

This 2024 Modern Slavery Statement sets out the actions taken by Barro Group Pty Ltd (ACN 005 105 724) including its controlled entities (Barro Group) to address modern slavery risks in our business operations and supply chains for the financial year ending June 2024.

Barro Group is committed to operating responsibly and adhering to the highest ethical standards, and we seek to have robust processes in place to prevent exploitation of human rights within Barro Group and its supply chains.

Barro Group is proud of our great people and workplace culture. We understand the importance of respecting each other and that improving human rights is fundamental to our business.

1. Purpose of this statement

The purpose of this Statement is to describe how Barro Group complies with the obligations of the Modern Slavery Act 2018 (Cth).

2. Introduction

Australia has modern slavery laws in place designed to ensure that businesses report publicly and responsibly on the risks of modern slavery in their operations and supply chains.

Modern slavery is an umbrella term for a number of serious exploitative work practices that represent violations of human rights.

The Commonwealth *Modern Slavery Act 2018* defines modern slavery as including eight types of serious exploitation:

- Human trafficking
- Slavery
- Servitude
- Forced or servile marriage
- Forced labour
- Debt bondage
- The worst forms of child labour
- Deceptive recruiting for labour or services to exploit victims and undermine or deprive them of their freedom

3. Our business and structure

Barro Group, founded in 1946, is a family-owned group. We are an integrated construction materials, manufacturing and distribution organisation providing continued supplies of quality construction materials, including cement, concrete, aggregates, bulk haulage services, precast concrete, reinforcing steel and other building and garden supplies to the residential, commercial, civil, infrastructure and industrial industries.

Our business operates predominantly in Victoria and Queensland with smaller activities in NSW. We have approximately 550 employees and 200 contractors (mostly cartage contractors) engaged on a regular or semi-regular basis to provide goods and/or services needed to operate our business.

Barro Group Pty Ltd submits this Modern Slavery Statement as a Single Statement on behalf of the Included Entities for the purposes of the Modern Slavery Act 2018:

- Dundowran Blue Metal Quarries Pty Ltd
- Wodonga Quarries Pty Ltd
- Seymour Quarries Pty Ltd
- Railway Sands Pty Ltd
- Yea Sand and Gravel Pty Ltd
- Flintstones Garden Supply Centre Pty Ltd
- Mt Marrow Blue Metal Quarries Pty Ltd
- Bromelton Quarry Pty Ltd
- Bogo Quarry Pty Ltd
- Australian Precast Pty Ltd
- Helix Steel Australasia Pty Ltd
- Presto Transport Pty Ltd
- Cartage Australia Pty Ltd
- Vue Australia Pty Ltd
- East Coast Cement Pty Ltd
- Probar Australia Pty Ltd
- Barro Administration Victoria Pty Ltd
- Barro Administration Queensland Pty Ltd

Throughout this document a reference to Barro Group also refers to the controlled entities.

Barro Group operates under the same policies and procedures including human resources, procurement and risk management. The strong risk management framework provides controls and guidance to our management and suppliers. They also contract with the same suppliers for goods and services.

Barro Group Pty Ltd's registered office is 191 Drummond Street Carlton Vic 3053.

4. Operations

Barro Group is an integrated construction materials, manufacturing and distribution organisation for construction materials including: cement, concrete, aggregates, bulk haulage services, precast concrete, reinforcing steel and other building supplies to the residential, commercial, civil and industrial industries.

Our core business is the supply of premixed concrete, quarry products and other construction materials to government and the private sector for infrastructure, residential, commercial, civil and industrial applications.

The operations group is responsible for sourcing:

- Employees
- Contractors who support our operational requirements such as information technology and plant maintenance
- Contracts with transport companies
- Fixed and mobile earthmoving plant, heavy transport vehicles and other motor vehicles
- Consumables such as spare parts and fuels
- Local source raw materials
- Other supplies include electronic security, labour hire, steel, builders' supplies, stationery, telephones, computers, uniforms, cleaners, personal protective equipment, lawyers, consultants and day-to-day goods/services

5. Supply Chains

Barro Group's operations are vertically integrated and our supply chain consists largely of critical raw materials required to manufacture products, and services and goods required for us to conduct our business.

In assessing the risk of Modern Slavery in our operations, Barro Group has identified the following:

Raw material supplies - the most significant and highest value spend relates to the purchase of raw materials such as cementitious products and aggregates for the manufacture of concrete; almost all raw materials are sourced locally from reputable Australian manufacturers. Where any raw material is imported it is sourced through a reputable Australian company and is considered low risk.

Workforce – Barro Group has robust human resource, recruitment, selection and appointment policies, including right to work in Australia. Any engagement of casual labour is through regulated and accredited labour hire providers only.

Transport – cartage services are an important part of Barro Group's supply chain; these services are provided by transport companies (all Australian owned) and audits are regularly conducted on these transport providers to ensure compliance standards are met.

Supply contracts or service engagements - these are entered into under Barro Group's standard terms and conditions of purchase. Prequalification, evaluation, assessment and approval processes are undertaken prior to the engagement of contractors to ensure compliance with our terms and conditions of engagement which include compliance with the Modern Slavery Act.

Suppliers based outside Australia – supplies from Malaysia, Italy, Brazil and Vietnam have been long term and have been assessed, including some site visits to the facilities of those providers, and risk of modern slavery is considered to be low. We have secured supplies from China (through reputable third-party Australian company who has provided audit declarations that these facilities are compliant with modern slavery protocols and are considered low risk.

6. Risk of Modern Slavery practices in our operations and supply chains

Barro Group has considered the extent to which we may contribute to, cause or be linked with Modern Slavery Risk in our operations and supply chain.

We continue to assess the risk of modern slavery in our operations as being low risk as almost all our suppliers operate in Australia and are required to comply with the Modern Slavery Act within their own supply chains.

Due to the highly regulated labour laws in Australia and our strong employment procedures, we consider there is no risk in our directly employed workforce.

Any labour hire is through regulated and accredited labour hire providers only and the risk is considered to be low.

Engagement of contractors requires prequalification assessment and comprehensive pre-screening, including the right to work in Australia and compulsory commitment and compliance with the Modern Slavery Act and to our business and supply chain ethics, and the risk is considered to be low. Most of our contractors are long-term engagements.

7. Actions taken by Barro Group to address Modern Slavery Risks

We strive to engage suppliers with a good reputation, high ethical standards and reliable business practices.

Supply contracts or service engagements are entered into under Barro Group's stringent ethical terms and conditions following prequalification, evaluation, assessment and approval processes prior to engagement.

During March 2024 all suppliers and contractors have been provided with our revised Code of Conduct for Suppliers/Code of Conduct for Contractors (as applicable) which included Barro Group's expectations regarding labour and employment practices and modern slavery. Additionally, the Code of Conduct for Employees was reviewed and training provided.

We continue to assess the risk for potential high-risk suppliers particularly by geographical location where there could be a risk to unskilled workers being exploited by lax safety and labour laws or unfavourable human rights records.

Barro Group has clear unambiguous policies including those that support the abolition of Modern Slavery, prevent workplace bullying, harassment and discrimination, and workplace grievance. These policies are provided to the workforce and regular contractors at engagement and annually through on-line training.

All employees with purchasing responsibilities are required to annually undertake specific Modern Slavery training and assessment questionnaires to ensure understanding of the requirements. All other employees are provided with general awareness of modern slavery through on-line induction



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and training which includes training on how to report any potential breaches of our policies without recrimination.

We encourage reporting of misconduct within our business and the supply chain without recrimination.

Our expectations are communicated to our suppliers and a Modern Slavery supplier questionnaire was undertaken during 2023. We propose to undertake a further supplier survey during the first half of 2025.

8. Assessing the effectiveness of actions taken by Barro Group

Barro Group will continue to identify through a diverse team reporting to senior management potential risks and review actions undertaken to ensure they are appropriate and effective.

We continue to identify risks and review our actions to ensure they are current and effective – in particular reviews of procurement processes including contracts for products/services to ensure inclusion of modern slavery clauses for commitment and compliance and training of our workforce.

9. Consultation

In the development of this statement, Barro Group has consulted with a cross section of personnel within each of the entities it owns and/or controls to ensure all aspects of the business operations validate ongoing commitment to eradicating Modern Slavery.

10. Policies and Governance

Barro Group has a strong framework of policies, standards and procedures that provide controls and guidance to our management, workforce and suppliers. These are communicated regularly including at initial induction and annual re-induction, and through contracts, purchase orders, supplier assessments. Our suppliers are required to comply with our policies.

Barro Group Pty Ltd and its reporting entities operate under the same policies and procedures and the same consistent approach applies to Modern Slavery.

Breaches of our policies are considered serious and there are formal processes in place for policy breaches. For employees these may include re-training, formal warnings or employment termination, and for suppliers, termination of supply arrangements.

This Statement was approved by the Directors of Barro Group Pty Ltd (the principal governing body) on 17 April 2025

Raymond Barro
Managing Director
17 April 2025

