



**Western Australian Specialty Alloys Pty Ltd**  
A.C.N. 053 910188 A.B.N. 14053 910188



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**WESTERN AUSTRALIAN SPECIALTY ALLOYS PTY. LTD. (ABN 14053910188)**

**MODERN SLAVERY STATEMENT  
FOR THE YEAR ENDED 31 DECEMBER 2020**

## Introduction

This statement has been prepared for Western Australian Specialty Alloys Pty. Ltd. (WASA) in accordance with the requirements of the Modern Slavery Act 2018 (the Act) and pertains to the calendar year ended 31 December 2020.

### **1. The reporting entity**

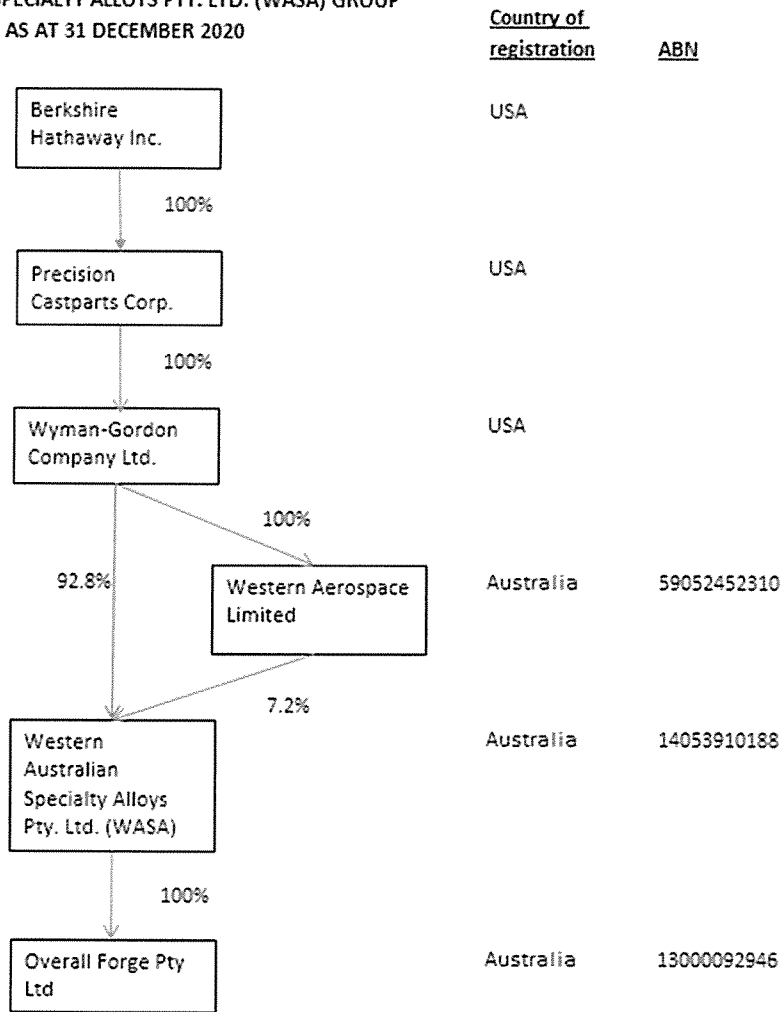
This statement is prepared for Western Australian Specialty Alloys Pty. Ltd., Hereinafter referred to as WASA, which is consolidated for accounting and income tax purposes with its wholly owned subsidiary, Overall Forge Pty Ltd (ABN 13000092946). A joint statement has not been prepared as the two companies are fully vertically integrated, sharing the same management team, accounting system, customers, suppliers and policies. Any risks of modern slavery at WASA identified in section 3 below apply equally to Overall Forge Pty Ltd since this company performs downstream manufacturing of product supplied by WASA.

### **2. Structure, operations and supply chains of the reporting entity**

#### **2.1 Structure**

The structure of the Group is shown in the chart below. WASA is a private Australian registered company directly owned and controlled by Precision Castparts Corp. (PCC) an unlisted USA registered entity. Precision Castparts Corp. is wholly owned by Berkshire Hathaway Inc. a USA registered listed company.

WESTERN AUSTRALIAN SPECIALTY ALLOYS PTY. LTD. (WASA) GROUP  
 ORGANISATION CHART – AS AT 31 DECEMBER 2020



WASA acquired ownership of Overall Forge Pty Ltd In October 2013. Overall Forge Pty Ltd is based in Albury NSW. The two companies are vertically integrated. Overall Forge Pty Ltd Converts WASA’s nickel alloy ingot into billet for oil and gas and aerospace applications. The two companies are operated as a single entity with a joint management team and a shared ERP system including shared customer and vendor master files. Overall Forge Pty Ltd has registered the business name Western Australian Specialty Alloys – Albury.

WASA also operationally manages Western Aerospace Limited (ABN 59052452310), a small private company which provides maintenance services to WASA and is located on the same premises. Western Aerospace Limited is a sister company of WASA sharing the same parent chain. The company is legally a subsidiary of Wyman-Gordon Company Ltd. which is a wholly owned subsidiary of PCC. Western Aerospace Limited is not part of the Australian consolidated group for accounting and taxation purposes.

WASA’s registered address is  
 2 Hopewell Street  
 Canning Vale WA 6155

As at 31 December 2020 the Australian registered companies in the PCC group had the following number of employees:  
 WASA - 69  
 Overall Forge Pty. Ltd. - 49  
 Western Aerospace Limited – 8

## 2.2 Operations

WASA is a manufacturer of nickel, cobalt and iron based superalloys in bar form which are utilised by WASA's customers for aerospace, oil and gas and industrial gas turbine applications. WASA's melting facility is located in Canning Vale, in Western Australia. Overall Forge Pty Ltd is a forging facility in Albury, NSW. This plant converts WASA's nickel alloy ingot into billet for oil and gas and aerospace applications. The Albury facility also manufactures steel shapes for the Australian mining sector.

WASA generally procures its raw materials, predominantly nickel, cobalt and chromium, from vendors with whom WASA has stable long-term relationships. WASA is required by PCC and by its primary original engine manufacturer (OEM) end users to procure from aviation industry approved suppliers. WASA also purchases scrap alloy from fellow subsidiaries of PCC. The scrap alloy originates from downstream processing by the above-mentioned end users.

## 2.3 Supply chain

WASA's main supplier of nickel pellets is based in Canada. WASA also buys cobalt from Europe and Japan and Chromium from Europe. WASA also purchases nickel alloy scrap from PCC subsidiaries in the USA and UK and refractory materials from a PCC subsidiary in China. Overall Forge Pty Ltd purchases steel used for steel shapes manufacturing from a major Australian steel supplier.

### **3. Risks of modern slavery practices in the operations and supply chains of the reporting entity and entities it owns or controls**

WASA has identified risks that it may be directly linked to modern slavery practices further down its supply chains. The risks identified are as follows:

#### **3.1 Sector and industry risk**

To produce its alloys WASA uses a mix of elemental raw materials and purchased alloy scrap. The elemental raw materials such as nickel, cobalt and chromium are the product of mining extraction activities. Mineral extraction is recognised as a higher risk industry globally.

#### **3.2 Geographical risk**

WASA uses tantalum and tungsten as raw materials in its alloys. Tantalum and tungsten have been identified by the OECD as potentially sourced from conflict zones such as the Democratic Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia or Angola. There is therefore a risk that WASA's suppliers may unknowingly source these minerals from a conflict zone. WASA purchases some of the refractories (contact materials) used in the pouring of its molten alloy metal into moulds from a PCC subsidiary in China. China carries a higher risk of modern slavery predominantly due to its practice of using forced Uyghur labour in Xinjiang province.

#### **4. Actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes**

Over the 2020 calendar year WASA took the following actions to assess and address the risks identified in section 3 above.

1. The refinement of the Modern Slavery Act 2018 compliance plan.
2. Provision of training on the Act and the compliance plan.
3. A vendor risk assessment to identify which of WASA's suppliers carried the highest risk of modern slavery. The assessment took into account the geographical location of each supplier and the products and services they provided.
4. Engagement with each of the suppliers identified by the initial risk assessment above as being of a higher risk of modern slavery in their supply chain. This engagement was in the form of a due diligence questionnaire sent to the supplier to evaluate the following criteria:
  - a. Whether the supplier has modern slavery policies or procedures in place which requires them to assess the risk of modern slavery in their supply chain and to take appropriate action to reduce any risks identified.
  - b. Whether the supplier conducts regular due diligence checks on its supply chain to assess the risk of the involvement of modern slavery in the goods and services they procure.
  - c. Actions taken by the supplier to mitigate any risks they identified as part of their modern slavery due diligence processes.
  - d. The due diligence questionnaire also provided each at risk supplier with links to:
    - d.1 The PCC Code of Conduct  
<https://www.precast.com/public-relations/code-of-conduct.pdf>
    - d.2 The PCC supplier Integrity Guide  
[http://www.precastcorp.com/web/user\\_content/files/pcc\\_supplier\\_integrity\\_guide.pdf](http://www.precastcorp.com/web/user_content/files/pcc_supplier_integrity_guide.pdf)
5. Follow up by the company purchasing team of the completed supplier due diligence questionnaires in order to work with suppliers to ensure their understanding of the Act and of WASA's expectations of the responsibility of the supply chain to minimise modern slavery risk.
6. Reinforcement to suppliers of the company's existing reporting mechanism which allows both employees and suppliers to anonymously report concerns about human trafficking / modern slavery using PCCs Ethicspoint telephone number 1-800-261-8651 and hotline [www.brk-hotline.com](http://www.brk-hotline.com).
7. Publication of the PCC Anti-Trafficking Statement, Conflict Minerals Statement and Supplier Integrity Guide on WASA's website at [www.wasa.com.au](http://www.wasa.com.au)
8. The inclusion of a modern slavery compliance section, section 39, in WASAs Terms and Conditions of Purchase which can be found on the company's website [www.wasa.com.au](http://www.wasa.com.au) under tab "About".
9. The requirement for all new WASA employees to sign the PCC Code of Conduct as acknowledgement that they have read, understood and will follow the Code.

**5. How the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks**

The company is implementing the following processes to assess the effectiveness of actions taken to assess and address modern slavery risks.

1. Establishing an annual senior management review meeting which includes the general manager, procurement team and FCO to assess actions taken to date to respond to modern slavery risk and to identify further actions required to improve the existing modern slavery compliance plan.
2. Review of the annual due diligence program in part 4 above and the establishment of a formal annual internal audit program to include the review of compliance plan actions and a review of supplier responses to the annual supplier due diligence questionnaires to ensure that mitigation measures arising from issues raised in the questionnaire responses have been consistently actioned.
3. Developing an action tracking tool to track the number of actions in the compliance plan that have been implemented to deadline, the number of high risk suppliers engaged and levels of modern slavery awareness among WASA staff.

**6. The process of consultation with any entities the reporting entity owns or controls**

WASA is the sole owner of Overall Forge Pty Ltd which operates in Albury NSW. As discussed in sections 1 and 2.1, this company is fully vertically integrated with WASA with the same management team.

Both facilities are required to follow the same PCC Policies and adhere to the PCC Code of Conduct.

This statement was approved by the Board of Directors of Western Australian Specialty Alloys on 08 June 2021.

Signed \_\_\_\_\_

Clive Reader  
Director

Dated \_\_\_\_\_

8/6/21.