

Modern Slavery Statement

Western Steel Processors Pty Ltd and Industrial Progress Corporation Pty Ltd

1. Introduction

This statement sets out the steps taken by Western Steel Processors Pty Ltd ACN 140 678 039 and its wholly owned subsidiary Industrial Progress Corporation Pty Ltd ACN 008 775 442 (**WSP**) to address modern slavery risks in WSP's business operations and supply chains during the FY23 financial year. This statement has been prepared as a joint statement pursuant to section 14 of the *Modern Slavery Act 2018* (Cth).

WSP is committed to ensuring that there are secure management systems and procedures in place to prevent exploitations of human rights within WSP itself and WSP's supply chain.

WSP consulted the relevant companies it owns or controls in the development of this statement.

2. Structure and operations

WSP is an Australian manufacturer and distributor of a wide range of steel and mesh building products and is committed to providing effective building solutions. WSP supplies reinforcing steel and mesh, roofing, cladding, panels, fencing and other building products and accessories and has an expansive and diverse customer base who are predominantly wholesale customers with a few retail customers.

WSP has around 7 sites in Western Australia.

3. Supply chain

WSP sources goods and services in the following categories: steel, consumables, utilities, transport, plant, equipment, parts and repairs, human resourcing information technology and other miscellaneous business spend.

Steel supply constitutes more than 75% of WSP's spend on goods and services. The majority of steel is sourced from Australian suppliers, including BlueScope. Small quantities of steel are also sourced from reputable international businesses.

Other goods and services used by WSP are predominantly sourced within Australia from Australian suppliers, but also from reputable international businesses.

WSP strives to engage suppliers with a good reputation, ethics and reliable business practices. WSP does not knowingly contract with or engage any businesses that are involved in modern slavery or human trafficking.

4. Description of risks of modern slavery

WSP considers the risk of modern slavery being caused by, contributed to or directly linked to its operations is low, driven by both geographic location, with all operations based in Australia, and by the human resources processes WSP has in place. These include compliance with relevant laws, checking employees' wages and, where relevant, salary agreements and confirming corresponding payment, as well as conducting employment checks (either internally or externally).

WSP considers the risks associated with the categories of goods and services sourced, as well as country of origin of goods and services in assessing the risk of modern slavery in its supply chain.

Some categories are seen as higher risk or having the potential for higher risk of modern slavery in supply chains. This includes steel production, which is reliant on raw materials, which may be sourced from geographies with a higher risk of modern slavery, as well as using unskilled labour, which may increase the opportunity for modern slavery in its production. In Australia, labour hire, cleaning and security services are sectors considered to have a higher risk of modern slavery.

The Global Slavery Index notes that the Asia and the Pacific region has some of the highest incidence of modern slavery. WSP sources goods and services from countries in this region, with the accompanying higher risk of modern slavery in supply chains for the goods and services sourced from those countries.

Where a supplier is identified as higher risk, due to category and/or geographic location, WSP looks to engage with that supplier to understand its modern slavery risk, with a view to managing that risk, as set out below.

5. Assessing and addressing modern slavery risks

At WSP, we understand the importance of raising awareness to aid the ending of modern slavery practices. To that effect, WSP has implemented the following processes and tools to assist in the detection and prevention of modern slavery risks:

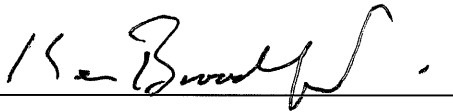
- a) **Supply chain mapping:** WSP undertakes due diligence in respect of its key suppliers to ensure that these parties are aligned with WSP's policies, codes and values. Supply chain mapping involves categorising suppliers by risks associated with their geographic location, size and industry.
- b) **Follow up questionnaire:** WSP requires suppliers identified as "high risk" during the supply chain mapping exercise to complete a modern slavery risk questionnaire to ensure compliance with modern slavery laws and to identify any issues. Significant issues are escalated to senior management.
- c) **Training:** Awareness of modern slavery risks in the workplace are communicated to WSP employees through toolbox talks and information sheets. Senior management and procurement personnel briefings are also carried out to raise awareness of modern slavery risks.
- d) **Supply contracts and due diligence:** Generally, supply contracts are entered into on the basis of WSP's standard terms and conditions or negotiated contractual terms depending on the type of product or service and WSP's affiliation with the third party. WSP requires its suppliers to comply with all relevant laws and regulations and ensures that due diligence checks are carried out prior to engagement of third parties.
- e) **Supplier Code of Conduct:** WSP has a Supplier Code of Conduct applicable to all of WSP's suppliers. The Supplier Code of Conduct contains provisions specifically relating to anti-bribery and corruption, human rights including modern slavery, work health and safety and the environment.
- f) **Anti-Slavery Policy:** WSP has adopted an Anti-Slavery Policy which affirms WSP's commitment to upholding its responsibility to comply with all modern slavery laws and regulations.
- g) **Whistleblower Policy:** The Whistleblower Policy applicable to WSP protects employees, service providers and suppliers who voice their concerns about certain events or conduct in the business that may be unlawful or unethical. The policy validates WSP's efforts in safeguarding the confidentiality, wellbeing and career of any individual who asserts any issues that affect the integrity of WSP's business operations.

6. Assessing effectiveness

WSP is focused on continuously strengthening its procedures and processes to combat modern slavery practices and ensuring the protection of human rights. WSP will continue to monitor, evaluate and assess the effectiveness of its established procedures by:

- a) monitoring existing suppliers and undertaking risk assessments in relation to new suppliers to ascertain whether they pose a modern slavery risk and, if they do, to reduce that risk to the maximum extent possible;
- b) reviewing and updating training material to ensure that it is up to date, relevant and effective;
- c) reviewing WSP's policies and Supplier Code of Conduct to ensure it remains relevant and in compliance with all applicable laws; and
- d) engaging with suppliers and key customers to verify they are following through with any modern slavery actions they have committed to undertaking.

This statement was approved by the Directors of Western Steel Processors Pty Ltd and Industrial Progress Corporation Pty Ltd, in their role as principal governing bodies of Western Steel Processors Pty Ltd and Industrial Progress Corporation Pty Ltd on 28 June 2024.



Ken Broadfoot, Director