

# Modern Slavery Statement

## Coil Steels Pty Ltd and United Steel Pty Ltd

### 1. Introduction

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This statement sets out the steps taken by Coil Steels Pty Ltd ACN 605 323 573 (**Coil Steels**) and United Steel Pty Ltd ACN 605 323 591 (**United Steel**) to address modern slavery risks in each of their business operations and supply chains during the FY22 financial year. This statement has been prepared as a joint statement pursuant to section 14 of the *Modern Slavery Act 2018* (Cth).

Coil Steels and United Steel are committed to ensuring that there are secure management systems and procedures in place to prevent exploitations of human rights within Coil Steels and United Steel and their supply chain.

In preparation of this joint statement, we engaged with each of the reporting entities covered by this statement and consulted the entities we own or control.

### 2. Structure and operations

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Coil Steels and United Steel are specialist stockists and processors of steel sheet, coil, roll formed and plate products.

Coil Steels supplies steel products including hot rolled steel, electro-galvanised steel, floor plate steel and BlueScope Steel products including Colorbond and TRUECORE.

United Steel supplies steel sheet and coil, structural beams, tubular products, merchant bars, plates, spring steel, reinforcing bars and mesh, and general building products like roofing and rainwater goods.

Coil Steels and United Steel have expansive and diverse customer bases who are predominantly wholesale customers. Coil Steels and United Steel have approximately 9 sites across Queensland, New South Wales, Victoria, South Australia and Western Australia.

### 3. Supply chain

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Coil Steels and United Steel source goods and services in the following categories: steel, consumables, utilities, transport, plant, equipment, parts and repairs, human resourcing, information technology and other miscellaneous business spend.

Steel supply constitutes more than 90% of Coil Steels' and United Steel's spend on goods and services. The majority of steel is sourced from Australian suppliers, including BlueScope, Infrabuild and Liberty Primary Steel. Steel is also sourced from reputable international businesses.

Other goods and services used by Coil Steels and United Steel are predominantly sourced within Australia from Australian suppliers, but also from reputable international businesses.

Coil Steels and United Steel strive to engage suppliers with a good reputation, ethics and reliable business practices. Coil Steels and United Steel do not knowingly contract with or engage any businesses that are involved in modern slavery or human trafficking.

#### 4. Description of risks of modern slavery

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Coil Steels and United Steel consider the risk of modern slavery being caused by, contributed to or directly linked to their operations is low, driven by both geographic location, with all operations based in Australia, and by the human resources processes Coil Steels and United Steel have in place. These 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).

Coil Steels and United Steel consider 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.

Some categories are seen as higher risk or having the potential for higher risk of modern slavery in supply chains. This includes steel production, which is reliant on raw materials, which may be sourced from geographies with a higher risk of modern slavery, as well as using unskilled labour, which may increase the opportunity for modern slavery in its production. 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. Coil Steels and United Steel source 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, Coil Steels and United Steel look 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

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

- a) **Supply chain mapping:** Coil Steels and United Steel undertake due diligence in respect of key suppliers to ensure that these parties are aligned with the policies, codes and values of Coil Steels and United Steel. Supply chain mapping involves categorising suppliers by risks associated with their geographic location, size and industry.
- b) **Follow up questionnaire:** Coil Steels and United Steel require 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 the standard terms and conditions of Coil Steels and United Steel or negotiated contractual terms depending on the type of product or service and their affiliation with the third party. Coil Steels and United Steel require their 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 Coil Steels and United Steel employees through toolbox talks and information sheets. Senior management and procurement personnel briefings are also carried out to raise awareness of modern slavery risks.
- e) **Supplier Code of Conduct:** Coil Steels and United Steel have a Supplier Code of Conduct applicable to all suppliers of Coil Steels and United Steel. 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:** Coil Steels and United Steel have adopted an Anti-Slavery Policy which affirms each of Coil Steels and United Steel's commitment to upholding its responsibility to comply with all modern slavery laws and regulations.
- g) **Whistleblower Policy:** The Whistleblower Policy applicable to Coil Steels and United Steel protects employees, service providers and suppliers who voice their concerns about certain events or conduct in the businesses that may be unlawful or unethical. The policy validates the efforts of Coil Steels and United Steel in safeguarding the confidentiality, wellbeing and career of any individual who asserts any issues that affect the integrity of their business operations.

## 6. Assessing effectiveness

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Coil Steels and United Steel are focused on continuously strengthening its procedures and processes to combat modern slavery practices and ensuring the protection of human rights. Coil Steels and United Steel will continue to monitor, evaluate and assess the effectiveness of their 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 Coil Steels and United Steel 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 Coil Steels Pty Ltd and United Steel Pty Ltd, in their roles as principal governing bodies of Coil Steels Pty Ltd and United Steel Pty Ltd on 20 December 2023.



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Ken Broadfoot, Director