



Modern Slavery Statement

This Statement covers the activities of Barro Group Pty Ltd (ACN 005 105 724) and its controlled entities ('Barro Group').

The Statement's purpose is to outline our approach to ensuring we have robust processes in place to minimise the risk of modern slavery in our business operations and supply chain.

Introduction

Australia has modern slavery laws in place designed to ensure 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 a number of serious exploitative work practices that represents violations of human rights.

The Commonwealth *Modern Slavery Act 2018* defines modern slavery under eight heads of serious exploitation:

- Human trafficking
- Slavery
- Servitude
- Forced or servile marriage
- Forced labour
- Debt bondage
- The worst forms of child labour
- Deception recruiting for labour or services

Our business

Barro Group, family owned and operated since 1946, is a leading independent supplier and distributor of premixed concrete, quarry products and a range of associated products.

We are a fully integrated resources, manufacturing and distribution organisation operating in Australia. We are well equipped to provide continuous supplies of raw construction materials, advance premixed concrete, genuine customer service and reliable delivery to residential, commercial, civil and industrial projects.

The depth, experience and competence of our people are evidence by our growth and diversification over the years.

Each division of Barro Group is operated by an experienced management team and skilled workforce.

We are proud of our great people and workplace culture. We understand the importance of respecting and improving human rights is fundamental to our business.

Our Structure, Operations and Supply Chain

For the purposes of this statement, our key operating entities and operations and the associated supply chains are as follows:

Area	Main operations	Supply chain
Corporate functions	<ul style="list-style-type: none"> Sales and marketing Finance, property, procurement Technology and data Commercial, governance and investments 	<ul style="list-style-type: none"> Office consumables Technology (hardware, software and cloud services) Utilities and professional services consultants who provide a service directly to Barro Group Uniforms and work attire (e.g. safety vests) Promotional merchandise
Premixed Concrete	<ul style="list-style-type: none"> Manufacture, sale and distribution of premixed concrete Central despatch operations located in Carlton Victoria 	<ul style="list-style-type: none"> Raw cementitious materials Concrete additives Delivery contractors - Contractors who deliver our products to our customers Maintenance contractors who carry out maintenance work Vehicles, tyres, fuel, spare parts, plant and machinery etc which may be sourced from various overseas locations
Quarrying	<ul style="list-style-type: none"> Extraction, sale and distribution of aggregates, crushed rock, sands, gravels 	<ul style="list-style-type: none"> Raw materials Dust suppression and other additives Delivery contractors - Contractors who deliver our products to our customers Maintenance contractors who carry out maintenance work Vehicles, tyres, fuel, spare parts, plant and machinery etc which may be sourced from various overseas locations
Builders' supplies	<ul style="list-style-type: none"> Reseller (retailer) of building materials and products including steel reinforcing and accessories, bagged cement, oxides, landscape supplies, tools of trade 	<ul style="list-style-type: none"> Products that we purchase and on sell to customers (steel reinforcing and accessories, bagged cement products, building materials, oxides, tools of trade and other products which may be sourced from overseas locations)
Concrete precast panels	<ul style="list-style-type: none"> Manufacture and delivery of concrete precast panels 	<ul style="list-style-type: none"> Delivery contractors - contractors who deliver our products to our customers Maintenance contractors who carry out maintenance Vehicles, tyres, fuel, spare parts, plant and machinery etc which may be sourced from various overseas locations
Land Fill	<ul style="list-style-type: none"> EPA Licensed for acceptance of Solid Inert Waste (non-putrescible) 	<ul style="list-style-type: none"> Maintenance contractors who carry out maintenance Vehicles, tyres, fuel, spare parts, plant and machinery etc which may be sourced from various overseas locations Delivery contractors
Concrete roof tiles	<ul style="list-style-type: none"> The manufacture, sale, distribution and fixing of concrete roof tiles for the domestic and commercial markets. 	<ul style="list-style-type: none"> Raw cementitious materials, sands Delivery contractors Roof tiling contractors Maintenance contractors Roof tile additives Roof tiling components (e.g. timber)
Transport	<ul style="list-style-type: none"> Delivery of bulk cementitious materials 	<ul style="list-style-type: none"> Maintenance contractors who carry out maintenance work Vehicles, tyres, fuel, spare parts, plant and machinery etc which may be sourced from various overseas locations
Technical services	<ul style="list-style-type: none"> NATA Certified Laboratories for comprehensive material testing and analysis ensuring strict quality controls are met 	<ul style="list-style-type: none"> Professional services such as concrete and aggregate testing by third parties

Tyres	<ul style="list-style-type: none"> • Repair, relugging and servicing of earthmover tyres; retreading/recapping of truck and passenger tyres • tyre sales fitting and balancing; on-site/roadside service 	<ul style="list-style-type: none"> • Raw materials and products that we purchase for the factory which may be sourced from overseas locations • Products we purchase and on sell to customers (tyres) which may be sourced from overseas locations
Mechanical and engineering workshops	<ul style="list-style-type: none"> • Repair and maintenance of fixed and mobile equipment, vehicles etc 	<ul style="list-style-type: none"> • Materials/products used for repair and maintenance which may be sourced from overseas locations
Joint ventures - Quarries - Cement - Transport	Operations are outsourced and their processes will be reviewed over the next 12 months	<ul style="list-style-type: none"> • Raw materials • Dust suppression and other additives • Delivery contractors - Contractors who deliver our products to our customers • Maintenance contractors who carry out maintenance work • Vehicles, tyres, fuel, spare parts, plant and machinery etc which may be sourced from various overseas locations
Investments	Diversified investment portfolio across various asset classes including equities, property, infrastructure and fixed income	<ul style="list-style-type: none"> • Professional services

Our approach

Barro Group has **zero tolerance** for any form of slavery-like practices.

Our policies and procedures

We have formal policies already in place that are intended to promote ethical and legally compliant business conduct. Our policies contribute to our commitment to prevent violations of human rights such as modern forms of slavery.

Our Commitment

Barro Group is committed to operating responsibly and adhering to the highest ethical standards across the group. Any forms of slavery or human trafficking in our business will not be tolerated.

We will seek to have robust processes in place to minimize the risk of modern slavery in our operations and supply chain:

1. In relation to our operations

- ensure that all our employees work for us voluntarily and are able to provide evidence that they are older than the minimum working age in the jurisdiction in which they work;
- ensure that all our employees are paid the minimum wage in the jurisdiction in which they work;
- train our staff in relation to how to identify modern slavery red flags; and
- regularly assess our operations for risk of modern slavery

2. In relation to our supply chain

- seek to engage contractors and suppliers who uphold our commitment to eliminating modern slavery practices;
- introduce modern slavery obligations in supplier contractors and where possible, require our suppliers to agree to comply with our ethical standards and this policy and other related policies in relation to their own operations and supply chains;

- undertake due diligence on our supply chain to identify and address any actual or potential risks of modern slavery;
 - making our Whistleblower policy available to our suppliers and their employees
3. Work with our employees, contractors and suppliers to provide effective remedies where we may directly cause or contribute to modern slavery. We will engage with affected persons (where appropriate) and work with our contractors, suppliers, consultants and others to eliminate the occurrence of modern slavery in both our operations and supply chain.

Actions

We are developing standard clauses in supply contracts and agreements and contractor pre-qualification questionnaires which are being rolled out providing an opportunity to establish a baseline expectation for how we expect our suppliers to manage modern slavery risks. The clauses will contain the following elements that suppliers must

- ensure compliance with all applicable modern slavery laws and take steps to meet international standards around modern slavery
- confirm the supplier has not been convicted or investigated for modern slavery offences
- take reasonable steps to ensure it, its subcontractors, and others in its supply chain have adequate procedures to prevent and address modern slavery
- grant Barro Group the right to audit it and its subcontractors for compliance against the above requirements
- on request, provide a copy of any modern slavery statement it is required to prepare under relevant modern slavery reporting legislation.

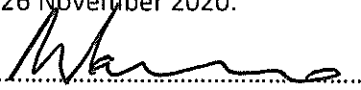
We are training our procurement personnel on this matter hoping this will drive higher levels of awareness, engagement and compliance across our supply chain.

We are also:

	Task	Status
Stage 1	• Reviewing legislation & reporting obligations	Completed
	• Engaging senior management	Completed
	• Modern Slavery Policy	Completed
	• Reviewing:	Completed
	– existing purchasing data and formats	
	– existing relevant policies and procedures	
	– supplier/purchasing contracts/agreements and prequalification questionnaires	
• Developing documentation for training purposes	Complete by target 28 Feb 2021	
• Prepare supplier/contractor modern slavery questionnaires and ascertain high risk suppliers	Completed	
• Draft clause for inclusion in sales contracts (terms & conditions of sale)	Complete by target 31 March 2021	
Stage 2	• Categorise suppliers and contractor risk	Completed
	• Select high risk suppliers for additional investigation	Complete by target 31 March 2021
Stage 3	• Develop KPIs and review progress	30 June 2021
Stage 4	• Prepare initial Modern Slavery Statement	FY2020 by 24 Dec 2020
Stage 5	• Board ratification and submission of initial Modern Slavery Statement report	Board meeting Nov 2020

This Modern Slavery Statement has been approved by the Board of Barro Group Pty Ltd (the principal governing body) at its Board Meeting held on 26 November 2020.

Raymond D Barro



 Managing Director