

Modern Slavery Statement 2022/2023
Stirlings Performance Steels Pty Ltd
ABN: 79 625 765 200

- **Business Profile:**

Stirlings Performance Steels is a privately owned and operated business based in Western Australia. Founded in 1973, we currently employ more than 100 employees nationally between our operations in different states such as Western Australia, Tasmania, Queensland, Victoria, and New South Wales, as well as Sales and Business Development staff in South Australia.

We provide a wide variety of services across Australia, such as Sales & Customer Service, Laser, Plasma, Sawing, and Polishing, Logistics, and stocking of high-quality stainless and performance steels to a vast variety of industries in which the majority is commercially focused.

We are driven to satisfy our customers, suppliers & employees, utilising improvement, innovation, technology & teamwork to present our best solutions and provide top-quality products, outstanding service & excellent value.

Stirlings Performance Steels takes pride in having zero tolerance for the violation of the Modern Slavery Act 2018 (Cth).

Modern Slavery Act involves situations where coercion, exploitation, threatening behaviour, and or deception are used to undermine the freedom of others. Outlined by the Australian Federal Government regarding regulations and reporting requirements, this statement serves as information presented by Stirlings Performance Steels for the 2021/2022 financial year based on modern slavery risk assessment.

Stirlings Performance Steels is committed to reducing the risk of modern slavery practices moreover developing an organisational culture that recognises human rights and seeks to avoid complicity in human rights abuses.

- **Business Partner Industries:**

Being a stockholding, processing & distributor of Stainless and Performance Steel products business, the following Industries/Stakeholders were identified as regulars attained by Stirlings Performance Steels:

- ✓ Freight and logistics

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- ✓ Industrial equipment, parts, and consumables
- ✓ Manufacturers & Suppliers
- ✓ Equipment hires
- ✓ Facilities management services
- ✓ Labour

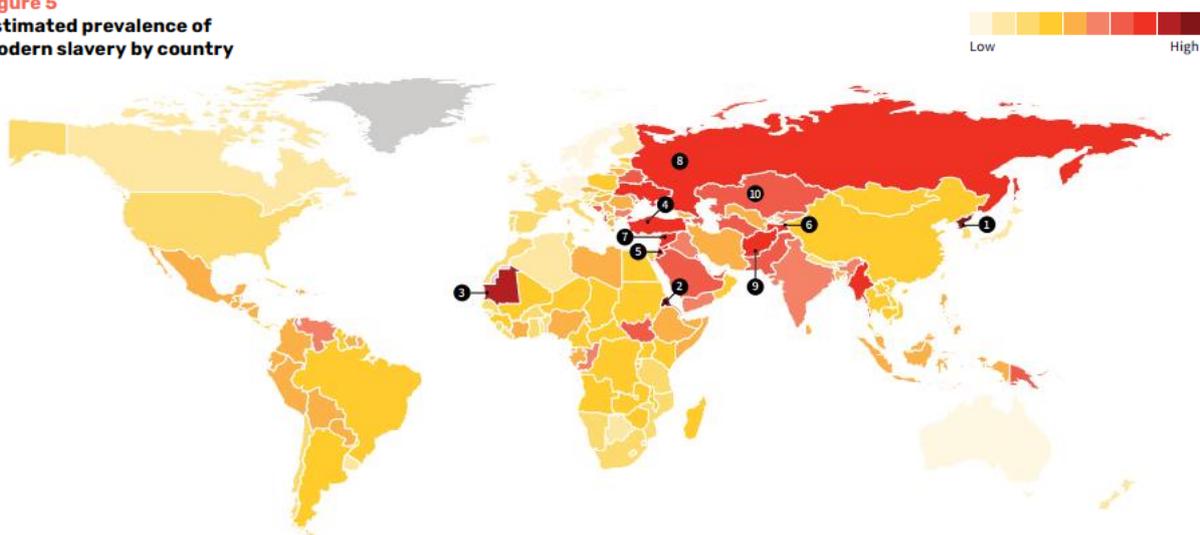
- **Assessment and action of our modern slavery risk:**

Proudly, Stirlings Performance Steels holds its Human Rights & Modern Slavery Policy as an internal living document and part of the business's daily routine. In addition, the following actions are placed:

1. Implementation and continuous rollout of a Modern Slavery Questionnaire to be completed by the suppliers.
2. Continuous rollout of the Modern Slavery Awareness Training and refresher training for the Leadership Team.
3. Review indicators of levels of Modern Slavery annually based on global public data such as the [Global Slavery Index 2023](#), which estimates the proportion of individuals living under modern slavery for each geographic area and country.

a. The current [Global Slavery Index 2023](#) data assessment identified the prevalence of Modern Slavery as below:

Figure 5
Estimated prevalence of modern slavery by country



- **Assessing, Evaluating Effectiveness and Entity:**

Aiming to assess the effectiveness of the Modern Slavery Questionnaire and Training implementation, Stirlings Performance Steels is committed to the following steps:

1. Monitor and review the adherence and answers from the Suppliers Questionnaire annually. Moreover, The Senior Management team will discuss and address any abnormality with the company's Chief Executive Officer (CEO).
2. The Human Resources Department is responsible for monitoring, reviewing and inducting the leadership team in the Modern Slavery Practices, Training and Policies. In addition, maintaining up-to-date policies and procedures based on the Modern Slavery Act 2018 and following the Australian Border Force Guidelines.
3. Further actions and monitoring procedures will be reviewed and placed based on findings from the questionnaires and training needs.
4. Stirlings Performance Steels states that it owns no other entities.

- **Improvement Commitment:**

Stirlings Performance Steels is committed to continuously reviewing our interactions and impact on the global community. Our internal auditing will continue to comply with the Modern Slavery Act 2018 (Cth) and produce an annual statement reporting on the risks within our operations. We will continue to communicate with all internal and external stakeholders to address our modern slavery risks.

- **Support Documents:**

- ✓ Stirlings Performance Steels – Supplier Modern Slavery Self-Assessment Questionnaire.
- ✓ PM 6.01 - Human Rights & Modern Slavery Policy
- ✓ PM 1.01 - Company Handbook
- ✓ Modern Slavery Act 2018
- ✓ Global Slavery Index 2023
- ✓ Quality Systems Manual QM1

This statement was approved by the board of Stirlings Performance Steels Pty LTD composed by the General Manager and Executive Manager-General on 11/05/2023.



David Stirling
Chief Executive Officer
Stirlings Performance Steels Pty Ltd



Patrick Stirling
Executive Manager-General
Stirlings Performance Steels Pty Ltd