



MODERN SLAVERY STATEMENT 2023

Document Name: *Policy – Modern Slavery Statement*

Author: Prasanth Palani

Version #: 2

Document #: OHS POLICY #23

About Structural challenge

Structural Challenge is a privately owned, Melbourne based fabrication company.

With a wealth of knowledge in construction and steel fabrication, Structural Challenge is set up to deliver your project on time and within budget, working collaboratively throughout the project. Structural Challenge provides full project management from 3-D Modelling & Detailing, fabrication and installation with close attention to quality, safety and sustainability.

Our Vision

Shaping the future in diverse steel structures!

Our commitment

According to the latest **Global Estimates of Modern Slavery (2022)** the International Labor Organization and the International Organization for Migration: **49.6 million** people live in modern slavery with up to **15,000** people estimated to be living in these conditions in Australia.

As Modern Slavery remains an issue around the world and in Australia, we at Structural Challenge do not accept any kind of it.

We place a high priority on our people’s well-being, and we have a number of Policies in place which are applied to all Structural Challenge’s employees, contractors, sub-contractors, clients and visitors.

Structure and Operations

Structural Challenge is a privately owned Melbourne based fabrication business with approximately 70 employees. The company is located in Dandenong South, Victoria.

Structural Challenge has been involved in fabricating iconic, design driven projects for top-tier construction companies for over 20 years. Structural Challenge is working on private and community projects with an emphasis on Health and Education projects. Structural Challenge has a strong commitment to quality, safety, and sustainability.

We prioritize our clients' needs and actively collaborate with them to ensure our actions align with the protection of human rights. We continuously strive to enhance our modern slavery program while fostering relationships with partners based on integrity, transparency, and ethical practices. In order to fulfill our responsibilities under the Act, we engage in discussions about addressing modern slavery risks with our clients, suppliers, and subcontractors, emphasizing our collective commitment to this cause.

Supply Chain

In order to conduct our business operations smoothly in the construction process, we need to actively engage and collaborate with multiple suppliers and subcontractors. However, this involvement also exposes our business to the risk of modern slavery, whether it be directly within our operations or indirectly through our suppliers and their supply chains. While we work with a limited number of preferred suppliers and subcontractors, we understand the significance of assessing and preventing the occurrence of modern slavery through these channels, regardless of their existing obligations.

To address this concern, we have implemented a comprehensive supplier and subcontractor selection process during the procurement phase. This process is designed to ensure compliance with all modern slavery

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regulations and legislation, while also ensuring a mutually beneficial outcome from a commercial perspective.

Modern Slavery Risks

This is our first reporting year and Structural Challenge focuses on understanding the risks of modern slavery in our industry.

We see modern slavery as including:

- Human trafficking.
- Slavery.
- Forced labour.
- Debt bondage and
- Any form of child labour.

Modern slavery risk describes the potential harm that a business can cause to individuals throughout its operations and supply chain. We recognize that our business inherently carries risks related to modern slavery, and it is our ongoing duty to consistently identify, evaluate, minimize, and confront these risks as part of our commitment to uphold human rights.

Structural Challenge has a series of policies and procedures in place related to Relationships, Values and Cultures:

- **Code of Conduct**
 - To ensure all that all Structural Challenge’s employees, contractors, sub-contractors, customers, and visitors behave appropriately and practice standards of professional and personal conduct that are consistent with Structural Challenge’s values and uphold the public reputation of the organisation. Structural Challenge may amend or vary this Code of Conduct, in its absolute discretion, from time to time.
- **Equal Opportunity Policy**
 - Ensure that every employee is treated with equal and fair behaviour.
- **Bullying and Violence at Work Policy**
 - To establish and maintain workplaces free of Bullying and Violence for the enjoyment and benefit of all employees.
- **Discrimination and Harassment Policy**
 - To establish and maintain free of discrimination and harassment of the enjoyment benefit of all employees.

These policies applied to all Structural Challenges employees, contractors, subcontractors, clients, and visitors.

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Response & Actions

We have included Modern Slavery Awareness reporting in our current management meeting structures to generate discussion and ensure our employees are aware of the company's obligations under the Act. The discussion is open and constructive, with the goal of exploring the modern slavery risks as well as any other risks that may emerge during our company's operations.

Our priority during this reporting period was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. At this stage, unable to assess the effectiveness of the measures we have implemented or undertaken. We have, however, begun and will continue to work on creating frameworks and processes that will allow us to review the efficacy of the actions we're taking to assess and address the risks of modern slavery in our operations and supply chains.

We met with SC Engineering and SC Design and Detailing where we controlled an entity during this reporting period to set our expectations, raise awareness, and understand their approach to mitigating modern slavery risks. We discussed the reporting requirements of the Modern Slavery Act, as well as the actions we intend to take to address these requirements.

Training

At Structural Challenge we make sure every employee is aware of the modern slavery statement. Our policies are introduced to everyone through the induction process. Every year our policies and procedures are being reviewed and updated.

We will provide training to our team members about modern slavery to help them understand what it is, the risks associated with it that we have identified, and the actions that can be taken to mitigate those risks. A profound understanding of modern slavery will increase our employees' ability to understand, recognize, and react to modern slavery risks.

Approval

We are committed to continuing to assess, measure and publicly report on our progress in the years to come.

This statement was approved by Maria Mavrikos as the Sole Director and principal governing body of Structural Challenge Pty Ltd.

SIGNED:



NAME: MARIA MAVRIKOS

POSITION: MANAGING DIRECTOR

DATE: 22/08/2023

NEXT DATE OF REVIEW: 22/08/2024

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