

JH Modern Slavery Statement



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Introduction

Pursuant to the requirements of the Modern Slavery Act 2018 (Cth.) (“Act”), this joint statement of RCI Holdings¹ and James Hardie Australia Pty Ltd (“James Hardie Australia” and “we” or “us”) sets out the actions taken by James Hardie Australia, whether in its own right or as part of the actions taken by the broader James Hardie Industries plc group of companies (“James Hardie”) in the financial year ending 31 March 2025 (“FY2025”), to identify, address and minimize the risk of modern slavery in our business and supply chain. This is our sixth Modern Slavery Statement.

James Hardie Australia - Who we are and our structure

James Hardie Australia manufactures, distributes and markets high-quality fibre cement building products. Our products include a variety of patterned profiles and surface finishes for a range of applications, including cladding, trim, soffit lining, internal linings, walls, facades, floors, and tile underlay. Building on a 135+-year legacy, we are relentless in pursuing our purpose of Building a Better Future for All™.

James Hardie Australia employs a diverse workforce and in the 1 April 2024 to 31 March 2025 this included 686 full time employees, 10 part-time employees and 8 contract employees. We believe that a skilled and diverse workforce encompasses different viewpoints, skills, attributes, and life experiences. The unique strengths of each employee contribute collectively to our culture and operating performance. We want to attract, develop, engage, and retain our workforce through a culture that promotes innovation, inclusion, social justice, performance, and growth. Our company culture is built on providing a foundation of “Zero Harm”, creating a positive impact in communities and delivering environmentally responsible and innovative solutions to customers.

James Hardie Australia’s top highest spend suppliers in pulp, cement, and freight, which are also the highest spend categories, are all located in Australia and New Zealand. These are low-risk suppliers through our risk mapping activities.

In FY25, James Hardie undertook a global transformation of the group’s Responsible Sourcing programme, building on the work being done at James Hardie Australia, and developed a global Human Rights Due Diligence programme.

James Hardie’s Commitment to Sustainability

James Hardie is committed to its sustainability journey and proactively managing the environmental and social impact of the companies within the James Hardie group. Meeting the challenges of a changing world and Building a Better Future for All™ means continuing to focus on four key pillars of Planet, Innovation, Communities and Zero Harm. The annual global sustainability report detailing James Hardie’s activities around these four pillars should be read in conjunction with this report as it goes into greater detail on our own operations and employee engagement as well as our Zero Harm work across the organization. For further information see the James Hardie Sustainability Report FY2025.

Innovation

James Hardie is committed to transforming new technologies into high-quality and sustainable products, solutions and building practices.

Communities

We, and James Hardie more broadly, are building and sustaining an inclusive culture within our business and supporting the communities where we live and work.

Zero Harm

With our Zero Harm culture, we seek to minimize risks to health, safety and the environment from our operations and products, for our employees, partners and customers and the communities in which we and they operate.

Planet

We are proactively managing our impact on the environment with prioritization on circularity and reducing greenhouse gas emissions.

Mitigating Human Rights Risks in the James Hardie Supply Chain

This past fiscal year was transformative for James Hardie, marked by the evolution of our social impact work into a truly global program, underpinned by a sharpened strategic focus on human rights. James Hardie launched a comprehensive Global Human Rights Policy, as well as conducted a global human rights salience review, and continued implementing its Global Supplier Code of Conduct; reinforcing our commitment to responsible sourcing and the eradication of modern slavery across our supply chain. These efforts reflect a broader strategic reorientation - one that aligns operational rigor with purpose-driven impact, setting the foundation for deeper engagement and accountability in FY26 and beyond.

FY25 Activities

James Hardie is committed to its sustainability journey and proactively managing the environmental and social impact of the companies within the James Hardie group. Meeting the challenges of a changing world and Building a Better Future for All™ means continuing to focus on four key pillars of Planet, Innovation, Communities and Zero Harm. The annual global sustainability report detailing James Hardie's activities around these four pillars should be read in conjunction with this report as it goes into greater detail on our own operations and employee engagement as well as our Zero Harm work across the organization. For further information see the James Hardie Sustainability Report FY2025.

Assessment

Foundational to James Hardie's responsible sourcing programme is the risk assessment process. We and James Hardie more broadly continue to utilize the FRDM database as they have a robust focus on human rights and modern slavery risks. This past fiscal year we took the time to reset our approach to risk mapping as James Hardie expanded from screening only our Australian suppliers to screening its entire global supply chain.

To determine which suppliers were operating in inherently high-risk environments and therefore would need an onsite audit, James Hardie targeted the risk variables of the country and industry they were operating in. This allowed us to focus on their onsite operations, which is what the audit activities assess against.

FRDM is a live platform and allows us to continuously monitor our suppliers particularly, as we deployed the Sanctions and Media alerts. In the last fiscal year, no alerts came up in either module for our or James Hardie's tier 1 suppliers. We are also able to use this tool to risk map new potential suppliers to support our procurement decisions.

FRDM also maps our supply chain using shipping manifests, customs documents and ownership records. FRDM utilizes some of the same data sources used by US Customs and Border Protection and the US Department of Labor. By doing so, it ensures that the data James Hardie sees is the same data used in making regulatory decisions by governmental agencies.

For those suppliers deemed potentially high-risk, we continue to engage with Intertek and use their Workplace Conditions Assessment (WCA), an industry standard tool, which covers all elements of James Hardie's Global Supplier Code of Conduct including modern slavery risks. We also understand that some suppliers may have other customers asking for audits and therefore participate in mutual recognition, allowing them to submit industry standard audits to Intertek for review.

While James Hardie's primary focus was on reviewing and creating a global Responsible Sourcing programme, it also undertook a Human Rights Salience Review. The UN Guiding Principles on Business & Human Rights outlines the responsibility of companies to respect human rights by preventing, mitigating, and remediating negative impacts on people. Companies are expected to conduct human rights due diligence, prioritizing their most prominent human rights risks and impacts. Salient issues are those with the most severe negative impact on people, considering the full value chain and internationally recognized human rights standards. James Hardie enlisted a third-party expert to execute this review. They conducted internal interviews across the global organization, reviewed policies, procedures and other internal documents and interviewed external parties including trade organizations to understand the industry and worker issues within it. Results of this review will be shared publicly.

Risk Assessment Results

In FY25 James Hardie had 4,768 active suppliers across the globe. Previously, we have only reported on suppliers through our Australian procurement activities. Of those, only 4 were required to undergo an onsite audit. This low number of tier 1 suppliers with potentially high-risk own operations is reflective of the industries we source from and our majority local sourcing approach, particularly

of our key raw materials and transportation. This approach is consistent across James Hardie as a whole and, globally, 81% of our raw materials are sourced within 150 miles of our manufacturing facilities.

Due Diligence

Onsite Auditing

James Hardie engaged with 4 suppliers for onsite social compliance auditing that were not already in the Intertek platform from our legacy program. One of the suppliers in Slovenia had a relevant SA8000 audit which is a robust and comprehensive onsite audit process. There were no critical or significant issues to report. The other audits in process are in Australia, Italy and Hungary. For most of these suppliers, this social compliance audit request was new to them and therefore took more time to raise awareness and understanding of why James Hardie was asking for this and the value the process can add to their business.

Engaging Suppliers

As per our previous modern slavery statement, we continue to raise awareness and understanding of modern slavery. Our Australian procurement policy specifies that, where possible, all agreements with suppliers include clauses relating to modern slavery.

James Hardie's Global Supplier Code of Conduct is embedded into our supplier onboarding process in Australia. All suppliers are required to acknowledge and accept the code as a precondition to being engaged as a supplier of James Hardie Australia and 100% of our James Hardie Australia suppliers have acknowledged and accepted the code. James Hardie is working globally to achieve similar practices.

When hiring temporary labour for our Australian operations, temporary labour suppliers must acknowledge and agree they will not use child labour in the provision of their services or throughout their operations. This includes no slavery, forced, bonded or involuntary labour. Recruiters must be fully compliant with all applicable Modern Slavery Legislation and have the necessary documentation, systems and controls in place to ensure its continued compliance.

Training

In FY2025, using our in-house online training platform, we continued to raise awareness of the risks of Modern Slavery. Training has been rolled out to all James Hardie Australia employees who may liaise with suppliers or engage suppliers on behalf of the business. In addition, we have also included all sales staff who deal with our customers daily. Compulsory training covers what Modern Slavery is, how to identify and report risks, human rights, and the prevention of modern slavery.

Policies & Governance

James Hardie continues its commitment to the sustainable and ethical procurement of products and services and continuous improvement to minimize the environmental and social impacts associated with our network. The James Hardie Global Supplier Code of Conduct outlines the minimum standards we require, including the express prohibition of the use of child and forced labour. All James Hardie companies, including James Hardie Australia, are covered by James Hardie's Global Code of Business Conduct and Ethics Hotline Policy. The Code of Business Conduct reinforces James Hardie's commitment to Zero Harm and promotes ethical behavior for our own employees. This year James Hardie launched the Global Human Rights Policy that expands its expectations on respecting human rights to our entire supply chain.

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 James Hardie executives who determine an appropriate response, which often includes independent investigation.

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

Looking Ahead

This past fiscal year was a transformative one as James Hardie evaluated its program and expanded its Responsible Sourcing work to cover all regions in which James Hardie operates. James Hardie made some adjustments that will allow us to be strategic and effective in our pursuit of mitigating the risks of forced labour from our supply chain. As James Hardie has worked through some of the challenges of engaging new suppliers in the onsite audit process, we've learned how to be more effective, which will allow for more prompt scheduling of audits. Suppliers already in James Hardie's system from our legacy programme will be undergoing follow-up or re-audits in FY26. Therefore, next year we will have more to report on audit results and the effectiveness of the Global programme.

We will continue to identify ways to engage with suppliers through Self-Assessment Questionnaires that are moderate and low risk based on the risk mapping tool to further promote awareness on modern slavery and other human rights issues. James Hardie and we will also review the Trading Partners module in FRDM to identify ways to leverage the information as we know some of the greatest risks of modern slavery and other human rights violations will be found deeper in the supply chain. While James Hardie has strong internal practices around worker voice, we will continue to explore ways that we, and our suppliers, can hear more from workers as their voice is critical to understanding working conditions.

In FY26 James Hardie will be rolling out a mandatory human rights training for all James Hardie employees globally that will provide them with an understanding of what Human Rights are and how they impact our supply chain.

Given the completion of the Human Rights Saliency Review at the end of FY25, James Hardie is

planning to release the report that will include prioritized human rights issues as well as current actions and opportunities.

Human Rights Due Diligence is an ongoing process that does not stop and start each year. James Hardie and we will continue to review our programme, strategy and actions to identify opportunities to improve our practices and expand our influence across the supply chain in our continued commitment to Building a Better Future for All™.

This statement is submitted on behalf of James Hardie Australia Pty Ltd and RCI Holdings Pty Ltd, pursuant to section 14 of the Modern Slavery Act 2018. This Statement was prepared in consultation with, and approved by, the Board of Directors for James Hardie Australia Pty Ltd and RCI Holdings Pty Ltd.

Signed on behalf of RCI Holdings Pty Ltd
by **Bruce Potts – Director**

Signed on behalf of James Hardie Australia Pty Ltd
by **John Arneil - Director**

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