



## Modern Slavery Statement

30 June 2023

### Introduction:

Modern slavery is a pervasive yet often hidden issue within global supply chains and has severe and devastating consequences for victims. We welcome the Australian Government's efforts to help Australian businesses prevent modern slavery in domestic and global supply chains.

This statement details the operations of **ARDEX Australia Pty Ltd** together with potential modern slavery risks which may exist within its business, and actions aimed identifying and eliminating slavery within its supply chain. ARDEX recognises there is no simple solution to eliminate the risks of modern slavery from its business and will refine its approach and processes and measure the effectiveness of these over the coming years to strengthen its response against modern slavery.

### Identification of reporting entity

This statement relates to **ARDEX Australia Pty Ltd (ABN: 82 000 550 005)** and is prepared in accordance with the criteria set out in the *Modern Slavery Act 2018 (Cth)*, relating to or the actions and activities during the calendar year 2022 (January 2022 to December 2022).

The registered office is located at Unit 7, 20 Powers Road Seven Hills NSW 2147.

### ARDEX Australia's Structure, Operations and Supply Chain:

#### Company Overview and Structure

**ARDEX Australia** is an industry leader in product innovation and development, range, and supply and distribution to multiple market channels, offering engineered products and systems in the applications for floor levelling and adhesives, tile and natural stone systems, sheet and liquid applied waterproofing membranes, general construction and decorative surfaces.

With sales, distribution and manufacturing across Australia ARDEX strives to provide its customers with industry-leading service, expert advice, and quality products. Since its establishment, company has experienced strong growth and continues to grow through strategic acquisitions and core business model.



ARDEX Australia has more than 220 employees across all its Australian locations, generating in excess of \$100 million in sales annually.

## **Operation and Supply Chain**

ARDEX Australia has sales, manufacturing, and distribution facilities in all mainland state capital cities. The Head Office site personnel perform national roles in areas of general management, human resources, marketing, finance, operations, supply chain and procurement, and product development and technical services. The functional heads of these teams form the Leadership team of the business, reporting directly to the Managing Director.

ARDEX Australia recognises that only through the joint commitment of all supply partners can we be sure that any form of modern slavery is eradicated. Our suppliers span Globally and locally and ARDEX Australia maintains a close and ongoing dialogue with its suppliers, partners, and customers.

Our procurement activities include supply from local manufacturers and distributors, as well as from overseas suppliers to support our manufacturing operations in Australia.

The number of our suppliers according to geographic region are:

- Europe – 16
- America – 5
- Asia – 7
- Oceania – 164

In addition to manufacturing and distribution, ARDEX procures various services including transport, freight and shipping, IT, and other ancillary services.

Our supply chain team focuses on building long term sustainable partnerships with suppliers and seeking innovative opportunities to ensure reliability and excellence in both product and delivery of service to customer.

## **Risks of modern slavery practices in ARDEX operations and supply chains:**

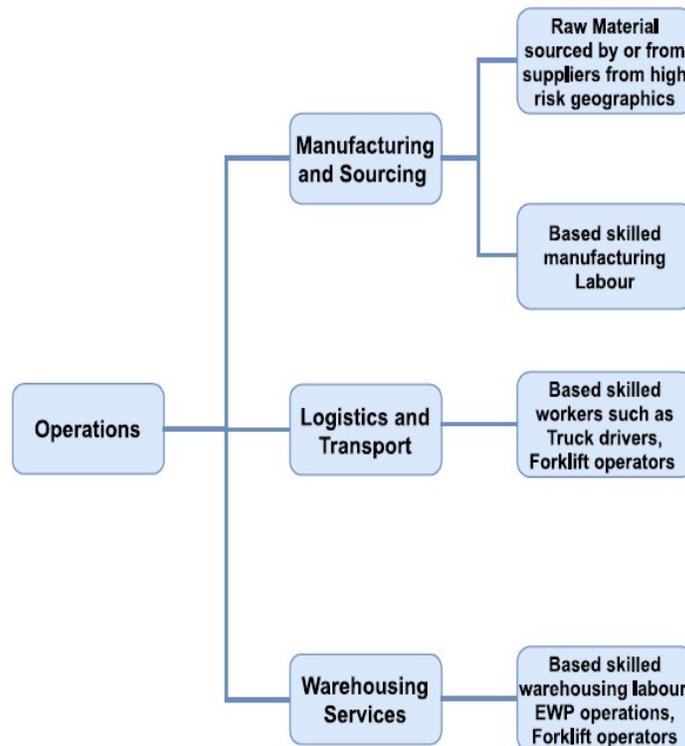
ARDEX Australia has undertaken an analysis of its operations and supply chain to identify potential risk of modern slavery.



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As with many other companies operating in our sector, the risk of modern slavery is heightened in our supply chain particularly beyond tier 1 suppliers as transparency of conduct and transparency of risks gradually diminishes. ARDEX looked at the potential risks in the supply chain by comparison against commonly published modern slavery risks according to sector or industry type, geographic or demographic risks, vulnerable populations and entity or business structure types where applicable.

The following areas have been identified as having the risk of modern slavery impacts in our operations and supply chain particular in tier 2 and beyond as ARDEX has direct relationship with Tier 1 suppliers.



- Unknown origin of raw material or intermediate components used to manufacture imported finished goods, high risk manufacturing countries such as China, Vietnam, and India where lower tier suppliers not visible.



- Migrant labour exploitation; skilled labour for manufacturing and warehousing functions.

## NOTE

The foregoing very largely repeats similar sections of our previous Modern Slavery Reports as the various matters referred to therein continue to remain relevant and substantially the same during year under review.

## **Actions taken to address key identified modern slavery risks:**

ARDEX Australia operates under Quality Accreditation (ISO9001:2015) and manages its operation under an integrated Quality management system. The developed policies and procedures including Modern Slavery Policy developed in FY 2022 will be integrated into the Quality Assurance Manual and will be subject to review and audits.

We continue to raise awareness of Modern Slavery issues with our employees, customers, suppliers, and the personnel involved in areas where the risk might be expected to be encountered.

Reference is made in our previous reports as to restrictions of various types imposed by National, State and International Governments as part of their respective responses to issues arising from COVID-19. Now that restrictions have been eased on National & International travel being more readily available, we expect to be able to continue face-to-face meetings and facility visits & audits of our suppliers. We also remain committed to supporting our suppliers and business counterparties as appropriate, in their efforts to deal with issues arising from Modern Slavery.

In 2021 ARDEX designed supplier-based questionnaire to gain better understanding of how key suppliers are addressing modern slavery risk in their operations and supply chains, we continued questionnaire process for period under review for new and existing suppliers.

In addition to questionnaire-based audit, this year we will.

- Continue to ensure employees who have regular contact with suppliers & service providers are trained on Australian Government response to modern slavery practices and are fully aware of ARDEX Modern Slavery Policy.



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- Continue to assess lower value suppliers and service providers using risk-based approach.
- Actively engage with suppliers that have classified their supply chain visibility as moderate to developing in questionnaire.
- Building our people's capability to recognise and report modern slavery risk by developing and rolling out internal training programs for employees.

Based on questionnaire audit survey for reporting period under review, 17.80% of suppliers meet the criteria requiring submission of a Modern Slavery Statement under the Act, and of these suppliers, 94.12% have high-moderate visibility of their supply chain. Of the remaining 82.80% of suppliers surveyed, 73.49% also reported having a moderate to high visibility of their supply chain.

## Supplier Due Diligence

ARDEX continues to update its Manufacturing and Supply agreements with key strategic partners by inserting specific clauses in relation to modern slavery to ensure suppliers:

- comply with Australian and international modern slavery laws relevant to the supplier.
- allow ARDEX to investigate and verify compliance with Australian and international modern slavery laws.
- provide information regarding itself and each of its suppliers involved in producing or procuring goods and services for supply to ARDEX.
- confirm that neither the supplier nor any of its officers, agents or employees has been convicted or investigated for any offence in connection with any Australian or international modern slavery laws; and
- confirm implementation of anti-modern slavery policies and due diligence procedures.

## Policies

ARDEX Australia also has following policies in place which are regularly updated and govern the way we interact with our staff, suppliers, and service providers which we consider assist us to operate ethically and address risk of modern slavery:



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- **Modern Slavery Policy:** This policy establishes our commitment to addressing Modern Slavery risk in our business and driving ethical business practices across our organisation and supply chain.
- **Speak Up Program:** This program encourages and provides a safe and confidential channel for any employee to raise and have formally addressed any concerns directly to management regarding any aspect of the business operations. This program would be how employees would raise any concerns regarding modern slavery within ARDEX's the supply chain.
- **ARDEX Group Ethics Guidelines:** Corporate ethics guidelines provide binding instructions regarding the ethical obligations to be observed by ARDEX employees and are designed to serve as a support for employees. These corporate ethics guidelines represent a framework providing minimum standards for all companies of the ARDEX Group.
- **Supplier code of conduct:** We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within all applicable laws in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy:** We use only reputable employment agencies to source labour. It is a requirement of the Agency to pay labour hire employees on assignment to ARDEX in accordance with the applicable Modern Award provisions to the Site in which they are working.

## Assessing effectiveness of actions:

ARDEX Australia acknowledges that combatting modern slavery requires ongoing commitment. ARDEX Australia will continue to comply with the Modern Slavery Act 2018 (Cth)



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and produce an annual statement reporting on risks within our operations and supply chains, and actions we have taken to mitigate these risks and the effectiveness of those actions.

We consider that the results of the Questionnaire exercise (referred to in previous statements and continued during year under report) are, as previously mentioned, sufficient satisfactory to enable us to deal with issues arising from modern slavery context.

ARDEX Australia will undertake regular surveying with suppliers in regards to their positions and progress on the potential risk of modern slavery practice in their business. Records of all surveys, site visits and discussions on modern slavery risks with suppliers and service providers will be maintained.

We are further reviewing the effectiveness of the actions and controls implemented within our processes relating to our modern slavery risks and the above-referenced development of the questionnaire approach.

### **Consultation and Approval:**

This Statement has been prepared in consultation with senior executive team representing the reporting entity and the entities under its control.

This Statement has been approved by the Board of Directors of ARDEX Australia Pty Ltd on 30<sup>th</sup> June 2023.

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**Fabian Morgan**

**DIRECTOR**

A handwritten signature in black ink, appearing to read "D Jefferys", with a horizontal line underneath.

**Darrell Jefferys**

**DIRECTOR**