



## Modern Slavery Statement 2024

At Cullen Steel Fabrications Pty Ltd (ABN 66 003 055 338), we are committed to upholding the highest ethical standards and promoting human rights across our operations and supply chain. We recognize the importance of addressing modern slavery and human trafficking, and we are dedicated to preventing and eliminating these practices from our business activities. This modern slavery statement outlines our commitment to combating modern slavery in the steel fabrication industry such as human trafficking, child labour, forced labour, slavery, and the steps we take to ensure compliance. This statement is based for the year 2024.

### ***Our Company:***

Cullen Steel Fabrications is a steel fabrication company that specializes in structural steel for infrastructure, warehouses, schools, bridges etc.. With a history spanning from the 1930s, Cullen Steel Fabrications has been a leader in the steel fabrication industry. We are committed to providing high-quality steel products while conducting our business in an ethical and responsible manner. We strive to create a safe and inclusive work environment for our employees, contractors, and stakeholders.

### ***Our Structure, operations and supply chain:***

We understand that the risks of modern slavery and human trafficking exist within complex global supply chains. As a steel fabrication company, we work with various suppliers and subcontractors to source raw materials, components, and services. We recognize that ensuring ethical practices throughout our supply chain is essential to combat modern slavery effectively.

The structure of the business is to bring in raw structural steel and fabricate/manufacture finished goods from a design and install them for structural members of buildings and machinery.

Our supply chain is diverse and sustainable, with majority of raw structural steel products coming from local Australian steel mills such as Infrabuild and BlueScope. Some are from Korea, United Emirates and China.

### ***Potential Risks in operations and supply chains:***

We undertake an internal review to identify any potential risks of modern slavery in our operations and supply chains.

We are part of the Sustainability Steel Australia (SSA) that undertakes audits for our operations and supply chains to verify that no risks of modern slavery practices are being implemented.

Vast majority of our projects are green star rated which also looks into modern slavery practices in operations and supply chain. Each project lets us go through and identify changes or unseeable risks in our supply chains.

### ***Due Diligence:***

We have implemented procedures in our policy to address modern slavery risks and to ensure compliance with relevant legislation, including the Modern Slavery Act 2018. Our due diligence processes are designed to assess and manage the potential risks of modern slavery within our supply chain. These processes include:

- **Supplier Assessment:** We conduct assessments to evaluate the ethical practices of our suppliers. We consider factors such as labor practices, human rights, and adherence to applicable laws and regulations.
- **Supplier Code of Conduct:** We have developed a Supplier Code of Conduct that outlines our expectations regarding labor standards, human rights, and ethical business practices. We communicate these expectations to our suppliers and require their commitment to upholding these principles.
- **Supplier Audits:** Conduct periodic audits of our suppliers to verify compliance with our Supplier Code of Conduct. These audits help us identify any potential instances of modern slavery and take appropriate actions to address them.
- **Training and Awareness:** We provide training and raise awareness among our employees and key stakeholders about the risks of modern slavery. This training ensures that everyone understands their roles and responsibilities in identifying and reporting any suspected cases of modern slavery.
- **Whistleblowing Mechanism:** We have established a confidential and anonymous whistleblowing mechanism that allows employees, suppliers, and stakeholders to report any concerns or suspicions of modern slavery. We take all reports seriously and investigate them promptly.

### ***Continuous Improvement and consultation:***

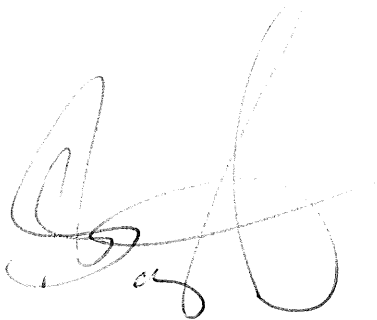
We are committed to continually improving our efforts to combat modern slavery. We engage in regular reviews of our policies, procedures, and due diligence processes to ensure their effectiveness. This enables sustainable responsibilities to comply with modern slavery act. We collaborate with industry partners, non-governmental organizations, and other stakeholders to share best practices and learn from their experiences.

### ***Assessment of effectiveness:***

- Annual audits within the company to ensure all risks are identified. Update company policies based on the risks that have been identified.
- Pursuing additional certification programs and audits such as SAI Assurance.
- Annually monitor and evaluate our supplier's adherence to their risk mitigation strategies.
- We will monitor and respond to any reports regarding suspected cases of modern slavery within our organisation and supply chains.

At Cullen Steel Fabrications we are committed to promoting ethical practices and human rights within our operations and supply chain. We will continue to work diligently to prevent and eliminate modern slavery in the steel fabrication industry. Through our policies, due diligence, training, and ongoing improvement efforts, we aim to create a sustainable and responsible business environment that respects the dignity and rights of all individuals involved in our operations.

**This statement was approved by Ron Barrington as the Principal Governing Body of Cullen Steel Fabrications Pty Ltd on 14/01/2025.**

A handwritten signature in black ink, appearing to be 'Ron Barrington', written in a cursive style.

Ron Barrington

Managing Director of Cullen Steel Fabrications