

Modern Slavery Statement 2024



Company Profile:

Sutcliffe Engineering is a leading provider of structural steel fabrication and erection services. With a specialised network of sub-contractors and suppliers, the company offers a complete package catered to customer requirements, from material procurement, shop drawings, fabrication and protective coating treatments, to on-site installation that's fully supported by our quality, safety management systems.

As part of our commitment to social responsibility, we recognize the importance of combating modern slavery in all its forms.

This Modern Slavery Statement outlines our efforts to prevent modern slavery within our operations and supply chains, particularly within the structural steel industry.

Risks of Modern Slavery:

We recognize that our business inherently carries risks related to modern slavery, and it is our ongoing duty to consistently identify, evaluate, minimize, and confront these risks as part of our commitment to uphold human rights.

We acknowledge that modern slavery risks that might exist within the structural steel industry, particularly in the areas of:

- *Raw material extraction and processing.*
- *Manufacturing processes.*
- *Transportation and logistics.*
- *Recruitment and labour practices.*
- *Subcontracting and outsourcing.*

Modern slavery as including:

- *Human trafficking | Slavery | Forced labour | Any form of child labour.*

Our Commitment:

Sutcliffe Engineering Pty. Ltd is committed to preventing modern slavery in all aspects of our operations and supply chain. We are dedicated to upholding the following principles:

Compliance:

We comply with all relevant laws and regulations related to modern slavery in every jurisdiction in which we operate.

Due Diligence:

Supplier Engagement: We need to actively engage and collaborate with our suppliers and subcontractors to raise awareness of modern slavery risks and encourage the adoption of responsible business practices throughout our supply chain.

We have a comprehensive supplier and subcontractor selection process during the procurement phase. We utilize reputable suppliers, subcontractors and manufactures with previous working history/relationship on services provided.

Training and Awareness: We provide training and resources to our employees to increase awareness of modern slavery risks and empower them to identify and report any suspicious activities.

Reporting Mechanisms: We will maintain effective reporting mechanisms for employees and stakeholders to raise concerns or suspicions regarding modern slavery or unethical practices. Reports

will be thoroughly investigated, and appropriate action is taken in accordance with our policies and procedures.

Continuous Improvement: We shall continuously review and improve our policies, processes, and procedures to enhance our effectiveness in preventing modern slavery and promoting ethical business practices.

Modern Slavery Awareness reporting shall be communicated at our management meeting raising the awareness and to mitigating modern slavery risks and ensuring our employees are aware of the company's obligations under the Act.

We shall discuss the reporting requirements of the Modern Slavery Act, as well as the actions we intend to take to address these requirements.

Conclusion:

Sutcliffe Engineering Pty. Ltd is committed to preventing modern slavery within the structural steel industry. Through our policies, practices, and partnerships, we strive to uphold the highest standards of ethical conduct and promote the well-being of all individuals within our supply chain.

This Modern Slavery Statement will be reviewed annually and published on our website to demonstrate our ongoing commitment to transparency and accountability.

Company Policy's:

Sutcliffe Engineering has implemented policies and procedures related to our company code of ethics, values and our commitments, ensuring all Sutcliffe Engineering employees, contractors, sub-contractors, customers, and visitors behave appropriately and conduct themselves in a professional manner upholding our code of ethics and values of our organisation.

Sutcliffe Engineering has implemented the following Policy's:

- *Code of Conduct Policy*
- *Antibribery and Corruption Policy*
- *Equal Opportunity Policy*
- *Workplace Bullying Policy*
- *Sustainability Policy*
- *OH&S Policy*
- *Environmental Policy*
- *Drug and Alcohol Policy*
- *Rehabilitation Policy*
- *Quality Policy*
- *Whistleblower Policy*

These policies apply to all Sutcliffe Engineering employees, contractors, subcontractors, clients, and visitors.

Approval:

We are committed to continuing to assess, measure and publicly report on our progress in the future years to come.

This statement was approved by Managing Director & General Manager governing body of Sutcliffe Engineering Pty. Ltd.



Nick Palamaras
Managing Director



Tass Flaounas
General Manager