

# MODERN SLAVERY STATEMENT

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2025



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# 1. MESSAGE FROM GENERAL MANAGER

Modern slavery, impacting millions of vulnerable people every day, is often far removed from public view, and alarmingly present in industries that underpin global infrastructure and construction.

The steel and reinforcement sector is not immune. The very materials that build our cities must never come at the cost of human suffering. At Reozone, we understand the responsibility that comes with our position in the supply chain, and we reject any environment where exploitation can exist unchecked. Addressing modern slavery is about more than compliance—it is about integrity, responsibility, and doing what is right. Ethical supply chains are not optional; they are fundamental.

We continue to partner with suppliers who align with our values: quality, consistency, reliability, and transparency. We prioritise long-term relationships built on regular engagement and open communication—because due diligence is most effective when it's active, visible and ongoing.

Through this Statement, we reaffirm our commitment to assessing, managing and reducing modern slavery risks across our supply chain. We continue to strengthen our due diligence frameworks, evolve our risk identification processes and incorporate human rights considerations into procurement, production and operational decision-making.

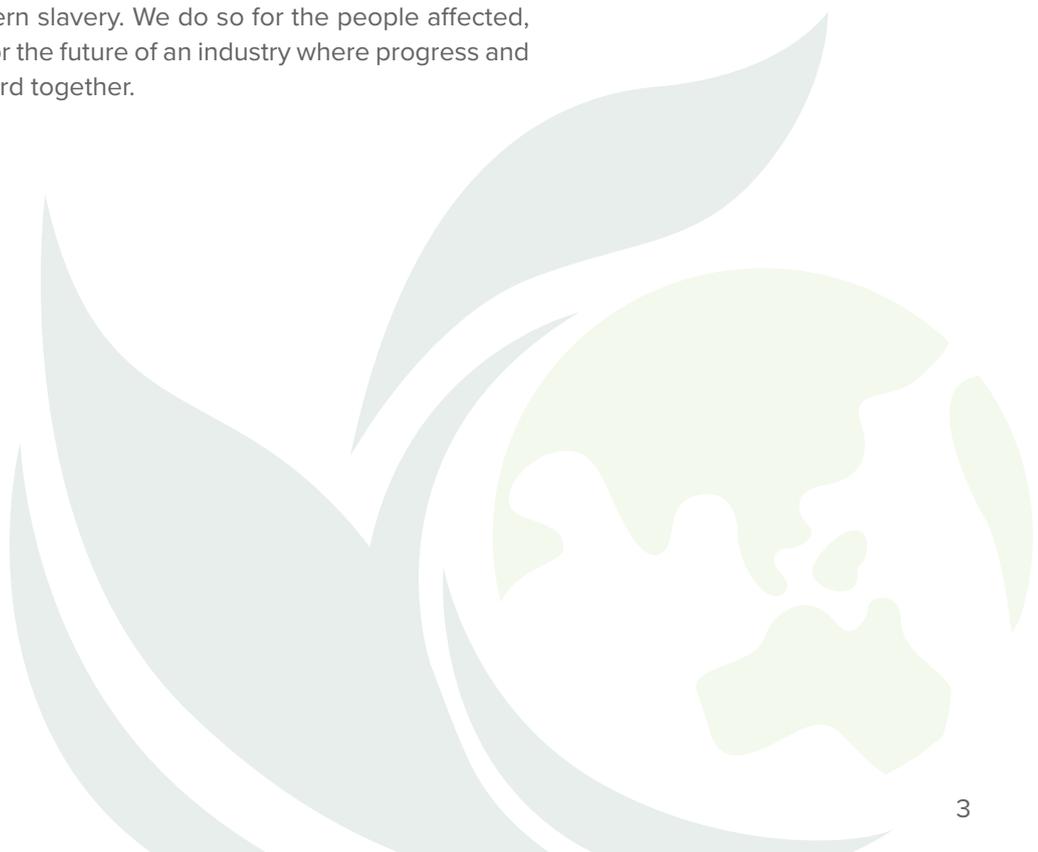
We believe leadership is measured by standards upheld. Our aim is not only to minimise risk within Reozone, but to help elevate the benchmark for ethical reinforcement supply across the industry.

Reozone stands firm against modern slavery. We do so for the people affected, for the values that define us, and for the future of an industry where progress and humanity must always move forward together.



**Stuart De Brincat**  
**GENERAL MANAGER**

20 November 2025



## 2. ABOUT THIS STATEMENT

This Modern Slavery Statement (“Statement”) was voluntarily prepared in alignment with the Modern Slavery Act 2018 (Cth) for the 2024-2025 financial year (1 July 2024 – 30 June 2025) (“reporting period”). It outlines Reozone’s commitment to eradicating modern slavery in all forms<sup>1</sup> and describes the actions taken to identify, address and mitigate risks associated with its operational and supply chain activities.

Recognising that modern slavery can manifest across diverse sectors and geographies, Reozone remains resolute in its efforts to identify, address and mitigate risks. Through sustained, collaborative and proactive initiatives, the business strives to promote ethical business conduct and contribute positively to the global fight against modern slavery.

This Statement has been prepared in alignment with the mandatory reporting criteria outlined in the Modern Slavery Act 2018 (Cth). The table below shows where each criterion is addressed within this Statement.

Requirements of the Act	Section	Page
Identify the reporting entity	3. Our structure	5 - 6
Describe the reporting entity’s structure, operations and supply chains	4. Our operations	
	5. Our supply chain	
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	6. Risk identification	7
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	7. Our actions to assess and address key modern slavery risks	8 - 9
Describe how the reporting entity assesses the effectiveness of these actions	8. Assessing effectiveness	10
Describe the process of consultation with any entities that the reporting entity owns or controls	9. Consultation process	11
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	N/A	

<sup>1</sup>The term “modern slavery” is used to describe situations where coercion, threats or deception are used to exploit victims and deprive them of their freedom. The Commonwealth Modern Slavery Act 2018 (Cth) defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour - situations where children are subjected to slavery or similar conditions, or engaged in hazardous work.



# 3. OUR STRUCTURE

Reozone Pty Ltd (ACN 141 459 127) operates as the trustee of the Reozone Unit Trust (ABN 48 784 895 894), with its registered office at Level 3, 239 Church Street, Parramatta NSW 2150. Reozone functions as a standalone Australian business — it is not part of a larger corporate group and does not own or control any other entities.

During the reporting period, Reozone employed 84 staff across our steel reinforcement operations in NSW. Our team supports the safe, reliable, and responsible delivery of steel reinforcement products. Since commencing operations in 2010, Reozone has remained proudly Australian-owned and driven by a commitment to quality, safety, sustainability, and ethical conduct. Our structure supports direct oversight, long-term supplier relationships, and continuous improvement in identifying and managing modern slavery risks within our supply chain. Our operations place people, integrity, and environmental responsibility at the centre of how we work and how we engage with our partners.



# 4. OUR OPERATIONS

Our primary business activity is the precision processing and supply of steel reinforcing bar products, reinforcing mesh, and associated accessories.

Based in St Marys, NSW, our business structure includes multiple NSW processing sites that support the manufacturing and supply of steel reinforcement products. Our NSW facilities are primarily focused on processing deformed bar in coil (DBIC) and deformed bar in length (DBIL), servicing multi-residential, commercial, industrial, infrastructure, civil, and mining sector projects. We also operate an additional site that concentrates on DBIL processing and the supply of reinforcing mesh, accessories, and related products, supporting clients within the single-dwelling residential market.

Reozone's operations encompass four main areas of activity:

## Raw Materials Procurement

Reozone procures steel reinforcing bar and other key inputs in alignment with our commitment to ethical sourcing. All materials undergo testing and certification to guarantee compliance with quality standards, supported by the Australian Certification Authority for Reinforcing Steel (ACRS).

## Production

Our precision processing involves cutting and bending steel reinforcing bar to customer specifications in adherence to stringent testing protocols. The business maintains accurate forecasting and open communication with clients to effectively plan production and delivery schedules.

## Service, Repair and Maintenance

Our specialised plant equipment undergoes regular inspection, servicing and repair to minimise downtime and maximise productivity. A dedicated team manages the maintenance and optimisation to ensure smooth and efficient production processes.

## Transport

Finished products are packaged and transported to construction sites across NSW. The logistics team coordinates scheduling, transport and client communication to ensure timely and reliable project supply.

Reozone maintains stable, long-term relationships with our key suppliers. This arrangement provides strong visibility over suppliers, ensuring consistent quality, reliability, and mutual trust.

# 5. OUR SUPPLY CHAIN

Reozone sourced premium-grade reinforcement steel and associated products from 245 trusted suppliers through a robust and diverse supply chain. Our eight key steel traders are located in Australia and source from overseas ACRS certified mills. We also procure a broad range of goods and services from both domestic and international suppliers.

The table below outlines the main categories of suppliers engaged by Reozone and the goods or services they provide.



## RAW MATERIAL

Deformed bar in coil (DBIC) and deformed bar in length (DBIL) is sourced from eight key suppliers, who procure from ACRS accredited mills in South Korea, Vietnam, Taiwan, Turkey and the United Arab Emirates.



## EQUIPMENT

Machinery, cranes and cherry pickers are sourced from Australian and overseas suppliers to support processing and logistics operations.



## ACCESSORIES

Connecting, fixing, lifting, and anchoring products are sourced from Australian suppliers.



## HANDLING AND STORAGE PRODUCTS

Timber, bulk bags and slings are sourced from Australian suppliers for the handling, packaging and storage of materials.



## OPERATIONAL AND BUSINESS SERVICES

Business services, energy, telecommunications, freight, maintenance, cleaning and recruitment are sourced from Australian and overseas suppliers to provide essential support for day-to-day operations.

# 6. RISK IDENTIFICATION

At Reozone, we are committed to ethical business practices and prioritise the proactive identification and mitigation of modern slavery risks across our operations and supply chains.

We recognise that modern slavery can exist in various sectors and geographies, and we are dedicated to identifying and mitigating any risks associated with our business practices. Given the highly regulated nature of Australian businesses, the risk of modern slavery within Reozone’s direct operations is considered to be low. However, there is a variable degree of modern slavery risk throughout our supply chains.

In line with the UN Guiding Principles on Business and Human Rights (UNGPs), we assess whether our actions may cause, contribute to, or be directly linked to modern slavery through our business activities. In preparation of this statement, Reozone has identified and assessed potential modern slavery risks in our operations and supply chains by considering drivers and indicators across:



To support this assessment, Reozone conducted a modern slavery questionnaire with key suppliers, representing 87% of total supplier spend, to understand potential risks and identify management practices in the supply chain. We also consulted relevant internal representatives from key business areas to identify operational controls in place.

## RISK IN OUR OPERATIONS

We recognise that we could potentially cause modern slavery if employment practices failed to meet legislative or ethical standards. However, as Reozone’s operations are entirely based in Australia, where employment conditions are highly regulated, the overall risk of modern slavery within our direct operations is considered low.

The business maintains policies, procedures and training programs to ensure potential risks are effectively identified and addressed across our operations. In addition, Reozone’s robust grievance mechanism enables individuals to safely report concerns related to modern slavery without fear of reprisal.

## RISKS IN OUR SUPPLY CHAINS

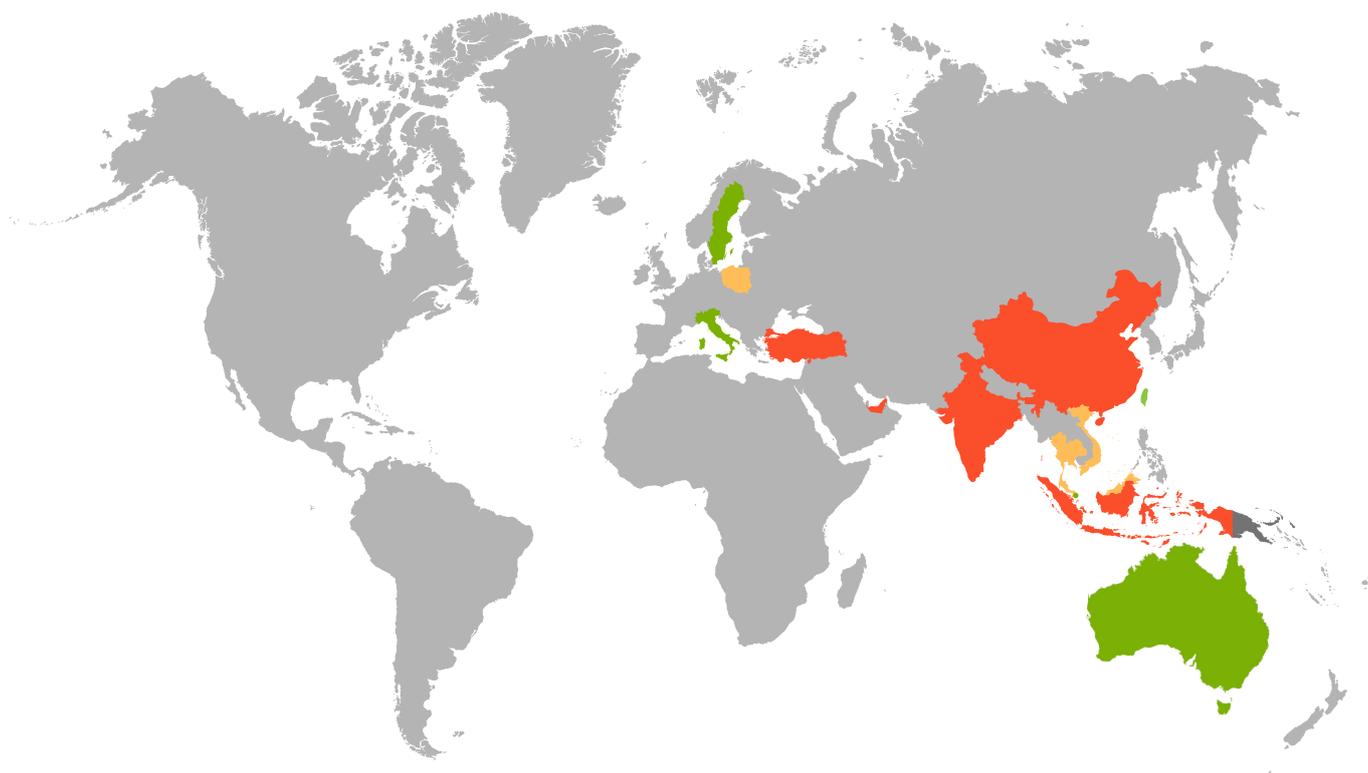
While the risk of modern slavery on our direct operations is low, we recognise that we may contribute to or be directly linked to modern slavery through our broader supply chains and business relationships. Risks may arise due to imported materials and products, overseas manufacturing, and the use of lower-skilled or temporary labour in certain service sectors.

The table below provides a summary of sectors globally recognised as high risk.

Sector	Risk indicator
Steel production and raw material sourcing	Low visibility over lower tier suppliers and traditionally unregulated nature of the industry, often operating in high risk countries.
Freight and shipping	Low supply chain visibility and risk of workers facing poor conditions, excessive hours, and lack of protections.
Cleaning and facility services	Low-wage industries with risk of underpayment, excessive overtime, exploitation of migrants and temporary labour.
Recruitment and labour hire	Low-skilled, temporary and migrant workers at risk of unfair fees, misleading contracts, or unsafe work conditions.

Approximately 98% of Reozone’s products and services are directly sourced from domestic suppliers, where the risk of modern slavery is considered low due to strong labour laws and regulatory enforcement. However, key raw materials such as DBIC, DBIL and mesh are manufactured overseas prior to import into Australia. The lower tiers of these supply chains, particularly where mining and steelmaking activities occur, can involve higher-risk countries where government responses to human rights issues are relatively weaker.

To understand geographic risks, we assessed the countries where Reozone’s suppliers (tier 1) operate and where their upstream suppliers (tier 2) source materials, using the Walk Free Global Slavery Index and the Social Hotspot Database. The inherent risk reflects the estimated prevalence of modern slavery and the social-risk indicators contained in these datasets<sup>2</sup>. The resulting map provides a visual representation of each sourcing country’s relative risk level, classified as low, moderate or high.



**LEGEND:**

<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #4CAF50; margin-right: 5px;"></span> Low prevalence of modern slavery and low social-risk indicators</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #FF9800; margin-right: 5px;"></span> Moderate prevalence and/or mixed social-risk indicators</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #F44336; margin-right: 5px;"></span> High prevalence and high or very high social-risk indicators</li> </ul>	<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #4CAF50; margin-right: 5px;"></span> Italy, Sweden, Australia, Taiwan &amp; Singapore</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #FF9800; margin-right: 5px;"></span> Poland, Thailand, Vietnam &amp; Malaysia</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #F44336; margin-right: 5px;"></span> Turkey, China, India, Indonesia &amp; United Arab Emirates</li> </ul>
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<sup>2</sup>Prevalence refers to the estimated proportion of the population living in modern slavery (Walk Free Global Slavery Index). Social-risk indicators refer to the country-level metrics in the Social Hotspot Database, which aggregates risks at the intersection of specific sectors and the countries in which those activities occur. Country classifications were derived by reviewing both datasets and allocating each sourcing country to a low, moderate or high inherent risk category.

# 6. RISK IDENTIFICATION cont.

## SUPPLIER RISK MANAGEMENT

Reozone conducts an annual assessment of modern slavery risks in our operations and supply chain. In the reporting period, we engaged our key suppliers to understand how modern slavery risks are identified and managed within their operations and supply chains.

All suppliers surveyed (100%) reported that workers are provided with a written contract in a language they understand, where terms of employment including wage rates and hours of work are clear. All suppliers surveyed also confirmed workers receive their legal pay entitlements, including superannuation, are paid on time and provided with pay slips clearly showing how wages and deductions are calculated. No suppliers retained security deposits or original identity documents of workers.

In addition, the majority of Reozone suppliers surveyed have assessed modern slavery risks within their operations and supply chains and have established governance measures such as a Modern Slavery Policy, Code of Conduct and grievance mechanism. More than half of the suppliers surveyed also conduct screening of prospective suppliers to assess risk of modern slavery.

More than half of Reozone's surveyed suppliers reported employing a labour group recognised as being more vulnerable to modern slavery, such as low-skilled, labour hire, migrant, Indigenous people, itinerant workers, and workers with disabilities. While these workers can face higher risks of exploitation, Reozone found that the companies in our supply chain have implemented measures to manage the risk of modern slavery.

These findings indicate Reozone's key suppliers have established measures to manage risks of modern slavery. Reozone remains committed to enhancing oversight through continued supplier engagement.



# 7. OUR ACTIONS TO ASSESS & ADDRESS KEY MODERN SLAVERY RISKS

In FY2024–25, Reozone developed an action plan aimed at addressing risks that could **cause** or **contribute** to modern slavery within our operations and supply chain. It spans three phases over five years, and sets measurable goals to monitor the effectiveness of our anti-slavery initiatives and ensure continuous improvement.

The action plan is structured around five key objectives:

- 1 Strengthen action in operations
- 2 Establish clear and consistent policy and framework documentation
- 3 Improve understanding of the supply chain
- 4 Build modern slavery awareness
- 5 Drive continuous improvement

During the reporting period, Reozone implemented the following actions:

## GOVERNANCE AND OVERSIGHT

Reozone strengthened its governance framework by refreshing its Anti-Slavery Policy to reflect the eight recognised forms of modern slavery outlined in the Modern Slavery Act 2018 (Cth). This policy was embedded into our Integrated Management System (IMS), elevating it from a standalone document to an enforceable governance pillar with defined ownership and accountability.

To reinforce a culture where concerns are not just allowed—but expected to be raised—Reozone also introduced a formal Grievance Policy. Together, these policies establish structured reporting channels, clear responsibilities, and escalation pathways for employees, suppliers and delivery partners alike. They extend to every individual working with or representing Reozone, including staff, suppliers, contractors, consultants, advisors and other third-party partners in our supply chain and operations.

Reozone’s modern slavery commitments are actively overseen by our Quality, Health, Safety and Environment (QHSE) Team, who manage risk evaluation, maintain assessment records, and report on compliance performance. To ensure oversight remains dynamic and forward-looking, modern slavery is now a permanent agenda item at our QHSE Management Review meetings held every April and October, cementing visibility, leadership discussion, and continual improvement at the highest operational levels.

## GRIEVANCES AND REMEDIATION

Reozone maintains a grievance mechanism, providing multiple reporting channels for employees, contractors, and suppliers to raise concerns anonymously. A dedicated grievance register for modern slavery and workplace concerns has been established to record and manage cases, document corrective actions, and ensure closure is tracked. The existence and use of the grievance mechanism and register have been communicated to all of our employees.

Concerns raised through the grievance mechanism are acknowledged within five working days and reviewed by the Quality, Health, Safety and Environment (QHSE) Team in consultation with management. Investigations are conducted where required, corrective actions are implemented, and outcomes are recorded to support transparency.

Throughout the reporting period, Reozone did not record any grievances connected to modern slavery or broader workplace concerns. While this reflects a positive compliance outcome, Reozone’s position remains unchanged: a lack of reports doesn’t end the job—oversight, visibility and vigilance are ongoing obligations.

# 7. OUR ACTIONS TO ASSESS & ADDRESS KEY MODERN SLAVERY RISKS cont.

## SUPPLIER ENGAGEMENT

Reozone engaged its key national and international suppliers through a modern slavery questionnaire to better understand the potential risks of modern slavery within their supply chains and gather insights into actions being taken by suppliers to manage these risks. Reozone engaged a total of 33 suppliers and achieved a 70% response rate.

Suppliers were selected for engagement based on the top ten highest spend suppliers, as well as the inclusion of all overseas suppliers and perceived higher risk service providers such as transport, cleaning and recruitment. In total, the suppliers engaged represent approximately 85% of Reozone's annual revenue.

Reozone will continue to engage suppliers on an annual basis to monitor potential risks and track progress in addressing modern slavery within its supply chain.

## CONTINUOUS IMPROVEMENT

Building on the actions taken during the reporting period, Reozone is actively progressing its Modern Slavery Action Plan, which includes integrating modern slavery considerations into existing training and procurement processes.

## AWARENESS AND TRAINING

A Modern Slavery Training Program will be developed for Managers, Human Resources (HR), Procurement, QHSE, and office staff. This program will build on the existing training in the induction process for new employees and ensure ongoing awareness as the workforce changes. It will aim to raise awareness of the risks of modern slavery and build staff capability to understand and identify potential indicators of exploitation.

Awareness on modern slavery will also be promoted through toolbox talks and office communications delivered to warehouse and operational staff. These briefings will cover the eight forms of modern slavery, reporting expectations, escalation pathways, Reozone's commitments and responsibilities, and the safe and confidential use of reporting channels to encourage staff to speak up.

## PROCUREMENT MANAGEMENT

Reozone will expand its existing supplier evaluation template to include criteria on ethical business practices and consideration to modern slavery risks. All new suppliers are required to complete this evaluation as part of the qualification process. The criteria will aim to promote the implementation of governance measures such as policies that protect worker rights, modern slavery, anti-bribery and corruption.



## 8. ASSESSING EFFECTIVENESS

Maintaining an effective response to modern slavery depends on regularly evaluating how well actions address identified risks. To support this, Reozone has established key performance indicators (KPIs) that provide a consistent basis for assessing progress and identifying areas for improvement.

These indicators include:

- Proportion of complaints resolved by grievance mechanism
- Number of training sessions and employees reached
- Number of suppliers screened against the supplier evaluation criteria
- Number of action plan milestones achieved

Modern slavery is regularly reviewed during the Quality, Health, Safety and Environment (QHSE) Management Review to assess progress against the established KPIs and evaluate the overall effectiveness of actions taken.

## 9. CONSULTATION PROCESS

Reozone Pty Ltd does not own or control any other entities, therefore this criterion is not applicable.

## 10. APPROVAL

Reozone is committed to addressing the risks of modern slavery within our operations and supply chains, and recognises the importance of continuous improvement. We will continue to monitor, review, and enhance our practices and provide annual updates on our progress.

Reozone's 2024-2025 Statement has been approved by the principal governing body and signed on 20/11/25 by Aaron Hadfield and John Incollingo, in their capacities as directors and principal authorities of the corporate trustee, Reozone Pty Ltd (ACN 141 459 127).



**Aaron Hadfield**  
**DIRECTOR**



**John Incollingo**  
**DIRECTOR**





## OUR MISSION

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Our mission is to service our customer needs by providing you with the most efficient and professional service. As a team we are entirely devoted to our clients, and as such, deliver only the very best standard of quality service.

We are determined to continue to be one of the leading reinforcement conglomerates operating in Australia.

The team at Reozone are 100% committed to providing our clients a service that cannot be replicated elsewhere. We're driven by a series of core values that act as motivation, and consistently push us to persevere in the multitude of services we provide.

## CONTACT US

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