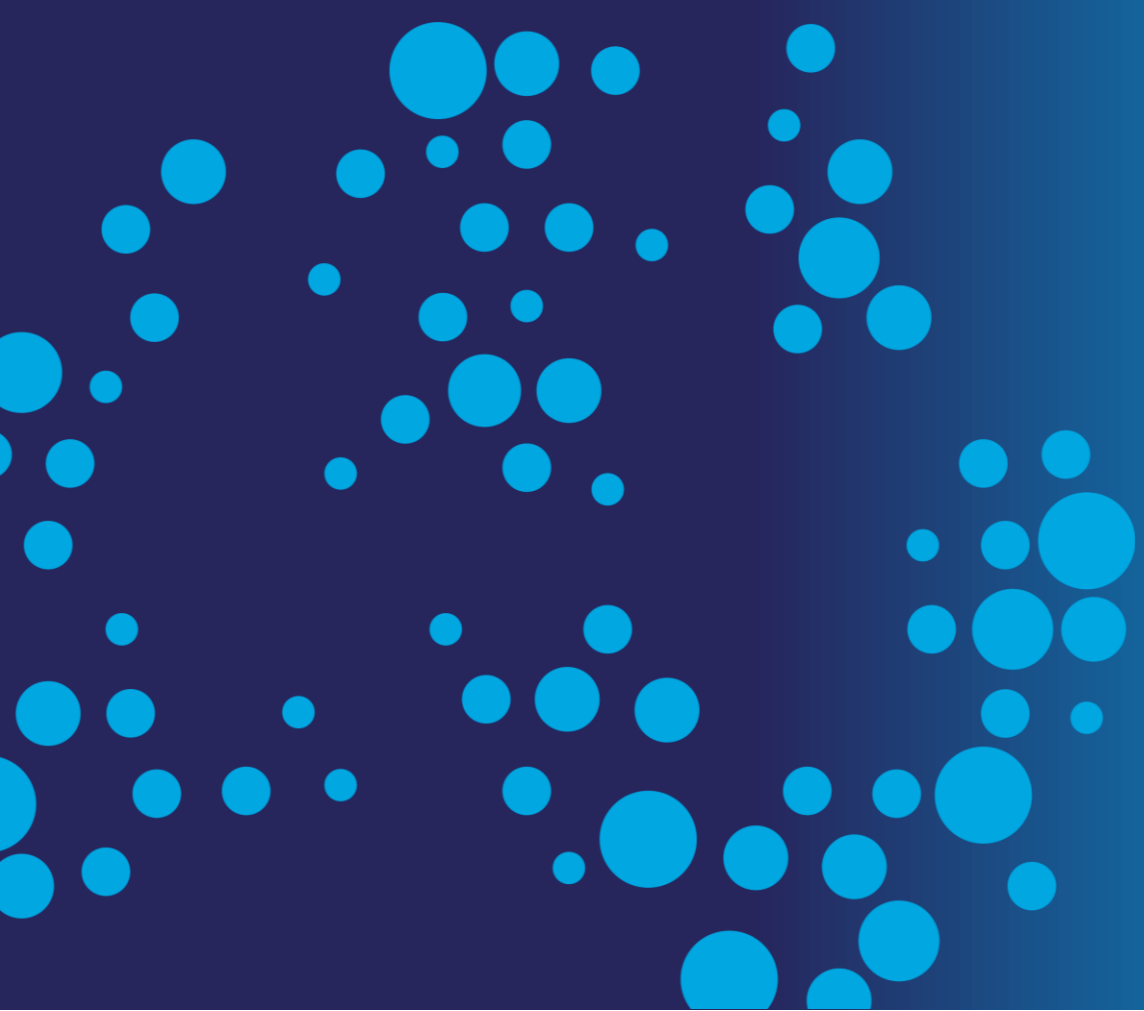


# Privacy Policy

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24 September 2024 Rev 1.2



# Privacy Policy

Adbri Ltd and its subsidiaries (referred to in this policy as the Adbri Group, we, us, our) are required to comply with the *Privacy Act 1988 (Cth) (Privacy Act)* including the Australian Privacy Principles (Privacy Laws). Our subsidiaries are listed in our annual report. This Policy outlines the way in which we collect, hold and manage personal information. In this Policy, 'personal information' means information about an identifiable individual (a natural person).

Adbri Group is part of CRH plc of 42 Fitzwilliam Square Dublin 2 D02 R279 Ireland and its subsidiaries within the CRH group of companies worldwide (together **CRH**).

## 1. Application of this Policy

This Policy applies if you:

- are one of our customers, contractors or suppliers;
- use any of our products or services;
- visit our main website at or other related websites;
- are seeking employment with us; or
- are an employee.

By providing us with your personal information, you authorise the personal information being collected, held, used and disclosed in accordance with this Policy. This Policy is in addition to any other applicable terms and conditions that may apply to your relationship and/or engagement with us.

## 2. The kinds of personal information we collect

We may collect and hold personal information about customers, potential customers, employees, prospective employees, contractors and suppliers. We collect and hold personal information that is reasonably necessary for our business functions.

The types of personal information we collect about you depends on your dealings with us and may include:

**Customers:** information as required for our relationship with you, such as:

- contact details (e.g. your name, address, telephone number and/or email address);
- financial information (i.e. for invoicing and payment purposes);
- information about your dealings with us and the products and services that you may be interested in;
- credit risk information, if you apply for an account with us;
- internet protocol (IP) address;
- records of our communications or dealings with you (which could include voice and audio recordings), including any complaints, incidents requests or queries; and
- CCTV footage from any of our premises.

**For prospective employees, or contractors and suppliers:** information for the purpose of commencing and conducting a business or employment relationship with you, such as:

- your basic contact information (e.g. name, address, contact details, date of birth, and other personal details);
- your government identifiers (e.g. tax file number, driver's licence, passport and/or visa details);
- information about your occupation, employment history, education and suitability for the role or relationship, including criminal history, and whether you hold any licences/permits, drug tests or police clearances required for the role;
- your financial information (e.g. bank account details or payment history for invoicing and/or payroll purposes);
- details about engagement by us, including the type of products and/or services you provide to us, and other information relating to your performance;
- name and contact details of emergency contacts;
- your health and medical information, including medical history and contact details for your medical practitioners and treatment providers;
- information about your COVID-19 vaccination status, for health and safety compliance;
- diversity information, which might include gender, ethnicity, country of origin, languages spoken;
- information about your past or current performance in the role or as a supplier or contractor;
- voice and video recordings of our communications or dealings with you;
- your internet protocol (IP) address; and
- CCTV footage from any of our premises.

If you do not provide all of the personal information we request, we may be unable to provide you with the products or services you are seeking or engage you as an employee or contractor.

### 3. How we collect personal information

We will collect personal information directly from you, where reasonable and practicable to do so. We generally collect personal information in person, or by telephone, or by voice and video conference (e.g. MS Teams), or through written information or forms that you submit to us. We may collect personal information about you:

- from a third party in some instances, for example, a report provided by a medical professional, police check service providers, trade or employment references, suppliers of services to us or other parties where we have your consent to that collection;
- from voice and video recordings of Adbri Group related meetings, presentations, public announcements and company briefings;
- from CCTV cameras that may be placed on and around our premises; and
- from public sources.

If you provide us with personal information about a third party, you warrant that that third party has consented to us collecting and using their personal information in accordance with this Policy. Your obligations under Privacy Laws may also mean that you need to tell that person about the disclosure and let them know that they have a right to access their personal information and that we will handle their personal information.

If the personal information we request is not provided, it may affect our ability to do business with you, including that we may be unable to supply the relevant product or service or to perform our obligations to you, offer you credit or engage you in certain roles in our business. You may be unable to attend our workplaces.

#### 4. How we use personal information

By providing us with your personal information, you consent to us using and disclosing your personal information for the following purposes:

- to verify your identity and communicate with you;
- to facilitate communication with you and your nominated contacts in an emergency and protecting the health and safety of employees and others;
- to provide and market our products and services to you;
- to respond to any feedback, enquiries or complaint, and provide you with information you have requested;
- to maintain and administer your records, including (where relevant) your employee records;
- to process, administer, collect payments from or make payments to you, and if applicable, make appropriate taxation deductions;
- to assess suitability of potential employees or contractors and assess performance of current employees and contractors;
- for general business purposes and management functions, such as payroll activities, performance management, making business travel arrangements and / or improving products and services;
- if we restructure or transfer any of our business assets;
- related purposes that you would reasonably expect;
- to comply with any legal obligations which require the collection, retention or disclosure of personal information, such as record-keeping and reporting, honouring contractual obligations and / or healthcare obligations; and
- other purposes required or authorised by law.

In addition, CCTV footage specifically may be used for the following purposes:

- detecting and deterring unauthorised access to, and criminal behaviour on, our premises;
- monitoring the safety and security of our customers, employees, contractors and suppliers, and completing incident investigations; and
- reviewing the actions of our employees and contractors.

In addition, voice and video recordings of Adbri Group related meetings, presentations, public announcements and company briefings specifically may be used for the following purposes:

- receiving and receiving training, education, information and demonstrations;
- recording minutes and actions;
- for viewing by invitees who were unable to attend the relevant meeting or other presentation.

If you consent to receiving direct marketing communications from us, we may use your personal

information to contact you from time to time whether by email, phone or SMS, to identify a product or service that you may be interested in or to tell you about new products or services, special offers, and events. You can opt-out of receiving marketing information from us at any time by using the opt-out mechanism provided.

## 5. Disclosure to third parties

Third parties to whom we may disclose personal information to include:

- the relevant individual's representatives;
- our related companies including CRH;
- third party contractors who are performing services for us, or on our behalf;
- if you apply for a credit account with us, credit providers, trade bureaus, and Credit Reporting Bodies (CRBs);
- our professional advisers including legal, accounting, auditing and business consulting advisers; and
- government and regulatory authorities, where we are required or authorised by law to do so.

If we disclose information to a third party, we will take reasonable steps to require that the third party protects your information to the same extent that we do.

We outsource our share register information to Computershare Limited and Boardroom Pty Limited, which may include personal information about individual shareholders. Computershare and Boardroom are bound by the Privacy Act and APPs, and a copy of their Privacy Policies are available here:

<http://www.computershare.com/au/help/Pages/privacv-policies.aspx>

<https://boardroomlimited.com.au/corp/privacy-policy/>

## 6. How we handle credit information

We sometimes provide products and services to our customers on specific or agreed payment terms. In the course of doing so, we may collect credit information from individuals, for instance, sole traders, company directors or guarantors. Such credit information may include:

- identity and contact details;
- details of other credit or trading account arrangements including the relevant dates and applicable terms and conditions;
- details of previous credit or trading account applications including the amount and type of credit and credit limit;
- details of any payment defaults, adverse court judgments or insolvency; and
- other credit related personal information permitted under the Privacy Act.

By providing us with your credit information, you consent to us using and disclosing your credit information for the following purposes:

- to assess your credit, guarantee and applications for an account;
- to monitor and assess your credit worthiness;
- to review and manage your trading account;

- to obtain credit reports and disclose credit information to CRBs; and
- to disclose credit reports to any solicitors and mercantile agents for enforcement and recovery purposes.

The CRBs that we use are Equifax Pty Ltd (telephone 13 8332) and Creditor Watch Pty Ltd (telephone 1300 50 13 12).

Under the Privacy Act, individuals may request CRBs not to:

- use their credit-related personal information to determine their eligibility to receive direct marketing from credit providers; and
- use or disclose their credit information, if they have been or are likely to be a victim of fraud.

Please see other sections of this Policy for further information regarding how we handle personal information generally.

## 7. How we keep personal information secure

We take reasonable steps to securely store personal information to protect it from unauthorised access, disclosure or modification or loss, misuse or interference, through physical, electronic and other procedural protection. We hold personal information as either physical or electronic records, on our site or in secure offsite locations.

We take reasonable steps to destroy or de-identify personal information that is no longer required for the purposes set out in this Policy and which we are not required by law to retain.

Our websites use cookies. We do not use the information stored in those cookies to collect information about you. You may configure your web browser to refuse or disable cookies. We have an obligation to notify the Office of the Australian Information Commissioner and any individual whose personal information is affected by a data breach which is likely to cause serious harm. If any unauthorised access, disclosure or loss of personal information occurs, we will take prompt action to investigate, contain and remediate the data breach.

## 8. How to access or correct your personal information

### Access

You may request access to the personal information (including credit information) we hold about you by contacting our Privacy Officer. In processing your request, we will comply with our obligations under the Privacy Laws, noting that we may need to verify your identity before we allow you to access your personal information, and may refuse your request for access if we are required or authorised by law to do so. We may charge a reasonable fee for assessing your request and providing access. Access may be provided by hard copy or by allowing you to view the relevant records.

### Correction

If you believe the personal information we hold about you is inaccurate, incomplete or out of date, please contact our Privacy Officer via the details shown below. If you satisfy us that any personal information we hold about you is not accurate, complete or up-to-date, we will amend our records

accordingly.

### **9. Cross-border disclosures**

We may disclose your personal information to overseas recipients located outside of Australia. These include related companies including CRH for the purposes in this policy and IT service providers who assist with our IT operations.

We will take reasonable measures to ensure that disclosure is in compliance with the requirements of the Privacy Act. By providing us with your personal information, however, you consent to the disclosure of such information to overseas recipients and acknowledge that in the event that an overseas recipient breaches the Privacy Act, that entity will not be bound by, and you will not be able to seek redress under, the Privacy Act.

### **10. Policy Updates**

This Policy was last updated in September 2024. We may amend this Policy at any time, without notice to you, to take account of new laws and technology, changes to our operations and practices and the changing business environment.

### **11. Questions, queries or complaints**

If you have any questions, concerns or complaints about our management of your personal information (including credit information), please contact our Privacy Officer at the details set out below:

Attention:  
Privacy Officer  
Adbri Ltd  
Level 4, 151 Pirie Street  
ADELAIDE SA 5000

Telephone: +618 8223 8000

Email: [privacy@adbri.com.au](mailto:privacy@adbri.com.au)

We request that any dispute or complaint be submitted in writing to our Privacy Officer. We will investigate and respond to your complaint within a reasonable time.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner at GPO Box 5218, Sydney NSW 2001 or by email to [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).



[adbri.com.au](http://adbri.com.au)

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Adelaide SA 5001  
+61 8 8223 8000  
[info@adbri.com.au](mailto:info@adbri.com.au)

