

Modern Slavery Statement FY22/23



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Introductory Statement

Enviro Pipes is dedicated to and will persist in developing frameworks and procedures to ensure the review of the efficacy of actions taken



This declaration is issued in accordance with the Modern Slavery Act 2018 (Cth) (The Act). Enviro Pipes (ACN 130 666 518) is dedicated to and will persist in developing frameworks and procedures to ensure the review of the efficacy of actions taken in evaluating and dealing with modern slavery risks within its operations and supply chains.

Enviro Pipes has no control or ownership over any entities other than those explicitly mentioned above.

The aim of this statement is to delineate the measures undertaken by Enviro Pipes during the 2022/2023 financial year (the relevant reporting period) to reduce the potential occurrence of modern slavery in its supply chains or any segment of its operations.

Enviro Pipes is committed to disseminating its Modern Slavery Policies across its workforce and supply chain, assessing outcomes annually, and applying the principles of ongoing enhancement within its scope of responsibility.

This Statement has been approved and signed by the Directors of Enviro Pipes.

Friday 29th December 2023

Joe Horvat

Joe Horvat
Director

Belmiro Da Silva Jorge

Belmiro Da Silva Jorge
Director

Operational Overview



Enviro Pipes specialises in manufacturing High-density Polyethylene (HDPE) pipe, fittings, custom spool work, and tanks suitable for a diverse array of applications, such as stormwater management, sewage systems, potable water supply, gas transmission, reticulation, and drainage solutions.

Certified to meet stringent Australian Standards like AS/NZS4130, AS/NZS4131, AS/NZS5065, AS/NZS4129, ISO9001, and ISO14001, our products have garnered approvals from notable bodies like local councils, WSAA, Main Roads, and Water Utilities. Our team, spanning under a hundred employees across three facilities in Australia, remains dedicated to delivering top-notch customer support and high-quality products pivotal for infrastructure projects that directly impact people's daily lives.

Enviro Pipes, a Proprietary Company Limited by Shares with two Directors, operates from its registered head office in Perth, Western Australia, and branches in Melbourne, Victoria, and Brisbane, Queensland. While procurement, fabrication, human resources, and commercial management are centralised at the head office, sales, stores, and manufacturing activities are distributed across all Australian locations.

Aligned with ethical and moral principles, Enviro Pipes values equality and fosters an inclusive organisational culture that prioritises treating all individuals with dignity and respect. We strictly prohibit any conduct construed as bullying, intimidation, discrimination, sexual or workplace harassment, underscoring our commitment to nurturing an inclusive and diverse workforce. Our recruitment and selection processes prioritise merit-based criteria to attract top talent.

Encouraging transparent communication between the workforce and management, our organisational structure promotes openness. We actively encourage clients, suppliers, and contractors to engage in open dialogue, fostering collaborative efforts for the betterment of everyone involved in our interactions.

MANAGEMENT STRUCTURE



Major Supply Overview

Enviro Pipes Pty Ltd sources raw materials and other supplies from local and international suppliers to meet production demand.



Major Supply Overview

Raw Material (HDPE): Australia, Thailand, UAE, South Korea

Steel Products: China



Manufactured Plastic Products, Consumables, Service Providers, Clothing, Office Stationery: Australia



Rubber Products: Vietnam



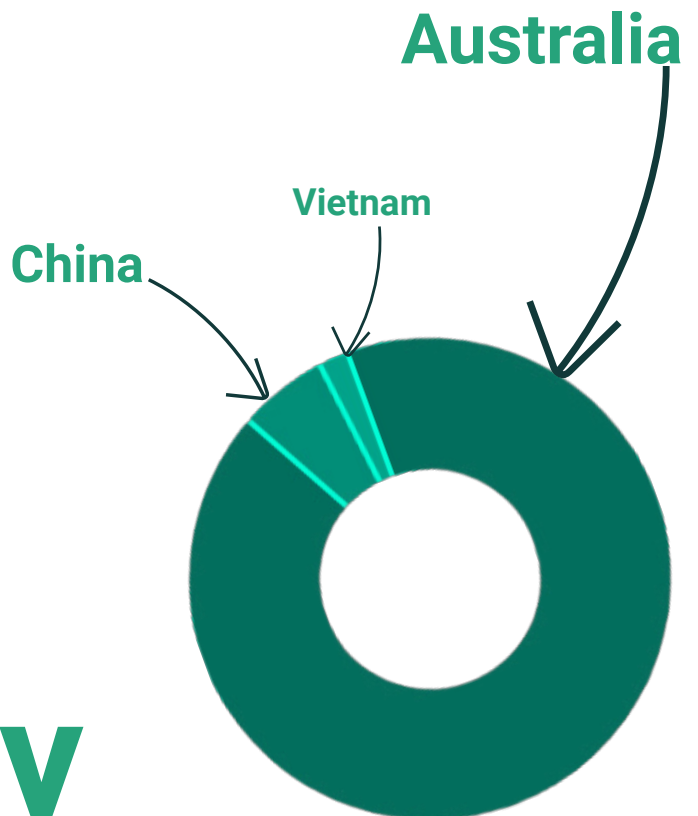
Employee Ratio



Australian Temporary Visa Holders

Australian Permanent Residents and/or Australian Citizens

Direct Purchase by Country



RISKS OF MODERN SLAVERY IN THE OPERATIONS AND SUPPLY CHAINS



Understanding where our key supply chain risks lie is the starting point for taking action. An assessment of our active direct suppliers was undertaken by initially reviewing The Global Slavery Index 2018 (The Index). Our major key direct suppliers are located in Australia. The index indicates that employees and contractors in Australia rank as low risk within the sectors of prevalence, and vulnerability in the population.

When evaluating potential suppliers, we consider varying aspects including price, lead times, reliability, and provide a full, fair, and reasonable opportunity for Australian businesses to bid for the supply of goods and services we require. In addition, we assess the risk of Modern Slavery within the supply chain.



RISKS OF MODERN SLAVERY IN THE OPERATIONS AND SUPPLY CHAINS



Country Risks

Consideration is given to the countries where the Supplier is located, where breaches of human rights are commonplace, where foreign contract labour is often used, where exploitation is facilitated by the vulnerable position of foreign workers.

According to the The Index, Enviro Pipes suppliers (direct and indirect) which we procure materials from, the countries with the highest modern slavery vulnerability are Thailand, China, and Vietnam.

Thailand is considered a country of medium risk to modern slavery conditions, and in global ranking, in the July 2020 DFAT report- Thailand is a destination, source, and transit country for human trafficking for both Thai nationals and foreigners. Industries most affected with the exploitation of human rights are commercial fishing and related industries, the poultry industry, manufacturing, construction, agriculture, domestic work, and street begging. People are exploited through debt-based coercion and fraudulent promises of well-paid employment.

In the January 2022 DFAT Report, Vietnam is a source, transit, and destination country for trafficking. Women and children, particularly from ethnic minorities, are common victims, but men have also been subjected to trafficking. Victims are trafficked using coercion, force, or deception to higher and lower wealth countries in Asia and the Middle East, but also via complex routes to Western countries, including in Europe.

China is considered a country of medium risk to modern slavery conditions, and in global ranking (source), is estimated to have the second highest absolute numbers of people in modern slavery.

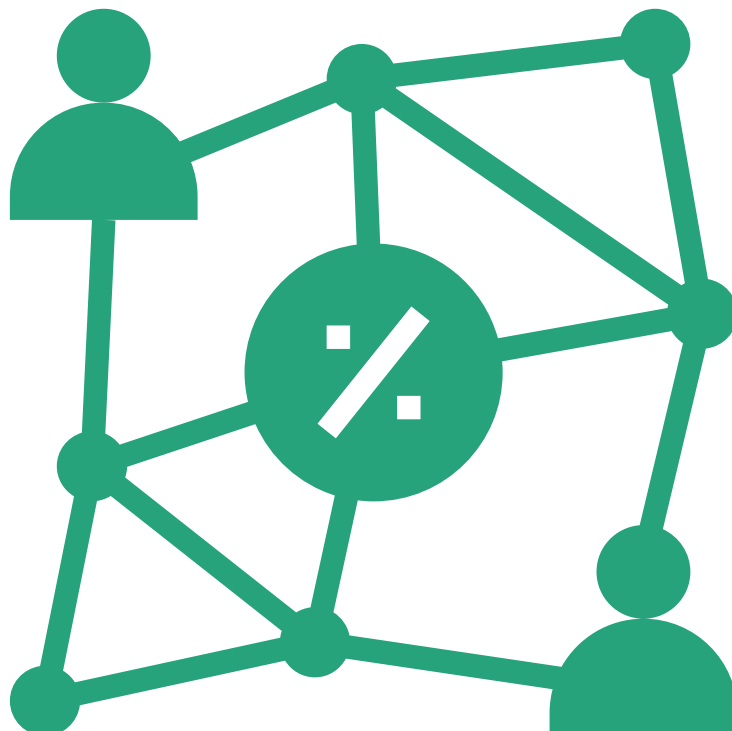
RISKS OF MODERN SLAVERY IN THE OPERATIONS AND SUPPLY CHAINS



Sector Risks

Consideration is given to the activities the Supplier undertakes to procure or manufacture its goods or services, where raw materials are often the products of child or slave labour, or where high levels of manual labour required provide the motivation to utilise the vulnerable.

Of the sectors that Enviro Pipes suppliers operate in, the apparel/clothing, and laptop/IT supplies are ranking in the top five products at risk of modern slavery with respect to value, in accordance with The Index. Although the suppliers in these sectors are not considered to be our major suppliers, we continue to promote meaningful communications with our suppliers to monitor their compliance with the laws of their country.



ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS



Enviro Pipes Pty Ltd does not engage, support or condone Modern Slavery and will use our best endeavours to assess our suppliers to ensure they comply with the Modern Slavery legislation. Failure of any of our management or Suppliers to comply with this legislation results in corrective actions being implemented and, in some cases, immediate termination of employment (in the case of individuals) or business relationship (in the case of Suppliers).

In order to minimise the risk of modern slavery, Enviro Pipes within its operations will continue to:

- i) Use effective procedures to verify the age of personnel.
- ii) Ensure workers have written employment conditions/contracts provided to them
- iii) Ensure workers are given equivalent employment conditions/remuneration regardless of citizenship status, gender, and/or ethnicity.
- iv) Ensure workers have access to health and welfare services in accordance with local laws.
- v) Ensure workers have access to mechanisms to raise grievances/whistleblow in relation to any suspected breaches of The Act.
- vi) Not prevent its workers or the workers of its subcontractors to join trade unions.
- vii) Apply the principles of continuous improvement to its area of accountability.

Enviro Pipes seeks to address the risks of modern slavery in its supply chains by considerations made prior to engaging with Suppliers by conducting desktop investigations, structuring contracts to include modern slavery and human rights provisions and risk reporting to the Directors and Chief Operating Officer including the following considerations: -

ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

	ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS
COUNTRY RISKS	Quantification of the countries where the Suppliers are located, where information is gathered from The Index and risks are determined by Enviro Pipes executive team and reviewed by the Directors.
SECTOR RISKS	Suppliers in vulnerable sectors must conduct a documented self-assessment questionnaire to confirm that the Supplier complies with local laws, not be in a region subject to international sanctions and provide sufficient proof that the minimum labour standards of its operations, and its subsidiaries, as defined by the local laws of where the business or supplier operates are met.
SUPPLIER RISKS	<p>are assessed by considering the relationship the Supplier has with financial institutions or business partners which may be funding trafficking or slavery operations. Enviro Pipes conducts due diligence checks necessary to ensure the persons or entities connected with its activities are not subject to targeted financial sanctions, by considering the following-</p> <ul style="list-style-type: none"> i) Using existing credible assessment of entities in its supply chain, such as audit reports, Non-Government Organisations (NGO) Sector Review, and any Modern Slavery Statements submitted by the suppliers. ii) Reviewing the Australian DFAT Consolidated List, which lists persons and entities listed under Australian sanctions laws. iii) Preparing and communicating Modern Slavery policies and procedures with Staff and Suppliers. iv) Collaborating with Suppliers to understand modern slavery risks in the area in which the supplier operates and actions that have been carried out or are planned to mitigate those risks. v) To reduce risk of financial and relationship stress between Enviro Pipes and its supply chain; Enviro Pipes payment processes ensure suppliers are paid promptly. vi) Applying the principles of continuous improvement to its area of accountability. Enviro Pipes seeks to address the risks of modern slavery in its operations by considering-
EMPLOYEE RISKS	<p>Substandard working conditions, discrimination, forced work or unpaid work. Enviro Pipes seeks to address the risks of modern slavery in its workforce by: -</p> <ul style="list-style-type: none"> i) Providing workers with employment contracts in accordance with the Fair Work Act 2009 as determined by independent legal reviews. ii) In accordance with the Charter of Human Rights and Responsibilities Act (Vic), Enviro Pipes acknowledges every person has the right to freedom of association with others, including the right to form and join trade unions. iii) Enviro Pipes provides training to all workers in the right to refuse work, reporting of bullying and/or harassment, and the role and responsibilities of their position.

DUE DILIGENCE PROCESSES



Enviro Pipes undertakes review processes to ensure our business and that of our stakeholders are not impacted by Modern Slavery with active engagement with our suppliers, customers, supply chains, the community, and personnel.

Supported by the Directors, all staff are encouraged to report suspected breaches of The Act for immediate investigation.

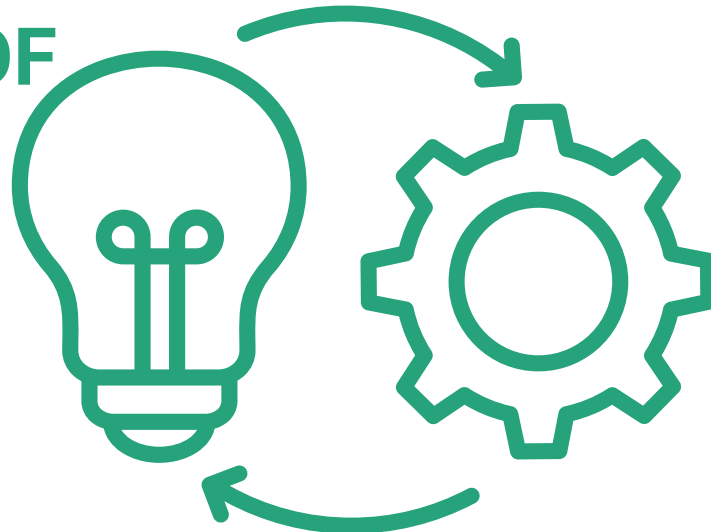
For Suppliers to supply products to Enviro Pipes, they must be assessed and approved by Enviro Pipes Directors. Responsibility for the reporting and management of human rights extends throughout our Company. With a collaborative approach we all work towards reducing the risk of breaches of the Enviro Pipes code of conduct.

Any breaches or concerns are conveyed to the Directors and Chief Operating Officer for review and investigation.

We continue to explore ways we can promote proactive and meaningful communications with individuals, workers and communities that are or could be affected by our operations, business relationships and supply chain.

Annual reviews are conducted across all areas of our company operations including received complaints and effectiveness of grievance mechanisms.

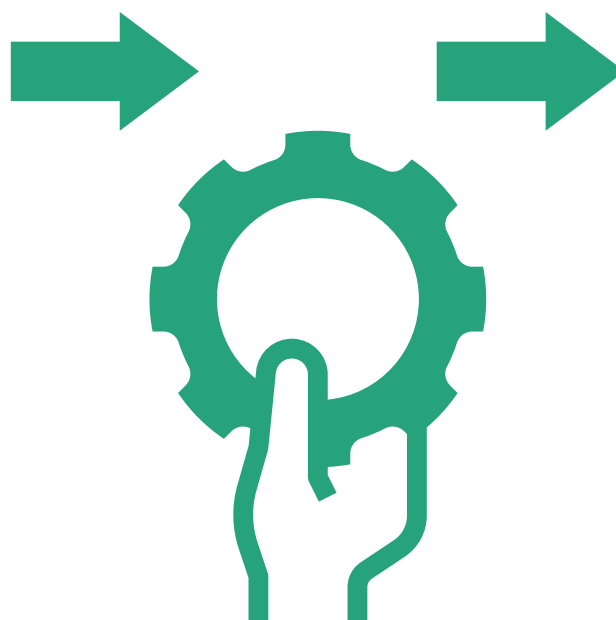
REVIEW AND ANALYSIS OF ACTIONS



Enviro Pipes engages with its Suppliers to understand modern slavery risks in the area in which the supplier operates, obtain feedback, and remediation actions that have been carried out or are planned to mitigate those risks.

On an annual basis, suppliers are reviewed for ethical supply chain risks by the Enviro Pipes Integrated Management System representative and results are presented to Management for review.

Enviro Pipes is continually evolving on ways to evaluate and manage human rights risks throughout the workforce and supply chain. A variety of resources and tools are being used to review and continuously improve our processes with a view to educate workers, reduce exploitative work practices and modern slavery in the supply chain.



CASE STUDIES



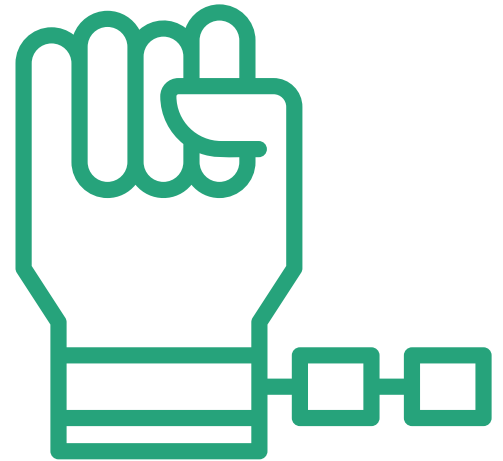
Enviro Pipes, have complied with the obligations under the Modern Slavery Act, with a strong focus on ethical and socially responsible business conduct to reduce the risk of modern slavery. Enviro Pipes' procurement practices reduces pressure on Suppliers by creating long term contracts and paying supplier in fair timeframes. In one such case in 2023, the Directors agreed to pay invoices early to assist the Supplier with cash flow. In another example, Enviro Pipes would pay invoices immediately for a small family business that is a Supplier to Enviro Pipes.

In providing direct employment to an Apprentice with paid study leave for the Apprentice to access quality off-the-job training opportunities- the Apprentice gains education and skills to reduce the risk of modern slavery in his career.

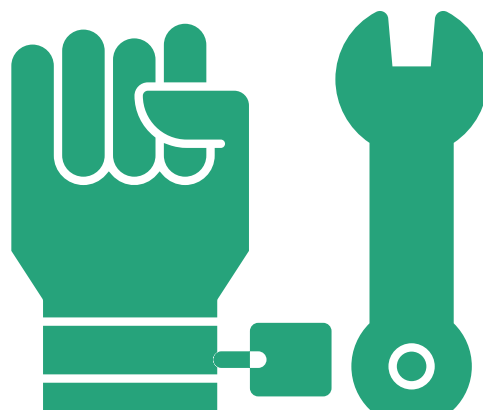


ENVIRO PIPES POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Enviro Pipes Pty Ltd in its operations and all parts of its supply chain does not participate in or benefit from Modern Slavery and will continue with our commitment to



- a. Identify risks of modern slavery.
- b. Take actions to mitigate risks of modern slavery
- c. Review the effectiveness of actions on an annual basis.
- d. Communicate with employees, contractors, and suppliers to ensure awareness of the legislation set out in The Act.
- e. Immediately implement corrective actions with any suppliers or individuals who fail to comply with our Policy or The Act.
- f. In the event of a criminal breach of The Act, terminate the relationship with any suppliers or individuals.



STAFF TRAINING AND COMPETENCY

The Modern Slavery Statement, Policies and Procedures are supported by the Directors, and the executive team. A positive and inclusive culture is promoted within our Company. By implementing a proactive approach in our involvement of The Act we hope to contribute towards mitigating the exploitation of humanitarian rights.

As we continue to expand our human rights training program, we will provide our employees and contractors with a general understanding of the human rights issues and encourage the topic to be discussed and acted upon.

We encourage every worker and manager to enhance their knowledge and awareness of The Act to mitigate future risk of them or their families becoming victims of modern slavery.

