



MODERN SLAVERY STATEMENT 2022



1. Introduction & Approval



This statement is produced to comply with the Modern Slavery Act 2018 (Commonwealth Act) and is prepared for the Southern Steel Group ABN 003 067 838 and its wholly owned subsidiaries. This Modern Slavery Statement has been approved by the Board of Directors of the Southern Steel Group, which is the principal governing body. The statement was approved on 10th April 2023.

The Southern Steel Group seeks to do business with suppliers that share similar values and ethics to us. We place a high value on quality, consistency, and reliability of our suppliers and form long term relationships, which involves regular visits and exchanges. We recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that might contribute to modern slavery through our operations and supply chains, and to continuing improving our risk assessment approach.

A handwritten signature in white ink, appearing to read 'Peter Smaller', is positioned above the printed name.

Peter Smaller
Executive Chairman
Southern Steel Group

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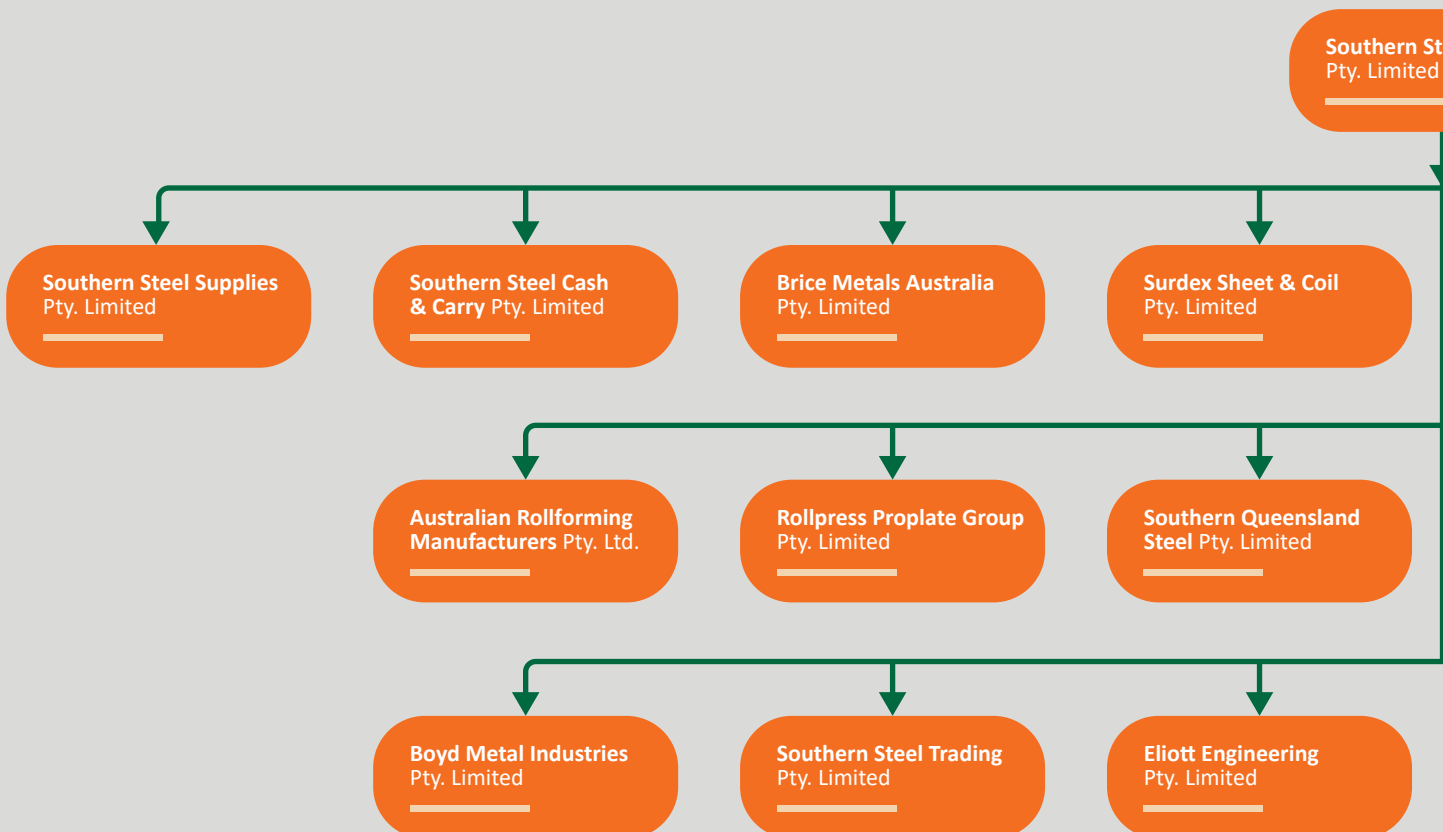
Web : www.southernsteel.com.au

2. About Southern Steel



Established in 1947, the Southern Steel Group is a family-owned and independent Australian business supplying, processing, and distributing a wide-range of steel products to the Australian steel fabrication, engineering, and construction sectors.

For further information about our companies please see our website at: <https://www.southernsteelgroup.com.au/company-directory/>



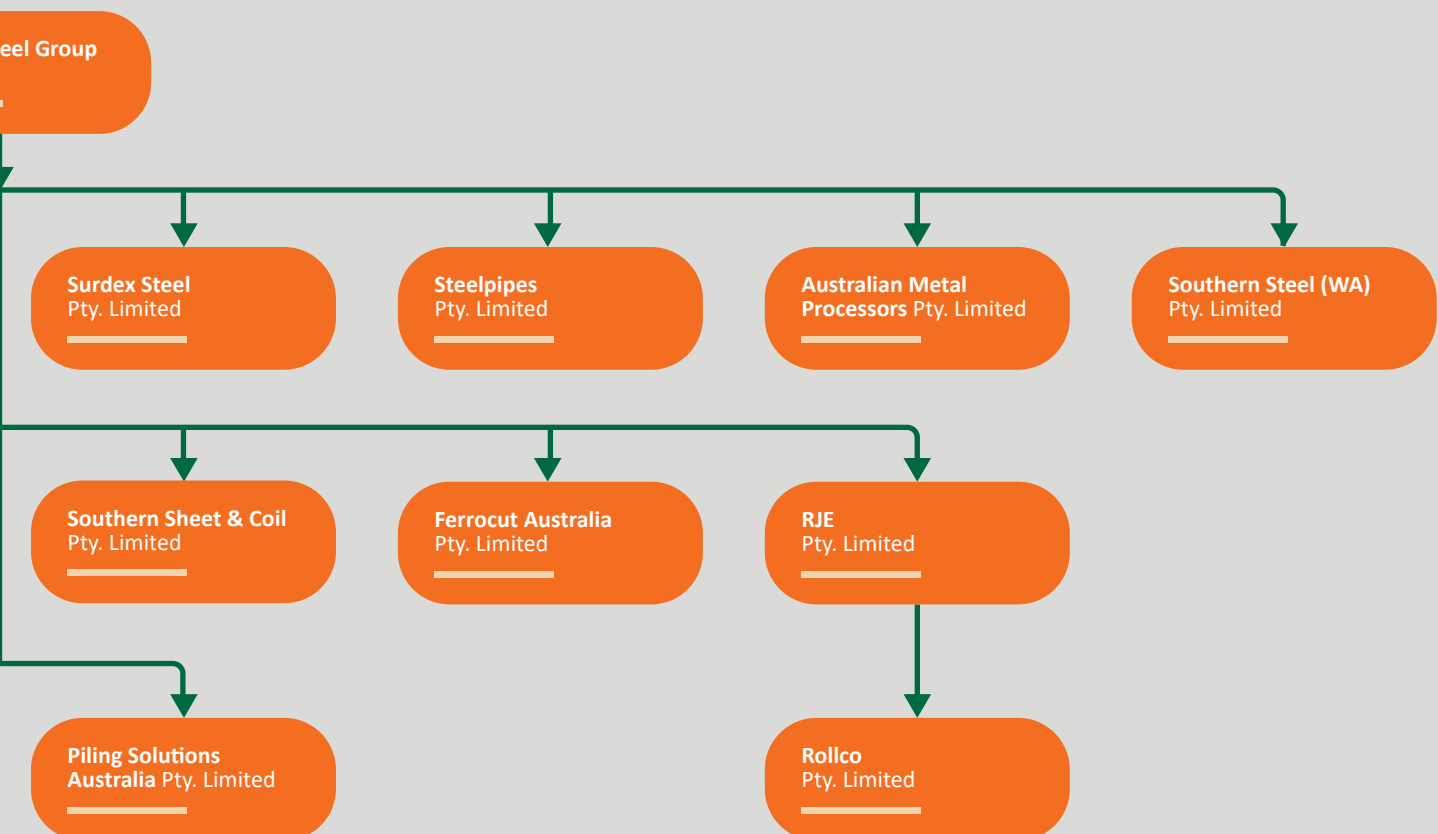
AUSTRALIA'S LEADING INDEPENDENT STEEL DISTRIBUTION & PROCESSING GROUP



2.1 Our Structure

The Southern Steel Group includes 19 subsidiary steel businesses under management. Our head office is at 319 Horsley Rd, Milperra, New South Wales 2214. The Southern Steel Group's network is represented in all Australian mainland states. The group's network covers steel products, sheet & coil, steel processing and distribution. The 19 subsidiaries in the network are:

1. Southern Steel Supplies Pty Limited
2. Southern Queensland Steel Pty Limited
3. Surdex Steel Pty Limited
4. Brice Metals Australia Pty Limited
5. Southern Steel (WA) Pty Limited
6. Steelpipes Pty Limited
7. Piling Solutions Australia Pty Limited
8. RJE Pty Limited
9. Rollpress Proplate Group Pty Limited
10. Elliott Engineering Pty Limited
11. Australian Rollforming Manufacturers Pty Limited
12. Ferrocut Australia Pty Limited
13. Boyd Metal Industries Pty Limited
14. Rollco Pty Limited
15. Southern Sheet & Coil Pty Limited
16. Australian Metal Processors Pty Limited
17. Surdex Sheet & Coil Pty Limited
18. Southern Steel Cash & Carry Pty Limited
19. Southern Steel Trading Pty Limited





2.2 Our Operations

The Southern Steel Group is one of Australia's largest steel supply, processing and distribution companies. We directly employ 1300 people across Australia in our 19 distribution, supply and processing business. Our steel products, sheet & coils are sourced predominantly from domestic steel mills, while the remainder are imported from Asia, Europe, and the Middle East.

Our long-term client portfolio is exclusively based in Australia and includes some of Australia's most influential steel fabrication, engineering and construction companies.

The group's network services small, medium and large enterprises with flexibility, humility and excellence in customer service and communication.



Employment

1300 people across Australia



Companies

19 businesses in our Group



Network

Small, medium and large enterprises

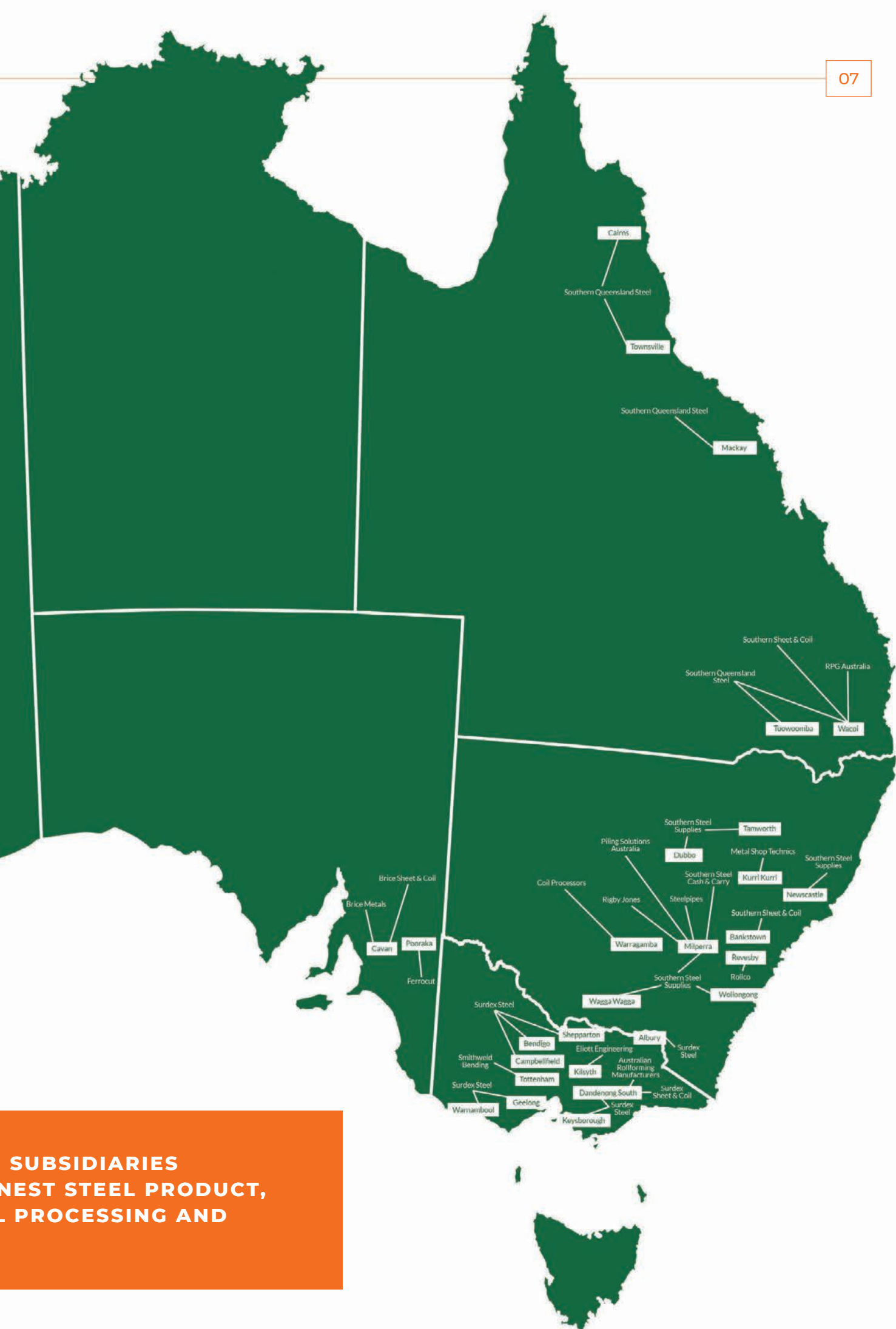


Market

Domestic and international



SOUTHERN STEEL GROUP AND ITS SPECIALISE IN PROVIDING THE FINEST SHEET & COIL, AND EXPERT STEEL DISTRIBUTION.



**SUBSIDIARIES
NEST STEEL PRODUCT,
PROCESSING AND**





2.3 Our Supply Chains

Our supply chain is predominantly domestic in Australia, with the bulk of our steel supplies from Australian domestic mills run by BlueScope, Liberty, and Infrabuild.



We place a high value on quality, consistency, and reliability of supply from our supply chain partners. We maintain regular and long-term relationships with our suppliers and regularly visit their mills. During FY2021/2022 our senior management were not able to visit overseas steel mills due to the COVID-19 pandemic.

The remainder of our steel is imported from Asia, Europe, and the Middle East, specially from the following countries:

- Belgium
- China
- Czechia
- Germany
- Republic of Korea
- Indonesia
- India
- Italy
- Japan
- Malaysia
- New Zealand
- Singapore
- Sweden
- Taiwan
- Thailand
- Turkey
- United Arab Emirates
- Vietnam



3. Description of Risks of Modern Slavery Practices in our Operations and Supply Chains

We recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that might contribute to modern slavery through our operations and supply chains, and to continuing improving our risk assessment approach.

Risk Assessment Methodology

We developed a risk assessment methodology which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location and specific entity risk. We reviewed the Global Slavery Index to assess the prevalence of slavery in our sector and in the countries where our suppliers are operating. We then identified and mapped out our list of steel suppliers and other office and warehouse suppliers, the volume and value of our business with them, their locations, and countries of origin. Our initial risk assessment has indicated that our operations and supply chains have a low risk for modern slavery. Based on the sectors, production and geography of our supply chain, our risk profile is summarised below.



Sector/Industry

There is a risk of the potential for modern slavery practices in the supply chain of the steel manufacturing sector because of its characteristics, products, and processes, such as the widespread reliance on unskilled workers as an industry practice and relaxed labour and safety regulations in some countries.



Product/Service

There is a risk of the potential for modern slavery practices in the supply chain of steel production because of the way that the product is produced, provided or used such as competitive markets that are subject to price pressure, cyclical production and high risk raw materials used as inputs.



Geographic

There is a risk of the potential for modern slavery practices in the supply chain in certain countries in Asia and the Middle East where the Southern Steel Group buys steel products due to factors such as poverty, weak governance, lack of enforcement of the rule of law, and high migration flows.



Specific Entity Risk

Certain companies or businesses may pose a risk of the potential for modern slavery due to their known poor human rights and/or labour practices record, poor governance structures and a lack of robust policies and/or responsible purchasing practices.





4. Addressing the Risks of Modern Slavery and Effectiveness of Actions

We conduct audits of our businesses and suppliers to detect any instances of bribery, corruption, and modern slavery. For example, the trading companies that we trade with are audited to ensure they only deal with reputable steel mills and our senior management regular visit the steel mills that are our major suppliers. During FY2020/2021, we undertook several key activities to identify and manage modern slavery risks in our own operations and within our supply chain. They are listed across.

1. Mapping our suppliers & supply chain

We conducted an extensive mapping exercise of foreign suppliers, including country of origin, list of steel mills, quantity of steel purchased, and value of steel purchased. The results shows that we currently import steel from 18 different countries including: Belgium, China, Czechia, Germany, Republic of Korea, Indonesia, India, Italy, Japan, Malaysia, New Zealand, Singapore, Sweden, Taiwan, Thailand, Turkey, United Arab Emirates, and Vietnam. According to the global slavery index, some of these countries have a risk of modern slavery but there is a very low risk of modern slavery in the steel sector in these countries.

We also conducted an extensive mapping of office and equipment suppliers, including amounts purchased and contact people. We found 51 companies supplying office equipment and supplies to our businesses, all of them based in Australia.

2. Corporate desk assessment

We conducted further assessments on our foreign steel suppliers to verify if there was any evidence of modern slavery risk. This was done through desktop research by an environmental, social and governance (ESG) and human rights specialist.

3. Regular visits to our suppliers

Senior management regularly visit our foreign steel suppliers to build long term relationships and to ensure our values are compatible, as well as quality, consistency, and reliability of supply. These regular visits enable us to conduct onsite assessments of the operations of our suppliers. In 2021/2022, we were unable to visit our overseas suppliers due to the COVID-19 pandemic.

5. The Process of Consultations and Future Plans

The process of consultation was extensive and at the highest management and leadership levels. The assessment and analysis were done under the guidance and oversight of the Executive Chairman.

Consultations took place with the General Managers of the 19 subsidiaries. An email questionnaire was sent out to the trading companies that we purchase steel from overseas.

In 2021/2022, senior management reviewed the supplier code of conduct and it will be adopted in 2022/2023.



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