

Modern Slavery Statement

Metecno Pty Ltd

1. Introduction

This statement sets out the steps taken by Metecno Pty Ltd ACN 096 402 934 (**Metecno**) to address modern slavery risks in Metecno's business operations and supply chains during the FY23 financial year.

Metecno is committed to ensuring that there are secure management systems and procedures in place to prevent exploitations of human rights within Metecno itself and Metecno's supply chain.

Metecno consulted the relevant companies it owns or controls in the development of this statement.

2. Structure and operations

Metecno is an Australian manufacturer and distributor of insulated sandwich panels and associated building products and operates in Australia under several well-known business names including Bondor, Metecno PIR Norfoam and National Polystyrene Systems.

Metecno trading as Bondor, manufactures & supplies thermal building solutions and lightweight architectural panels used in walling, roofing, cold storage, fire resistant walling and building systems.

Operating as Metecno PIR, Metecno manufactures insulated panels and PIR cored solutions.

Metecno under the banner of Norfoam operates primarily in Northern Queensland, where it produces and supplies thermal building solutions, lightweight architectural panels and polystyrene products

National Polystyrene Systems is the name used by Metecno to produce & distribute high quality expanded polystyrene products for use in building, construction, civil engineering and various other projects requiring insulation, cladding, void forming, flotation and light weight fill solutions.

Metecno has an expansive and diverse customer base, predominantly comprising wholesale customers operating across agricultural, commercial, industrial, education and residential sectors. Metecno is a national brand with 11 sites across New South Wales, Victoria, South Australia, Queensland, Western Australia and Tasmania.

3. Supply chain

Metecno sources goods and services in the following categories: raw materials (mainly steel, polyurethane chemicals and expanded polystyrene bead (**EPS bead**)), consumables, utilities, transport, plant, equipment, parts and repairs, human resourcing, information technology agencies and other miscellaneous business spend utilised by Metecno in the course of its operations are primarily companies incorporated in Australia.

At Metecno, steel supply constitutes more than 40%, and supply of polyurethane and polystyrene products constitutes approximately 30%, of the total expenditure on raw materials and services. These materials are predominantly sourced from Australian manufacturers and suppliers with onshore facilities, including Bluescope as the principal supplier of steel.

Other production inputs, such as consumables and accessories, are sourced from Australian distributors of creditable international suppliers.

Metecno strives to engage suppliers with a good reputation, ethics and reliable business practices. Metecno does not knowingly contract with or engage any businesses that are involved in modern slavery or human trafficking.

4. Description of risks of modern slavery

Metecno considers the risk of modern slavery being caused by, contributed to or directly linked to its operations to be low. This assessment is driven by its geographic location, with all operations based in Australia, and by the human resources processes in place at Metecno. These processes include compliance with relevant laws, checking employees' wages and, where relevant, salary agreements and confirming corresponding payment, as well as conducting employment checks (either internally or externally).

Metecno considers the risks associated with the categories of goods and services sourced, as well as country of origin of goods and services in assessing the risk of modern slavery in its supply chain.

Certain categories of inputs entail a potential risk of modern slavery in their supply chain. Steel sheets, polyurethane and EPS beads and some accessories procured from Australian manufacturers and suppliers may use ingredients sourced from geographical regions impacted by modern slavery practices, including forced labour or inadequate working conditions.

In Australia, labour hire, cleaning and security services are sectors considered to have a higher risk of modern slavery.

The Global Slavery Index notes that the Asia and the Pacific region has some of the highest incidence of modern slavery. Metecno and its suppliers source certain goods and services from countries in this region, with the accompanying higher risk of modern slavery in supply chains for the goods and services sourced from those countries.

Where a supplier is identified as higher risk, due to category and/or geographic location, Metecno looks to engage with that supplier to understand its modern slavery risk, with a view to managing that risk, as set out below.

5. Assessing and addressing modern slavery risks

At Metecno, we understand the importance of raising awareness to aid the ending of modern slavery practices. To that effect, Metecno has implemented the following processes and tools to assist in the detection and prevention of modern slavery risks:

- a) **Supply chain mapping:** Metecno undertakes due diligence in respect of its key suppliers to ensure that these parties are aligned with Metecno's policies, codes and values. Supply chain mapping involves categorising suppliers by risks associated with their geographic location, size and industry.
 - b) **Follow up questionnaire:** Metecno requires suppliers identified as "high risk" during the supply chain mapping exercise to complete a modern slavery risk questionnaire to ensure compliance with modern slavery laws and to identify any issues. Significant issues are escalated to senior management.
 - c) **Supply contracts and due diligence:** Generally, supply contracts are entered into on the basis of Metecno's standard terms and conditions or negotiated contractual terms depending on the type of product or service and Metecno's affiliation with the third party. Metecno requires its suppliers to comply with all relevant laws and regulations and ensures that due diligence checks are carried out prior to engagement of third parties.
 - d) **Training:** Awareness of modern slavery risks in the workplace are communicated to Metecno employees through toolbox talks and information sheets. Senior management and procurement personnel briefings are also carried out to raise awareness of modern slavery risks.
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- e) **Supplier Code of Conduct:** Metecno has a Supplier Code of Conduct applicable to all of Metecno's suppliers. The Supplier Code of Conduct contains provisions specifically relating to anti-bribery and corruption, human rights including modern slavery, work health and safety and the environment.
 - f) **Anti-Slavery Policy:** Metecno has adopted an Anti-Slavery Policy which affirms Metecno's commitment to upholding its responsibility to comply with all modern slavery laws and regulations.
 - g) **Whistleblower Policy:** Metecno's Whistleblower Policy protects employees, service providers and suppliers who voice their concerns about certain events or conduct in the business that may be unlawful or unethical. The policy validates Metecno's efforts in safeguarding the confidentiality, wellbeing and career of any individual who asserts any issues that affect the integrity of Metecno's business operations.

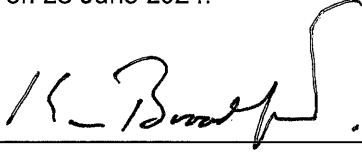
6. Assessing effectiveness

Metecno is focused on continuously strengthening its procedures and processes to combat modern slavery practices and ensuring the protection of human rights. Metecno will continue to monitor, evaluate and assess the effectiveness of its established procedures by:

- a) monitoring existing suppliers and undertaking risk assessments in relation to new suppliers to ascertain whether they pose a modern slavery risk and, if they do, to reduce that risk to the maximum extent possible;
- b) reviewing and updating training material to ensure that it is up to date, relevant and effective;

- c) reviewing Metecno's policies and Supplier Code of Conduct to ensure they remain relevant and in compliance with all applicable laws; and
- d) engaging with suppliers and key customers to verify they are following through with any modern slavery actions they have committed to undertaking.

This statement was approved by the Directors of Metecno Pty Ltd, in their role as principal governing body of Metecno Pty Ltd on 28 June 2024.

A handwritten signature in black ink, appearing to read 'Ken Broadfoot', is written over a horizontal line. The signature is stylized and cursive.

Ken Broadfoot, Director