

BEST FAB PTY LTD.
METAL & STRUCTURAL STEEL FABRICATORS

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Phone (03) 9311 2888 Fax (03) 9311 0770

12/09/2024

Modern Slavery Statement 2023–2024

Introduction

Best Fab Pty Ltd is a Melbourne-based steel fabricator committed to upholding ethical business practices and safeguarding human rights. This statement outlines the steps taken by the Company during the 2023–2024 reporting period to identify, assess, and address risks of modern slavery in our operations and supply chains, in accordance with the Modern Slavery Act 2018 (Cth).

Structure, Operations, and Supply Chains

Best Fab Pty Ltd specializes in the fabrication and supply of steel products to a range of industries, including construction, infrastructure, and manufacturing. Our operations include:

- Manufacturing facilities in Melbourne employing 35 skilled workers in various roles, from production to quality control, who are committed to upholding our high standards of ethical conduct and labor rights.
- A supply chain network comprising both local and international suppliers of raw materials, consumables, and professional services. We work closely with key suppliers and service providers to ensure that modern slavery risks are identified, addressed, and mitigated within all stages of our supply chain.

We collaborate with trusted suppliers and partners, ensuring they share our commitment to quality, transparency, and ethical business practices, including:

- **Surdex Steel:** Our primary supplier of steel products. Surdex Steel is a respected Australian company with a strong commitment to responsible sourcing, supply chain transparency, and the prevention of modern slavery in its operations and supply chain.
- **GB Galvanizing:** Our preferred galvanizing partner, recognized for their reliability and alignment with our ethical standards. They are dedicated to fair labor practices and supply chain integrity.
- **Action Alliance:** Our preferred painting contractor, known for their credibility and adherence to ethical business practices, ensuring that their operations meet our high standards of labor rights and fair treatment of workers.

Our supply chain network includes both Australian and international sources for steel and related materials, as well as subcontracted services such as fabrication, galvanizing, painting, and logistics. We continuously assess and monitor our suppliers' practices to ensure they align with our commitment.

Modern Slavery Risks

Best Fab Pty Ltd recognizes the potential for modern slavery risks within our supply chains, particularly in the following areas:

1. **Procurement of Raw Materials:** We acknowledge the potential risks associated with sourcing raw materials from regions where labor rights protections are inadequate, or enforcement is weak.
2. **Subcontracted Services:** We are aware that services such as fabrication, painting, and galvanizing may involve vulnerable worker groups, especially in regions where labor practices are less regulated.

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3. **Multi-Tiered Supply Chains:** We recognize that the complexity of multi-tiered supply chains may limit visibility beyond our direct suppliers, potentially increasing the risk of modern slavery at lower levels of the supply chain.

Actions Taken to Assess and Address Modern Slavery Risks

To mitigate these risks, Best Fab Pty Ltd has implemented the following actions during the 2023–2024 period:

1. Governance and Policies

- **Supplier Code of Conduct:** We have maintained and communicated a comprehensive Supplier Code of Conduct that clearly outlines our expectations for labor practices, fair wages, and human rights protections. This Code applies to all suppliers, subcontractors, and service providers, ensuring they align with our ethical standards.
- **Training and Awareness:** We have conducted annual training sessions for both employees and suppliers, emphasizing the identification, mitigation, and prevention of modern slavery risks. This training covers practical steps to ensure compliance with our ethical practices and labor laws.

2. Supplier Due Diligence

- **Supplier Onboarding:** We continuously strengthen supplier due diligence by requiring all new suppliers and subcontractors to complete a modern slavery self-assessment questionnaire as part of the onboarding process and by conducting regular risk-based audits to evaluate labor practices and adherence to ethical standards.
- **Anti-Slavery Clauses:** We have integrated anti-slavery clauses into all supplier contracts, reinforcing the importance of compliance with both Australian and international labor laws. These clauses hold suppliers accountable for their actions and make clear that violations will result in consequences.

3. Risk Management

- **Supply Chain Risk Assessment:** We regularly review our supply chains to identify high-risk categories and regions. This includes a specific focus on raw material sourcing and subcontracted services, where modern slavery risks are most prevalent. Our assessments allow us to adjust our procurement strategies as needed to reduce these risks.
- **Transparency and Traceability:** As a member of the Aluminum Stewardship Initiative (ASI) holding CC3 certificate, we implement the best practices for transparency and traceability, ensuring that all suppliers in our supply chain are held to the highest standards of ethical sourcing.

4. Continuous Improvement

- **Grievance Mechanism:** We have established a grievance mechanism that allows both employees and suppliers to report unethical practices confidentially and without fear of retaliation. This mechanism is crucial for identifying potential modern slavery issues early and addressing them quickly.
- **Annual Reviews:** We are committed to conducting annual reviews of modern slavery risks and actions. These reviews ensure our policies, procedures, and training align with evolving global best practices, regulatory changes, and emerging risks.

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Effectiveness Assessment

Best Fab Pty Ltd evaluates the effectiveness of its actions to address modern slavery risks through the following measures:

- **Internal Audits and Risk Assessments:** Regular internal audits are conducted to evaluate the performance of our modern slavery mitigation efforts and identify areas for improvement.
- **Supplier Compliance Monitoring:** We track supplier compliance with our Supplier Code of Conduct and measure the completion rates of modern slavery self-assessments to gauge supplier engagement and adherence.
- **Grievance Analysis:** We monitor and assess the number and nature of grievances raised through our reporting mechanisms. This helps us identify patterns of unethical practices and take corrective action where needed.

We acknowledge that addressing modern slavery is an ongoing process and are fully committed to continuous improvement. We will keep reviewing and enhancing our approach to ensure we maintain the highest ethical standards and protect the rights of workers throughout our operations and supply chains.

Approval

This Modern Slavery Statement was approved by the Board of Directors of Best Fab Pty Ltd on September 10, 2024, in accordance with the requirements of the Modern Slavery Act 2018 (Cth).



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