

## Ullrich Aluminium – Annual Modern Slavery Statement 2019/2020

### Who Are We?

Ullrich Aluminium Pty Ltd (ABN 70 001 697 445) is a privately owned company not listed on the Australian Market. We employ 300+ staff in Australia and another 300 + staff in New Zealand. We have 43 branches in total throughout both countries. In Australia alone, we have operations in every state and territory, with over 25 sites. We have 5 manufacturing sites plus an Extrusion Plant in the NSW Hunter Valley. Our Australian Head Office is located in Carole Park Brisbane.

In Australia, all of our manufactured product is for domestic consumption; we do not export any of our products. Our New Zealand operations supply for domestic consumption and we also export products to 23 South Pacific Island nations. In both countries, we own our own distribution networks and manufacturing plants. We are the largest Trans-Tasman independent Aluminium distributor and Aluminium extruder.

With Sixty (60) years of continued business, we are proud that our growth and success is linked to our integrity in all facets of our business and our business brand.

### Supply Chains

We have a relatively simple local supply chain which includes the purchase of products and services needed for our business's day-to day operations including distribution of our products, office supplies, employment and training of our employees, industry advice from industry organisations, IT infrastructure and support services. Aluminium billet is our largest cost item and we have supply contracts with Aluminium Smelters in Queensland (QAL owned by Rio Tinto) and the Tomago Aluminium (partly owned by Norsk Hydro) in the NSW Hunter Valley. Both of these Suppliers have Modern Slavery policies in place globally.

In regard to our international supply chain, some of our Aluminium billet comes from the Aluminium Smelter at Qatar, in the Middle East, through a Supplier contract with Norsk Hydro who have Modern Slavery policies in place globally. Other imported products come from China and South East Asia. Our Suppliers are vetted through qualification of products, facilities and trade capabilities. *Ullrich Aluminium* also relies on international standards such as ISO accreditation.

Despite our vetting process, it is recognised that imported products coming from South East Asia may have a high risk of Modern Slavery due to the geographical risks and the possibility of poor governance and socio-economic factors like poverty.

### How Are We Addressing These Risks?

*Ullrich Aluminium* Pty Ltd is committed to our corporate social responsibility, we are determined to do our best and to act as an ethical corporate citizen. Through publicly sharing our Annual Modern Slavery Statement, with regard to slavery and human trafficking, Ullrich Aluminium hopes that our words and our actions can help reduce its prevalence anywhere in the world by withdrawing support for those suppliers who utilise or support such practices.



In preparing our first Annual Modern Slavery Statement, our National Management will take ownership and responsibility for compliance with the Act.

To meet the requirements of the Act, we propose to undertake the following throughout 2021:

1. Develop new company policies on modern slavery in operations and review our existing procedures in relation to our supply chain management.
2. Implement a Self-Assessment Questionnaire to be sent to all of our existing local and international suppliers as well as new suppliers.
3. Assess the potential modern slavery risks in our operations and supply chains with emphasis on high-risk geographical locations and business transactions.
4. Conduct due diligence on local and global supply chains.
5. Reviewing supplier contracts to ensure they contain terms that are consistent with the Act.
6. Developing training for staff in modern slavery requirements.
7. Develop a whistle blower policy to enable reporting.
8. Take steps to address any potential modern slavery risks identified.
9. Set up a program to measure effectiveness through performance monitoring.

### **How Do We Assess the Effectiveness of Our Actions Being Undertaken?**

We already undertake risk reviews of our local and international suppliers. However, these processes need review to meet the requirements of the Act.

Our Senior Management Team will determine the most appropriate method, scope and resources for assessing the effectiveness of our approach and processes related to modern slavery risks.

The sorts of activities we will be looking to establish or enhance will be (but not be limited to):

- Establishing a process to regularly review our actions.
- Regularly review our risk assessment process.
- Tracking actions we have taken and measuring their impact.
- Working more closely with our suppliers and checking how they are progressing in their efforts to address modern slavery.

This statement was approved by the Board of Directors of Ullrich Aluminium on 24th November 2020.



Gilbert Ullrich

Gilbert Ullrich – Chief Executive Officer

25th November 2020