



Safety systems
and processes

Modern Slavery Policy

PURPOSE:

Metromix supports Australia's Modern Slavery Act 2018 (Cth). The company is working to better understand the risks within its business and supply chain, addressing them through engagement with employees, suppliers and other stakeholders. The key purpose of the Act is to increase transparency and accountability by requiring businesses to report and publicise the incidence of modern slavery in their supply chains to enable the market to make more informed decisions when purchasing goods and services.

This Policy affirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and our operations. To ensure the human rights of all employees and contractors are upheld, whether they be in Metromix or Metromix's supply chain.

SCOPE OF POLICY:

This Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, contractors, consultants and any other third-party representatives.

POLICY STATEMENT:

Metromix expects all who have, or seek to have, a business relationship with the company to familiarise themselves with the Policy and to act in a way that is consistent with its core values. We are committed to acting ethically and with integrity in our business dealings and relationships and are committed to preventing modern slavery in our business and to helping prevent modern slavery in our supply chains.

Metromix supports responsible sourcing and works to ensure safe and sustainable work practices for all those involved in its operations and supply chain. Metromix in conjunction with its shareholders reviews human rights risks and its supporting policy. Metromix is working with its broader organisation to ensure it addresses issues related to human rights, modern slavery and environmental sustainability. It is consistent with our ethical framework, together with a culture of high ethical standards, including compliance with all applicable laws, contractual and other obligations.

WHAT IS MODERN SLAVERY:

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, child labour, forced labour, human trafficking and any related exploitation (together, "modern slavery"), all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain and this will not be tolerated by Metromix.

It is defined by the Modern Slavery Act (Cth) 2018 to include eight types of serious exploitation and which can be understood as:

- **Trafficking in persons**, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;
- **Slavery**, which is where the offender exercises powers of ownership over the victim;
- **Servitude** which is where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work;
- **Forced labour**, which is where the victim is either or not free to stop working or for free to leave their place of work;
- **Forced marriage**, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
- **Debt bondage**, which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;
- **The worst forms of child labour**, which involves situations where children are: exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and
- **Deceptive recruiting for labour or services** which is where the victim is deceived about whether they will be exploited through a type of modern slavery.



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RESPONSIBILITY:

The General Manager has overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations and that all those under our control comply with it. The Senior Leadership Team have primary day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries regarding the Policy and auditing internal procedures. Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy.

COMPLIANCE:

You must ensure that you read, understand and comply with this Policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.



You must notify your manager as soon as possible if you believe or suspect that a conflict with this Policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

COMMUNICATION AND AWARENESS:

Guidance on this Policy forms part of the induction process for all employees and contractors. We are committed to continuous improvement so that our processes and interventions remain effective in preventing and remediating modern slavery.

Training on this Policy, and on the risk our business faces from modern slavery in its supply chain will be given (if required). Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

BREACHES OF THIS POLICY:

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



OUR OPERATIONS:

Metromix has been in the business of providing construction materials involved in building communities for over 25 years in Sydney and surrounding regions.

We service the construction industry by supplying ready-mixed concrete, quarry products and transport services. With 8 concrete plants spread across Sydney and 2 quarries located in Lithgow and Newcastle, we supply to a wide circle of suburban areas and rapidly developing regional centres.

Metromix offers a range of high quality products to suit the commercial, civil and domestic sectors. We can deliver to meet the concrete and quarry requirements of a multi-million dollar development through to delivering a concrete supply as little as 0.4m³ to a confined location using our mini Able trucks.



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Built on components of safety, quality, expertise and environmental care, the major measure of our success lies in the satisfaction of our customers. Not only with the products and technical support they receive, but with every aspect of the customer/supplier relationship.

We welcome the opportunity to provide new and existing customers with a superior service, unlike any other in the industry.

We offer standard and premium readymix concrete and quarry products, at high levels of service, product quality, delivery and value. Choose from our range of products that cater for builders, contractors, building designers, Architects, or your home and garden project.

For more than 20 years, we have been at the leading edge of concrete technology and continue to develop and improve our products through our own internal R&D and product development and by observing industry trends both locally and internationally.

SUPPLY CHAIN MANAGEMENT:

Through the Human Rights Management Approach and Policy Framework outlined in this Policy, Metromix aims to understand and address the potential to cause, contribute to, or be directly linked to modern slavery through its operations or supply chains. By applying our Risk Assessment Process Metromix has identified areas of procurement that are considered higher risk for human rights and labour. These are:

- mining, mining subcontracting;
- production services, engineering services;
- production of mining equipment; and
- facility services, including cleaning and production of personal protective equipment and uniforms.

Metromix will review its supply chains every 2 years.

Metromix seeks to promote high standards in sustainability across its entire value chain and ensure reliability of its strategic sourcing. Sustainable development is integrated into Metromix's procurement strategy, its day-to-day operations and relationships with suppliers. Metromix are required to identify, prevent and manage risks pertaining to Health and Safety, Social Responsibility and Environment in their supply chain. This Policy is provided to all suppliers as part of the on-boarding process and suppliers must acknowledge and adhere to the requirements of this Policy.





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MANAGING RISKS IN THE SUPPLY CHAIN:

Communicate this Policy to Metromix Employees

This Policy forms a key part of the on-boarding of relevant employees and provides the foundation for the on-going processes and reporting related to Metromix's sustainable sourcing program.

Communicate this Policy to all current and potential new suppliers conducting business with Metromix

This Policy is provided to all suppliers of Metromix during the tendering process. Suppliers are required to confirm their understanding and adherence of these requirements before proceeding with the tender process. Supplier contracts contain a clause regarding conditions reflecting environmental, social and health and safety standards. This Policy is available on the Metromix website.

Prioritise the Supplier base to Identify potential "High risk" suppliers following the methodology defined in this Policy.

This risk matrix includes an analysis of risks to human rights and labour, health and safety, and environment. Metromix has localised the risk analysis matrix to reflect the local operating environment following an evaluation of:

- Sector and industry risk;
- Products and services risks;
- Geographical risks; and
- Labour and regulatory indicators. Metromix conducts a review of potential and new suppliers against this matrix, and reviews existing suppliers regularly.

Conduct supplier assessment by executing continuous evaluation of risk exposure through supplier self-assessment/fact finding/audits accordingly

Suppliers in categories that are indicated as high risk are sent a self-assessment questionnaire, which is evaluated. Any answers flagged as medium or high risk are followed up requesting additional information until the matter is resolved either by email/phone communication. To date there have been no high-risk responses. There is a due diligence process that is conducted when using labour hire companies to ensure that relevant employment standards and practices are upheld at all times.

Mitigate identified risk (ultimately supply disruption and company reputation) adhering to the consequence management approach defined in this Policy.

The remediation process would be that if a high-risk response was returned, or there was any other indication of high-risk identified with a supplier, Metromix would follow the process of investigating through visits or audits and may take measures such as suspending or discontinuing the relationship if satisfactory standards were not met.





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STAKEHOLDER ENGAGEMENT:

This policy outlines the level commitment to act as a responsible partner with all its stakeholders. To improve the quality of life of the members of its workforce, their families and the communities related to site operations. It extends to conducting business consistent with sustainable development principles in its own operations, extending to suppliers and customers.

Metromix expects suppliers to meet the social, environmental and health and safety standards established in this Policy. Metromix aims to address risks in these areas which in turn can cause supply disruption and impact reputation. The organisation also aims to capitalise on opportunities for creating shared value for society. Suppliers must meet minimum standards when assessed on the following pillars:

Human Rights and Labour Requirements are Related to:

- Fair working conditions;
- Freedom of association;
- No Forced Labour;
- No Child Labour; and
- No discrimination.

Health and Safety Requirements are Related to:

- Health and Safety performance of suppliers and their employees and contractors; and
- Management of Health and Safety risks.

Environment Requirements are Related to:

- Environmental regulatory compliance; and
- Management of Environmental impacts.

Anti-Bribery and Corruption Requirements are Related to:

- Compliance with local and international anticorruption laws and good business practices; and
- Risk-based management practices to prevent bribery and corruption in the supply chain.

GLENN SIMPKIN
GENERAL MANAGER

11th August 2021