

BISALLOY STEEL GROUP LIMITED

MODERN SLAVERY STATEMENT FOR THE YEAR ENDING 30 JUNE 2022

At Bisalloy Steel Group Limited (Bisalloy), we are deeply committed to our Integrity, which means we do what's right. This is the approach we take to address any human rights harm, including modern slavery.

There is no doubt that modern slavery risks exist throughout our supply chain, and we take this very seriously. In the past year, the evolving COVID-19 pandemic has continued to interrupt global supply chains, and this added another layer of complexity.

While the challenge is significant, we are dedicated to continuously improving our modern slavery approach. In doing this, we recognise the need to work closely with our suppliers, partners, workforce, and other stakeholders to develop a common understanding of modern slavery risks that allow us to identify, assess and address them in a meaningful manner. The ultimate goal is to mature our capability to manage modern slavery to a point where it becomes integrated into the way we do business.

Looking ahead, we will continue to embed modern slavery mitigation into our operational processes. We will work with our business partners to build their capacity to manage modern slavery and labour exploitation risks. Our expectations are they take the same zero tolerance approach to these issues as we do.

I am pleased to present our 2022 Modern Slavery Statement.

Bisalloy, its structure, its operations, and its supply chain

- Bisalloy is an Australian company listed on the ASX with a 42-year history of manufacture and sale of quenched and tempered steel.
- The business has its primary site of manufacture and operations at Unanderra, south of Sydney.
- The business directly employs around 60 full time employees at Unanderra most of whom are covered by the Bisalloy Steels Collective Agreement 2020 which agreement also covers the AMWU, the AWU and the CEPU.
- During 2022 The company has self-audited its direct employment arrangements for its domestic manufacturing and sales operations and confirms that all aspects of those operations insofar as Bisalloy employees are concerned are fully compliant with the company Human Rights Policy Statement and the Modern Slavery Act 2018.

- In addition to its domestic manufacturing and sales business the company also has three key international business partnerships:
 - (a) An investment in a Chinese Co-operative Joint Venture with Shandong Steel called Bisalloy Shangang (Shandong) Steel Plate Co, Ltd located at Airport Road, Licheng District, Jinan, Shandong Province, China
 - (b) A distributor arrangement with an entity majority owned by Bisalloy called PT Bima Bisalloy located at MM2100 Industrial Town Jl. Sumbawa Kav. C7 No. 1 Cikarang Barat - Bekasi 17520 in the West Java area of Indonesia.
 - (c) A distributor arrangement with an entity majority owned by Bisalloy called Bisalloy Thailand located at 1 Bang Na-Trat 25 Alley, Bang Na, Bangkok 10260, Thailand.

- The domestic supply chain of the business is made up as follows:
 - (a) External third-party Green feed (plate) mills who supply alloyed steel plate for processing by Bisalloy.
 - (b) External third-party repair and maintenance operators whose task is to engage with the Unanderra production team for the purpose of maintaining and when required repairing the production facility equipment.
 - (c) External suppliers of work clothing for the Unanderra production team and the PPE worn by many members of the team.
 - (d) Road transport operators who convey the steel products manufactured at Unanderra to customers within Australia and to the waterfront logistics operation at Port Kembla for export to Indonesia and Thailand.
 - (e) Ship owners and operators whose vessels convey the Bisalloy products to Indonesia and Thailand, UAE and other ports worldwide.
 - (f) Support Services including utility providers
 - (g) Corporate & Administrative Service providers, including Legal, Accounting and Audit, IT services, Banking, and Insurances.

The risks faced by the business in relation to compliance with the Modern Slavery Act 2018 and the Human Rights Policy Statement of the Bisalloy Steel Group, are defined below;

- Bisalloy acknowledges that good corporate governance is important in order to promote investor confidence and enhance our reputation with employees, suppliers and external stakeholders. Our approach to governance and sustainability can be found in our 2022 Appendix 4G and our 2022 Annual Report.
- The business continues to believe that its domestic operations face minimal risk in regard to compliance with the Bisalloy Human Rights Policy Statement and the Modern Slavery Act 2018, due to their obligations under Australian legal and regulatory frameworks.
- The business is of the view that the main risks in relation to noncompliance may be found in its Indonesian and Thailand operations simply for the reason that those operations are still maturing and both operations might be perceived to have some vulnerability to external suppliers whose compliance is wanting.
- The business does not believe that its Chinese partnership poses a significant risk of non-compliance because of preparatory work done by Bisalloy before the Commercial Joint Venture was launched and discussions since that time.

Assessing Effectiveness of our Actions and Going Forward

At present:

- there were no reports under our Whistleblower Policy in relation to modern slavery.
- we periodically review and update our group risk register (which includes modern slavery aspects).
- we consulted the relevant companies we own or control in the development of this statement.

In the future, we plan on developing a set of key performance indicators against which our actions can be assessed. It is envisaged that this will include any feedback from the grievance mechanisms and any actions that arise from the supplier questionnaire responses.

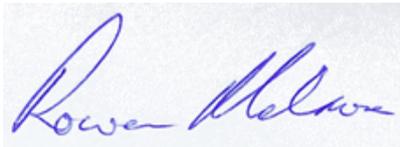
Going Forward

Bisalloy is aiming for continuous improvement in our actions to assess and address modern slavery risks in our operations and supply chains, including how we assess the effectiveness of those actions. In FY23, Bisalloy is prioritising the following:

- Complete a program for assessing and monitoring significant modern slavery risks.
- Develop a set of key performance indicators for being able to measure the effectiveness of our actions in relation to modern slavery. This may include matters such as:

- Tracking how many modern slavery incidents are raised and what actions are taken in response (through our Whistleblower grievance mechanism or otherwise).
- the number of supplier questionnaires issued, and responses received; and
- tracking any actions arising out of supplier questionnaire responses and the group level modern slavery risk assessment.
- Continue to undertake risk assessments on identified suppliers (based on spend, the type of product/service, sector/industry and geographical location) and require these suppliers to complete a supplier survey/questionnaire in relation to modern slavery.

This statement was approved by the board of Bisalloy Steel Group on 21 December 2022 and 27 May 2023



Rowan Melrose, CEO and Managing Director