

Modern Slavery Statement 2021/2022
Stirlings Performance Steels Pty Ltd

ABN: 79 625 765 200

Business Profile:

Stirlings Performance Steels is a privately owned and operated business based in Western Australia. Founded in 1973, we currently employ more than 100 employees nationally between our operations in different states such as Western Australia; Tasmania; Queensland; Victoria, New South Wales as well as Sales and Business Development staff in South Australia.

We provide a wide variety of services across Australia, such as Customer Services, Laser, Plasma, Sawing, and Polishing, Logistics, and stocking of high-quality stainless and performance steels to a vast variety of industries in which the majority is commercially focused.

We are driven to satisfy our customers, suppliers & employees, utilising improvement, innovation, technology & teamwork to present our best solutions and provide top-quality products, outstanding service & excellent value.

Stirlings Performance Steels takes pride in having zero tolerance for the violation of the Modern Slavery Act 2018 (Cth).

Modern Slavery Act involves situations where coercion, exploitation, threatening behaviour, and or deception are used to undermine the freedom of others. Outlined by Australian Federal Government regarding regulations and reporting requirements, this statement serves as information presented by Stirlings Performance Steels for the 2021/2022 financial year based on modern slavery risk assessment.

Stirlings Performance Steels is committed to reducing the risk of modern slavery practices, moreover, developing an organizational culture that recognised human rights and seeks to avoid complicity in human rights abuses.

Business Partner Industries:

Being a stockholding, processing distributor of Stainless and Performance Steel products business, the following Industries/Stakeholders were identified as regulars attained by Stirlings Performance Steels:

- Freight and logistics
- Industrial equipment, parts, and consumables
- Manufacturers & Suppliers
- Equipment hires
- Facilities management services
- Labour

Assessment and action of our modern slavery risk:

Proudly Stirlings Performance Steels hold its Human Rights & Modern Slavery Policy as an internal living document and part of the business's daily routine. In addition, the following actions are placed:

1. Implementation of a Modern Slavery Questionnaire to be completed by the suppliers in 2023.

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2. Implementation of the Modern Slavery Awareness Training and refresher training for the Leadership Team to be completed annually.
3. Review indicators of levels of Modern Slavery annually based on global public data such as [Global Slavery Index 2018 \(GSI\)](#), which estimates the proportion of individuals living under modern slavery for each geographic area and country.
 - a. The current data assessment identified the potential likelihood or risk of Modern Slavery as below:

Tier 1	Tier 2	Tier 3
Region: Australia	Region: East Asia & Europe	Region: Central; South; South East Asia & Africa.
Current business head quarters	Direct suppliers	Indirect Suppliers (Suppliers to our suppliers)
Low likelihood	Medium likelihood	High likelihood

Assessing, Evaluating Effectiveness and Entity:

Aiming to assess the effectiveness of the Modern Slavery Questionnaire and Training implementation, Stirlings Performance Steels is committed to the following steps:

1. Monitor and review the adherence and answers from the Suppliers Questionnaire annually. Moreover, The Senior Management team will discuss and address any abnormality with the company`s Chief Executive Officer (CEO).
2. Human Resources Department is responsible for monitoring, reviewing and inducting the leadership team in the Modern Slavery Practices, Training and Policies. In addition, maintaining up-to-date policies and procedures based on the Modern Slavery Act 2018 and following the Australian Border Force Guidelines.
3. Further actions and monitoring procedures will be reviewed and placed based on finds from the questionnaires and training needs.
4. Stirlings Performance Steels states that it owns no other entities.

Improvement Commitment:

Stirlings Performance Steels is committed to continuously reviewing our interactions and impact on the global community. Our internal auditing will continue to comply with the Quality Systems, Modern Slavery Act 2018 (Cth) and produce an annual statement reporting on the risks within our operations. We will continue to communicate with all internal and external stakeholders to address our modern slavery risks.

Related documents:

- Stirlings Performance Steels – Supplier Modern Slavery Self-Assessment Questionnaire.
- PM 6.01 - Human Rights & Modern Slavery Policy
- PM 1.01 - Company Handbook
- Modern Slavery Act 2018
- Global Slavery Index 2018 (GSI)
- Quality Systems Manual QM1

This statement was approved by the board of Stirlings Performance Steels Pty LTD compost by General Managers and Executive Manager-General on 11/05/2023.



David Stirling
Chief Executive Officer
Stirlings Performance Steels Pty Ltd



Patrick Stirling
Executive Manager-General
Stirlings Performance Steels Pty Ltd