A photograph of a modern brick building with a courtyard. The building features a mix of brick colors, including light tan and dark grey. Large windows with black frames are visible, some showing interior spaces like a dining room with a table and chairs. A courtyard with a brick-paved floor and a green wall is also visible. The sky is clear and blue.

Modern Slavery and Human Trafficking Statement 2024

BRICKWORKS

Modern Slavery and Human Trafficking Statement 2024

This statement covers the activities of Brickworks Limited ABN 17 000 028 526, and its controlled entities, to understand and implement actions to minimise the risk of modern slavery and human trafficking in its operations and supply chain. This statement will reside on our Company's website.

This is a joint statement on behalf of the following reporting entities within the Brickworks Group. The entities covered in the statement use the same policies and processes, operate in the same sector and have many shared suppliers. These entities are the Austral Brick Company Pty Ltd, Nubrik Pty Ltd, Brickworks Supply LLC and Glen-Gery Corporation. Brickworks Limited as the head entity of the Brickworks Group is a controlling entity of the other reporting entities, which are 100% subsidiaries and so makes this a joint statement. The directors of the other reporting entities were engaged as part of this process and approved this statement.

The actions described in this statement cover the period 1 August 2023 to 31 July 2024 and cover Brickworks and its wholly owned operations in Australia and the United States.

Our Commitment

Brickworks opposes all forms of slavery and forced labour. We are committed to respecting and supporting the dignity, well-being and human rights of our employees and those we engage with through our supply network. We are also committed to working collaboratively with our partners and suppliers to ensure that our business is conducted in an honest and ethical manner. This includes identifying and addressing human rights risks, including modern slavery, throughout our business and supply chain.

The construction, manufacturing, forestry, mining, quarrying, cleaning and security sectors are especially at risk from modern slavery practices – and these are the sectors that Brickworks both serves and sources from.

This is our fifth Modern Slavery Statement (“statement”). While this statement is in response to the Federal *Modern Slavery Act 2018*, it is driven by, and reflective of, our commitment to act on any incidences of modern slavery in our supply chain. The statement aligns with and complements our aim of improving Brickworks’ sustainability disclosures. It is part of our overall Sustainability Framework which links our sustainability commitments with our business strategy.

Who we are

Who we are

Brickworks Limited is an ASX200 publicly listed company (ASX:BKW), with a long and successful history, dating back to 1934. Brickworks comprises Australian-owned companies involved in the manufacture and distribution of building products, property development, and investments. We are one of the nation's leading providers of bricks, sleeper retaining walls, pavers and roofing tiles.

Employing 954 employees across its Australian operations (permanent and part time employees, excluding casuals) and 898 employees in North America, Brickworks has a diversified corporate structure with four divisions:

1. **Building Products Australia**
2. **Building Products North America**
3. **Property**
4. **Investments**

This report covers the key operating divisions of Building Products Australia and Building Products North America.

Building Products

Brickworks has a vast network of sites and display centres in Australia and North America. As of 31 July 2024, Brickworks was operating from 27 manufacturing sites and 40 quarries, comprising:

- 7 Brick plants (Australia)
- 8 Brick plants (North America)
- 2 Roof tile plants (Australia)
- 1 Timber batten plant (Australia)
- 8 Masonry plants (Australia)
- 1 Cement terminal (JV) (Australia)
- 23 Quarries (Australia)
- 17 Quarries (North America)

In addition, the Building Products Group has an extensive network of Design Studios, Displays and Masonry Supply Centres across major capital cities in Australia and North America, complemented by an extensive reseller network.

For FY24, Brickworks' total revenue was \$1,089 million (AUD). This included Building Products Australia revenue of \$646 million, across three major divisions – Austral Bricks, Bristle Roofing and Concrete Products and revenue of \$442 million (AUD) for Building Products North America.

Property Division

Brickworks' Property division was established to maximise the value of land that is surplus to the Building Products business. Operational land that becomes surplus to the business needs is transferred to the Property division where it is assessed for optimum land use.

Investment

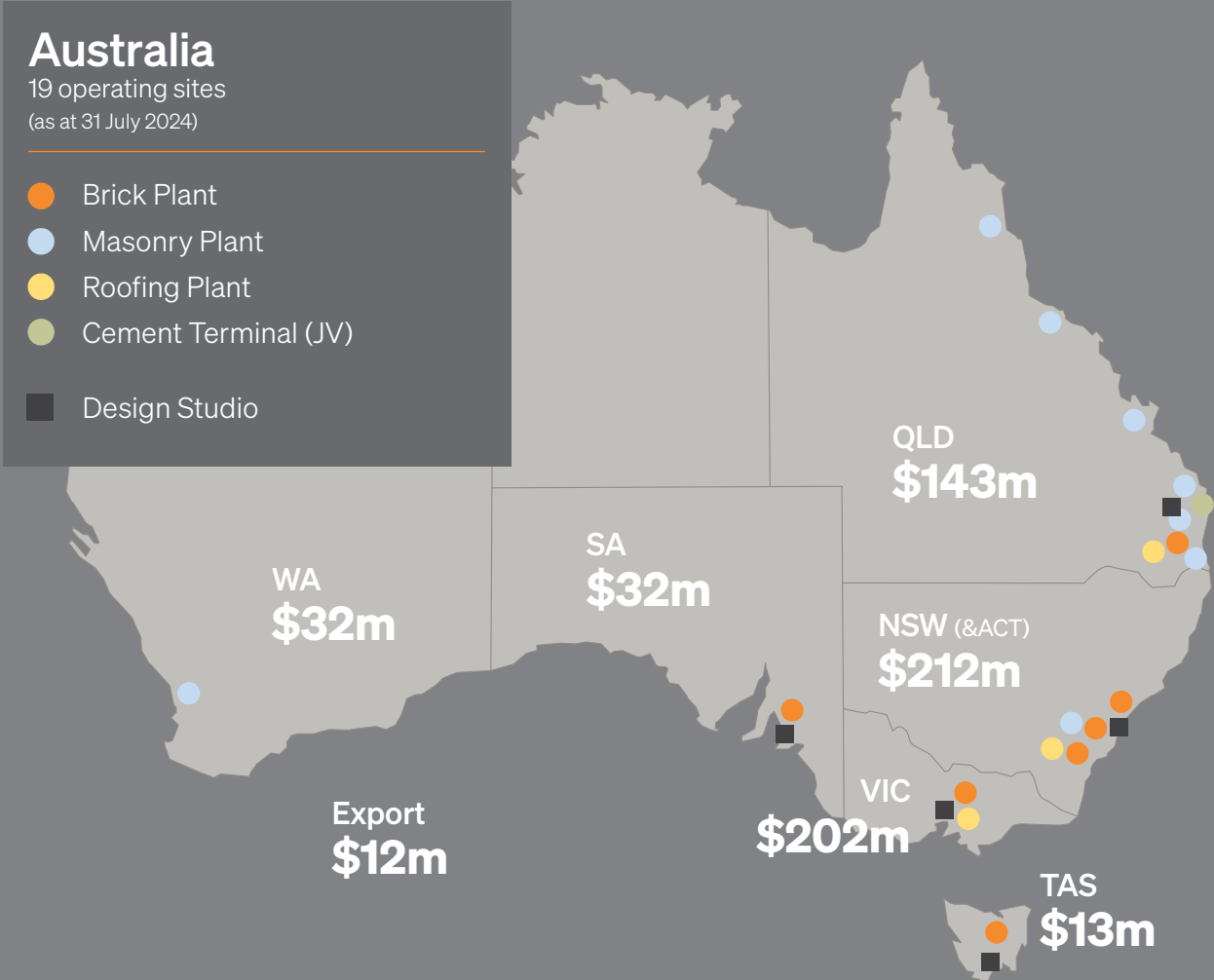
Brickworks' investments division is largely represented by a 26.1% interest in multi-industry investment house, **Washington H Soul Pattinson Limited**. Brickworks is also a party to a joint venture in Southern Cross Cement, involved in the import of raw materials to produce cement.

Brickworks

at a glance

EARNINGS BEFORE INTEREST AND TAXES BY DIVISION	Investments: \$137m	Building Products (Aus): \$41m
	Property: (\$110m)	Building Products (US): \$14m

BUILDING PRODUCTS AUSTRALIA – \$646m revenue (FY24)



NUMBER OF
FACTORIES



27

NUMBER OF
RETAIL OUTLETS



65+

GROUP
REVENUE



A\$1,089m

NUMBER OF
EMPLOYEES



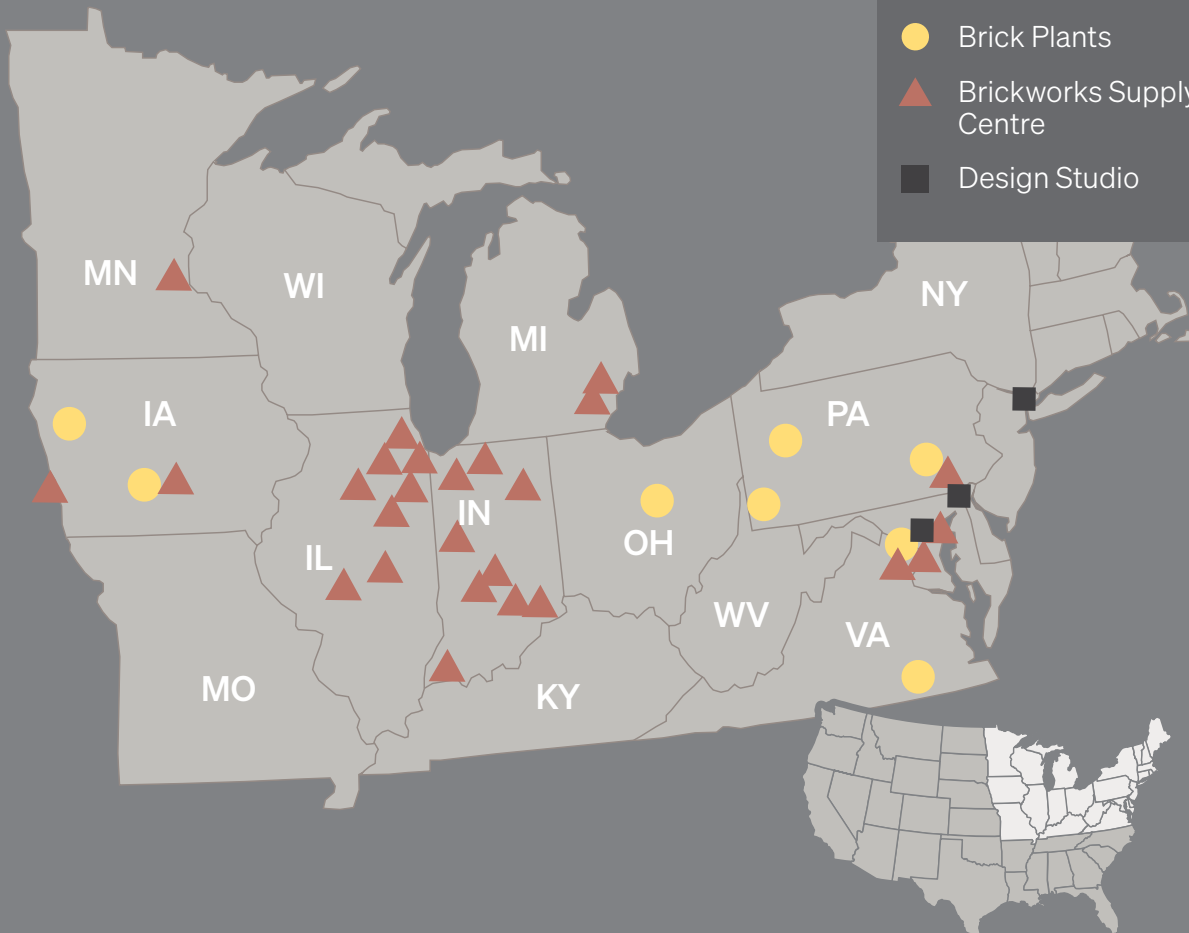
1,852

BUILDING PRODUCTS NORTH AMERICA – A\$442m revenue (FY24)

North America

8 manufacturing sites
(as at 31 July 2024)

- Brick Plants
- ▲ Brickworks Supply Centre
- Design Studio



Our structure

and operations



This statement includes the business activities of the Brickworks owned and controlled entities under the brand names noted below, details of which can be found in the Brickworks 2024 Annual Report.

- ▶ **Austral Bricks** is a large Australian clay brick and paver manufacturer, with manufacturing and sales facilities in every state. www.australbricks.com.au
- ▶ **Bowral Bricks** produce dry-pressed bricks in Australia. www.australbricks.com.au/nsw/products/bricks/bowral-bricks
- ▶ **Daniel Robertson** is an Australian producer of clay bricks. www.danielrobertson.com.au
- ▶ **Nubrik** produce premium-quality bricks in Australia. www.nubrik.com.au
- ▶ **Glen-Gery** is one of the U.S.'s largest brick manufacturers and has a network of over 500 distributors in the United States and Canada. www.glengery.com
- ▶ **Austral Masonry** is an Australian producer of concrete masonry, pavers and retaining wall systems. www.australmasonry.com.au
- ▶ **GB Masonry** is an Australian company specialising in sandstone style concrete. www.gbasonry.com.au
- ▶ **UrbanStone** are Australian manufacturers of engineered stone, natural stone and porcelain stoneware. www.urbanstone.com.au
- ▶ **Bristile Roofing** is one of Australia's largest suppliers and installers of concrete and ceramic roof tiles. www.bristilerroofing.com.au

Backed by Brickworks

Local expertise. Global quality. Brickworks Building Products are one of Australia’s biggest building material producers. With heritage going all the way back to one of Australia’s founding brick producers, we’re proud of our reputation for design, innovation and sustainability.

BRICKWORKS

AUSTRALIA



NORTH AMERICA



INTERNATIONAL BRANDS

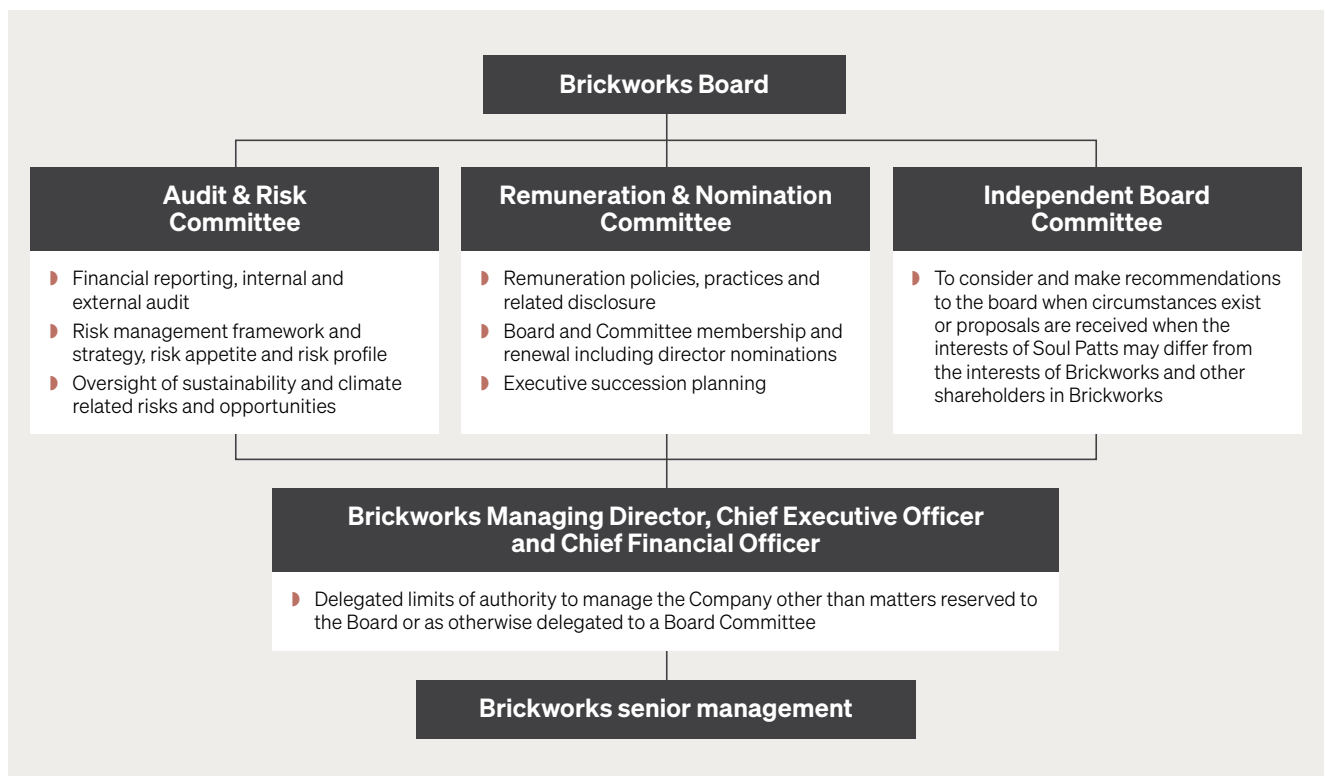


Our approach

and progress

a) Our policies and governance

Brickworks' governance framework, shown below, ensures strong business ethics and behaviour.



Brickworks' business behaviour is guided by our values as articulated in our business [Code of Conduct](#), *We Are Brickworks*. This code articulates how we conduct our business, including acting in an ethical and lawful manner. The code applies to everyone who works for, or in conjunction with, Brickworks including directors, employees and contractors. It also refers to our seven key values: care, innovate, collaborate, integrity, lead, inclusive and exceed. This Code of Conduct was updated in July 2024 to ensure its currency.

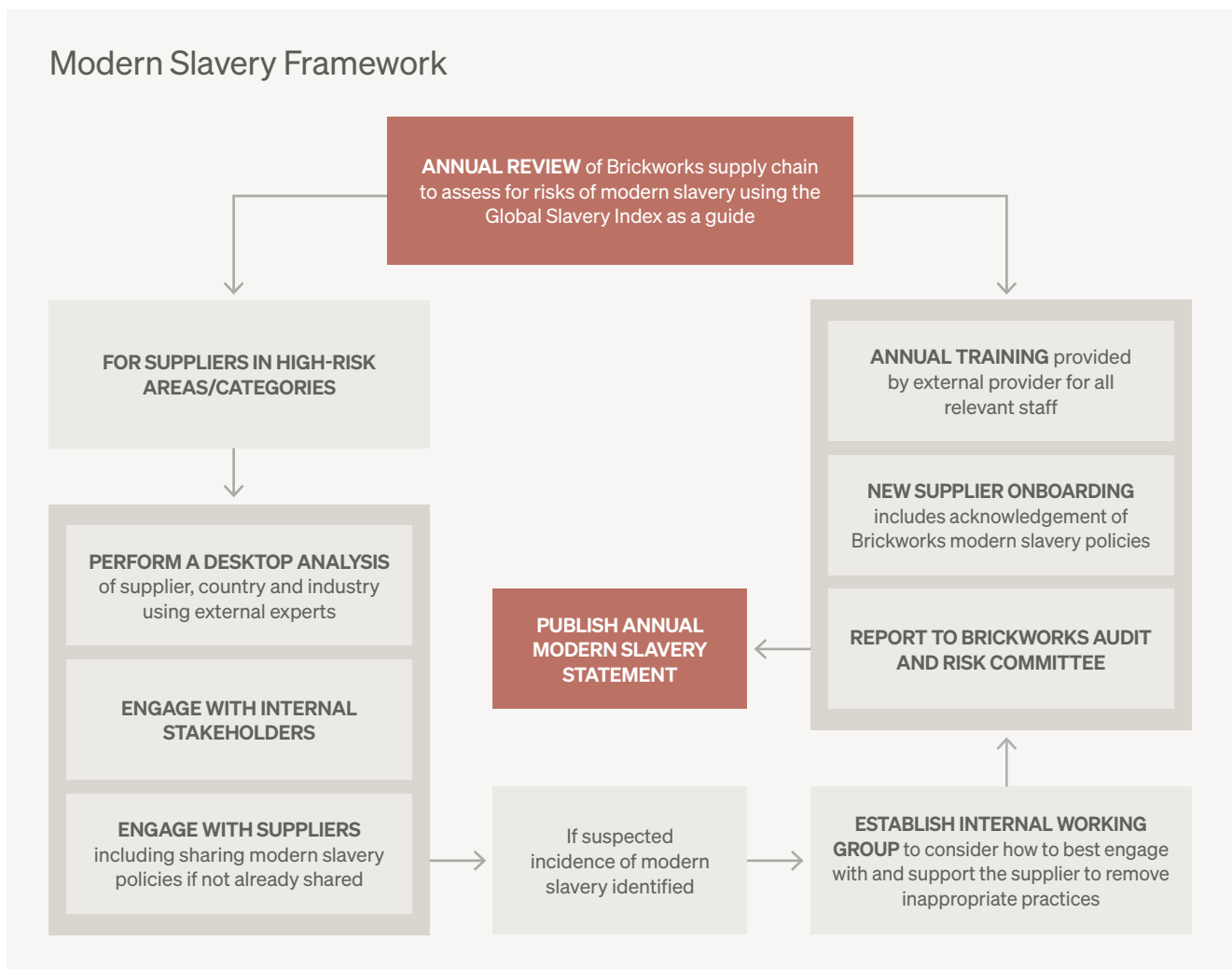
In terms of our overall procurement practices, Brickworks' governance procedures ensure adequate procurement pricing, prompt payment of suppliers and good procurement planning. These procedures are backed by relevant Brickworks procurement policies and authorisation limits, as well as an annual internal audit program.

In relation to human rights and modern slavery, Brickworks' [Modern Slavery Policy](#) outlines our commitment to respect and encourage human rights and not tolerate the existence of modern slavery in our operations or supply chain. This policy is further articulated in Brickworks' [Modern Slavery Supplier Code of Conduct](#), which sets out the minimum expected standards of behaviour and legal obligations that we require our suppliers to meet around labour and human rights, health and safety and modern slavery.

Brickworks has policies covering [anti-bribery, corruption](#) and [whistle-blower](#) practices. All our employees are required to undertake annual on-line training to demonstrate their understanding of these policies. Our [Whistle-blower Policy](#) encourages the raising of misconduct or any behaviour that is inconsistent with the Group's culture, values or policies. This policy was updated in the reporting period to ensure its currency.

Be Honest @ Brickworks is an anonymous avenue for all staff in the USA and Australia to raise concerns of suspected or actual misconduct, including any concerns around procurement practices or outcomes. The *Be Honest @ Brickworks* reporting platform is easily accessible from our intranet page and other avenues.

The above policies and procedures are backed up by a genuine commitment to address modern slavery, which is driven from the top with strong backing from our Board. The Board's Audit and Risk Committee is responsible for oversight of this on behalf of our Board and receives regular reports on our modern slavery processes and outcomes. As a result, a greater focus was placed on our domestic suppliers in FY24. Our Modern Slavery framework is shown below. Our General Manager of Risk oversees the Modern Slavery framework and engages outside expertise when and where needed, including the use of Deloitte to undertake reviews of suppliers located in high-risk geographies and to assist in supplier engagement.



b) Identifying and understanding our risks

Brickworks operations in Australia and the USA source most materials and services from within Australia and the US, respectively, with raw materials typically provided from owned quarries. Over 97% of Brickworks' Australian operations Tier 1 suppliers are located in Australia and New Zealand, with the remaining 3% spanning across countries throughout Asia, Europe and North America.

Several of these countries (China, Indonesia, Egypt and India) are considered high risk geographies following the assessment of numerous human rights indicators. The assessment was based on a range of human rights, labour standards and related criteria as detailed in the Responsible Sourcing Tool (<https://www.responsiblesourcingtool.org/identify/>). Collectively, those countries in high-risk or medium-risk bands comprise less than 1% of all Brickworks' Tier 1 suppliers yet present a potential link to modern slavery.

Sourcing premium roof tiles and bricks from Italy and Spain drives a majority of Brickworks spend with international Tier 1 suppliers. Some finished product is also imported from Belgium, Germany, Egypt and China. Brickworks directly engages with a supplier in Indonesia to process stone. Australian based importers are utilised by Brickworks to import raw materials and additives such as cement, manganese and synthetic stains from Indonesia, Vietnam, South Africa, Germany and France.

From time-to-time capital equipment is imported from overseas countries, such as USA, Germany, France, Spain, Holland, Japan and Italy.

In addition to the supplier's location, the Global Slavery Index also identifies two areas in our supply chain considered to be high-risk; labour and building materials (including bricks). As a major manufacturer and supplier of building products to the construction industry, Brickworks operates in a high-risk sector for modern slavery. The construction sector has significant challenges in detecting, understanding and responding to modern slavery risks due to the length, complexity and geographic spread of its supply chains. Contributing factors also include high demand for low-skilled, manual, low-waged work, which has been identified as likely to facilitate forced labour.

We recognise that our Tier 1 suppliers will have modern slavery risks in their supply chains and that our supply chains are linked to other high-risk industries, such as cleaning, security or clothing and textiles.

Brickworks annually reviews its Tier 1 suppliers by geography, industry and product to help assess and better understand its modern slavery risks.

Brickworks includes modern slavery consideration as part of the set-up for new vendors, each of which must read and acknowledge Brickworks' modern slavery policies and our expectations of suppliers, with regards to human rights.

In FY24, Brickworks engaged expert consultants to assist with desktop assessments of potentially high-risk Tier 1 and Tier 2 suppliers and, together with management, engaged with them to minimise the risk of modern slavery in their own operations and supply chains. These reviews did not identify any known or suspected incidents of modern slavery.

By combining these risk assessments of industry, geography and product, Brickworks prioritises its suppliers by a range of criteria that pinpoints those presenting the greatest risk in our supply chain.

c) Our global due diligence activities in FY24

To support Brickworks' position of zero-tolerance for any type of slavery-related practices, we undertook a range of due diligence activities in the reporting period to identify, understand and respond to specific human rights risks associated with our suppliers, materials, countries, sectors and both our Australian and USA businesses. These activities have enacted our commitment to modern slavery in FY24 and continue to inform the improvement of our modern slavery management framework.

Category	Undertaken in FY24	To be Undertaken in FY25
Governance	<p>Engaged experts in the human rights field to assist with the ongoing development of our modern slavery framework.</p> <p>Our MS policies and procedures were reviewed in response to the McMillan review of the Modern Slavery Act (Cth).</p>	<p>Continue to monitor emerging best practices in Australia and internationally through scanning the environment and seeing what new approaches we can adopt.</p> <p>Strengthen the alignment of our modern slavery risk processes and responses across our brands and controlled entities.</p>
Risk Review	<p>Engaged expert consultants to undertake a review of those suppliers in high-risk areas/industries.</p> <p>Assessed our Tier 1 suppliers based on the Global Slavery Index indicators to identify suppliers in high-risk categories.</p> <p>Continued to identify and assess Tier 2 suppliers in high-risk categories.</p>	<p>Conduct an annual evaluation of our supply chain risk.</p>
Communication and engagement Also see section (e) below	<p>All new vendors have read and acknowledged our Modern Slavery Policy and agreed to our Modern Slavery Supplier Code of Conduct.</p> <p>Further staff engagement through awareness posters and toolbox sessions.</p> <p>Encouraged the raising of misconduct or any behaviour that is inconsistent with the Group's culture, values or policies, via our Whistle-blower program.</p>	<p>Socialise Brickworks' Modern Slavery Supplier Code of Conduct among our suppliers, our controlled entities and our business partners.</p> <p>Strengthen our current engagement processes through audit and conducting direct supplier engagement to socialise our policies and understand suppliers' awareness of modern slavery.</p>
Capacity building Also see section (f) below	<p>581 employees in the Australian business and 132 staff in the USA business completed our online Modern Slavery training module.</p>	<p>Continue the modern slavery training for all our employees through our online platform.</p>

d) Measuring our effectiveness

Brickworks constantly monitors the effectiveness of the tools and processes we use in relation to modern slavery risks within our operations and supply chain. We are pleased to report that to date Brickworks has not identified any actual or suspected cases of modern slavery in its supply chain. However, we continue to monitor and measure the effectiveness of our:

- Supplier communication – engagement with suppliers in high-risk categories to measure suppliers' understanding of Brickworks' overall risk management and the risks of modern slavery.
- Supplier evaluation – annual risk review of our supply chain.
- Employee communication – enhanced and supported through annual online training.
- Whistle-blower program – encouraging the raising of misconduct or any behaviour that is inconsistent with the Group's culture, values or policies.
- Governance tools – our policies and procedures are currently being reviewed in response to the McMillan review of the Modern Slavery Act tabled in parliament.

e) Communicating, engaging and collaborating with our stakeholders on modern slavery

This fifth Modern Slavery Statement is an important document for Brickworks, not just because it is required under the Commonwealth *Modern Slavery Act 2018*. It is important because it communicates a powerful message to our internal and external stakeholders on our position in relation to modern slavery and is a platform for our engagement and collaboration with them.

Throughout the process of responding to the *Modern Slavery Act 2018*, Brickworks has engaged with its owned and controlled entities, as well as those it has a direct business relationship with. In particular Brickworks engages with its USA operations and key cement supplier, Southern Cross Cement throughout the year as part of its Modern Slavery management program. This engagement has been important to confirm that these entities are both aware of, and responsive to, the legislation. Brickworks has used this opportunity to request information and leverage resources to ensure a coherent, supportive and coordinated response across the Group.

f) Building our capacity and that of our suppliers

Brickworks is committed to working collaboratively with our suppliers to ensure that our expectations of them, and the standards they need to meet, are clearly understood and their potential exposure to risk is minimised.

Should our risk assessment processes uncover any cases or instances where suppliers do not meet the *Modern Slavery Supplier Code of Conduct*, or any breaches of the code within Brickworks' supply chain, we will engage directly with the suppliers to understand how they are managing these risks. We will assist with any remediation and develop an action plan to eradicate any risk in a transparent, timely and efficient manner. Should the supplier be uncooperative, appropriate action will be taken by Brickworks, including termination of the business relationship, if necessary. For any identified actual or suspected breach, a working group will be established with responsibility for managing known, or suspected, cases of modern slavery.

What's next

We are aware that expectations for companies such as Brickworks around the management and reporting of Modern Slavery risks and incidents are changing in Australia, particularly as a result of recent reviews such as the Australian Government review led by Professor John McMillan in May 2023. Rather than waiting for these expectations to become legislation, Brickworks is looking to anticipate and embed these changes in its modern slavery risk management approach.

With that in mind, our key focus areas for FY25 are detailed in the table under section (c) above.



Deborah R Page AM
Chair of the Audit & Risk Committee

4 November 2024

The Modern Slavery Statement is approved by the Board's Audit and Risk Committee and the Brickworks Board.