

2021/2022

**Modern
Slavery
Statement**

Enviro Pipes
Pty Ltd



Introductory Statement

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) (The Act). Enviro Pipes Pty Ltd (ACN 130 666 518 became a Reporting Entity (as defined by the Act) during the reporting period, and is committed to, and will continue to work on developing frameworks and processes to ensure it can review the effectiveness of the actions taken to assess and address modern slavery risks in its operations and supply chains.

Enviro Pipes does not control or own any other entities other than that stated above.

This is the first reporting Statement for Enviro Pipes due to our increased turnover. The purpose of this statement is to outline the steps taken by Enviro Pipes in the 2021/2022 financial year (the relevant reporting period) to minimise the risk that modern slavery is occurring in its supply chains or any part of its businesses.

Enviro Pipes are committed to communicating its Modern Slavery Policies throughout its workforce and supply chain, reviewing results on an annual basis and applying the principles of continuous improvement to its area of accountability.

This Statement has been approved and signed by the Directors of Enviro Pipes Pty Ltd.

Friday, December 30, 2022



Joe Horvat
Director



Belmiro Da Silva Jorge
Director



Enviro Pipes Pty Ltd

Operational Overview

Overview

Enviro Pipes is a manufacturer of High-density Polyethylene (HDPE) pipe, fittings, custom spool work and tanks for a wide range of applications, including but not limited to stormwater, sewage, potable water, reticulation, gas, and drainage.

Enviro Pipes have gained certification to Australian Standards including AS/NZS4130, AS/NZS4131, AS/NZS5065, AS/NZS4129 and ISO9001. Our products have received approval for use by local councils, WSAA, Main Roads and Water Corporation.

With under a hundred employees spread amongst three facilities in Australia; Enviro Pipes are committed to providing superior customer support and quality products that are often utilised in infrastructure projects which benefit the everyday lives of people. According to the Plastics Industry Pipe Association of Australia (PIPA), plastic pipes play a major role in achieving the objectives of the United Nations development goals.

Enviro Pipes is a Proprietary Company Limited by Shares with two Directors. The registered head office is located in Perth, Western Australia with branches located in Melbourne, Victoria and Brisbane, Queensland.

Procurement, fabrication, human resources and commercial management is carried out in the head office, and sales, stores, and manufacturing activities are carried out at all Australian locations.

Enviro Pipes Pty Ltd does not condone any behaviour which may be perceived as bullying, intimidation, discrimination, or any form of sexual or workplace harassment. As such, we encourage an inclusive and diverse workforce. We are committed in attracting the best talent and engage in recruitment and selection processes that are based on merit.

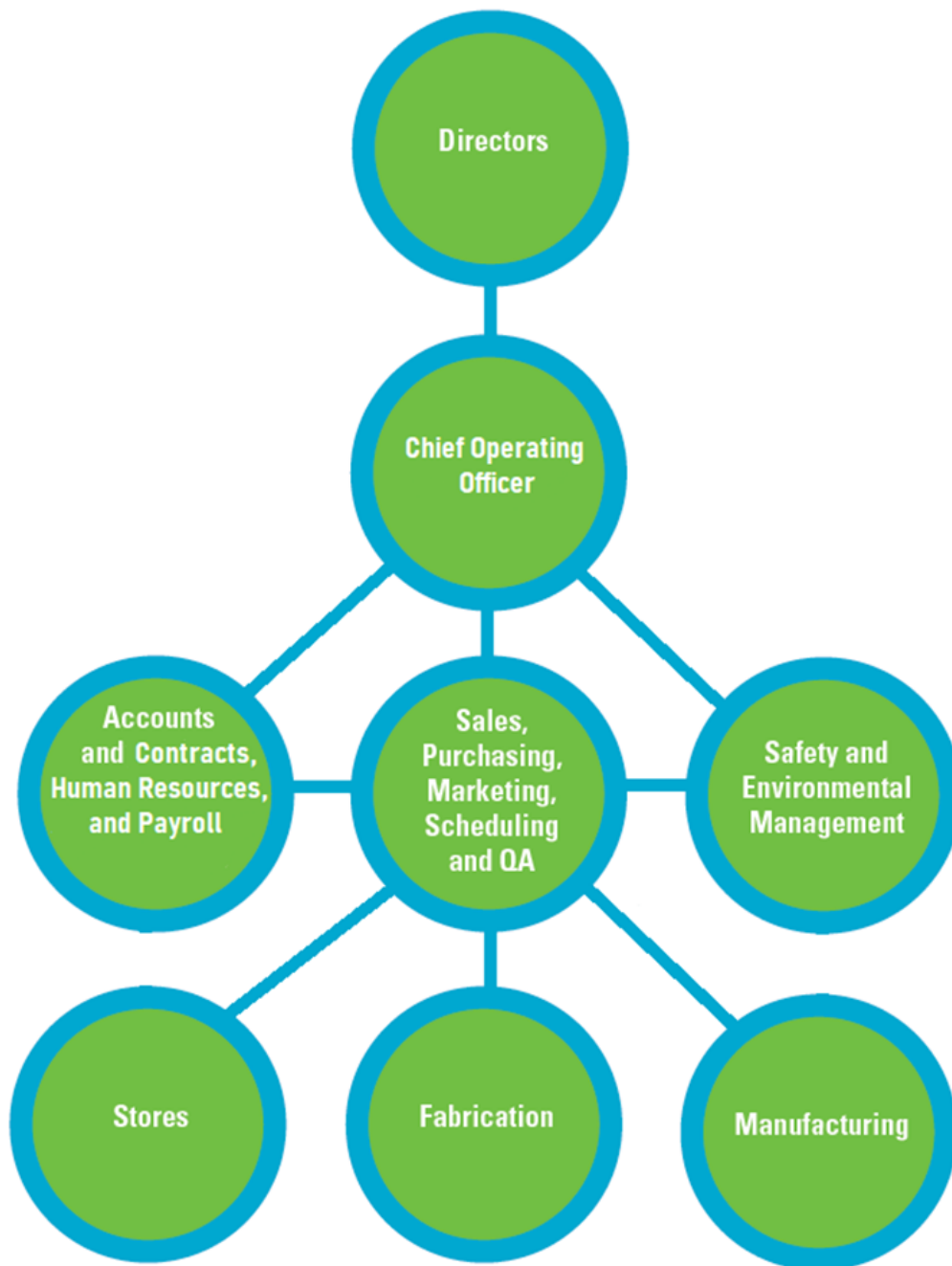
Locations



Enviro Pipes Pty Ltd Management Structure

Overview

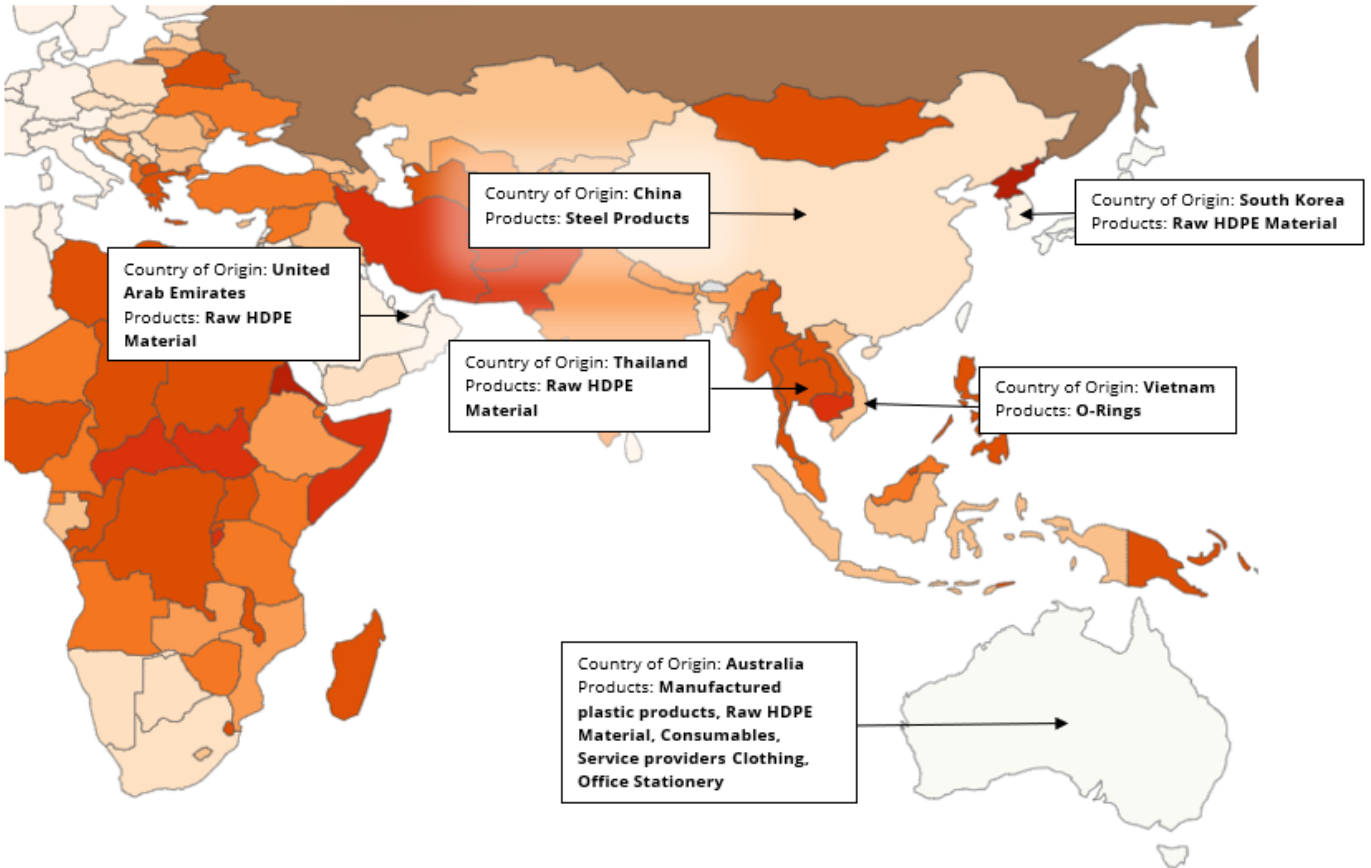
Enviro Pipes flat organizational structure encourages open communication between the workforce and management. We invite clients, suppliers and contractors to openly communicate so that together we can make improvements in the welfare of all people we interact with.



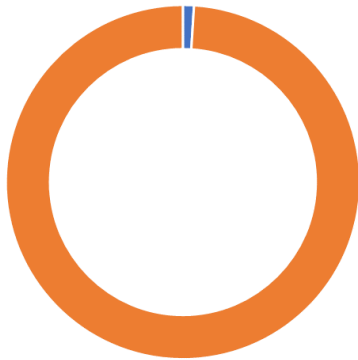
Enviro Pipes Pty Ltd Employment and Purchasing

Overview

Enviro Pipes Pty Ltd sources raw materials and other supplies from local and international suppliers to meet production demand.

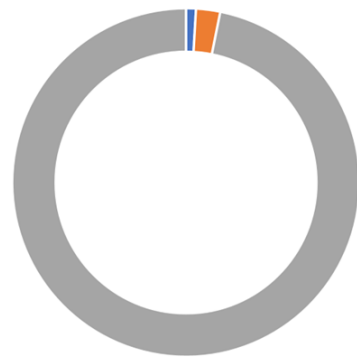


Employee Ratio - 2021/2022 Financial year



■ Australian Temporary Visa Holders ■ Australian Permanent Residents and/or Australian Citizens

(DIRECT) PURCHASE BY COUNTRY - 2021/2022 Financial year



■ Vietnam ■ China

Risks

MODERN SLAVERY IN THE OPERATIONS AND SUPPLY CHAINS

Understanding where our key supply chain risks lie is the starting point for taking action. An assessment of our active direct suppliers was undertaken by initially reviewing The Global Slavery Index 2018 (The Index). Our major key direct suppliers are located in Australia. The index indicates that employees and contractors in Australia rank as low risk within the sectors of prevalence, and vulnerability in the population.

When evaluating potential suppliers, we consider varying aspects including price, lead times, reliability, and provide a full, fair and reasonable opportunity for Australian businesses to bid for the supply of goods and services we require. In addition, we assess the risk of Modern Slavery within the supply chain. We consider various contributing risk factors including-

COUNTRY RISKS

Consideration is given to the countries where the Supplier is located, where breaches of human rights are commonplace, where foreign contract labour is often used, where exploitation is facilitated by the vulnerable position of foreign workers.

According to the The Index, Enviro Pipes suppliers (direct and indirect) which we procure materials from, the countries with the highest modern slavery vulnerability are Thailand, China, and Vietnam.

Thailand is considered a country of medium risk to modern slavery conditions, and in global ranking, in the July 2020 DFAT report- Thailand is a destination, source, and transit country for human trafficking for both Thai nationals and foreigners. Industries most affected with the exploitation of human rights are commercial fishing and related industries, the poultry industry, manufacturing, construction, agriculture, domestic work, and street begging. People are exploited through debt-based coercion and fraudulent promises of well-paid employment.

China is considered a country of medium risk to modern slavery conditions, and in global ranking, is estimated to have the second highest absolute numbers of people in modern slavery.

SECTOR RISKS

Consideration is given to the activities the Supplier undertakes to procure or manufacture its goods or services, where raw materials are often the products of child or slave labour, or where high levels of manual labour required provide the motivation to take advantage of the vulnerable.

Of the sectors that Enviro Pipes suppliers operate in, the apparel/clothing, and laptop/IT supplies are ranking in the top five products at risk of modern slavery with respect to value, in accordance with The Index. Although the suppliers in these sectors are not considered to be our major suppliers, we continue to promote meaningful communications with our suppliers to monitor their compliance with the laws of their country.



Enviro Pipes Pty Ltd

Actions Taken

ASSESS AND ADDRESS RISKS

Enviro Pipes Pty Ltd does not engage, support or condone Modern Slavery and will use our best endeavours to assess our suppliers to ensure they comply with the legislation the Australian Government Modern Slavery Act 2018 (The Act). Failure of any of our management or Suppliers to comply with this legislation results in corrective actions being implemented and, in some cases, immediate termination of employment (in the case of individuals) or business relationship (in the case of Suppliers).

IN ORDER TO MINIMISE THE RISK OF MODERN SLAVERY, ENVIRO PIPES WITHIN ITS OPERATIONS WILL CONTINUE TO:

- i) Use effective procedures to verify the age of personnel.
- ii) Ensure workers have written employment conditions/contracts provided to them
- iii) Ensure workers are given equivalent employment conditions/renumeration regardless of citizenship status, gender, and/or ethnicity.
- iv) Ensure workers have access to health and welfare services in accordance with local laws.
- v) Ensure workers have access to mechanisms to raise grievances/whistleblow in relation to any suspected breaches of The Act.
- vi) Not prevent its workers or the workers of its subcontractors to join trade unions.
- vii) Apply the principles of continuous improvement to its area of accountability.

Country risks

Quantification of the countries where the Suppliers are located, where information is gathered from The Index and risks are determined by Enviro Pipes executive team and reviewed by the Directors.

Sector risks

Suppliers in vulnerable sectors must conduct a documented self-assessment questionnaire to confirm that the Supplier complies with local laws, not be in a region subject to international sanctions and provide sufficient proof that the minimum labour standards of its operations, and its subsidiaries, as defined by the local laws of where the business or supplier operates are met.

Supplier Specific risks

are assessed by considering the relationship the Supplier has with financial institutions or business partners which may be funding trafficking or slavery operations. Enviro Pipes conducts due diligence checks necessary to ensure the persons or entities connected with its activities are not subject to targeted financial sanctions, by considering the following-

- i) Using existing credible assessment of entities in its supply chain, such as audit reports, Non-Government Organisations (NGO) Sector Review, and any Modern Slavery Statements submitted by the suppliers.
- ii) Reviewing the Australian DFAT Consolidated List, which lists persons and entities listed under Australian sanctions laws.
- iii) Preparing and communicating Modern Slavery policies and procedures with Staff and Suppliers.
- iv) Collaborating with Suppliers to understand modern slavery risks in the area in which the supplier operates and actions that have been carried out or are planned to mitigate those risks.
- v) To reduce risk of financial and relationship stress between Enviro Pipes and its supply chain; Enviro Pipes payment processes ensure suppliers are paid promptly.
- vi) Applying the principles of continuous improvement to its area of accountability.



Enviro Pipes Pty Ltd

Actions Taken

DUE DILIGENCE PROCESSES

Enviro Pipes undertakes review processes to ensure our business and that of our stakeholders are not impacted by Modern Slavery with active engagement with our suppliers, customers, supply chains, the community, and personnel.

Supported by the Directors, all staff are encouraged to report suspected breaches of The Act for immediate investigation.

For Suppliers to supply products to Enviro Pipes, they must be assessed and approved by Enviro Pipes Directors. Responsibility for the reporting and management of human rights extends throughout our Company. With a collaborative approach we all work towards reducing the risk of breaches of the Enviro Pipes code of conduct.

Any breaches or concerns are conveyed to the Directors and Chief Operating Officer for review and investigation.

We continue to explore ways we can promote proactive and meaningful communications with individuals, workers and communities that are or could be affected by our operations, business relationships and supply chain.

Annual reviews are conducted across all areas of our company operations including received complaints and effectiveness of grievance mechanisms.

REVIEW AND ANALYSIS OF ACTIONS

Enviro Pipes engages with its Suppliers to understand modern slavery risks in the area in which the supplier operates, obtain feedback, and remediation actions that have been carried out or are planned to mitigate those risks.

On an annual basis, suppliers are reviewed for ethical supply chain risks by the Enviro Pipes Quality representative and results are presented to Management for review.

Enviro Pipes is continually evolving on ways to evaluate and manage human rights risks throughout our supply chain. A variety of resources and tools are being used to review and continuously improve our processes with a view to reduce exploitative work practices and modern slavery in our supply chain.

CASE STUDIES

Enviro Pipes, due to their increased turnover for the year 2021/2022 have commenced reporting under The Act.

Our resources indicate that our major suppliers have comprehensive Modern Slavery Statements, Policies, and Procedures in place to assess and mitigate potential modern slavery risk.

In the upcoming financial year, we will review and monitor the effectiveness of our processes in addressing modern slavery risk.

ENVIRO PIPES POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Enviro Pipes Pty Ltd in its operations and all parts of its supply chain does not participate in or benefit from Modern Slavery and will continue with our commitment to:-

- a. Identify risks of modern slavery.
- b. Take actions to mitigate risks of modern slavery
- c. Review the effectiveness of actions on an annual basis.
- d. Communicate with employees, contractors, and suppliers to ensure awareness of the legislation set out in The Act.
- e. Immediately implement corrective actions with any suppliers or individuals who fail to comply with our Policy or The Act.
- f. In the event of a criminal breach of The Act, terminate the relationship with any suppliers or individuals.

STAFF TRAINING AND COMPETENCY

The Modern Slavery Statement, Policies and Procedures are supported by the Directors, and the executive team. A positive and inclusive culture is promoted within our Company. By implementing a proactive approach in our involvement of The Act we hope to contribute towards mitigating the exploitation of humanitarian rights.

As we continue to expand our human rights training program, we will provide our employees and contractors with a general understanding of the human rights issues and encourage the topic to be discussed and acted upon.

