and New Zealand, the group has established a robust operational footprint that supports efficient delivery and strong customer relationships. Manufacturing capabilities are also integral to our operations, with specialized facilities producing custom products such as banner mesh, printed road safety signs, and roadside safety barriers. These products are designed, produced, and distributed with a focus on quality, safety, and reliability, in alignment with Jaybro Group's commitment to industry-leading standards.

The workforce at Jaybro Group comprises over 600 employees, including warehouse personnel, production operators, and sales representatives, as well as professionals in support functions such as finance, human resources, marketing, customer service, procurement, quality assurance, safety, logistics, and executive roles. This team structure ensures that Jaybro Group can effectively meet customer demands while upholding its ethical and compliance standards.

Supply Chains

Jaybro Group's supply chains encompass a range of goods and services essential to its operations. These include:

- **Goods for Resale:** Products sourced from long-term partners and reputable manufacturers, providing construction consumables, safety equipment, and specialty items for the infrastructure and civil sectors.
- **Materials for Manufacturing:** Raw materials and components required for in-house production, such as those used for banner mesh, safety signs, and barriers.
- **Freight and Logistics:** Services facilitating the efficient movement of goods across Australia, New Zealand, and international borders to meet the delivery expectations of customers.
- **Professional Services and Contractors:** Engaging third-party services to support areas such as compliance, technology, finance, and consulting.

Jaybro Group's supply chain strategy emphasizes sustainable partnerships with suppliers who share our values, including those committed to ethical labour practices and continuous improvement. Through rigorous supplier assessments, audits, and ongoing engagement, we work to identify and address any potential modern slavery risks within our supply chains. This approach supports our goal of maintaining a responsible and transparent supply chain, while driving innovation and sustainability across our network of suppliers.

Risk of Modern Slavery Practices

Jaybro Group acknowledges the potential for modern slavery risks across various segments of our operations and supply chains. The complexity of our global supply network necessitates a proactive approach to identifying, assessing, and addressing areas where modern slavery risks may be more prevalent. Key areas of potential risk include geographic location, industry sector, and specific labour practices, where factors such as weak labour protections, low transparency, and labour-intensive processes heighten vulnerability.

To enhance our understanding and monitoring of these evolving risks, we take the following actions:

- **Monitor External Factors:** We assess external influences that may intensify modern slavery risks in specific regions, such as geopolitical conflicts and climate events that can exacerbate economic vulnerabilities.
- **Stay Informed on Regulatory Changes:** We consider changes in regulatory frameworks, including the US Uyghur Forced Labour Prevention Act, the proposed EU Forced Labour Ban, the Australian *Modern Slavery Act 2018*, and the California Transparency in Supply Chains Act, to ensure compliance and adapt our practices accordingly.
- **Supplier Screening and Risk Assessment:** New suppliers undergo a thorough screening process before entering a partnership, and our existing suppliers are subject to ongoing desktop risk assessments to evaluate potential areas of concern.
- **Review Industry Disclosures:** We examine modern slavery statements and public disclosures from peers and suppliers, gaining insights into best practices and current challenges.
- **Consult with Experts:** Where relevant, we seek guidance from subject matter experts on modern slavery risks, helping us refine our strategies and respond effectively to emerging issues.

By employing these monitoring and assessment strategies, Jaybro Group actively strengthens its ability to mitigate modern slavery risks, fostering greater transparency and accountability throughout our operations and supply chains.

Risks within Our Operations

While we actively review and monitor modern slavery risks, we consider the risk within our direct operations to be low due to the following robust measures in place:

- **Rigorous Employment Verification:** Our HR policy mandates thorough verification of right-to-work credentials for all prospective employees, along with police checks to confirm minimum age requirements, ensuring all hires meet legal standards for employment.
- **Strong Legal Protections for Workers' Rights:** Australia's well-enforced workplace legislation provides extensive protection for workers' rights, with multiple accessible channels for individuals to seek assistance or report issues.
- **Compliance in Employment Contracts:** All employment contracts are crafted to comply fully with Australian labour laws and reference relevant industry awards, ensuring fair and lawful employment terms across all levels of the organization.
- **Comprehensive Induction and Onboarding Program:** Every employee participates in an extensive onboarding process that introduces them to our Modern Slavery Policy, as well as other key policies, including our Code of Conduct, Anti-Discrimination and Anti-Harassment

policies. This program ensures that all employees are aware of their rights and understand their responsibilities toward respecting the rights of others in the workplace.

- **Whistleblower Protection:** Jaybro Group's Whistleblower Policy, which is communicated to staff during induction and accessible on our website, provides a secure and anonymous avenue for employees to report any concerns or unethical practices, reinforcing a culture of transparency and accountability.
- **Open Communication and Supportive Work Environment:** We actively promote open communication, ensuring that all employees have direct access to management for raising any concerns, grievances, or other issues. Our commitment to employee health and well-being is supported by flexible working arrangements and wellness programs, which contribute to Jaybro being recognized as a Great Place to Work for the fourth consecutive year.



These measures, combined with a strong organizational culture that values transparency and employee welfare, enable us to maintain a low risk of modern slavery within our operations, while continuously enhancing our practices to support a safe, respectful, and compliant work environment.

Risks within Our Supply Chain

Through extensive research and resources from agencies specialising in modern slavery issues, we have identified key risk factors that increase the likelihood of modern slavery within our supply chain. These criteria are essential in helping us pinpoint areas where the risks are most pronounced, especially when multiple risk factors overlap. This assessment forms the foundation of our Supplier Self-Assessment Questionnaire (SAQ), enabling us to quickly identify high-risk suppliers and improve our monitoring and intervention efforts.

Our approach to managing supply chain risks prioritizes long-term partnerships with suppliers, which fosters stability and stronger alignment with our ethical standards. We structure our supply agreements to allow for justified price adjustments throughout the term, reducing pressure on suppliers and minimizing the risk that cost-cutting practices could contribute to modern slavery. However, we acknowledge that the highest risk often lies within the lower tiers of our supply chain, particularly for complex products with multiple components or materials, where visibility is limited even for our Tier 1 suppliers. To better illustrate our understanding of modern slavery risks, the following table outlines the risk categories, factors, and examples:

Risk Category	Risk Factors	Examples
Sector, Industry, and Category Risks	<ul style="list-style-type: none"> - Poorly regulated industries - Seasonal work - Intensive manual labour - Low-paid work - Base-skilled work - Dangerous work - Remote or isolated work - Long or complex supply chains with low visibility 	Industries/Sectors: Mining and extractives, textiles/garments, electronics, fishing, agriculture, bricks, cotton, rubber Services: Cleaning, Ocean Freight
Geographic/Population Risks	<ul style="list-style-type: none"> - Poor governance - Weak labour laws and enforcement - Conflict zones or war-torn regions - Corruption or bribery - Displaced populations - Large migrant worker population - Minority discrimination - Socio-economic factors such as poverty 	High-Risk Countries: Afghanistan, Bangladesh, Cambodia, India, Pakistan, Nigeria, Myanmar, Vietnam, Yemen, Syria, among others
High-Risk Business Models	<ul style="list-style-type: none"> - Extensive use of third-party labour contractors - Use of labour recruiters with limited transparency - Deceptive recruitment practices (e.g., charging excessive fees) - Low-skilled foreign worker recruitment with limited oversight 	Sectors: Construction, agriculture, manufacturing

Our assessment of key modern slavery risks remains consistent with previous years, with ongoing improvements in areas like contract cleaning services, where we have implemented increased awareness and additional checks. The following are identified as primary risks within our supply chain:

- **Unknown origin of raw materials or intermediate components:** In high-risk categories like IT hardware and textiles, the origin of raw materials and components is often obscured, making it challenging to ensure ethical sourcing practices. Organizations such as the International Labour Organization and the Walk Free Foundation have identified the manufacturing sector as particularly high-risk, with issues including forced labour, debt bondage, child labour, excessive unpaid overtime, and human trafficking. The use of labour-hire for base-skilled workers, especially in high-risk countries, exacerbates these risks in manufacturing.
- **Outsourcing by vendors to high-risk countries:** Some suppliers may outsource manufacturing processes to countries with weaker labour protections and higher modern slavery risks, which complicates transparency and ethical oversight.
- **Manufactured goods from high-risk countries:** Countries such as China, India, and parts of Southeast Asia are frequently associated with elevated modern slavery risks, especially for complex products where visibility into lower-tier suppliers is limited.
- **High-risk services:** Certain services, like shipping, are recognized as high-risk due to potential modern slavery conditions for workers on cargo vessels, where labour practices may go unmonitored and unregulated.

By identifying and addressing these specific risks, we are committed to strengthening our approach to supply chain management, promoting transparency, and upholding ethical practices across all levels of our operations.

Jaybro Group uses this framework to continually assess and refine our approach to supply chain management, ensuring we remain vigilant in addressing potential modern slavery risks. By maintaining robust supplier relationships, regularly updating our risk assessments, and promoting transparency across our supply chain, we work towards reducing modern slavery risks and fostering ethical practices within our business ecosystem.

Actions Taken to Address Modern Slavery Risks

At Jaybro Group, we follow a unified approach to addressing modern slavery risks, implementing consistent policies and processes across all levels of our operations. Below is a consolidated overview of the actions we have taken to combat modern slavery throughout our organization.

Governance

Responsibility for human rights matters, including modern slavery, is embedded within our overall governance framework. Each level of management has a responsibility to consider modern slavery risks within their areas, guided by our Modern Slavery Management Plan.

Our Board maintains oversight of modern slavery risk management and approves all company policies, including our Modern Slavery Policy. Modern slavery remains a key focus of our Sustainability Framework (ESG -Environmental, Social, and Governance) with quarterly report presented to the Board. Additionally, our Group Operational Excellence Manager is responsible for monitoring and coordinating our response to modern slavery risks, ensuring we meet our reporting obligations under the *Modern Slavery Act 2018*. Each year, we review our strategies to identify, assess, and address modern slavery risks, continuously improving and refining our approach.

Supplier Due Diligence

Suppliers are fundamental to our business, and we dedicate considerable resources to selecting partners who align with our values, expectations, and performance standards. As part of our supplier due diligence, new suppliers undergo a suitability assessment based on factors such as geographic location, business size, reputation, supply capability, financial stability, cost, and alignment with our ethical standards.

During the current reporting period, we required new suppliers to complete a modern slavery Self-Assessment Questionnaire (SAQ). This questionnaire helps us identify high-risk suppliers and includes an acknowledgment of compliance with our Modern Slavery Policy and Ethical Sourcing Policy, which incorporate our Supplier Code of Conduct.

Based on the initial screening, our procurement team determines the level of assessment needed to validate a supplier's adherence to our standards, which may include reviewing financial records, HSEQ (Health, Safety, Environment & Quality) performance, insurance, licensing, and ethical conduct. Where necessary, we conduct supplier site audits, either by our employees or third-party representatives.

We have transitioned to using the iPro platform to help manage our modern slavery risks. This platform enhances our SAQ (Supplier Self-Assessment Questionnaire) process, enabling automatic risk ratings based on factors such as location, industry, and a combined risk score. We anticipate full implementation in the next reporting period, allowing us to develop tailored action plans based on survey responses and focus our efforts on addressing the highest risks in our supply chain.

Procurement Management

Our Procurement team manages suppliers in key spending categories and takes a risk-based approach to assessing and monitoring all suppliers. Supply arrangements vary depending on the nature of the goods or services provided, ranging from formal procurement agreements for long- and short-term contracts to more flexible arrangements, such as purchase order terms and conditions.

Looking ahead, our new management platform will support our annual supplier review program, allowing us to standardize and track year-over-year assessments of supplier risks and improvements. All suppliers, regardless of the type of arrangement, will be required to comply with our Modern Slavery

Policy and Ethical Sourcing Policy, which establish minimum expectations for supplier conduct, with modern slavery as a primary consideration.

This year, we engaged with suppliers in higher-risk areas, including PPE, to understand their awareness of modern slavery. Responses varied, with some suppliers unfamiliar with their own sourcing origins and others citing confidentiality concerns. While we did not identify any severe issues, we continue to work with these suppliers to enhance their understanding and awareness of modern slavery risks.

Policies and Standards







Respect for human rights aligns strongly with our core values, and we regularly review our policies to ensure they reflect our commitment to ethical practices. We expect that any business partners with whom we work share these same values. We also monitor any reports made through our Whistleblower Policy, which is publicly available on our website. This policy provides a confidential and safe way for individuals to report modern slavery concerns without fear of repercussions. Suppliers of goods and services are eligible to report concerns, and we encourage transparency and accountability throughout our supply chain. No reports related to modern slavery were received during this reporting period.








Through these governance structures, supplier due diligence practices, procurement management strategies, and policy frameworks, we demonstrate our commitment to mitigating modern slavery risks and fostering ethical business practices across all areas of our operations and supply chains.








Summary of Activities and Plans

The table below provides a summary of actions and activities undertaken during the current reporting period, along with our plans. Completed activities from the previous year's statement have been excluded.

		Ongoing	In progress	Completed	Future planned activities
Governance	Develop and implement Ethical Sourcing Policy.				
	Incorporate modern slavery risks into an internal audit program.				
	Monthly reports to Board.				
	Development of risk mitigation strategies to minimize risk to the overall business based on susceptibility to risk factors.				

		Ongoing	In progress	Completed	Future planned activities
Risk Identification and Due Diligence	Raise awareness on issues surrounding modern slavery and its risk factors to all levels of the business.				
	Identify Tier 2 and below suppliers based on risks assessed.				
	Provide further training on specific employee roles and responsibilities with respect to modern slavery policy and associated processes.				
	Expand due diligence for new suppliers to determine risk level and control measures.				
	Implement acknowledgement process for Ethical Sourcing Policy (encompassing Supplier Code of Conduct) for all suppliers.				
	Minimum standards for ethical sourcing issued to new and existing suppliers as part of				

		Ongoing	In progress	Completed	Future planned activities
	compliance program.				
	Issue modern slavery survey to all tier one suppliers to assist prioritisation of risks.				
	Follow up survey with Tier 1 suppliers.				
	Develop supplier awareness module targeting overseas suppliers				
	Expand existing supplier site audit program to cover risk factors and red flags for modern slavery.				
Risk Management and Reporting	Develop and implement a reporting system for identified cases and/or extreme risk factors or concerns in the supply chain.				
	Ensure awareness, accessibility, and assurance of confidentiality for reporting mechanism is communicated to suppliers.				
	Develop risk analysis				

		Ongoing	In progress	Completed	Future planned activities
	procedure for reported incidences.				
	Procure management system platform and automate SAQ scoring to better manage supplier risk assessments				
Remediation	Collaborate with suppliers to remediate any reported incidences				
	Develop remediation procedures for reported incidents.				
Review of Effectiveness	Develop and implement procedures to review effectiveness of risk management activities.				
	Annual review of effectiveness of actions with respect to risk minimization.				
	Develop measurable outcomes or KPI targets to aid review activities.				
Improvements	Examine other entities' approaches to aid continuous				

		Ongoing	In progress	Completed	Future planned activities
	improvement activities.				
	Collaborate with suppliers to help identify where the greatest impacts can be made.				»»»
	Expand Modern Slavery awareness training to induction/onboarding module.			<input checked="" type="checkbox"/>	

Remediation

Our approach in instances where we find that our business has caused or contributed to modern slavery is guided by the United Nations Guiding Principles on Business and Human Rights. These principles emphasize that businesses should address and remediate impacts by taking a person-centred approach, prioritizing the safety, privacy, and well-being of affected individuals. Given that each case of modern slavery is unique and may require different remedial actions, we commit to conducting a thorough investigation and developing tailored actions on a case-by-case basis to ensure appropriate responses, effective implementation, and preventive measures to avoid recurrence.

As part of our remediation procedures, we have established a list of referral contacts to seek expert advice and provide victims with support resources. For locally identified cases:

- To report a crime or suspicion of modern slavery, contact the Australian Federal Police (AFP) at <https://www.afp.gov.au/contact-us> or by calling 131 444. The AFP will assess whether criminal conduct has occurred and, if necessary, refer victims to a government support program for assistance.

These resources are in place to ensure that any instances of modern slavery are addressed swiftly and that victims have access to the support and guidance they need. To report a crime or suspicion of modern slavery contact the Australian Federal Police (AFP) at

<https://www.afp.gov.au/contact-us> or 131 444 who will determine whether criminal conduct has occurred and refer any victims to a government support program

For advice and additional resources:

(UTS) Anti-Slavery Australia +61 2 9514 9660

(UTS) Anti-Slavery Legal Practice +61 2 9514 8115

Domus 8.7: +61 (2) 9307 8464 or antislavery@sydneycatholic.org

Translating and Interpreting Service 131 450

Red Cross Support for Trafficked People Program 03 9345 1800

Assessing the Effectiveness of Actions

During the reporting period, we formalized processes to evaluate the effectiveness of our actions in addressing modern slavery risks, with these processes currently in implementation. Key measures include conducting audits, establishing KPIs, and reviewing any reported cases. An informal compliance review highlighted the challenges in classifying and managing a high volume of supplier questionnaires effectively with our previous systems. To address this, we transitioned to the iPro platform, which enhances our assessment and monitoring of modern slavery risks among both new and existing suppliers. In response, we are revising KPIs to align with the capabilities of this new platform and are developing supplier awareness training modules to enable more precise tracking of effectiveness.

Challenges identified in the first two reporting periods have provided valuable insights that will shape our ongoing strategy to improve the impact of our actions. Key challenges include:

- **Variable Influence Across Suppliers:** We do not have equal leverage over all suppliers, and smaller suppliers often lack influence within their own supply chains, making it more challenging to enforce standards.
- **Questionnaire Accuracy:** Some suppliers may not answer questionnaires fully or truthfully, potentially omitting information to avoid raising red flags.
- **Concerns About Business Impact:** Some suppliers are apprehensive that their responses could negatively impact their business relationship with us, affecting transparency.
- **Confidentiality of Supplier Sources:** Some suppliers express concerns about confidentiality when disclosing their sourcing details, limiting our visibility into certain areas of the supply chain.

We recognize that assessing the effectiveness of our actions will continue to evolve, particularly as we integrate human rights considerations more deeply into our day-to-day operations. By refining our tools, training, and engagement processes, we aim to build a more robust and transparent system that ensures our actions are impactful and aligned with our commitment to combat modern slavery.

Future Commitments and Continuous Improvement

Jaybro Group is committed to enhancing our approach to addressing modern slavery risks within our operations and supply chains. As part of our ongoing commitment to continuous improvement, we are dedicated to refining our processes, expanding our capabilities, and deepening our understanding of emerging risks.

Future Initiatives

- **Enhanced Supplier Engagement:** Building on our current supplier due diligence processes, we plan to expand our supplier engagement efforts. This includes developing targeted training sessions for high-risk suppliers to improve awareness and understanding of modern slavery risks and encourage transparency throughout the supply chain.
- **Advanced Risk Assessment Tools:** With the full implementation of the iPro platform, we aim to leverage more sophisticated risk assessment capabilities, including automated risk ratings based on location, industry, and supplier profile. This will allow us to focus on high-priority areas and develop tailored action plans to address identified risks more effectively.
- **Annual Supplier Review Program:** We are introducing an annual review program to assess and monitor all suppliers based on updated KPIs, questionnaire responses, and any observed changes in risk profiles. This program will support our ability to identify trends and areas for improvement and ensure compliance with our Modern Slavery and Ethical Sourcing Policies.
- **Improved Monitoring and Reporting:** We are committed to refining our monitoring and reporting processes to measure the effectiveness of our actions. This will include setting measurable KPIs for modern slavery risk reduction, conducting regular internal reviews, and integrating insights from these reviews into our broader risk management strategy.

Continuous Improvement Goals

- **Policy and Framework Enhancement:** We will continue to review and enhance our Modern Slavery Policy, Supplier Code of Conduct, and other related policies to ensure they reflect evolving standards and best practices. This includes incorporating feedback from audits, employee feedback, and industry developments.
- **Strengthening Internal Awareness:** As part of our strategy to embed human rights considerations throughout our operations, we are committed to strengthening internal awareness of modern slavery issues. This will include ongoing training and awareness programs for all employees, ensuring that modern slavery considerations become an integral part of day-to-day decision-making.
- **Regular External Engagement:** We recognize the value of collaborating with external stakeholders, including NGOs, government bodies, and industry experts. By maintaining regular engagement with these groups, we aim to stay informed of best practices and integrate their guidance into our modern slavery strategy.

These future commitments and improvement initiatives reflect Jaybro Group's dedication to creating a safe, ethical, and transparent supply chain. We understand that addressing modern slavery requires a dynamic approach, and we are committed to advancing our practices to protect human rights and uphold the integrity of our business.

Consultation with Controlled Entities

As part of our commitment to addressing modern slavery risks across the entire Jaybro Group, we maintain a collaborative approach with all controlled entities. Our controlled entities—comprising Global Synthetics Pty Ltd, Jaybro NZ Ltd, Cadia Group Pty Ltd, Delnorth Group Pty Ltd, Link Plus Pty Ltd, Safe Direction Pty Ltd, Specialised Force Pty Ltd, and Plastics Solutions Australia Pty Ltd—are fully integrated into our governance and compliance frameworks, ensuring alignment on modern slavery policies and risk management practices.

During the reporting period, we conducted consultations with each controlled entity to ensure a consistent approach to modern slavery risk assessment and mitigation. These consultations involved:

- **Policy Alignment:** Reviewing and aligning our Modern Slavery Policy and other related policies to ensure each entity upholds the same standards in ethical sourcing, supplier management, and risk mitigation.
- **Shared Training and Resources:** Providing access to shared training modules, tools, and resources, including our iPro platform, which supports modern slavery risk assessment and management. This platform enables entities to monitor their supply chains effectively and identify areas for action.
- **Risk Assessment and Reporting:** Engaging with entity leaders to gather insights on specific risks in their operations and supply chains. This collaborative risk assessment process ensures that each entity contributes to the development of a comprehensive risk profile for the Jaybro Group.
- **Regular Communication:** Facilitating regular communication channels between our central compliance team and controlled entities, allowing for the exchange of information, updates on emerging risks, and any new regulatory developments.

These efforts foster a unified response to modern slavery risks and help to ensure that each entity within the Jaybro Group is equipped with the knowledge and tools needed to address these risks effectively. By embedding consistent practices across all entities, we strengthen our overall impact, uphold our ethical standards, and ensure a coordinated response to modern slavery risks within the broader organization.

Approval and Sign-Off

This Modern Slavery Statement for the financial year ending June 30, 2024, has been reviewed and approved by the Jaybro Group Board of Directors. The Board is committed to upholding the standards outlined in this statement and ensuring that Jaybro Group's actions align with our ethical values and obligations under the *Modern Slavery Act 2018*.

The responsibility for implementing, monitoring, and continuously improving our approach to managing modern slavery risks rests with our Chief Operating Officer and leadership team, with oversight from the Board. This statement reflects our ongoing commitment to transparency, accountability, and the ethical treatment of all individuals across our supply chains and operations.

The undersigned confirms that this statement has been approved by Jaybro Group's Board of Directors.

A handwritten signature in black ink, appearing to read 'Adrian Palumbo', with a stylized flourish at the end.

Adrian Palumbo

CEO, Jaybro Group Pty Ltd

Date: 22 November 2024