

Modern Slavery Statement

A. Introduction (Criterion 1)

This statement is submitted by Wire Industries Pty Ltd (ACN 055 064 155) under section 13 of the Modern Slavery Act 2018 (Cth) (MSA) for FY24-25 financial year.

Wire Industries is a privately owned company, wholly owned by Bestbar Pty Ltd, and is registered in WA. Wire Industries is dedicated to maintaining robust management systems and procedures to prevent the exploitation of human rights within its business operations and across its supply chain.

Reporting Entity :

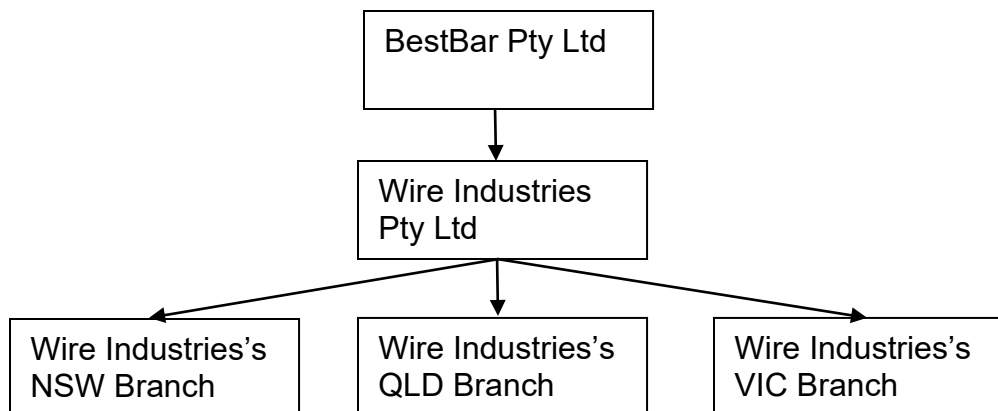
Wire Industries Pty Ltd

ACN 055 064 125

B. Structure and Operations (Criterion 2)

Wire Industries is one of Australia's leading suppliers of processed reinforcing steel and reinforcing mesh, serving the building and construction industries. The company sources locally manufactured reinforcement steel and wire rod, which are processed into finished goods at its manufacturing facilities. With operations in New South Wales, Victoria, and Queensland, Wire Industries maintains a robust presence across key regions. In addition to its core products, the company also sources supplementary accessory items locally to support its comprehensive product offering.

Wire Industries employs approximately 200 people across its management, production, and distribution network, all of whom are based in Australia. The majority of these employees are engaged on a full-time basis in our NSW, QLD and VIC branch.



Document :	Approved By :	Position :	Date of Issue :	Page :
P013 – Modern Slavery Statement	Grant Johnston	M.D	25/10/2024	1 of 6

Modern Slavery Statement

C. Supply Chain (Criterion 2)

Wire Industries predominantly sources its raw materials, consumables, and services, including human resourcing agencies, from companies incorporated in Australia. The company is committed to partnering with suppliers that demonstrate strong reputations, ethical standards, and reliable business practices. While Wire Industries does not knowingly engage with businesses involved in modern slavery or human trafficking, it acknowledges the inherent risks associated with third-party contracting and supply chain participation.

Supply agreements are typically established under Wire Industries' standard terms and conditions, or through negotiated terms depending on the nature of the product or service and the relationship with the third party. Wire Industries mandates that all suppliers adhere to applicable laws and regulations, with thorough due diligence conducted before entering into any third-party agreements.

Purchases are only allowed from previously approved suppliers. This also includes suppliers of services and consumables for normal operation. Finished goods are delivered using locally owned and operated transport providers.

D. Modern Slavery Risks (Criterion 3)

Wire Industries upholds a zero-tolerance approach to all forms of slavery. This means that the company is fully committed to preventing harm to individuals, protecting its reputation, avoiding legal action, and maintaining its standing in the business community by ensuring strict compliance with the Modern Slavery Act. The Act identifies eight types of exploitation that qualify as modern slavery, which include:

1. Trafficking in persons
2. Slavery
3. Servitude
4. Forced marriage
5. Forced labour
6. Debt bondage
7. Deceptive recruiting for labour or services
8. The worst forms of child labour

Wire Industries is committed to sourcing goods and services exclusively from 100% local suppliers. The majority of our suppliers are leading Australian businesses. However, we acknowledge that there

Document :	Approved By :	Position :	Date of Issue :	Page :
P013 – Modern Slavery Statement	Grant Johnston	M.D	25/10/2024	2 of 6

Modern Slavery Statement

may be risks associated with modern slavery in our supply chain, particularly concerning goods originating from outside of Australia.

To address this, Wire Industries will focus on our actions conduct gap analysis on suppliers providing imported goods to ensure compliance with ethical standards and mitigate any potential exposure to modern slavery practices.

Product/Service	Supplier	Source	Risk Class	Type of Risk	Country
Raw Material	Local	Local	Low	Slavery	Australia
	Local	Imported	Med	Geographic risk, Product & Service	Korea, Turkey
Transport	Local	Local	Low	Slavery	Australia
Staff	Local	In-house	Low	Slavery	Australia
Temp Staff	Local	Local Agency	Low	Slavery	Australia
Sundry Products	Local	Local	Low	Slavery	Australia
	Local	Imported	Med	Product & Service	China
Consumables	Local	Local	Low	Slavery	Australia
	Local	Imported	Med	Product & Service	China
Services	Local	Local	Low	Slavery	Australia

E. How Wire Industries Combats Slavery (Criterion 4)

To ensure compliance with the Modern Slavery Act, Wire Industries has implemented the following measures:

1. Supply Chain due diligence:

Wire Industries conducts thorough due diligence on key suppliers to ensure alignment with the company's policies, codes, and values. These actions are designed to reduce the risk of slavery and will include the requirement for supply chain participants to attest to the absence of non-compliant activity, sign agreements ensuring compliant behaviour, and report any modern slavery-related issues. Suppliers are categorized based on the risk associated with their geographic location, size, and industry.

Document :	Approved By :	Position :	Date of Issue :	Page :
P013 – Modern Slavery Statement	Grant Johnston	M.D	25/10/2024	3 of 6

Modern Slavery Statement

2. Follow-up Questionnaire:

Suppliers identified as "high risk" during the supply chain due diligence process are required to complete a modern slavery risk assessment questionnaire. This process helps ensure compliance with modern slavery laws and escalates any identified issues to senior management for further action.

3. Employment Contracts:

All persons employed by Wire Industries are engaged under formal employment contracts to minimize the risk of forced labour. Failure to comply with this Modern Slavery Policy may result in disciplinary actions.

5. Code of Conduct:

All suppliers must adhere to Wire Industries's Code of Conduct, which includes provisions related to anti-bribery, corruption, human rights (including modern slavery), work health and safety, and environmental sustainability.

6. Whistleblower Policy:

Wire Industries's Whistleblower Policy protects employees, service providers, and suppliers who raise concerns about unethical or unlawful behavior within the company. The policy ensures confidentiality and protects individuals from any potential repercussions.

7. Communication and Transparency:

This Modern Slavery statement will be published on Wire Industries' website for access by subcontractors and suppliers during the tendering process. Wire Industries will clearly communicate its expectations regarding modern slavery and human rights to staff, business partners, and other stakeholders.

8. Policy Availability and Integration:

Wire Industries will ensure this Modern Slavery statement is available and communicated both internally and externally to all relevant personnel and business partners. It will also be reflected in operational policies and procedures to integrate it throughout the business.

These initiatives demonstrate Wire Industries' commitment to upholding the highest ethical standards and ensuring compliance with the Modern Slavery Act.

F. Assessing Effectiveness and Actions (Criterion 5)

Document :	Approved By :	Position :	Date of Issue :	Page :
P013 – Modern Slavery Statement	Grant Johnston	M.D	25/10/2024	4 of 6

Modern Slavery Statement

Wire Industries is committed to continually enhancing its procedures and processes to combat modern slavery and protect human rights. The company will consistently monitor, evaluate, and assess the effectiveness of its efforts by:

- a) Conducting ongoing monitoring of current suppliers and performing gap analysis on new suppliers to identify potential modern slavery risks, and mitigating those risks to the fullest extent possible.
- b) Regularly reviewing and updating training materials to ensure they remain current, relevant, and effective.
- c) Reviewing and updating Wire Industries policies and Code of Conduct to ensure compliance with applicable laws and continued relevance.
- d) Actively engaging with suppliers and key customers to verify their adherence to the modern slavery actions they have committed to implementing.
- e) Creation of remediation process and Sustainability statement.

G. Consultation of own Entity (Criterion 6)

Wire Industries do not own or control any other entities. If there is any own entity in the future, Wire industries will have a joint statement describe consultations with the entity.

H. Application Of this Statement

We seek the co-operation of all workers, suppliers and other parties working with our business. We encourage suggestions for realising our modern slavery, equal opportunity and anti-discrimination objectives to create a safe, fair and tolerant working environment. This Statement applies to all business operations and functions, including those situations where workers are required to work at any site not controlled by our business.

I. Approval of this Statement

The Board of Directors, being the principal governing body of Wire Industries Pty Ltd, have approved this Modern Slavery Statement on 25 Oct 2024.

Document :	Approved By :	Position :	Date of Issue :	Page :
P013 – Modern Slavery Statement	Grant Johnston	M.D	25/10/2024	5 of 6

Modern Slavery Statement

Signed by



Grant Johnston, Managing Director

25 Oct 2024

Signed by



Bradley Johnston, Director

25 Oct 2024

Document :	Approved By :	Position :	Date of Issue :	Page :
P013 – Modern Slavery Statement	Grant Johnston	M.D	25/10/2024	6 of 6