



# Modern Slavery and Human Trafficking Statement FY 2024



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# Commitment to Eliminating Modern Slavery and Protecting Human Rights

Gunlake Group opposes all forms of slavery and forced labour in its operations and the operations of its suppliers.

This Modern Slavery Statement is made on behalf of Gunlake Group pursuant to the Modern Slavery Act 2018 (Cth). Gunlake Group is the 100% owner of two subsidiary businesses, Gunlake Concrete NSW Pty Limited and Gunlake Quarries Pty Ltd. Both of these businesses were consulted in the review of compliance and in developing this annual statement. This statement sets out the actions taken by Gunlake to address modern slavery and human trafficking risks in our business and supply chain for the financial year ending 2024. Gunlake is taking proactive measures to establish and develop the company's policy, supply chain and culture in accordance with the Act.

Gunlake's core business is the supply and delivery of ready-mix concrete in the greater Sydney area and the supply and delivery of Quarry products. The company operates from six sites across NSW, mainly in the greater Sydney area with their head office in Double Bay, NSW. Gunlake is largely a vertically integrated company whose core products are mostly produced inhouse from mining operations in its quarry at Marulan, NSW south of Sydney.

Gunlake also uses a other suppliers that are largely based in the regions surrounding Sydney and purchases cement from Port Kembla that has been imported from Japan. The Gunlake Group are an Australian-owned, family company spanning four generations in the quarrying and concrete industry with strong relationships with their suppliers, customers, and employees. They have an excellent reputation within the industry, best practice in quality, work health and safety, and environmental standards.

Gunlake's supplier selection is carried out with these same principals with a focus on:

- Anonymous reporting for suspected breaches.
- Health and safety standards, and employment conditions.
- Supply chain risks and workforce risks.
- Material toxicity
- Sanctioning and suppliers that fail to improve their performance in line with our requirements.

Gunlake Group recognises the importance of protecting human rights and are committed to protecting the rights of all people including its employees, the communities in which the Company operates, its customers, and those within its supply chain.

Modern slavery has the potential to exist in the supply chain through a variety of circumstances including:

- Forced labour
- Child labour
- Debt bondage
- Human trafficking
- Discriminatory employment practices





# Measures Taken to Assess, Address and Manage the Risk of Modern Slavery

At Gunlake, we have a zero-tolerance approach to modern slavery, and we are committed to keeping our suppliers accountable to prevent slavery and human trafficking in our operations and supply chain. Our supply chain has been assessed as low risk. Supply chain risks will continue to be investigated as part of ongoing continuous improvement measures, predominantly via supplier surveys. One key focus of senior management will be to work collaboratively with Gunlake's suppliers, so that our expectations and standards are understood and upheld.

Gunlake will initially investigate and seek to work with Suppliers found to be high risk and then will look to source materials from other suppliers who are more transparent and cooperative with respect to their compliance with the Act.



## Due Diligence

Gunlake Group are committed to only working and engaging with suppliers locally who demonstrate their alignment with The Gunlake Group's core company values. We work alongside and hold our suppliers accountable to collaborate with us to tackle the issue of modern-day slavery and prohibit human slavery and slavery-like practices, human trafficking, and child labour.

Gunlake's supplier surveys have indicated that:

- Domestic suppliers are low risk as they employ Australian citizens and are paid under the correct industrial agreements.
- Offshore suppliers have higher risks, such as Japanese cement could use Russian coal. However since the Russian invasion of Ukraine, our supplier has switch to Australian coal for their cement manufacturing in Japan.
- Other materials used in admixtures have been sourced in Europe, where strict Modern Slavery law and company processes reduce the risk of modern slavery.

Improvements to due diligence going forward will include the development of a risk register and risk matrix for key suppliers. This assessment will include looking specifically at Geographic risks, sectoral risks and product/service risks.





# Policies

## Anti-Bribery and Corruption Policy

### Recruitment Policy

We operate a robust recruitment policy, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

### Code of Conduct

This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

### Whistleblowing Policy

We operate a whistleblowing policy that encourages people to speak up and raise breaches that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

### Diversity and Inclusion

This policy ensures that employees are treated equally in all employment matters including recruitment, selection, promotion, training and development, performance review and termination. It also applies to remuneration practices, benefits, and all other conditions of employment.



# Moving Forward, Continuous Review and Improvement

Assessing our practices and procedures against the requirements of the Modern Slavery Act 2018 (Cth).

Gunlake's aim is to create an enhanced and evolved understanding of modern slavery risks within our business operations and supply chains. We will review our key suppliers annually as part of the process of updating this report key report. This will typically consist of surveys but could be expanded to use [www.fairsupply.com](http://www.fairsupply.com) to drill down 10 tiers if we feel that there is a risk. Regardless it is universally accepted that Australia, Japan and Europe are very low risk and that the construction materials industry is also low risk.



# Policy Review

Gunlake will continue to review the relevant policies every 2-years to identify, assess and address any opportunities for improvement.

Gunlake will provide modern slavery education and training to its procurement staff if the risk assessment shows that the risks are increasing and that the company could benefit from increased employee awareness.







# Assurance

Gunlake recognises that tackling the issue of modern slavery requires an ongoing and continuing commitment. Gunlake will continue to engage and collaborate with internal and external stakeholders in addressing modern slavery risks, as well as strengthening the group's ability that modern slavery risks are identified and acted upon.

This Modern Slavery Statement was approved by an authorized person of The Gunlake Group. Signed for and on behalf of the Directors of Gunlake Group.

*Angus Richmond*

Angus Richmond – Commercial, Strategy & Cement Director

Gunlake Concrete NSW Pty Ltd



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