

Voestalpine High Performance Metals (Australia) Pty Ltd

Modern Slavery Statement

August 2024

(period 1 April 2023 to 31 March 2024)

About this Statement

voestalpine High Performance Metals (Australia) Pty Ltd is the sales company in Australia for the High Performance Metals Division of the voestalpine Group, head office located in Austria. voestalpine High Performance Metals (Australia) Pty Ltd is pleased to release its Modern Slavery Statement covering our financial year period of 1 April 2023 to 31 March 2024, in accordance with the Modern Slavery Act 2018 (Cth).

This statement outlines our approach to modern slavery by ensuring our supply chains are administered to mitigate modern slavery risk, any actions taken during the reporting period and how we continue to improve any policies and/or processes moving forward.

Modern Slavery Act Reporting Criteria

Criterion	Page
Identify the reporting entity	2
Describe the consultation process with any entities that the business owns or controls	2
Describe the entity's operations, structure and supply chains	3
Identify any risks of modern slavery risks in the operations and supply chains	4
Describe the actions taken to assess and address modern slavery risks	4
How we assess the effectiveness of our actions	5

Identify the reporting entity

The High Performance Metals division focuses on technologically demanding product segments and is the worldwide leader for tool and other specialty steels. In Australia, we stock and supply a wide range of high performance steels and specialty metals to all major engineering sectors supporting customers in the Die and Mold making, Automotive, Food Processing, Mining and Resources.

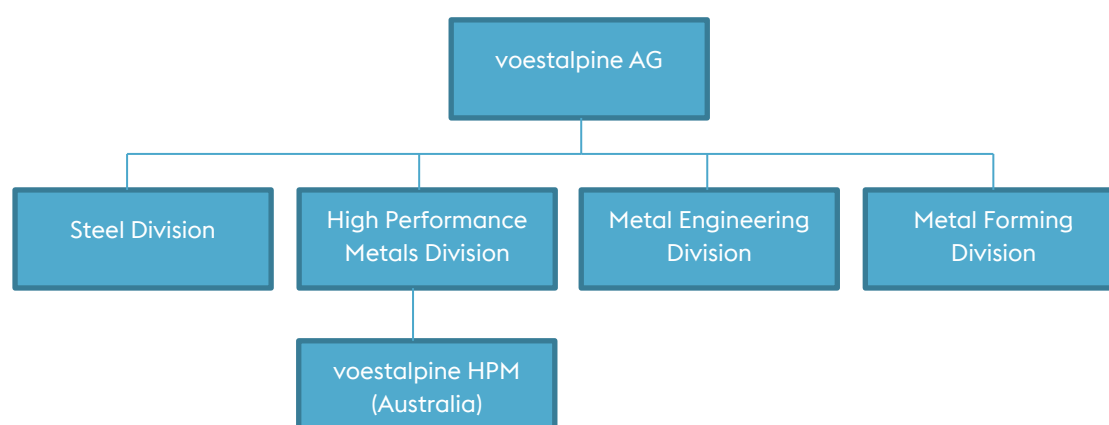
voestalpine understands the importance of modern slavery education and awareness of this issue and are committed to ensuring we continue with identifying risks that may exist in our supply chain and continued education and awareness for our employees.

Consultation with entities

As voestalpine HPM does not own or control any other entities/business, this consultation process is not applicable.

Our Structure

voestalpine High Performance Metals (Australia) Pty Ltd is one part of the voestalpine AG network (voestalpine Group), the global leader for steel production. voestalpine Group is based in Linz, Austria and is listed on the Vienna Stock Exchange. Our position within the voestalpine Group is as follows:



Our Operations

Based in each state across Australia, our 80 warehouse employees are supported by 63 administration and sales employees for the national business.

Our full time employees make up 98% of our workforce and 2% permanent part time.

Our procurement team, based in Canning Vale, WA, source material for the national business.

We operate warehouses in:

- Orchard Hills, NSW (Head Office)
- Newcastle, NSW
- Dandenong, VIC
- Darra, QLD
- Brendale, QLD
- Townsville, QLD
- Canning Vale, WA
- Welshpool, WA
- Launceston, TAS

We have not opened any other warehouses or premises over the course of the last financial year.

Our Supply Chain

Whilst we strive to source material predominantly within Australia, we also procure steel from the UK, Europe, China, Korea, Taiwan, India and the USA. Any sourcing of goods internationally is mostly sourced through local trading houses and directly from mills.

Materials and services other than steel are solely (100%) procured within Australia.

We recognise our Australian suppliers have their own supply chains which may source goods internationally.

Modern Slavery risks in our operations and supply chain

Risks in our workforce

All employees working in voestalpine HPM (Australia) are employed to work exclusively within Australia. vHPM strictly adheres to the legislated framework and best practices to ensure our risk of modern slavery practices is low.

56% of our employees undertake warehousing duties where they are managed by the relevant awards or enterprise agreements. We have not had the need to utilise or rely on labour hire.

Risks in our supply chain

We acknowledge risks of modern slavery may be heightened in some of our groups supply chains and operations as a result of the geographical location of some suppliers. We also acknowledge we lack visibility in overseas markets which carries additional risk of modern slavery especially in any secondary levels of our chain of suppliers

As the majority of the metal bars are sourced overseas, voestalpine HPM analyses our supply chain and operations on an annual basis by way of a supplier questionnaire, to identify areas of risk. Products supplied to us from Asia carries particular risks of modern slavery. We also identify areas of low risk, such as group operations handled by staff directly employed by voestalpine Group.

voestalpine expects all its suppliers, both nationally and internationally, have a clear understanding of our requirements in relation to our business operations and corporate responsibility, inclusive of modern slavery eradication.

All suppliers are expected to complete our Modern Slavery Questionnaire and read and comply with both our Code of Conduct for voestalpine Business Partners and Corporate Social Responsibility Policy as a condition of doing business with our Company.

Addressing modern slavery risks

In FY 22-23 voestalpine Group implemented a risk assessment process and published a Group-wide 2022 *Corporate Responsibility Report* on key risks including modern slavery. voestalpine High Performance Metals Australia Pty Ltd has incorporated this information into our modern slavery approach.

All voestalpine HPM employees, whether new or existing, are provided with initial and on-going training of our Code of Conduct and Corporate Social Responsibility Policy. Both these documents mention and prohibit human trafficking and modern slavery. We continue to educate our employees on all aspects of Human Rights and possible impacts on individuals, including their quality of life.

Through our supplier questionnaire, provided to all suppliers of voestalpine HPM Australia, we aim to understand how they perceive modern slavery and identify and respond to any such risks within their operations and supply chain/s.

We continue to review

Provide regular updates to the board in relation to modern slavery or risks and impacts.

Policy and governance

voestalpine Group published a human rights and modern slavery commitment in its 2022 Corporate Responsibility Report. We must apply the Group Code of Conduct, which prohibits forced and child labour, in our own operations. We will continue to monitor our supplier responses and consult with our business partners.

Supplier Engagement

To continue to work with voestalpine HPM, our suppliers are required to comply with our expectations laid out in the Group Code of Conduct and Corporate Social Responsibility Policy.

Assessing the effectiveness of our actions

Assessing and monitoring the effectiveness of our actions to mitigate risks of modern slavery in our operations and supply chains has put further focus on our risk analysis, supplier engagement, employee awareness and governance as follows:

Risk analysis: ensuring all suppliers complete our questionnaire and the responses received are reviewed, monitored and further follow up actioned if required.

Supplier engagement: ensuring our suppliers understand voestalpine's strong stance on modern slavery and have an open door approach to feedback and discussion.

Employee awareness: providing initial training of our Code of Conduct and Corporate Social Responsibility policies during onboarding. All employees continue to receive ongoing training and discussions raising knowledge and awareness of these human atrocities.

Aside from our Code of Conduct and Corporate Social Responsibility Policy, a human rights learning module has been developed at group level and is regularly assessed, updated and rolled out to all businesses across the voestalpine group. 100% of employees in Australia undertake this module as part of the operations yearly training on modern slavery, the risks and impacts, ensuring our continued awareness and expectations.

Should we have the need to utilise labour hire, they will receive the same training at onboarding, and ongoing, be employed under the same industrial agreements or awards and receive the same wages as our permanent employees.

Governance: We continue to monitor our supplier responses and to consult with our business partners.

During the reporting period, there have been no grievances related to modern slavery.

As voestalpine HPM does not own or control any other entities/business, the consultation process is not applicable.

Other information

Our aim is to thoroughly educate our employees on all aspects of Human Rights and the possible impacts on individuals, including their quality of life.

At voestalpine HPM, we believe;

- Everyone is entitled to protection under human rights;
- Everyone is entitled to human rights from birth, regardless of their origin, place of residence, sex, sexual orientation, age, colour, religion, language, disability or any other characteristic
- Observance of human rights is ensured by following the guidelines of international standards;
- The voestalpine Code of Conduct makes reference to these standards;
- Companies should ensure that no human rights are violated within their sphere of influence

As per the voestalpine Corporate Responsibility Report:

Child Labour and Forced Labour

voestalpine strictly prohibits child, forced and bonded labour. Nor does voestalpine tolerate any form of child, forced and bonded labour at its suppliers and business partners. As part of the company's investigation of the supply chain (Sustainable Supply Chain Management (SSCM)), suppliers are evaluated in targeted fashion as to compliance with human rights and specifically the prohibition of child, forced and bonded labour. voestalpine HPM is committed to making ongoing improvements in our society and operations by showing our respect of all individuals.

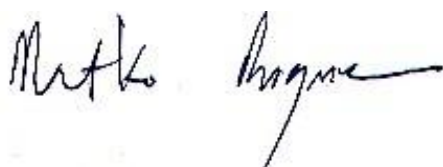
Human Trafficking and Modern Slavery

Companies of the voestalpine Group that are subject to the UK Modern Slavery Act fulfil the Act's prescribed requirements by publishing a statement to that effect. Both the Code of Conduct and the Code of Conduct for Business Partners explicitly mention and expressly prohibit human trafficking and modern slavery.

Board Approval

This statement was submitted, and approved by the board of voestalpine High Performance Metals (Australia) Pty Ltd in their capacity as principal governing body of voestalpine High Performance Metals (Australia).

This statement is signed by Matko Bozanic in his role as Managing Director and a member of the aforementioned board of voestalpine High Performance Metals (Australia).



Matko Bozanic

Managing Director