

# James Hardie Building Products Ltd ("James Hardie UK") **Modern Slavery Statement**

Pursuant to the requirements section 54 of the Modern Slavery Act 2015 this statement sets out the actions taken by James Hardie UK in the financial year ending 31 March 2024, to identify, address and minimise the risk of modern slavery in our business and supply chain.

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# Our Business

## James Hardie UK

James Hardie Industries plc<sup>1</sup> is the world's #1 producer and marketer of fibre cement building products and a market leader in Europe for fibre gypsum building products. James Hardie UK is part of the James Hardie Group of companies (the Group)<sup>2</sup>, and distributes fibre cement and fibre gypsum building products and accessories in the United Kingdom. Our products are used in new residential construction, manufactured housing, renovations and extensions, as well as a variety of commercial and industrial applications.

The Group employs of approximately 5,000 employees. We believe that a skilled and diverse workforce, which encompasses different viewpoints, skills, attributes, life experiences and the unique strengths of each employee, contributes collectively to the company's operating performance and we have policies in place to support and promote this belief. More broadly, but related, we consider the respect and improvement of human rights, but globally and within the United Kingdom, is an important issue and we believe that taking steps to address the serious issue of modern slavery is everyone's responsibility.

## Reporting Entities & Organisational Structure

### James Hardie UK

James Hardie UK is a proprietary limited company with a sole shareholder, James Hardie Europe B.V.<sup>3</sup> and no subsidiaries. It is an indirect wholly owned subsidiary of James Hardie Industries plc.

James Hardie UK is the main operating entity for the Group in the United Kingdom. James Hardie UK's modern slavery activities in FY24 are, therefore, focused on the James Hardie UK supply chain, where greatest value could be delivered.



<sup>1</sup> James Hardie Industries plc (company no. 485719)

<sup>2</sup> James Hardie Industries plc and all its direct and indirect subsidiaries

<sup>3</sup> James Hardie Europe B.V. (company no. 34181531)

# Our Governance Framework

Consistent with the Group's practices and procedures, James Hardie UK adopts appropriate corporate governance practices designed to assure that informed, competent and independent guidance and oversight is maintained over its activities.

All James Hardie companies, including James Hardie UK, are covered by the Group's Global Code of Business Conduct (Code of Business Conduct) (<http://ir.jameshardie.com.au/jh/library.jsp>) and the Group's Ethics Hotline Policy. The Code of Business Conduct reinforces Group's commitment to Zero Harm and promotes ethical behaviour. According to the terms of the Ethics Hotline Policy, The Group maintains an ethics hotline (Ethics Hotline) which provides a means by which internal and external stakeholders can report instances of suspected non-compliance with the Code of Business Conduct and any other concerns. The Ethics Hotline is managed by a third-party provider able to receive reports by phone or email. Details of any Ethics Hotline concerns reported are forwarded for review by a select group of senior Group executives who determine an appropriate response, often including independent investigation.

In preparing this modern slavery statement, relevant directors and officers of James Hardie UK were consulted and provided with an opportunity to review the statement prior to its approval.

## Code of Conduct



The Code of Business Conduct emphasises the Group's dedication to its core values and explains what we stand for collectively, and our commitment to Zero Harm. All James Hardie UK employees are committed to a ZERO HARM working environment and accept and undertake to comply with, the Group's Safety Pledge - Safe People, Safe Places, Safe Systems. We value input from employees and encourage employees to ask questions and raise concerns in good faith. We do not tolerate retaliation of any kind against employees.

The Code of Business Conduct covers a range of other elements, that are important to the way we do business, including Business Integrity, Personal Accountability and Integrity in the Workplace. The Code of Business Conduct applies to all employees, agents, contractors, directors and officers who are expected to comply with the spirit as well as the letter of the Code of Business Conduct and to act ethically and with integrity in a manner consistent with our values.

## Our Workforce

James Hardie UK is covered by the Group's Workplace Diversity

Policy and related policies such as its Equal Employment Opportunity and Anti-Harassment Policy and Workplace Flexibility Guidelines. These support our core organisational values, including Operating with Respect. The policies apply to all individuals recruited or employed by James Hardie UK and reflects the organisation's inclusive view of diversity.

## Sustainable Manufacturing

The Group is committed to environmental excellence and long-term sustainability. As an example, the Group endeavours to source raw materials as close to the point of manufacture as possible, reducing the environmental impact caused by transportation of materials.

We are committed to implementing innovative solutions that optimise the use of raw materials, water and energy resources. The Group's Environmental Policy is based on four guiding principles:



Renewable and Recyclable Resources



Protection of the Environment



Water, Resource and Energy Conservation



Full Lifecycle and Product Sustainability

## Supplier Code of Conduct

The Group is committed to the sustainable and ethical procurement of products and services and continuous improvement to minimize the environmental and social impacts associated with our network. Our Supplier Code of Conduct sets out the principles and standards which we expect of our suppliers, through to their employees, personnel, agents and subcontractors (collectively referred to as suppliers) to support, embrace and adhere to.

Our Supplier Code of Conduct requires suppliers to adhere to modern slavery regulations by complying with minimum employment age limits, as defined by international Labour Organisation conventions, and prohibiting child labour, forced labour or involuntary labour. Suppliers must also avoid sourcing from organisations or individuals associated with illegal activities or human rights abuse and protect the human rights of their own workforce and those employed in their supply chain networks.

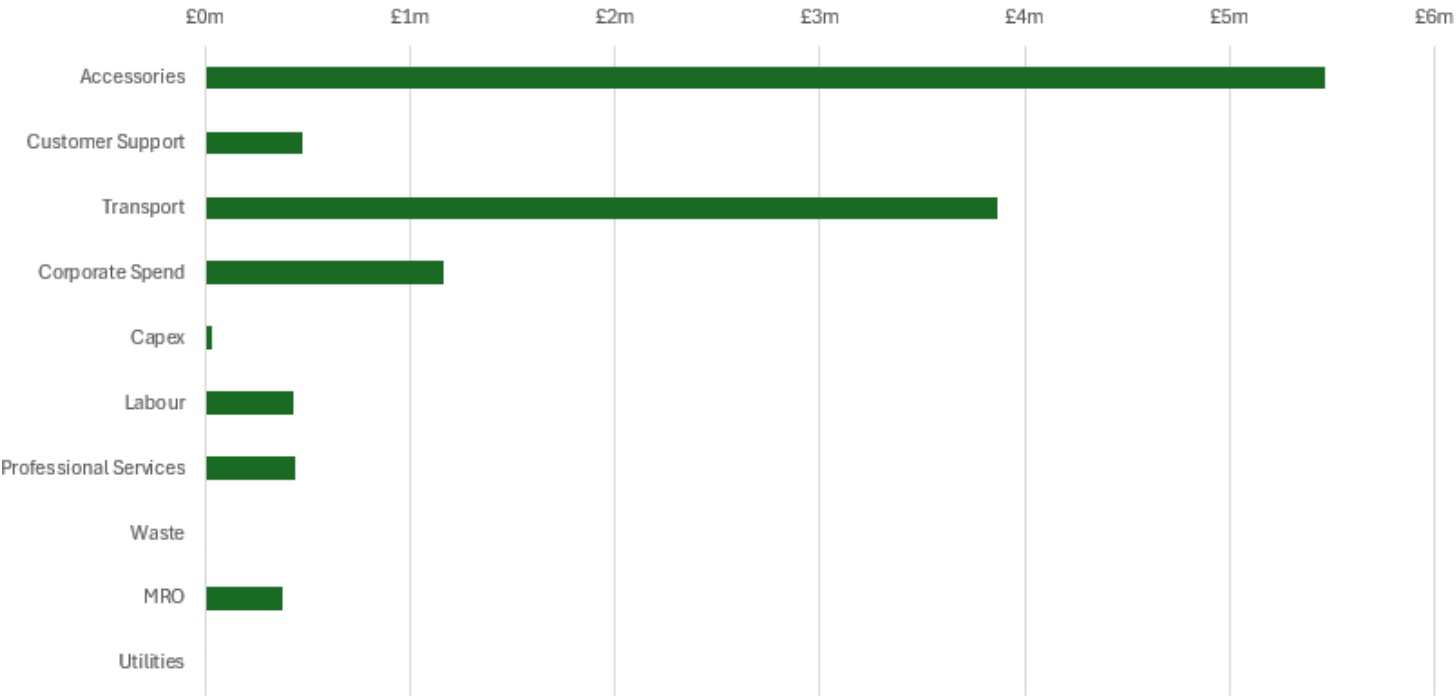
To learn more about our principles and standards, refer to: [www.jameshardie.co.uk](http://www.jameshardie.co.uk)

# Our Supply Chain

Having regard to our geographical location and operational footprint, we have identified our supply-chain, as opposed to the operations of James Hardie UK business, as being the area at greatest risk of modern slavery. Accordingly, focusing on the area of greatest risk, our efforts have been devoted to an analysis of our supply-chain.



James Hardie UK purchases good and services within the following categories:



# Supplier Risk Management

## Awareness

One of the key elements contributing to the perpetuation of modern slavery, is the fact that it can often be hidden in plain sight. Fundamental therefore, to eradicating modern slavery, is raising awareness about modern slavery, including actively engaging with our supply chain regarding risks of modern slavery, and what we can do, and must do, to address them. Accordingly, we have commenced a review of our policies and procurement contracts to ensure that they expressly include terms and conditions which require compliance with all relevant modern slavery legislation and facilitate this engagement. Any new negotiated supplier agreements will include clauses obliging suppliers to comply with all applicable laws, and requirements of the company, with respect to modern slavery.

Our agreements for raw materials and supply of goods and services will outline our commitment to ensure we have a positive impact on the working conditions of those engaged directly and indirectly in the James Hardie UK business and its supply-chains. As part of our supplier onboarding process, suppliers will be required to review and undertake to comply with our Supplier code of Conduct including relevant provisions relating to modern slavery. James Hardie UK will require its suppliers to declare their adherence to the Supplier Code of Conduct and demonstrate compliance with its principles throughout their operations.





# James Hardie UK

## Modern Slavery Statement

### Modern Slavery - Future Commitments


Over the course of FY25, James Hardie UK has and will:

- Continue to develop awareness on modern slavery for internal and external stakeholders
- Publish our Supplier Code of Conduct and our Modern Slavery Statement on the James Hardie UK website [www.jameshardie.co.uk](http://www.jameshardie.co.uk)
- Focus our efforts on deepening engagement with high-risk operations suppliers
- Engage with suppliers to understand how they are addressing their modern slavery risks
- Roll out a training module on modern slavery and trafficking risks and report on completion



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes James Hardie UK's slavery and human trafficking statement for the financial year ending 31 March 2025. This Statement was prepared in consultation with, and approved by the Board on 23 September 2024

Signed on behalf of James Hardie Building Products Ltd by [Lee Bucknall, Managing Director]

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