



BIG RIVER

Modern Slavery Statement

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(Company)

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1 Introduction

This Modern Slavery Statement has been prepared by Big River Industries Ltd ACN 609 901 377 and its subsidiary reporting entity Big River Group Pty Limited ACN 000 009 754 in accordance with the *Modern Slavery Act 2018* (Cth) for the reporting period commencing on 1 July 2023 and ending on 30 June 2024 (**Reporting Period**).

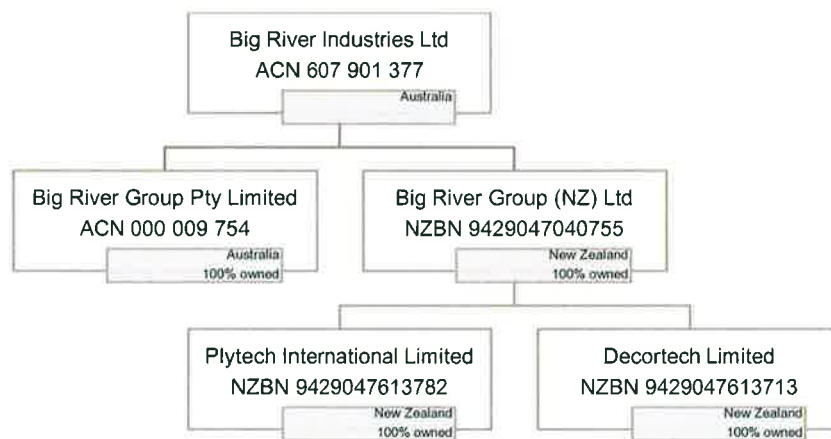
It sets out the steps taken by Big River Industries Ltd and its controlled entities, including the reporting entities referred to above, (together, **Big River**) during the Reporting Period to assess and address modern slavery risks in its operations and supply chain.

This is the fourth Modern Slavery Statement prepared by Big River.

Big River is opposed to slavery in all its forms and acknowledges its role in upholding human rights through ethical and sustainable business practices across its supply chain.

2 Big River's structure

Big River's corporate structure is set out below:



Big River Industries Ltd and Big River Group Pty Limited both are incorporated and operate in Australia. Big River Industries Ltd also has three subsidiaries which are incorporated and operate in New Zealand, as shown above. No changes were made to Big River's corporate structure during the Reporting Period.

Big River Industries Ltd is an Australian public company listed on the official list of ASX and acts as the holding entity of the corporate group. Big River Group Pty Limited is an Australian proprietary company and is a distributor of building products and a manufacturer of plywood and formwork products. Big River Group (NZ) Ltd, Plytech International Limited, and Decortech Limited are each New Zealand companies and are distributors of specialist plywood construction products and architectural panels.

3 Big River's operations and supply chains

3.1 Operations

Big River operates in Australia and New Zealand and is a diverse manufacturer and major distributor of timber products to local trade, and medium sized and enterprise sized companies. During the Reporting Period, Big River acquired the business and assets of Specialised Laminators Queensland (SLQ), which is a specialty manufacturer & distributor of a range of panel products. Completion of the acquisition occurred in May 2024, Big River will integrate this business into its wider corporate group during the financial year 2025, including the group's modern slavery framework.

Big River has 8 manufacturing facilities, located in Grafton, NSW, Crestmead, Qld, Campbellfield, Geelong and Beaufort in Victoria, Dry Creek, SA, Bellevue, WA and Auckland, New Zealand.

Big River has 25 sales and distribution centres, of which 23 are located throughout Australia and 2 are in Auckland, New Zealand.

Big River employs approximately 660 employees across Australia and New Zealand.

During the reporting period there was a change in key supply chain leadership with a new General Manager of Supply Chain & Manufacturing appointed in January 2024.

3.2 Supply Chain

Big River has approximately 800 local and overseas suppliers, from which it sources a range of goods and services under purchase orders with standard terms. This report addresses the modern slavery risks in Big River's supply chain for those goods and services.

Big River is satisfied its local Australian and New Zealand suppliers are not engaging in modern slavery practices in their operations. Many of these suppliers are substantive, well reputed local companies with which Big River has had regular and close dealings over a long period. In forming its assessment of and relationship with these local suppliers, Big River is satisfied that their operations in this regard are appropriate.

Of its overseas suppliers, Big River engages 24 suppliers in Asia, 18 suppliers in Europe, 2 suppliers in the America's and 2 in Africa to provide timber products and construction materials, such as plywood, formply, flooring, plasterboard and specialty panel products.

These overseas suppliers engage factory workers to manufacture the products and materials being sourced. Big River's relationships with overseas suppliers have typically been longstanding and with larger and established businesses.

Big River engages one Chinese local to assist Big River in its dealings with Chinese suppliers, including by providing translation and logistics services. Big River deals with its European and other non-Australian and New Zealand suppliers without the assistance of any country locals.

4 Risks of modern slavery practices in Big River operations and supply chain

4.1 Operations risks

Big River has determined that the risk of modern slavery in its operations is low.

Big River's employees at its manufacturing facilities are covered by enterprise bargaining agreements, which appropriately cover usual matters such as wages, overtime, allowances, leave and redundancies. Big River's other employees are employed under and in compliance with relevant industry awards or individual employment contracts. Big River also engages with the CFMEU, an Australian industry employee trade union, in respect of certain of its Australia employees. There have been no disputes with any trade unions involving any modern slavery type allegations during the Reporting Period.

Big River has in place a Code of Conduct, which sets out Big River's expectations that persons acting on behalf of Big River and its suppliers will not engage in modern slavery and will report any actual or suspected modern slavery activities within Big River's operations and supply chains to Big River's company secretary or under Big River's Whistleblower Policy. No modern slavery risks were reported under Big River's Whistleblower Policy or otherwise during the Reporting Period.

4.2 Supply chain risks

While Big River undertook actions during the Reporting Period to assess and address modern slavery risks in its supply chain (as described in section 5), and Big River considers there is a low risk of its suppliers engaging in modern slavery practices, the following two potential risks may still exist in its supply chain:

- (a) there may be modern slavery risks in Big River's supply chain which its suppliers have not disclosed, and which Big River was not able to uncover from on-site audits; and

- (b) Big River's overseas and local suppliers may not undertake sufficient due diligence investigations into their own supplier's supply chains to satisfy themselves that no modern slavery practices exist further up Big River's supply chain.

5 Actions Big River has taken to assess and address risks

5.1 Actions taken during this Reporting Period

For this Reporting Period, Big River undertook the following actions:

- Issued its annual modern slavery questionnaire and reviewed responses from suppliers to assess and address risks of modern slavery practices in its supply chain. The results of which are shown below
- Continued education of its employees who deal with overseas suppliers about Big River's policies on modern slavery
- The business' review of updating its trading terms to include modern slavery requirements was deferred as a result of personnel change

Region	No. of suppliers surveyed	Risk rating			Actions
		Low	Medium	High	
North America	1	1	-	-	Nil
South America	1	1	-	-	Nil
Africa	2	1	1	-	Further information requested from supplier
Europe	18	17	1	-	Site visit during June 2024 and risk rating reduced to low
Asia	24	16	8	-	Site visits scheduled for 4 suppliers in October 2024. Further information requested from 4 suppliers
Total	46	37	10	-	

Table 1 – Results of financial year 2024 annual anti-slavery questionnaire

5.2 Educating employees

During this Reporting Period, Big River continued to provide training on its modern slavery policies to its employees who deal with overseas suppliers to improve their understanding of modern slavery risks. These employees were the focus of Big River's training sessions given the potential higher risks of modern slavery in overseas supply chains.

Big River's Code of Conduct covers the business commitment and its employee's responsibility to "not be involved in or support or deal with businesses involved in modern slavery", this Code of Conduct and its Modern Slavery statements are available on its website, which are accessible by all employees.

5.3 Risk assessing overseas suppliers

During this Reporting Period, Big River sent out its modern slavery questionnaires to all of its overseas suppliers to assist Big River to identify risks of modern slavery occurring in the business' supply chain. Big River's employees who engage with overseas suppliers assigned each such supplier with a risk rating (comprising "low risk" and "increased risk") based on a number of factors including geographic location, geopolitical environment and past engagement with that supplier. Each supplier declared as "low risk" was issued with a compliance statement containing a number of questions for it to, amongst other things, confirm that it was not engaging in any activity that may constitute modern slavery.

Each supplier declared as "increased risk" and each "low risk" supplier whose compliance statement revealed potential non-compliance was issued with a questionnaire containing more focused questions aimed at identifying specific modern slavery risks in its activities. After each supplier returned its questionnaire to Big River, its answers were entered into a risk assessment

tool prepared by Big River and that supplier was given a risk rating of either "low," "medium" or "high". During the Reporting Period, 10 overseas suppliers (8 in Asia, 1 in the Africa and 1 in Europe) were given risk ratings of "medium". All other overseas suppliers were given risk ratings of "low". No supplier was given a risk rating of "high" during the Reporting Period.

Any supplier with a risk rating of "medium" is followed up where either more information is sought from the supplier or a site audit by a member of Big River's senior management is scheduled to discuss and endeavour to resolve the issues identified. Although no supplier was assigned with a "high" risk rating during the Reporting Period, Big River intends to cease engaging any supplier with a "high" risk rating until the issues giving rise to the high risk rating are addressed to Big River's satisfaction.

5.4 Actions to be undertaken in next reporting period

Big River remains committed to eliminating the risk of modern slavery in its supply chain and will focus its effort in the next reporting period on:

- Resolving outstanding questions with suppliers who have scored a medium risk, including scheduled site visits where required. In the event that any outstanding concerns can not be satisfactorily resolved, Big River group will cease sourcing from that supplier.
- Continue to issue its annual modern slavery questionnaire for each supplier (including from the newly acquired businesses) to complete, confirming, amongst other things, that it does not engage in any practices that constitute modern slavery and disclosing any modern slavery issues;
- Finalise the updating of its trading terms to include the template modern slavery clause and progressive roll out across the supplier base.

In addition to the matters set out above, Big River will in the next reporting period:

- Complete a review of its questionnaire and risk assessment process to ensure the tools and associated processes are subject to continuous improvement and the incorporation of any learnings gained in prior reporting periods
- Formalise anti-slavery training requirements for its employees who deal with suppliers and incorporate into its core induction and training frameworks.

6 How Big River assesses the effectiveness of such actions

At this stage, Big River considers the fact that 39 of its 46 overseas suppliers were given a "low risk" rating (as referred to in section 5.3) to suggest that Big River's due diligence processes when engaging suppliers have been effective in helping it engage suppliers which do not have modern slavery risks within them. However, Big River is conscious that the process relies heavily on self-disclosures and as such Big River will continue to develop and refine the tools it uses to ensure due diligence with regard the risk of modern slavery. It will do this via both internal continuous improvement mechanisms as well as external best practice benchmarking and formal learning programs.

7 Consultation

All divisions and entities were consulted in order to develop this Modern Slavery Statement. This involved the CEO and appropriate senior managers from across the business working collaboratively and sharing the steps taken by, and experiences of, their respective entities during the reporting period to assess and address modern slavery risks that arose within their operations and their supply chain.

8 Next steps

Big River is committed to not supporting or dealing with businesses involved in modern slavery practices. Going forward, Big River's focus will be on continuing to undertake due diligence and risk assessments of its operations and supply chain and addressing issues which are identified, increasing training for employees, and seeking adoption of, and compliance with, its updated

supplier terms by overseas suppliers. Big River's goal is to be able to confidently state that its operations and supply chain have a low risk of exposure to modern slavery and that it is adequately managing modern slavery risks in its operations and supply chain.

This statement has been prepared in consultation with each reporting entity covered by the statement. This statement was approved by the Board of Big River Industries Ltd in November 2024.

This statement is signed by John Lorente, a director of the Board of Big River Industries Ltd.

A handwritten signature in black ink, appearing to be 'J. Lorente', written in a cursive style.

John Lorente
CEO and Managing Director
Big River Industries Ltd