

Growth Steel MODERN SLAVERY STATEMENT

FY2023



G R O W T H



Acknowledgement of Country

We acknowledge the Traditional Owners of Country throughout Australia and that sovereignty was never ceded. We recognise the deep and enduring spiritual connections and relationship Aboriginal and Torres Strait Islander People have to community, as well as the lands, oceans, waterways, air, and sky. We pay our respects to Aboriginal and Torres Strait Islander cultures; and to Elders past and present. We also acknowledge and pay our respects to First Nations People, and other Traditional owners of the lands where Growth Steel operates globally.

About this Statement

The submitting entity is Growth Steel Australia Pty Ltd ('Growth Steel Australia') which qualifies as a reporting entity under the *Modern Slavery Act 2018* (Cth).

This Statement covers all business units within Growth Steel Australia and reports on the state of operations, structure, governance framework and activities during the reporting period from 1 January 2023 to 31 December 2023. All business units are covered by Growth Steel Australia policies, procedures and systems, including those relating to contracting, purchasing and human resources. The assessment of modern slavery risks in Growth Steel Australia's supply chain, as described in this Statement, includes suppliers procured by Growth Steel on behalf of its subsidiaries or by the subsidiaries themselves.

All dollar figures presented in this Statement are in AUD.



About Growth Steel

Growth Steel Australia is the Australian subsidiary of Growth Asia (or Growth), one of the world's leading manufacturing foundries. Growth is the largest iron and steel foundry in Indonesia and is now ranked as one of the top three global suppliers of grinding mill lining systems.

Growth Asia was established in 1989 to manufacture wear parts for Steel Mill operations. Since 1996, Growth has been supplying wear parts to the mining industry. Our global headquarters are in Medan - North Sumatera, Indonesia and we have additional sales offices located around the world including in South Africa, Ghana, Peru, Chile and China.

Growth Asia established its Australian operations in 2000 and we have office in Perth.

We have the greatest confidence that we will only continue to grow stronger together with our partners around the world.

Our Vision and Mission

As a conscientious and responsible company, we acknowledge the damage and injustice caused by modern slavery and human trafficking on vulnerable people worldwide. We commit to mitigating the risks of any form of exploitation from our operations, supply chain, and the communities impacted by our business activities.

Our Vision is to grow a prosperous world by supplying quality products and excellent service sustainably to a global industry.

Our Mission is threefold:

1. To grow the prosperity of shareholders, staff, local communities and host countries.
2. To grow our understanding of global trends and future innovations to deliver the best products.
3. To grow and continuously maintain the highest standards in everything we do.

We have established a positive and supportive environment where our staff, suppliers and business partners understand the importance of our corporate values and are expected to abide by our values, rules, and procedures and to uphold human rights.

Our operations are guided by internationally recognised global frameworks and codes, including:

- ISO 14001:2015 - Environmental Management System
- ISO 9001: 2015 - Quality Management System
- ISO 45001 - Occupational Health and Safety Management System.



Statement from our Board and Managing Director

We are pleased to present Growth Steel Australia's inaugural Modern Slavery Statement as required under the *Modern Slavery Act 2018* (Cth).

We understand the complexity of our industry's supply chains, which involve modern slavery risks, as well as environmental, product quality, and sustainability issues.

This statement details our ongoing efforts to identify, manage and mitigate modern slavery risks. It also outlines the practical steps we're taking to maintain high ethical standards and eliminate exploitation within our operations and supply chain.

Our Modern Slavery Action Plan and three-year roadmap provided here form the basis of our ongoing risk management efforts and drive our continuous improvement.

Our objective is to ensure that everyone potentially affected by our business is treated fairly and respectfully and that our business practices adhere to the highest ethical standards.

We commend the commitment of our Working Group in preparing this statement and implementing our Modern Slavery Action Plan.

This Statement was approved by the Growth Steel Australia Board.



Caterin Widjaja

Director

Date: 4 June 2024

FY2023 Highlights

Completed modern slavery supplier risk prioritisation to identify potentially high-risk procurement categories and direct suppliers

Undertook a Modern Slavery Gap Analysis to better understand our governance maturity, identify system gaps and document improvement opportunities across five business areas

Formalised our Modern Slavery Working Group which includes broad representation from across the company

Developed a practical three-year Modern Slavery Action Plan to drive our program forward and to keep us accountable.

2023: Modern Slavery Risk Management Initiatives

While this is our first year as a reporting entity, we have undertaken significant work to understand modern slavery risks within our operations and global supply chains.

During the reporting period, six of our Australian-based staff, including our National Manager and several client support representatives completed online modern slavery training modules.

We focused on enhancing our understanding of our broader operational and supply chain modern slavery risks and impacts.

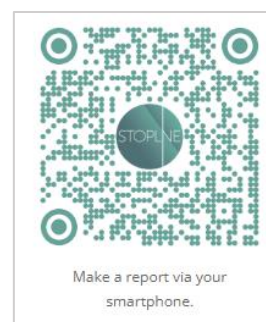
With the support of external experts, we conducted a review of our systems and processes and undertook a Modern Slavery Gap Analysis to identify gaps and opportunities and enhance our modern slavery and broader human rights risk management systems. We formalised a Modern Slavery Working Group ('Working Group') comprised of representatives from key business areas across Australia and our head office in Indonesia.

The Working Group developed a practical and comprehensive 12-month Modern Slavery Action Plan ('Action Plan') and a high-level three-year road map that will inform our ongoing risk management approach.

We documented and prioritised our Tier 1 (direct) suppliers and supply categories against internationally recognised modern slavery risk indicators.

We reviewed our Whistleblower Policy and processes and established a dedicated reporting 'hotline' managed by StopLine. We will continue to communicate this to our staff and stakeholders. that would enable at-risk workers in our operations and supply chain to communicate with us.

More details of actions taken are included under *Criteria 4: Actions Taken to Assess and Address Risk*.



Our Plans for 2024

In 2024, we will implement Year 2 priority actions from our Action Plan and heighten awareness of modern slavery risks among key internal stakeholders, including our board, our senior management teams in Australia and Indonesia, staff, suppliers, and contractors. Modern slavery training will be integrated into employee and contractor inductions.

We will assign clear roles, responsibilities and accountabilities for modern slavery risk management across our organisation and develop a risk appetite statement incorporating modern slavery and broader human rights risks.

The Working Group will work with key stakeholders to review and update policies, procedures and contract clauses as our understanding of this risk matures.

We will establish goals and targets in our next reporting period to determine the number of high-risk suppliers to assess each year. These will include detailed desktop assessments and on-site audits (where required) of our priority suppliers.

We will formalise our reporting / grievance mechanism for at-risk workers to formally raise grievances with us and to help inform our remediation approach.

We will continue to review and update relevant policies and other key documents and processes to ensure our commitments to manage modern slavery risk are communicated effectively to internal and external stakeholders.

Our Plans for 2025 and Beyond

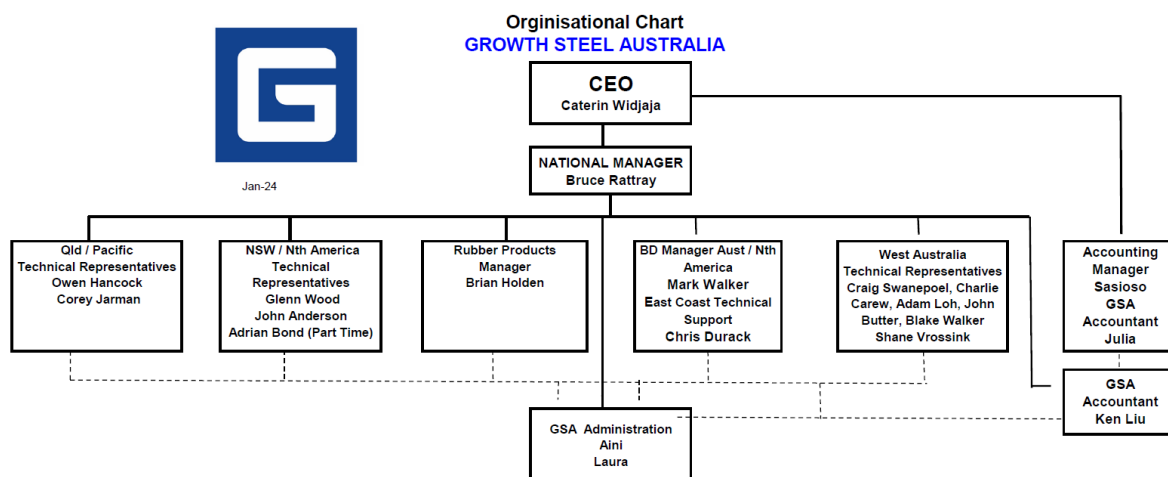
In 2025, we will enhance our modern slavery risk management program, expanding it to address broader human rights risks. Our focus will be on setting performance standards and assessment criteria for suppliers, as well as creating and reviewing corrective action plans for high-risk suppliers.

We will establish a transparent and accountable remedy pathway and program based on international best practices to assist identified victims.

Reporting Criteria 1 & 2

Our Organisational Structure

Growth Steel produces high-quality products, including Steel and Rubber Liners, Fasteners, and Grinding Media, with a focus on customer satisfaction through continuous consultations. We consistently deliver top-tier solutions for the mining industry's grinding and mineral processing needs.



Our Governance Framework

Growth Steel Australia is governed by a Board of 2 Directors, with CEO based in Indonesia and our National Manager based in Australia.

Our Board has ultimate responsibility for the approval and oversight of our modern slavery risk management program and approval of this Statement. The Board is kept informed on modern slavery issues via input from the Senior Management Team and is supported by our Working Group responsible for the development, implementation and monitoring of our modern slavery risk management program and performance.

Our Senior Management Team (SMT) leads and guides our business towards our strategic objectives while overseeing our operations and ensuring effective decision-making. The SMT meets once a year and receives reports from all committees including key business areas and our Working Group.

The Modern Slavery Working Group drives our Action Plan and meets regularly to monitor progress, discuss emerging issues and identify risk management improvement opportunities. The Working Group includes members from Administration, Accounts, Technical Support Representatives (Sales & Quality), Product Development and Procurement.

What we do	Manufacture of Mill Liners, Grinding Media Agriculture Food Biomass energy production
Where we do it	Australia Indonesia Global Distribution Network
Our values	Reliability Total Solution Quality Assured
Our manufacturing base	Indonesia China
Our relationship to potential modern slavery risks	<p>Cause: Unlikely in Australia</p> <p>Contribute: Unrealistic deadlines, downward cost pressures, lack of oversight</p> <p>Directly linked: Manufacturing base companies/direct suppliers in high-risk countries, poor visibility of Tier 2 supply chain, outsourcing arrangements</p>
How we manage risk and undertake due diligence	<p>Governance framework: Board engagement and oversight, implementation of risk framework, documented modern slavery action plan, policies and codes of conduct</p> <p>Due diligence and risk management: Supplier risk prioritisation, factory audits</p> <p>Training & engagement: Staff training (Australia and Indonesia)</p>

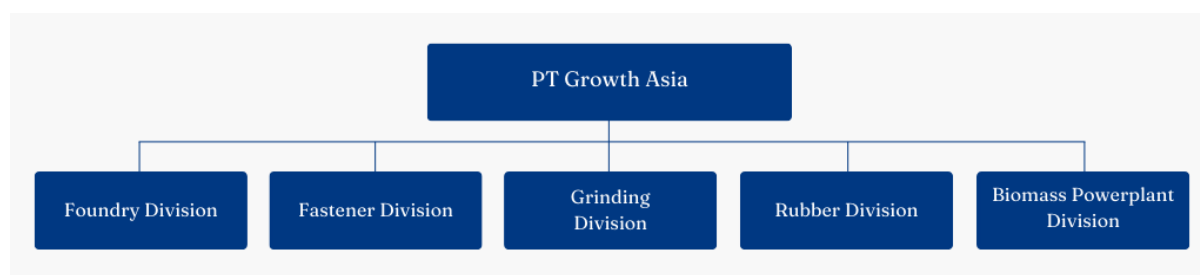
Our Policies

Our group-level policies, codes, and guidelines mandate that our staff, suppliers, and other business partners uphold and protect human rights in our daily operations. These policies are applicable across all our entities and align with our group mission and dedication to ethical sourcing and the management of modern slavery risks.

Policy and procedures	Purpose
Employee Handbook	Guides existing and new staff on company regulations, policies and procedures including ethical standards and our corporate values. Outlines our expectations of ethical conduct and is used as a guide for making decisions in day-to-day activities.
Supplier Code of Conduct	Outlines our expectations of our suppliers to operate as responsible and ethical businesses including management of modern slavery risk in their operations and supply chains. Non-compliance with the Code leads to the development and required implementation of a corrective action plan.
Whistleblower Policy	Establishes procedures for the receipt, retention, and treatment of complaints or violations to company policies or business practice. Reporting of suspicions or activity related to modern slavery in our operations or supply chain is actively encouraged.

Our Operations







As one of the world's leading manufacturing foundries, we pride ourselves in providing excellent wear parts. Manufacturing is our craft and providing comprehensive technical services to our customers is the core of our ambition. Our business divisions provide a wide range of solutions to several industry sectors, including:



1. **Steel Division** comprises of a Steel Mill, Foundry and Fastener manufacturing facilities in Medan, North Sumatera.
2. **Grinding Media Division** supplies Grinding Rods and manufactures Grinding Balls in Medan, Indonesia and in Suzhou, China.
3. **Our Rubber Division** manufactures Rubber Mill Liners and various rubber mining products in Medan, Indonesia
4. **Biomass Powerplant Division** operates in Medan, Indonesia, supplying green and renewable energy.

Our Supply Chain

At a glance:

 <p>Total spend: \$95.1M</p>	 <p>Total suppliers: 87</p>	 <p>Total categories: 15</p>
 <p>Per cent spend on top five categories: 99%</p>	 <p>No. of supplier countries: 4</p>	 <p>Top spend category: Engineering materials, parts and consumables</p>

Overview

Our total annual procurement spend in 2023 was \$95.1 million with 15 direct (Tier 1) suppliers across 15 goods and services categories.

Additional work will be undertaken in the 2024 and 2025 reporting periods to better understand our extended supply chain and inherent modern slavery risks in our indirect (Tier 2) suppliers.

What we buy

Our supply chain consists of goods and services that support us as a major global manufacturer of steel and rubber grinding media. Broad categories of goods and services used in our operations are:

- Bulk materials and consumables
- Corporate fees and expenses
- Engineering materials, parts and consumables
- Software and networking services
- Maritime cargo and logistics services
- Plant and equipment
- Professional services and consulting
- Warehouse, materials handling and land logistics

Close to 90 per cent of our spend is on engineering materials, parts and consumables we sell to customers in Australia and internationally. The main categories of goods and services we procure from our direct suppliers and the percentage of total spend with each category are included in [Table 2]

Table 2: Key goods and services procured

Procurement category	Per cent total spend
Engineering materials, parts and consumables	87
Bulk materials and consumables	7
Warehouse, materials handling and land logistics	2

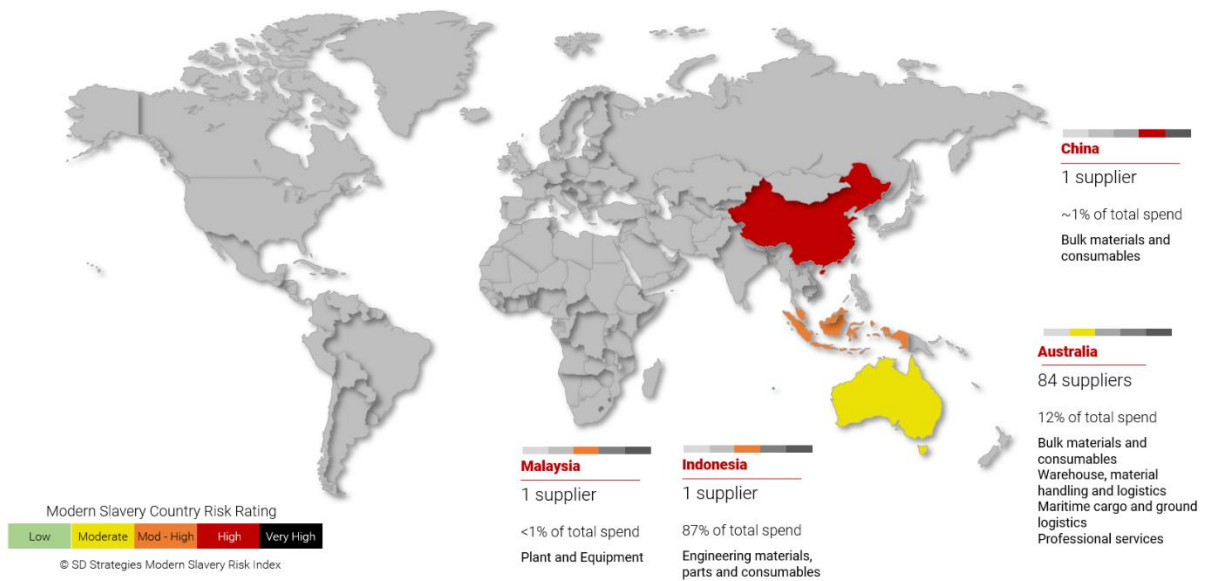
Maritime cargo and logistics services	2
Other goods and services	2

Supplier countries

We source our goods and services from direct (Tier 1) suppliers in four countries with 87 percent of our total procurement spend being with suppliers located in Indonesia. The remaining spend is with suppliers located in Australia (12%), China (~1%) and Malaysia (<1%).

The map on page 11 provides an overview of our Tier 1 global supply chain. Information on each country includes the number of suppliers, percent of total spend in each country and the main categories of goods and services procured. The map provides an indication of modern slavery risk in each country based on the SD Strategies' Modern Slavery Country Risk Rating Index.

Tier 1 Supply Chain



Reporting Criteria 3

Modern Slavery Risks in Operations and Supply Chain

Our focus in 2023 was to enhance our understanding of potential modern slavery risks in our operations and supply chain, identify gaps in our approach to modern slavery governance and engage and educate our senior management team and Modern Slavery Working Group members.

Summary: operational risks

With the support of external experts, we undertook a modern slavery gap analysis of our operations, policies and processes with members of our Working Group representing governance, risk finance, ICT, human resources and communications from across our Australian and Indonesian head office.

The purpose of this initial gap analysis workshop was to:

- identify gaps in our systems and processes that may increase our exposure to modern slavery risks in our operations and supply chains;
- identify opportunities to improve and enhance our systems and processes; and
- inform the development of our modern slavery risk management program.

Summary: supply chain risks

In 2023, we focused our efforts on obtaining a deeper understanding of our Tier 1 supplier risks and the operational processes in place to manage those risks. We engaged external expertise to help us document, assess and prioritise our direct suppliers against four modern slavery risk indicators.

We acknowledge that there is potential modern slavery risk associated with our direct suppliers and with indirect suppliers in our extended supply chain. Many of our manufacturing suppliers are in countries identified as higher risk for modern slavery, including China and Malaysia.

We will continue to engage priority high-spend and high-risk Tier 1 suppliers in FY2024.

Operational Risks

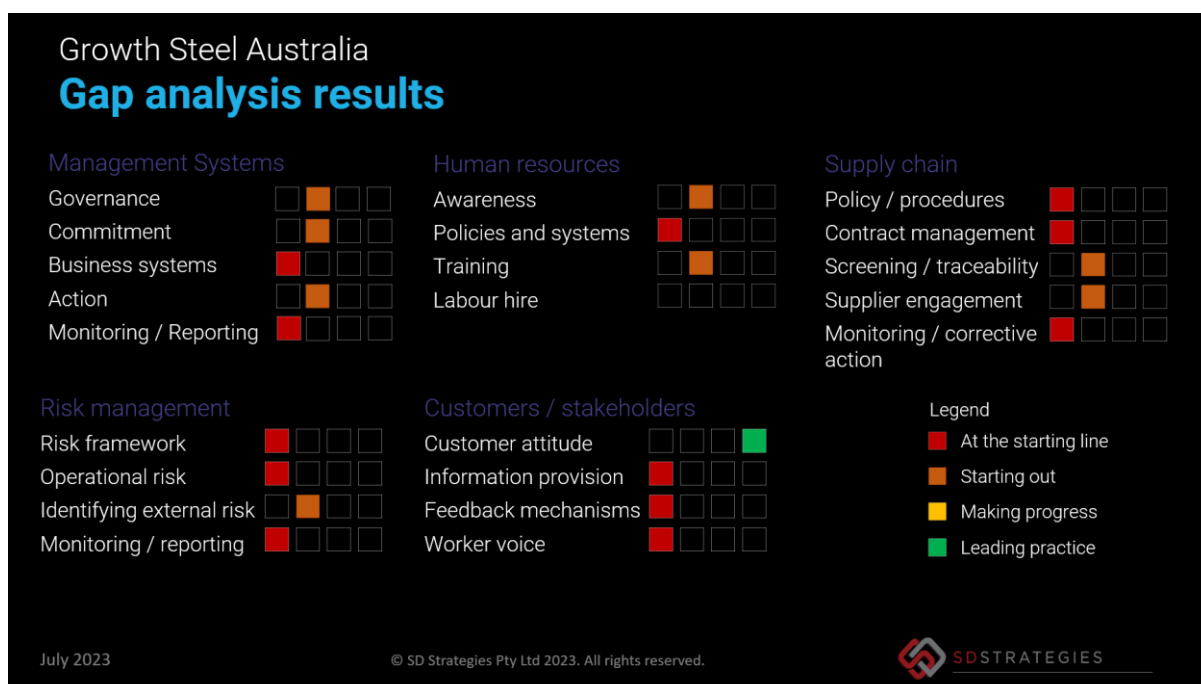
Growth Steel has a professional-level and largely office-based workforce in Australia. While we consider the risk of modern slavery to be relatively low within our direct business operations in Australia, we recognise that the potential risk of modern slavery increases through our international supply chains and business relationships. Importantly, our board and leadership teams in Australia and Indonesia are committed to identifying and addressing modern slavery risks and have committed resources to this process.

Modern Slavery Gap Analysis

Our Working Group undertook a gap analysis to identify opportunities for improvement across five key categories:

- Management systems
- Human resources and recruitment
- Procurement and supply chain
- Risk management
- Customers and stakeholders

Figure 1: Modern Slavery Gap Analysis Heat Map



The analysis identified gaps and opportunities for better assessing and addressing our modern slavery risks. The gap analysis enabled our Working Group to:

- develop practical actions to address potential risks in our operations and supply chains
- prioritise actions and set timeframes for deliverables
- assign responsibilities for implementation
- identify 'unknowns' that additional research or engagement within our operational areas, customers and the textiles and apparel business sector more broadly.

The results of the gap analysis informed the development of our Modern Slavery Action Plan and Roadmap, developed collaboratively with key representatives from across our organisation. We acknowledge that we are at the starting point to deliver against our commitment to managing modern slavery risk in our operations and supply chain.

Our three-year modern slavery road map has established a clear pathway for us to enhance our modern slavery risk response and deliver tangible benefits to our customers, community and business. Elements of the action plan and roadmap are included in Criteria 4 '*Actions Taken to Assess and Address Risk*' below.

Actions taken during our first year as a reporting entity have enabled us to better understand the core elements of an effective modern slavery risk management program. Key aspects of our program included expanding our understanding of operational and supply chain risks, engaging and educating our staff, reviewing and updating our whistleblower processes and adapting our supply chain management processes to respond to these challenges.

Supply Chain Risks

High level findings at a glance

- Ninety-seven per cent of our total procurement spend of \$95.1 million is potentially high-risk for modern slavery.
- Almost two-thirds (62% or 54) of our 87 suppliers are potentially high risk for modern slavery.
- Our highest risk spend category is 'engineering materials, parts and consumables' accounting for 87% of our potentially high-risk spend.
- Goods and services procured from suppliers located in countries ranked as high risk for modern slavery are recognised as a key risk factor.

Supply Chain Overview

Our procurement team, supported by external experts, analysed \$84.2 million of procurement data for potential modern slavery risk against four key risk indices:

- **Industry sector** – Specific industry sectors (deemed as high risk in international and national guidance documentation. This includes sectors with high-risk business models such as the use of labour-hire workers and outsourcing, seasonality, franchising and aggressive pricing.
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor's 2022 *List of Goods Produced by Child and Forced Labor*, the Global Slavery Index (GSI) and other international guidance materials.
- **Geographic location** – Based on estimated prevalence of modern slavery and the government responses as outlined in the 2022 GSI and using the SD Strategies country risk matrix which assesses risks against 13 global indices. High risk geographies include those with a weak rule of law, corruption, displacement, conflict, and the State's failure to protect human rights. While we predominantly source stock from distributors based in Australia, we recognise that our manufacturing base is in countries that are at high risk for modern slavery.
- **Workforce profile** – In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where base skill, vulnerable, or temporary migrant labour is used.

Important note: Our focus in 2023 has been on understanding risks across our supply chain and those posed by higher spend Tier 1 (direct) suppliers. We recognise that there may be

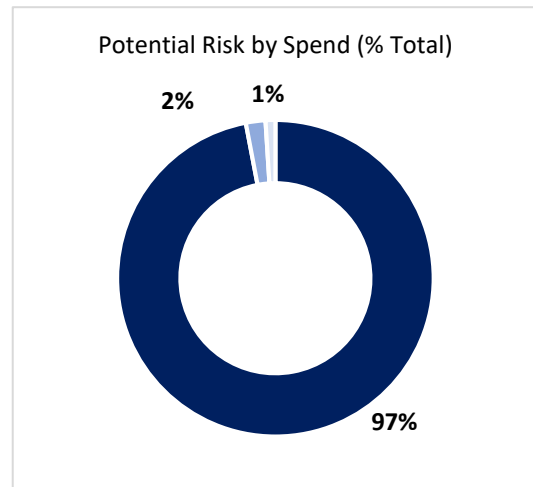
high risk amongst our lower spend suppliers and our extended supply chain and will incorporate these into future risk assessments.

Risk by Spend

Analysis of procurement spend across our operations in Australia identified 97% of spend as potentially high risk for modern slavery. This is almost entirely attributable to spend on engineering materials, parts and consumables for sale to customers, and the geographic area from which we procure these goods (see risk by supplier country below).

A further 2% of spend was categorised as medium risk for modern slavery and 1% as lower risk.

The high percentage of potentially high risk spend is typical for a company operating in the mining products manufacturing sector. Our supply chain extends into countries, sectors and commodities that are known to be at higher risk for modern slavery. Ongoing assessment of our procurement processes and engagement with potentially high-risk suppliers will provide a more detailed understanding of actual risk and practical mitigation actions we can take.



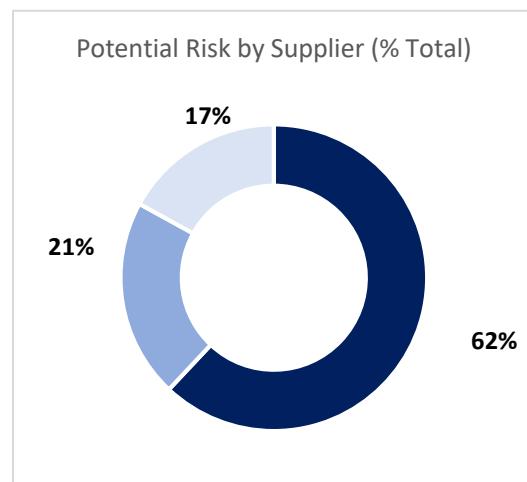
Risk by Suppliers

High level prioritisation of 87 Tier 1 (direct) suppliers used by our Australian operations indicates that just under two thirds (62%) of our suppliers are potentially high risk for modern slavery.

A further 21% of our suppliers are categorised as medium risk for modern slavery and 17% as lower risk.

While some of our direct suppliers based in Australia represent lower risk of modern slavery practices, suppliers located in higher risk countries, operating in high-risk industry sectors, and engaging a more vulnerable workforce pose a higher risk for modern slavery.

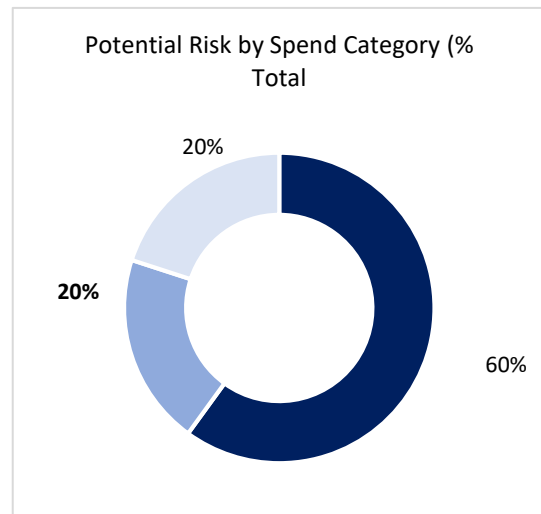
We will continue to gather data on the modern slavery risk (including dynamic and emerging risks) associated with the goods and services we procure. By engaging our direct suppliers, we will obtain a better understanding of potential risks in our extended supply chain both in Australia and internationally.



Risk by Spend Category

Based on the four risk factors outlined above (geography, industry sector, commodity and workforce profile), nine of the fifteen categories of goods and services we procure are potentially high risk for modern slavery.

As indicated, our potentially highest risk spend category is engineering materials, parts and consumables for sale. This spend category accounts for nearly ninety per cent of potentially high risk spend. Other lower spend, potentially high-risk categories include bulk materials and consumables (7% of total high risk spend) and maritime cargo and logistics services (~3% of total high risk spend).



Risk by Supplier Country

We purchase a wide range of goods and services from four countries: Australia, China, Indonesia and Malaysia.

According to the GSI and SD Strategies' Country Risk Index 2022, three of our supplier countries are 'Moderately High Risk' (orange) and 'High Risk' (red) for modern slavery, these being China, Indonesia and Malaysia. (see map page 11).

While twelve per cent of our spend is with 84 suppliers in Australia (see map page 11) we recognise that these are Tier 1 (direct suppliers) and that there may be risk associated with Tier 2 suppliers and beyond.

Our modern slavery action plan will work towards identifying and managing risk in our indirect supply chain in future reporting years as resources allow.

Reporting Criteria 4

Actions taken to assess and address risk

The following actions were completed in the FY2023 reporting period.

Modern Slavery Working Group

We formalised our Working Group. The Working Group includes representatives from across our Australian operations including management, quality assurance, sales, production, product development and procurement. The Working Group is responsible for leading our modern slavery risk management program and implementing our action plan and road map.

Awareness Raising Workshop

An important objective of our modern slavery gap analysis workshop was to raise awareness of modern slavery and its prevalence globally. Members of our Modern Slavery Working Group, as well as other internal stakeholders located in our Australian and Indonesian offices, attended the workshop which discussed the different forms of modern slavery, the continuum of worker exploitation and the changing global legislative landscape. Importantly, the workshop also provided a comprehensive overview of the relevance of modern slavery risk management to our industry sector.

Modern Slavery Gap Analysis

With the support of external consultants, we conducted a review of our systems, policies and processes, and undertook an operational gap analysis to identify our modern slavery governance maturity. The Working Group responded to 22 multi-choice questions assessing five key areas of business activity for gaps and opportunities. The outcome of the Gap Analysis informed the development of our Action Plan and three-year roadmap. *Results of our Gap Analysis are included under Reporting Criteria 3.*

Modern Slavery Action Plan

The Working Group developed a practical and comprehensive 12-month modern slavery action plan and three-year road map, which will inform our risk management approach moving forward. Our action plan includes commitments to establish a project management group, address gaps in our governance and due diligence processes, update risk management processes, improve supply chain management, engage our suppliers, focus on HR and recruitment activities and deliver training to key internal and external stakeholders.

Policy Review

We engaged an external specialist to review our Subcontractor Policy, Supplier Code of Conduct, Whistleblower Policy and Employee Handbook to ensure alignment with legislative reporting requirements and the UN Guiding Principles on Business and Human Rights. We updated our documents based on recommendations made and will continue to review, update and communicate our policies both internally and externally.

Whistleblower Policy

Following an external review of our Whistleblower Policy, the policy was updated, approved by our board and communicated internally and externally. We have partnered with STOPLine as an external and independent hotline provider: <https://growthsteel.stoplinereport.com/>

Our updated Whistleblower Policy and link to the hotline is available on our website.

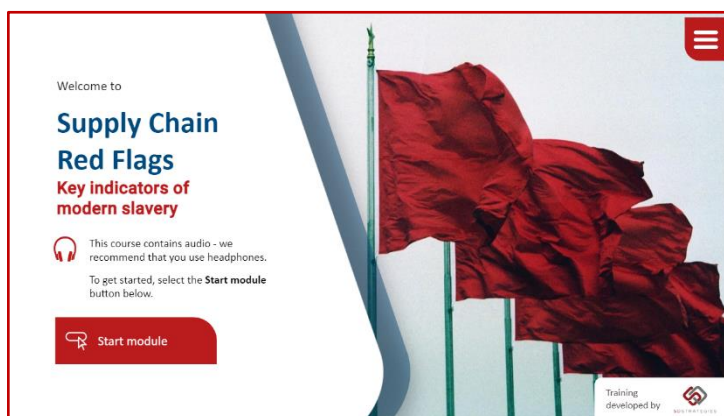
Modern Slavery Training (eLearning)

Members of our Modern Slavery Working Group completed two modern slavery training modules provided on SD Strategies' externally managed 'Know Slavery' training platform. The following courses were completed:

Module 1: What is Modern Slavery

Module 3: Supply Chain Red Flags

Additional training is proposed for 2024.



Supplier Risk Identification and Prioritisation

We reviewed and prioritised our highest spend suppliers against modern slavery risk indicators and high-risk spend categories (see Criterion 3 'Modern Slavery Risks in Operations and Supply Chains' above). We have committed to working with our management team, procurement and quality assurance teams to support efforts to assess potential modern slavery risks both within our own operations and across our manufacturing partners' operations in China and Malaysia.

In Year 2 we will focus on implementing additional risk management actions and enhancing our due diligence processes for our priority national and international suppliers.

In Year 3 our focus will be on monitoring and reviewing progress as part of our commitment to continual improvement. Our three-year road map is included below.

Modern Slavery Roadmap

Our focus for Year 1 (the reporting period for this statement) was on reviewing existing systems and processes for managing operational and supply chain modern slavery risks, determining our highest risk/highest priority suppliers and building a modern slavery risk management framework.

Our three-year road map is outlined below:

Area of Focus	Year 1 (FY2023) Establish Framework	Year 2 (FY2024) Expand due diligence program	Year 3 (FY2025) Review, Extend, Evaluate & Improve
Governance & due diligence	<p>Formalised our Working Group and developed a detailed Modern Slavery Action Plan and Road Map.</p> <p>Engaged our SMT and key business areas to implement priority modern slavery risk management actions.</p>	<p>Incorporate modern slavery risk management into relevant business systems and processes</p> <p>Formalise responsibilities /accountabilities for managing risk into employee roles and position descriptions.</p>	<p>Review outcomes and overall effectiveness of our program and update the Modern Slavery Action Plan to strive for continuous improvement.</p>
Risk Management	<p>Identified opportunities to expand our modern slavery risk management efforts.</p>	<p>Ongoing integration of modern slavery into our risk management systems and processes.</p> <p>Develop a formal monitoring program to identify operational and supply chain risks.</p>	<p>Review and report on the integration of modern slavery risk management actions into our operational systems and processes.</p>
Procurement & supply chain	<p>Mapped our Tier 1 (direct) suppliers and undertook a supplier risk prioritisation process to identify risk categories and potentially high-risk suppliers.</p>	<p>Integrate risk screening into procurement processes.</p> <p>Include modern slavery management requirements in all contracts and undertake additional due diligence on priority suppliers.</p> <p>Consider expanding risk assessments to our extended supply chain</p>	<p>Review the effectiveness of modern slavery risk management actions into procurement systems and requirements in supplier contracts.</p>
Engagement, training & education	<p>Trained our SMT and Working Group on modern slavery risks and legislative requirements.</p>	<p>Undertake training needs analysis for internal and external stakeholders and develop an internal modern slavery awareness program including induction training.</p>	<p>Assess levels of internal and external stakeholder awareness of modern slavery risks and actions.</p>
Grievance and reporting	<p>Reviewed our Whistleblower Policy. Implemented an independent reporting channel for at-risk workers to raise concerns.</p>	<p>Communicate our whistleblower hotline and policy more widely across internal and external stakeholders, including workers in our supply chain.</p>	<p>Develop a transparent and accountable modern slavery remediation program for people impacted by modern slavery practices in our operations or supply chain.</p> <p>Investigate the practical application of worker voice data collection and reporting systems.</p>

Reporting Criteria 5

Effectiveness Assessment

Our effectiveness assessment includes a review of the measures taken to date to better understand our modern slavery risks, develop internal capabilities and improve our risk management and mitigation systems and processes.

Our modern slavery risk management action plan and due diligence processes are regularly reviewed as part of our corporate commitments to ethical sourcing and risk management through:

- Reporting to the SMT and Board including policy review, monitoring the effectiveness of our risk management system and measures taken to manage risk, and making improvement recommendations.
- Investigating and responding to issues or reports through our staff or reporting channels.
- Assessing and reporting modern slavery risks across our operations and supply chain and ensuring improvements are implemented.
- Educating our manufacturing base suppliers regarding our policies and expectations regarding modern slavery.
- Delivering relevant and practical training to staff and suppliers on modern slavery issues and risk management.

As we implement our Action Plan, we will assess the effectiveness of our actions against a both qualitative and quantitative indicators.

Continuous improvement

Addressing modern slavery risk is complex and challenging. In 2023 we made significant progress in understanding our operational and supply chain risks, engaging our staff and management team globally and documenting our modern slavery action plan and road map.

Our Working Group will strive for continuous improvement as we continue to integrate modern slavery risk management into all aspects of our operations and purchasing decisions.

We expect our approach to evolve over time as we and the business community learns more about the risks and impacts of modern slavery globally.

Reporting Criteria 6

Process of consultation with entities owned or controlled

Growth Steel does not own or control any other entities.

Growth Steel is an entity of its parent company Growth Steel Group which is headquartered in Medan.

We are working closely across our business units and teams to ensure a harmonised approach to managing modern slavery risk across the organisation and identify opportunities to share learnings from our program.