

**MARIO & SONS STEEL
FABRICATION
MODERN SLAVERY STATEMENT
FY 2024/2025**

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1. Introduction

1.1 Foreword

Mario & Sons Steel Fabrication PTY LTD is opposed to Modern Slavery in all forms and is committed to working collaboratively to prevent the risk of it occurring in the steel industry. This Modern Slavery Statement has been developed in accordance with the Australian Modern Slavery Act 2018 (the Act) and outlines the steps taken by Mario & Sons during the financial year ending in 2025. This statement is voluntary, as our company does not qualify as a reporting entity under the Act. It is our first formal submission and was developed in collaboration with senior management. It reflects our continued commitment and ongoing actions to minimise the risks of modern slavery occurring in our business.

1.2 Approvals

This Modern Slavery Statement has been approved by the principal governing body of Mario & Sons Steel Fabrication PTY. LTD. as defined by the Act on 21st of August 2025.

This Modern Slavery statement is signed by a responsible member of Mario & Sons Steel Fabrication PTY. LTD. as defined by the Act.

A handwritten signature in black ink, appearing to read 'Maurizio Palozzo'.

Maurizio Palozzo

Managing Director

1.3 About Mario & Sons Steel Fabrication - Structure, Operations & Supply Chains

Mario & Sons Steel Fabrication, based in Sydney, New South Wales, specialises in the fabrication and erection of structural steel. We have operated proudly in Australia with no international ties for nearly 60 years and currently employ approximately 70 staff across our office, workshop and erection teams. Mario & Sons primarily fabricates and erects steel for warehouses, and occasionally other types of buildings such as data centres, factories, schools and hospitals.

Our main operations include the supply, fabrication, painting, sandblasting, delivery and erection of structural steel. Our three biggest spending categories are raw steel material, wages and paint.

Our Australian-based supply chains are used for the sourcing of a variety of materials including raw steel and paint supplies as well as various other items that are required for the purposes of general maintenance and operations of our facilities.

2. Risks of Modern Slavery within our Operations and Supply chains

Mario & Sons understands that modern slavery is an emerging and constantly evolving compliance issue for the industries we work in and alongside. We have been proactive in revising our policies and principles to address this issue in accordance with Australian legislation as well as organisations that are recognised as the global standard for preventing and addressing business-related human rights harm such as the United Nations Global Compact Network Australia and Walk Free Foundation. Through our extensive internal assessments, we have been able to enhance our understanding of the risks of modern slavery in our operations and supply chains.

2.1 Operations

Within our daily operations we have identified that some potential risks may stem from hire companies used to provide subcontracted labour such as welders, boilermakers and riggers. These tend to have a low risk of modern slavery as Mario & Sons typically has direct or near-direct control over the work setting and facilities they operate in. Thus, there is minimal risk of individuals working in overly harsh and difficult working conditions unbeknownst to us. However, we do acknowledge that we do not directly control subcontractor wages, raising potential concerns about wage exploitation or underpayment, albeit at a low risk.

2.2 Supply Chains

Mario & Sons has conducted a scoping exercise to assist us in identifying any potential risks of modern slavery occurring within our own supply chains. The materials used in our processes are all purchased directly from various locations within Australia. On the occasion where our local steel suppliers are unable to supply locally manufactured product, they may source those materials from overseas.

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We are highly alert to the fact that supply chains outsourcing goods from international corporations indirectly links us to a risk of modern slavery by financially supporting a company that may use exploited labour or conduct operations in a manner that does not align with Australian standards.

The following is a breakdown of countries our suppliers may source product from and the respective risk of modern slavery from each.

Countries Our Suppliers Use	Potential Risk of Modern Slavery
Australia	Low
China	High
India	High
Japan	Low
Germany	Low
Republic of Korea	Moderate
United Kingdom	Low
United States	Moderate
New Zealand	Low
Vietnam	High
United Arab Emirates	High

The risk was determined based off the Walk Free Global Slavery Index 2023.

Through this scoping exercise we have identified our company is at minimal risk of indirectly contributing to modern slavery, as foreign sources indicate a 'low' to 'moderate' risk. Countries with a 'high' risk rating are not commonly used, and we ensure that our suppliers have the same high standards for their anti-modern slavery regulations as us.

3. Actions taken to Assess and Address the Risks of Modern Slavery

Mario & Sons understands that collaboration is key to combat modern slavery. Over this reporting period, we have been transparent about our company's risks and have made significant progress in implementing changes to reduce the risks of modern slavery within our operations and supply chains.

3.1 Decent Work Range

Mario & Sons strives to do our due diligence to consistently act in identifying, mitigating and accounting for how we address potential risks of modern slavery within our operations. We ensure that our workers are adequately qualified for their role and that their values align with our policies. Employees are paid in accordance with relevant awards and receive all applicable entitlements. Their wages may be negotiated, their rights are respected, and they can refuse or cease work they do not feel safe or capable of doing. These policies, which are embedded within our WHSE system, follow all WHS compliance standards, ensuring our company is consistently working with a 'Decent Work' range, a guideline set out by the International Labour Organisation of the United Nations.

Our yearly SWOT Analysis and Management Review Meetings are methods of upkeeping these standards. These procedures allow our company to have a detailed, independent review of our business model and discover and implement new strategies to combat modern slavery.

Mario & Sons regularly partakes in a quarterly General WHSEQ Audit by an external party. This provides us an outline of potential risks, their severity and a guideline of how long risk resolution should take, while also independently reviewing our ability to meet all legislative and non-legislative requirements.

3.2 Modern Slavery Policy

Mario & Sons understands that the most prominent strategy to combat the risks of modern slavery is to increase remediation in the workplace. The development and implementation of our own Modern Slavery Policy has been our biggest focus of this financial year. This policy ensures that harm cannot occur from within our internal operations. It was drafted with senior management across a diverse range of departments to ensure it is relevant to all. The policy was developed using the resources of the Australian government in line with the Act, as well as UN Guiding Principles and Walk Free Foundation guidelines. We have trained all staff on this policy

and used it to raise awareness about Modern Slavery. Our policy has also been integrated into our inductions, ensuring all new employees are aware of our commitment upon introduction to the company.

3.3 Workplace Conduct Policy

As previously stated, Mario & Sons has taken guidance from multiple reputable sources, allowing us to become familiar with the core principles against labour exploitation thus furthering our remediation processes. We put this knowledge into action by regularly reviewing and reforming our other relevant policies and grievance mechanisms such as our Workplace Conduct Policy. This ensures all employees are aware of how they are expected to act in the workplace, have full transparency of our values as a company and understand their protection and privacy rights. All employees can make recommendations to amend the policy to help Mario & Sons consider a broad range of circumstances. Our Workplace Conduct Policy includes our Whistle Blower Policy, ensuring all Mario & Sons employees understand who they can speak to if they wish to raise a concern. Each of these policies are communicated upon induction and translated when necessary to ensure adequate understanding.

3.4 Toolbox Talks

To ensure that we can consistently improve our due diligence as well as staff and management awareness of modern slavery risks, Mario & Sons communicates our methods to our workers. Our monthly Toolbox Talks allow proactive discussions surrounding WHS and other workplace related issues to occur. This allows the needs of all workers to be accounted for, reducing the risk of modern slavery.

3.5 Supplier and Service Provider Assessment

Mario & Sons engages with our suppliers on modern slavery issues and strives to work solely with like-minded companies. We have done this by intensifying our screening and qualification procedures. Our Supplier and Service Provider Assessment is used to rate suppliers and service providers based on a variety of criteria central to our values. All companies are re-assessed at least once a year, and new suppliers and service providers are added as we use them. This due diligence keeps us updated on any potential risks that may arise in our supply chain. The rating of companies is based on their policies, actions, countries they operate in, prices, compliance related documentation as well as their history with WHS related issues. These figures allow us

to assess the potential modern slavery risk based on the operators of each individual business.

3.6 Sourcing of Steel

Mario & Sons also ensures that all raw material is only used if it is supported by formal test certificates or other documents that prove compliance to the relevant Australian standards. This method of due diligence is conducted by matching each individual order of material to the relevant test certificate so that their origin can be thoroughly traced if required. This not only ensures we produce quality and compliant products but also alerts us to potential modern slavery risks in our supply chain, as low-quality steel is highly correlated with the exploitation of labour.

3.7 Financial Leverage

Although Mario & Sons is smaller than most of our suppliers, the high demand for Australian made steel provides us with many projects to work on and in turn the opportunity to continue remediation with our supply chains through leverage. With many suppliers to choose from, we use our financial leverage to communicate our expectations regarding modern slavery issues, ensuring their continued compliance. This allows us to maintain responsibility and transparency in our supply chains, while also ensuring that the employees of these companies are free from exploitation and other risks of modern slavery.

4. Assessing the Effectiveness of the Actions

At Mario & Sons we understand that combatting the risks of modern slavery is an ongoing process that requires constant monitoring and ongoing learning. We continually assess the effectiveness of our actions, processes and procedures to track our progress and create strategies for the future.

4.1 Decent Work Range

The effectiveness of our due diligence within our operations is proven through the reputable organisations we co-operate with and the compliance systems we have in place. Our SWOT Analysis and Management Review Meetings are efficient methods of understanding and discussing our potential weaknesses and threats to our company that could hinder our progress in combatting modern slavery.

Mario & Sons' externally sourced quarterly WHSEQ Audit provides our company with observations and areas of improvement on various aspects of our work. By using a third-party organisation, we can prove the actions we take towards having a 'Decent work range' and maintain our high standards. These actions are highly effective in ensuring that any risks our company may have are closed out in a timely manner, reducing the risks of modern slavery in the workplace.

4.2 Modern Slavery Policy

The creation of our Modern Slavery Policy and its implementation in inductions and Toolbox Talks has been very effective in remedying any potential risks of modern slavery in our operations. As previously stated, this policy was influenced by significant organisations who are experts in the field such as the United Nations. This ensures that our policy and training is reliable, valid and accurate. Previous and future inductions are a very effective method in ensuring that all Mario & Sons employees and subcontractors abide by the required standard of ethics and compliance.

4.3 Workplace Conduct Policy

These actions of collaboration and reformation do not end with our Modern Slavery Policy. We also use the reliable and effective information from third-party expertise to update our other policies, such as our Workplace conduct Policy and Whistleblower Policy. Having widespread policies makes addressing risks throughout operations accurate, efficient and effective. Open communication with senior management and access to a plethora of relevant materials has resulted in less grievances and incidents in the workplace compared to previous years.

4.4 Toolbox Talks

Our regular Toolbox Talks have been highly effective in allowing for continual improvement in addressing any potential risks of modern slavery across our operations. They have ensured all staff are across all of our policies and stay up to date on all ever-evolving matters in the workplace. They also allow all staff to be part of the decision-making process, including the continuous improvement and awareness of the impacts of modern slavery. Thus, this method is in line with Principle 31 of the UN Human Rights OHCHR Accountability & Remedy Project as they are "legitimate, accessible, predictable, equitable, transparent, rights compatible, a source of continuous learning and based on engagement and dialogue". Since the beginning of 2024, Mario & Sons

has put significant effort into holding Toolbox Talks more consistently. This has led to a clear improvement in dialogue between management and the general workplace, as well as ensuring the working environment for all individuals has been able to undergo constant improvement.

4.5 Supplier and Service Provider Assessment

At Mario & Sons, we understand that working with companies that also take action against modern slavery is effective in ensuring our continuous due diligence and effective response to these risks. Our Supplier and Service Provider Assessment is an efficient tool we use to create a scope of our operations and supply chains. This ranking of suppliers based on the aforementioned criteria, allows us to proficiently identify and assess actual and potential human rights risks.

This method has elevated our company's ability to source supplies from Australia and other countries that place a high level of importance on the rights of workers. We have seen this through our suppliers' cooperation with our own goals. This assessment has enabled us to be confident in choosing who we should and shouldn't work with.

4.6 Sourcing of Steel

Using test certificates and other compliance documents has been effective in continuing our due diligence by ensuring that all raw steel material that has been manufactured in at any point in our supply chain can be traced back to its origins and investigated for any breaches of our modern slavery guidelines. This has allowed us to reduce links between sourced product and modern slavery practices.

4.7 Financial Leverage

The financial leverage we have over our supply chains has been highly effective in reducing the risks of modern slavery and has increased our remediation with supply chains. By openly advocating our requirements and using our finances as evidence of our commitment, we have built strong, long-lasting connections to the suppliers who can demonstrate that they are also working towards the same goal. The repeat business and co-operation with our suppliers is evidence that our suppliers maintain good working conditions for their employees just as we do. This co-operation is mutually beneficial and thus effective in reducing the risks of modern slavery within Mario & Sons and many companies around Australia.

Overall, the many methods that Mario & Sons has developed and actioned has proven our understanding of our obligations under the Act and the effective systems we have in place to identify and manage risks of modern slavery in our operations and supply chains.

5. Consultation with Entities we Own or Control

Mario & Sons controls Painting and Blasting Industries and Structural Steel Rigging who support us in the fabrication, workshop services and erection of steel components. Our management ensure effective consultation with all employees from these entities by overseeing their participation in all previously mentioned actions we take to address modern slavery, such as inductions, policies and toolbox talks.

6. Final Statement

Mario & Sons is proud to publish its 2024/2025 Financial Year Modern Slavery Statement and commits to continuing to track and publicly report on its progress.

This Modern Slavery Statement has been approved by the Managing Director.



Maurizio Palozzo

Managing Director

21.08.25