



MODERN SLAVERY STATEMENT

YEAR ENDING 30 JUNE 2026



MODERN SLAVERY 1

Introduction 3

Bianco Reinforcing Group Governance, Operations, and Supply Chains..... 5

Risks of modern slavery practices, operations and supply chains. 10

Effectiveness of these actions. 14

Other information that Bianco Reinforcing Group considers relevant. 16

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Introduction

ABOUT THIS STATEMENT

This Modern Slavery Statement has been prepared by Bianco Reinforcing Pty Ltd (ABN 88 087 147 251) for the reporting period 1 July 2025 to 30 June 2026 in accordance with the Modern Slavery Act 2018 (Cth).

This statement covers the operations and supply chains of **Bianco Reinforcing Pty Ltd** and its related entities Bianco Transport Pty Ltd and R.B.S.C. Pty Ltd.

References to "Bianco Reinforcing Group", "Bianco", "the Group", "we", "our" and "us" refer collectively to these entities unless otherwise stated.

This statement outlines our approach to identifying, assessing and addressing modern slavery risks within our operations and supply chains, the actions undertaken during the reporting period, and our ongoing commitment to continuous improvement.

CONSULTATION

This statement was prepared by the QHSE Team in consultation with management representatives across Bianco Reinforcing Group.

As part of the annual review process, a draft statement was circulated to key personnel and management representatives from Bianco Reinforcing Pty Ltd, Bianco Transport Pty Ltd and R.B.S.C. Pty Ltd for review and feedback. Consultation included consideration of operational activities, procurement practices, workforce management, supply chain risks and actions undertaken during the reporting period.

Modern slavery is also included as part of the Group's annual management review process, providing an opportunity for management to review the effectiveness of existing controls, discuss emerging risks and future priorities, and provide input into the ongoing development of the Group's modern slavery framework.

OUR COMMITMENT

Bianco Reinforcing Group is committed to conducting business ethically, responsibly and with respect for human rights.

Our objective of **Zero Harm** extends beyond workplace health, safety and wellbeing to include the prevention of exploitative practices such as modern slavery, forced labour, child labour, debt bondage and human trafficking.

Our **People First** value reinforces our commitment to treating people with dignity, respect and fairness, whether they are our employees, contractors, suppliers or those working within our broader supply chain.

PEOPLE FIRST

We recognise that modern slavery risks can exist within both global and domestic supply chains. While the nature and scale of these risks vary across industries and regions, we are committed to taking reasonable and practical steps to identify, assess and address modern slavery risks within our operations and supply chains through responsible procurement, workforce protections, effective management systems and continual improvement.

OUR APPROACH

Bianco Reinforcing Group is committed to developing a practical and proportionate approach to managing modern slavery risks in our operations.

As a privately owned Australian manufacturer and distributor, our approach is focused on understanding where modern slavery risks are most likely to occur within our operations and supply chains, integrating modern slavery considerations into existing business processes, and continually improving our due diligence framework over time.

Our focus is not on attempting to review every supplier or every tier of the supply chain equally. Instead, we seek to prioritise areas where risk and potential impact are greatest, while progressively strengthening our understanding of broader supply chain risks as our processes mature.

This approach allows us to focus our resources where they can achieve the greatest benefit while continuing to build a sustainable and effective modern slavery management framework.

Our approach is based on five key elements:

- Understanding our operations and supply chains
- Identifying and assessing risks
- Preventing and mitigating potential impacts
- Monitoring effectiveness and reviewing performance
- Continually improving our framework and processes

APPROVAL

This statement is approved by resolution of management and the managing director (being the relevant principal governing body) of Bianco Reinforcing Pty Ltd.



Peter Gregg

Managing Director, Bianco Reinforcing Group



Bianco Reinforcing Group Governance and Management System

POLICIES & STANDARDS

Bianco Reinforcing Group maintains policies, procedures and standards that support ethical business conduct, fair treatment of workers and responsible procurement practices.

Key documents relevant to modern slavery risk management include:

Workforce

- Code of Conduct Policy
- Recruitment & Selection Policy
- Equal Opportunity Policy
- Training & Development Policy
- Complaints, Grievances and Whistleblower Policy

Suppliers & Contractors

- Code of Conduct Policy
- Supplier Code of Conduct
- Purchasing Policy

Together, these documents establish the Group's expectations for lawful, ethical and responsible business conduct and support the identification and management of potential modern slavery risks within our operations and supply chain.



MANAGEMENT SYSTEM

Bianco Reinforcing is committed to maintaining the highest standards of ethical governance and business practices, ensuring compliance with legislation, industry regulations and recognised best practice.

Certification with internationally recognised standards is foundational to our operations. Maintaining ISO 9001 (Quality Management), ISO 45001 (Occupational Health and Safety), and ISO 14001 (Environmental Management), reinforces our commitment to continuous improvement, risk management and responsible business conduct.

Additionally, our certifications with Australasian Certification Authority for Reinforcing and Structural Steels (ACRS) for reinforcing steel manufacturing and distribution, and Sustainable Steel Australia (SSA) ensure our commitment to employee safety, training and ethical treatment and responsible business practices. Through SSA we also consider broader sustainability outcomes, including responsible sourcing and social sustainability principles within the reinforcing steel supply chain.



Supporting Quality, Safety, Environment, Ethical Operations, Responsible Sourcing and Continuous Improvement.

These governance frameworks support ethical operations, sustainability and continuous improvement throughout our business and supply chain.

The principles that support the management of modern slavery risk are already embedded within our management system and day-to-day business operations. Bianco seeks to integrate modern slavery considerations into existing business processes where practical and appropriate, allowing our approach to develop alongside our broader management systems and continuous improvement activities.

Operations & Supply Chains

OPERATIONS

Bianco Reinforcing Group is a South Australian privately owned manufacturer and distributor supplying reinforcing steel products to the civil, construction and building industries.

The Group operates primarily within South Australia and consists of three related entities:

- Bianco Reinforcing Pty Ltd
- Bianco Transport Pty Ltd
- R.B.S.C. Pty Ltd

Collectively, the Group employs approximately 190 people across manufacturing, transport, administration and support functions.

Bianco Reinforcing Pty Ltd is the principal reporting entity and individually meets the reporting threshold under the Modern Slavery Act 2018 (Cth). However, operations across the three businesses are closely integrated. *Bianco Reinforcing Group* reflects our trading and brand identity rather than three separately obligated reporting entities, and this statement is prepared on behalf of the Group to provide a transparent overview of our operations, supply chains and approach to managing modern slavery risks.

BIANCO REINFORCING



Bianco Reinforcing Pty Ltd is a South Australian privately owned manufacturer and distributor of reinforcing steel products and associated services to the civil, construction and building industries.

Operating from Gepps Cross, South Australia, the business supplies reinforcing steel and related products to metropolitan and regional South Australian customers, with selected products and services also provided interstate.

Services include reinforcing steel processing, scheduling, estimating, mesh fabrication, logistics and associated support services.

Bianco Reinforcing is the principal reporting entity within the Group and individually meets the reporting threshold under the Modern Slavery Act 2018 (Cth).

BIANCO TRANSPORT



Bianco Transport Pty Ltd provides in-house transport and logistics services supporting the delivery of Bianco's products, operating mainly across metropolitan Adelaide with intermittent regional runs to areas including Victor Harbor and Murray Bridge, depending on project activity, and less frequent trips to Yorke Peninsula. Interstate freight is contracted out to third-party carriers.

In-house transport means our drivers are directly engaged with our operations. During heavier work periods, we supplement our fleet with sub-contracted delivery companies, maintaining regular contact and reviewing driver activity records covering delivery times and rest breaks. Given the bulk of the workforce is directly employed and our contract arrangements are closely monitored, we assess the modern slavery risk here as low.

RBSC - REINFORCING BAR SPACER COMPANY



RBSC takes recycled plastic pellets from a local recycler and processes them through injection moulding machines into reinforcing bar chairs, other placing aids for reinforcing steel, and other construction accessories such as star picket caps. RBSC currently operates from a site nearby in Wingfield.

With a wholly local supply chain from recycled waste materials, local manufacturing, and no overseas exposure, we assess the modern slavery risk here as negligible.

SUPPLY CHAINS

To manufacture our products, Bianco sources reinforcing steel material from Australia and a small number of moderate-risk overseas countries, and this remains by far our largest supply category by volume and spend. Beyond materials, the Group's supply chain also includes products purchased for resale, plant and equipment, logistics, utilities, general services, and uniforms and PPE, all of which support our day-to-day operations. The table below outlines our main supply categories.

Category	Description
Materials	The largest component is the procurement of material used to produce reinforcing steel products
Products for Resale	Bought-in finished placing aids and reinforcing accessories we resell, including RBSC's own products
Plant & Equipment	Supply, maintenance, consumables, professional servicing and calibration
Logistics	Fleet, fuel, parts and maintenance, to deliver our products, as well as mobile plant and fuel for material handling
Utilities	Includes electricity used by our offices and factories as well as water and gas for amenities
Services	Includes professional services such as IT, cleaning, marketing, and other office operating costs such as office supplies and consumables
Uniforms & PPE	Consists of branded and unbranded clothing and personal safety items

Bianco prioritises engagement with local manufacturers and businesses to support South Australian and Australian economic development.



Risks of modern slavery practices, operations and supply chains.

Bianco Reinforcing periodically reviews its structure, operations and supply chain for risks of modern slavery. Risks of modern slavery practices applicable to the Group come from:

- Supporting modern slavery through our supply chain
- Causing modern slavery in our workforce
- Contributing to modern slavery downstream to our customers and community

REINFORCING STEEL

Reinforcing steel material remains disproportionately our largest supply category by volume, far exceeding any other category of purchase. Bianco Reinforcing's risk assessment of this category considered both purchasing volume and country of origin. The table below sets out the countries we source reinforcing steel from and their associated risk rating.

Risk Rating	Reinforcing steel materials country of origin	Supply of materials (%)
Very High	None identified	0
High	None identified	0
Moderate	Indonesia, Malaysia, Singapore, Vietnam	<10
Low	Australia	>90
Note: country risk rating is adopted from the Global Slavery Index 2023 data		

OTHER DIRECT SUPPLIERS

Beyond reinforcing steel, our review also takes in a wider range of direct suppliers, prioritised by the significance of the purchasing relationship as well as risk of product or service, rather than covering every supplier equally. This includes suppliers with high, recurring purchasing volume, suppliers that represent a smaller number of transactions but a significant, infrequent or one-off investment in our operations, such as capital machinery, as well as suppliers of known higher risk items such as uniforms and PPE. This is a broad review intended to give us a general overview of where risk may sit across our direct supply chain, guiding where we focus more detailed attention as we move forward, in line with the resourcing of our business.

Where a direct supplier purchases through a distributor or intermediary, such as uniforms sourced through a distribution arrangement, our review considers that relationship at the tier 1 level only. We have not yet directly, formally assessed the distributor's own suppliers (tier 2) or further upstream manufacturers, and we've noted this as a limitation to address as our review process matures.

Products for Resale

Covers bought-in finished goods and accessories we resell, including RBSC's own locally manufactured placing aids. Several of our suppliers in this category are large, established manufacturers or distributors with their own reporting obligations under the Act, and we treat their own published statements as a proportionate starting point for assurance. We have not identified any specific concerns in this category to date.

Risk: Low

Plant & Equipment

Comprises capital production equipment, along with associated consumables and parts for maintenance. Capital equipment purchases occur infrequently but represent a significant investment when they do. Our suppliers in this category are established international manufacturers operating in generally low to moderate risk countries.

Risk: Low

Logistics

Covers fleet, fuel, parts and maintenance associated with delivering our products, as well as mobile plant for materials handling. Suppliers in this category are a mix of reporting and non-reporting entities, but are all established Australian businesses.

Risk: Low

Utilities

Includes electricity used by our offices and factories, sourced through the South Australian power grid, as well as gas and water for amenities, which represent a minimal component of this category. As electricity is drawn from the National Electricity Market, some of which is generated interstate, this remains a domestic supply.

Risk: Low

Services

Covers professional services such as IT, cleaning, travel and marketing, provided predominantly by local South Australian businesses. Stationery supplies within this category are purchased through suppliers that are reporting entities under the Act.

Risk: Low

Uniforms and Personal Protective Equipment

Garment manufacturing is widely recognised as a higher-risk category internationally, regardless of purchase volume. Our uniforms and PPE are purchased through a distributor that falls under a joint Modern Slavery Statement filed by its parent company. As part of this review, we also conducted an informal check of our higher-volume tier 2 manufacturers supplying this category, and found each had either its own modern slavery reporting obligations or published ethical sourcing and labour compliance policies in place.

Risk: Moderate

Where a supplier or its parent entity has published a Modern Slavery Statement, or maintains its own ethical sourcing or labour compliance policy, we treat this as a positive but limited indicator. Publication of a statement or policy is largely self-reported, and unless a supplier also discloses completion rates for external, independent audits, the actual extent and effectiveness of its due diligence cannot be independently verified. Even where external audit frameworks are referenced, this does not guarantee the absence of gaps. We factor this limitation into our own risk assessment of each category, rather than treating a published statement or policy as conclusive evidence of low risk.



Bianco Reinforcing Group has assessed the risk of modern slavery within its supply chain as low to moderate overall, as the majority of suppliers are Australian businesses operating in a low-risk country. Our highest exposure remains reinforcing steel materials sourced from a small number of moderate-risk overseas countries, and we continue to prioritise local procurement where practical.

During the 2025-26 financial year, we broadened our review beyond materials and conducted a cursory risk assessment of Tier 1 suppliers across our main supply categories. This assessment confirmed that most categories present a low risk of modern slavery, with uniforms and PPE identified as a moderate-risk category for future review. The findings will help inform future due diligence activities and focus resources where they can provide the greatest benefit.

EMPLOYEES

Bianco Reinforcing Group is dedicated to the safety of our employees. Our culture is underpinned by our objectives of 'Zero Harm' to our team, the environment and greater community, and 'Continuous Improvement' to achieve this. Our goal is to maintain a safe and fair workplace for our team members and our operations.

Bianco Reinforcing Group staff are engaged under employment contracts that are in accordance with Fair Work Australia. We comply with the applicable employment legislation and industrial awards. We also comply with superannuation, leave and other entitlement obligations.

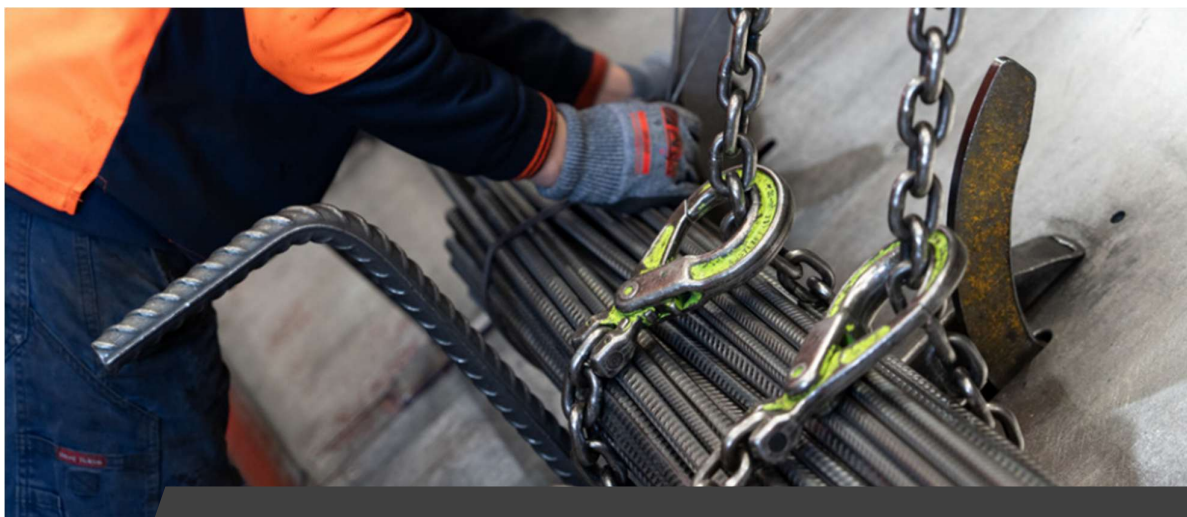
Our staff engagement is guided by the following policies:

- Recruitment and Selection Policy
- Equal Opportunity Policy
- Code of Conduct Policy
- Training & Development Policy
- Complaints, Grievances & Whistleblower Policy

Additionally, employees are inducted in the following policies and related processes:

- Work Health & Safety Policy
- Environmental Policy

Migrant workers, especially those without the legal rights to work in Australia, are at the greatest risk of modern slavery practices within Australia. We confirm our employees have the right to work in Australia with the Department of Home Affairs' Visa Entitlement Verification Online System, as well as regularly consulting with applicable employees to ensure the Group and employee are meeting the requirements and obligations of the visa.



Bianco Reinforcing Group have assessed the risk of modern slavery within our workforce as negligible because we operate in a low-risk country and maintain quality People & Culture policies and procedures.

Effectiveness of these actions.

Addressing modern slavery as related to Bianco Reinforcing Group is always evolving. We are focused on continually improving our risk detection and mitigation methods and engaging with suppliers who either have modern slavery policies in place or in other ways demonstrate a commitment to mitigating the risks of modern slavery in their supply chain.

We currently manage our modern slavery risk in accordance with our QHSE Management System risk process. It is difficult to provide an effectiveness rating for any one activity so we have instead chosen steps and goals to achieve.

Some of Bianco Reinforcing Group's key actions in our commitment to reducing modern slavery practices from our suppliers are:

- Working with brokers to ensure they understand the expectations we have of them to ensure we engage and operate in accordance with all applicable modern slavery laws.
- Maintaining positive and open relationships with brokers and suppliers so we can monitor the relationship, and suppliers will have a reasonable expectation that we will require the opportunity to ask questions in relation to their operations, also that the suppliers feel able to disclose to us challenges they may be facing in complying.
- Working in preference with suppliers who can demonstrate inspection by, or accreditation or membership with, respected international ethical standards and accredited entities.
- Where practicable we aim to meet with or visit suppliers to further enhance working relationships and review their processes.



Bianco Reinforcing Group continues to improve its procurement practices to identify and manage modern slavery risks. During the 2025-26 financial year, a cursory risk assessment of Tier 1 suppliers was undertaken to better understand supply chain risks and inform future due diligence activities. The findings will help focus resources where they can provide the greatest benefit while supporting ongoing improvement of supplier monitoring and risk management processes.

MODERN SLAVERY ACTION PLAN

☒ Completed
 ☐ Focus for future years

Action	Description	Status
Supply chain mapping	Steel materials suppliers have been assessed	☒
	Suppliers other than steel materials suppliers deemed high risk have been assessed	☒
	The Tier 1 supply chain is mapped and assessed	☒
	Priority Suppliers identified for enhanced review	☐
	Tier 1 supplier risk profile periodically reviewed and updated	☐
Suppliers and reviews	Modern Slavery criteria added to Supplier Evaluation and Performance Monitoring processes	☒
	Supplier Code of Conduct Policy published and implemented	☒
	Materials and high-risk suppliers reviewed annually to reassess modern slavery risk	☐
Audits and inspections	Desktop reviews conducted on Suppliers	☒
	On-site inspection and meetings conducted on Priority Suppliers	☐
	Modern slavery disclosures and publicly available information reviewed for Priority Suppliers.	☐
Remediation	Group commitment to working with suppliers to remediate any identified high-risk activities or products	☒
Complaints mechanism	Implement a confidential and anonymous whistleblower mechanism for workers and the supply chain to raise concerns with protection from reprisal	☒
	Implement a defined process for investigating and reporting on issues raised through the whistleblower mechanism	☒
Education and awareness	Employees involved in purchasing activities receive awareness training on modern slavery risks	☐
Review	The Group annually reviews its modern slavery risk assessment and publishes a statement	☒

Other information that Bianco Reinforcing Group considers relevant.

During the 2025-26 financial year, Bianco Reinforcing Group did not receive any reported concerns relating to modern slavery practices and did not identify any instances of modern slavery within our operations or direct supply chain. While no issues were identified, we recognise that modern slavery risks can exist within global supply chains.

As part of our commitment to continuous improvement, Bianco Reinforcing Group will continue to review and enhance our purchasing policies, supplier management processes and procurement controls to strengthen the identification and management of modern slavery risks. Continuing education and awareness for employees involved in purchasing decisions will also remain a focus area, supporting an informed and risk-based approach to supplier selection and monitoring.

Bianco Reinforcing Group is also aware of proposed reforms to Australia's modern slavery legislation and reporting framework expected to progress during 2026 and will continue to monitor these developments to support ongoing compliance and continual improvement of our modern slavery program.





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