

## Ullrich Aluminium – Annual Modern Slavery Statement 2020/2021

### Who Are We?

Ullrich Aluminium Pty Ltd (ABN 70 001 697 445) is a privately owned company not listed on the Australian Market. We employ 350+ staff in Australia and another 300 + staff in New Zealand. We have 43 branches in total throughout both countries. In Australia alone, we have operations in every state and territory, with over 25 sites. We have 5 manufacturing sites plus an Extrusion Plant in the NSW Hunter Valley. Our Australian Head Office is located in Carole Park Brisbane.



In Australia, all of our manufactured product is for domestic consumption; we do not export any of our products. Our New Zealand operations supply for domestic consumption and we also export products to 23 South Pacific Island nations. In both countries, we own our own distribution networks and manufacturing plants. We are an independent Aluminium distributor and Aluminium extruder and have the largest Trans-Tasman footprint.

With over Sixty (60) years of continued business, we are proud that our growth and success is linked to our integrity in all facets of our business and our business brand.

## Supply Chains

We have a relatively simple local supply chain which includes the purchase of products and services needed for our business's day-to day operations including distribution of our products, office supplies, employment and training of our employees, industry advice from industry organisations, IT infrastructure and support services. Aluminium billet is our largest cost item and we have supply contracts with a number of reputable Australian Aluminium suppliers. These suppliers also have Modern Slavery policies in place globally.

In regard to our international supply chain, some of our Aluminium billet comes from reputable overseas Aluminium suppliers who have Modern Slavery policies in place globally. Other imported products come from China and South East Asia. Our suppliers are vetted through qualification of products, facilities and trade capabilities. *Ullrich Aluminium* also relies on international standards such as ISO accreditation.

Despite our vetting process, it is recognised that imported products coming from South East Asia may have a high risk of Modern Slavery due to the geographical risks and the possibility of poor governance and socio-economic factors like poverty.

## How Are We Addressing These Risks?

*Ullrich Aluminium* Pty Ltd is committed to our corporate social responsibility, we are determined to do our best and to act as an ethical corporate citizen. Through publicly sharing our Modern Slavery Annual Statement, with regard to slavery and human trafficking, *Ullrich Aluminium* hopes that our words and our actions can help reduce its prevalence anywhere in the world by withdrawing support for those suppliers who utilise or support such practices.

In preparing our second Annual Modern Slavery Statement, we do not consider our Modern Slavery risk profile to have materially altered and we are satisfied that our framework continued to be fit for purpose during 2020 and 2021. Our Senior Management Team will continue to take ownership and responsibility for compliance with the Act.

## Impact of COVID-19

*Ullrich Aluminium* have not been immune to the impact of COVID-19 over the last 12-months reporting period, and into the current year as well. Our primary focus has been on ensuring that our key business activities continued to operate effectively in a very challenging commercial working environment. The same has applied to our international and local suppliers and customers. This has caused delays in achieving some of the goals set out in our previous Annual Statement.

We were able to complete and implement the following actions in this reporting period:

1. A new company policy and procedure covering Modern Slavery in our operations has been approved and implemented.



2. Training for staff in Modern Slavery requirements has been completed. All managers and supervisors, as well as our external and technical sales representatives, have been supplied with this training. In addition, our Code of Conduct Induction training has had additional Modern Slavery material added for those employees that do not directly interface with Modern Slavery.

As a result of delays caused by COVID-19, we have elected to roll the implementation of the following actions into 2021 and early 2022:

1. Implement a Self-Assessment Questionnaire to be sent to all of our existing local and international suppliers as well as new suppliers.
2. Assess the potential Modern Slavery risks in our operations and supply chains with emphasis on high-risk geographical locations and business transactions.
3. Conduct due diligence on local and global supply chains.
4. Reviewing supplier contracts to ensure they contain terms that are consistent with the Act.
5. Develop a whistle blower policy to enable reporting.
6. Take steps to address any potential modern slavery risks identified.
7. Set up a program to measure effectiveness through performance monitoring.

### **How Do We Assess the Effectiveness of Our Actions Being Undertaken?**

Our Senior Management Team will continue to determine the most appropriate method, scope and resources for assessing the effectiveness of our approach and processes related to Modern Slavery risks.

Looking ahead, the sorts of activities we will be looking to establish or enhance will be (but not be limited to):

- Establishing a process to regularly review our actions.
- Regularly review our risk assessment process.
- Tracking actions we have taken and measuring their impact.
- Working more closely with our suppliers and checking how they are progressing in their efforts to address Modern Slavery.

This statement was approved by the Board of Ullrich Aluminium in their capacity as principal governing body of Ullrich Aluminium on 7th December 2021.



Gilbert Ullrich

Gilbert Ullrich – Chief Executive Officer

7<sup>th</sup> December 2021