

Modern Slavery Statement

Coil Steels Pty Ltd and United Steel Pty Ltd

1. Introduction

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 FY20 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.

2. Structure and operations

Coil Steels and United Steel are specialist stockists and processors of 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 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 6 sites across Queensland, New South Wales, Victoria, South Australia and Western Australia. United Steel has a fleet of approximately 12 trucks that provide high quality and long-lasting services and products.

3. Supply chain

The raw materials, consumables, human resourcing agencies and other businesses utilised by Coil Steels and United Steel in the course of their operations are businesses incorporated and operating within Australia and also 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, but Coil Steels and United Steel acknowledge that there is always some risk that may contribute to modern slavery practices by virtue of contracting with third parties and being part of a supply chain.

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.

4. Assessing and addressing modern slavery risks

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.

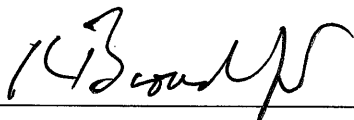
- b) **Follow up questionnaire:** Coil Steels and United Steel require suppliers identified as “high risk” during the supply chain mapping exercise to complete a modern slavery risk questionnaire to ensure compliance with modern slavery laws and to identify any issues. Significant issues are escalated to senior management.
- c) **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.
- d) **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.
- e) **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.
- f) **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.

5. Assessing effectiveness

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 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 30 March 2021.



Ken Broadfoot, Director