



ASCENT
STRUCTURAL & ARCHITECTURAL STEEL

Modern Slavery Statement

2023 – 2024



Ascent Structural & Architectural Steel is a leader in the supply, fabrication, and installation of quality structural steel to the building and construction industry within Western Australia. We are committed to providing complete customer satisfaction through a high level of professionalism and workmanship.

We acknowledge our role in safeguarding human rights through ethical and sustainable business practices. Our first Modern Slavery Statement is an expression of our core values of corporate responsibility, leadership, respect, social responsibility, and accountability. It demonstrates our commitment to identifying, managing, and mitigating modern slavery risks in our supply chain.

We are proud of the initial actions that we have taken in this reporting period to better understand our supply chain, and to develop a more comprehensive process for identifying supply chain risk and evaluating supplier performance.

We look forward to working with our employees and suppliers over the next 12 months to embed responsible procurement in our operations and supply chain and to raise awareness about modern slavery and human rights.

This statement was approved and signed by Peter Jackson in his capacity as the managing director of Ascent Enterprises WA Pty Ltd, which is the trustee of the Jackson Unit Trust.

Peter Jackson
Managing Director
Ascent Enterprises WA Pty Ltd
13/12/24

Overview

We are committed to partnering with our suppliers to procure responsibly. We care deeply about the safety and wellbeing of our people, our customers, and the communities and environments that we operate within.

Our operations

Ascent Steel was originally founded in 2004 in Western Australia. In 2015 the company structure changed and we are now operating as a trust. We remain 100% Australian owned and operated in Western Australia.

Ascent Steel employs 56 full time staff and engages subcontractors to support galvanising and installation works across Western Australia.

We do not own or control any other entities and therefore mandatory reporting criteria six is not applicable.

About our supply chain

Our global supply chain is made up of approximately 60 registered suppliers. We have established long term business relationships with most of our suppliers, but purchasing decisions are made on a project-by-project basis. We also have long term established relationships with all of our subcontractors based in Western Australia.

Ascent manages all purchases through our Purchasing Manager who reports directly to the Managing Director. All procurement decisions are made in accordance with our documented Procurement Procedure.



Purchase categories



Production steel: used in manufacturing processes



Steel manufactured products: custom fabricated steel



Transport: some external transport services for overflow or long-distance trips



Safety, testing, and engineering: safety equipment (i.e. PPE), equipment training and verification, competency training



Utilities: IT hardware and software and site expenses including electricity, rates, water, rent and fuels



Other: general services including cleaning services, office consumables, tools, etc

Supply chain locations

- > Australia
- > Bahrain
- > China
- > Dubai
- > India
- > Japan
- > South Korea
- > Taiwan
- > Thailand
- > Vietnam

Responsible Procurement

We have implemented a series of policies and procedures to promote responsible procurement across our operations and supply chain. These policies and procedures form a responsible procurement framework which addresses modern slavery as a priority.



Our philosophy

We are committed to responsible procurement activities in partnership with our suppliers. We value collaborative relationships with like-minded business partners and suppliers, and care deeply about the safety and wellbeing of the people within our operations and supply chain, our customers, communities, and the environments that we operate within.



Principles for supplier interaction

We seek to engage with suppliers who are aligned with our responsible procurement values and aspirations. Our aim is to work with suppliers to improve sustainability performance, and to protect the rights of everyone in the supply chain. We define success as succeeding together with our suppliers, rather than eliminating poorly performing suppliers.



Supplier Code of Conduct

We are integrating sustainability into our procurement processes. We have developed a Supplier Code of Conduct and companion Questionnaire which will be provided to new suppliers as part of the supplier selection and onboarding process. Over the next year the Code of Conduct and Questionnaire will also be provided to direct suppliers who have been identified as high risk in the initial risk assessment. Suppliers must complete the Questionnaire satisfactorily and acknowledge and adhere to the requirements of the Code.



Supplier evaluation

We require suppliers to meet the minimum (RE) social, environmental and health and safety standards set out in our Supplier Code of Conduct. Through the Code, we also communicate our expected (EX) and encouraged (EN) social, environmental and health and safety standards so that our suppliers are supported in their own sustainable procurement journey. The code, questionnaire and evaluation provide a process for identifying and qualifying performance for new as well as existing suppliers.



Responsible Procurement Risk Assessment

Our responsible procurement risk assessment tool supports the evaluation of supplier compliance with the Modern Slavery Act 2018 (the Act) and helps us understand the sustainability profile of our purchase categories. The assessment reviews the risk level across five responsible procurement issues: modern slavery, governance, safety and wellbeing, environment and sustainability, and quality assurance, and is used to inform our procurement decisions.

Managing risks in our supply chain

We have a zero-tolerance approach towards any breaches of human rights, and we hold our suppliers, contractors, and business partners to the same standard.

We are committed to continuously assessing our operations and supply chain to identify modern slavery risks.

Identifying modern slavery risks

In 2024 we took significant steps to improve how we identify and report on modern slavery risks in our supply chain. We are working to achieve better visibility over our supply chain, and our plan for the 2024-2025 Financial Year is to:

- ▶ Identify all medium and high-risk suppliers
- ▶ Embed our responsible procurement framework in our procurement processes
- ▶ Promote responsible procurement across our operations and supply chain, supported by our responsible procurement framework
- ▶ Embed modern slavery in our existing supplier and subcontractor evaluation processes

Modern slavery risk indicators

In 2024 we improved our understanding of the risk indicators for modern slavery and human rights abuses that can occur in supply chains. We have worked with an external consultant to guide us in developing a more robust modern slavery risk assessment tool and have drawn on publicly available resources to better explore the risks in our supply chain.

Throughout the next reporting period we will conduct supplier risk assessments using the following indicators:



Country profile

We know that certain countries have a higher risk of modern slavery practices, but also that no country or industry is completely free of these practices. Approximately 68% of our annual spend is with Australian suppliers and 32% with suppliers located internationally (listed page 2).



Sector, industry and supplier profile

We are also aware that certain sectors and industries are more prone to human rights abuses, including modern slavery. Our risk assessment tool will help us to identify and track the performance of our medium and high-risk suppliers with more accuracy.



Direct and indirect supply

The structure of our supply chain determines the level of visibility and transparency we have over the goods and services we purchase. We will have less oversight and control over items with a long supply chain, for example when purchasing finished products over raw materials.



Ability to audit

Suppliers that we can audit (and successfully pass our criteria) or that are able to demonstrate compliance with a recognised international standard or certification body have a reduced risk of modern slavery or other human rights abuses.

Our modern slavery risk assessment



Three main supplier groups:
Commercial cleaning, waste services, direct and indirect steel supply.



Six companies identified for **immediate action** (end of 2024 calendar year).



23 companies identified for action in the **next 12-18 months**

Our plan for the next 12 months



Responsible procurement framework

We are embedding modern slavery, human rights and ethical business conduct into our procurement framework. The framework is comprehensive, and intended to identify, track, and remediate modern slavery risks within our operations and supply chain, through clear procedures and policies.



Training and awareness

We have drawn on publicly available resources to explore and better understand the key risks and signs that may indicate the presence of modern slavery in our supply chains.

We will conduct awareness training internally to improve our organisational knowledge in this area.



Supplier evaluations

We will incorporate modern slavery and human rights into our existing supplier evaluations.



Subcontractor agreements

We are reviewing our subcontractor agreements to include clauses that set our expectations with regards to modern slavery.






Measuring our effectiveness

- › All high-risk suppliers have gone through risk assessment by the end of the 24/25 FY.
- › All new suppliers are sent the code of conduct and questionnaire.
- › All relevant new staff receive training on responsible procurement as part of their induction.
- › All high-risk suppliers have been identified and mitigation actions are in place, if required.

We understand that we are at the beginning of our efforts to manage modern slavery risks in our supply chain. We know that this will be an ongoing and evolving process, and we are committed to building on our approach.

Throughout the 24/25 FY we will implement the following actions to embed our responsible procurement framework across our operations and supply chain.

FOCUS AREA	ACTIONS	OBJECTIVES
 <p>Training and awareness</p>	<ul style="list-style-type: none"> › Deliver internal training on modern slavery risks to relevant staff. › Introduce our Responsible Procurement Framework to employees and key suppliers. › Develop and launch an Employee Code of Conduct. 	<ul style="list-style-type: none"> › Equip our employees to identify and respond to modern slavery risks. › Embed responsible procurement internally and take steps to actively engage our suppliers. › Provide clear guidelines on the behaviours and conduct we expect from our employees.
 <p>Risk identification</p>	<ul style="list-style-type: none"> › Introduce our Responsible Procurement Framework to suppliers; put Tier 1 and high-risk suppliers through the evaluation process. › Develop remediation processes to be used if modern slavery practices are identified in our supply chain. 	<ul style="list-style-type: none"> › Communicate our responsible procurement philosophy externally, and develop detailed risk-profiles for Tier 1 and high-risk suppliers. › Establish a process to ensure we can protect and support any identified victims of modern slavery.
 <p>Risk Mitigation</p>	<ul style="list-style-type: none"> › Develop an employee Code of Conduct which includes whistle blowing and anti-bribery and corruption. 	<ul style="list-style-type: none"> › Continue to grow and improve our policies and practices in relation to procurement, human resources and corporate responsibility.

This statement was approved on 13/12/24 in accordance with the requirements of the Modern Slavery Act 2018 (Cth) by the board of directors (principal governing body) for Ascent Enterprises WA Pty which is the trustee of the Jackson Unit Trust.



ASCENT
STRUCTURAL & ARCHITECTURAL STEEL



BUILDING THE FUTURE

- › Fabrication
- › Construction
- › On-site erection
- › Welding
- › Mezzanine Floors
- › Specialised metalwork

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