

voestalpine High Performance Metals (Australia) Pty Ltd

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Voestalpine High Performance Metals (Australia) Pty Ltd

Modern Slavery Statement for the 1st April 2022 – 31st March 2023 Financial Year

1. ABOUT THIS STATEMENT

voestalpine High Performance Metals (Australia) Pty Ltd (voestalpine HPM) has developed this Modern Slavery Statement (Statement) for the financial year beginning on 1st April 2022 and ending 31st March 2023.

During this reporting period, we continue to be committed to our compliance with human rights and our non-negotiable conditions of our activities in all countries in which we do business.

This Statement covers the mandatory criteria for reporting under the *Modern Slavery Act 2018* (Cth). The table below indicates where within this Statement each criterion is addressed.

(This statement was amended on 25 October 2023 in order to update our approach to identifying modern slavery risk).

Mandatory criteria for modern slavery statements

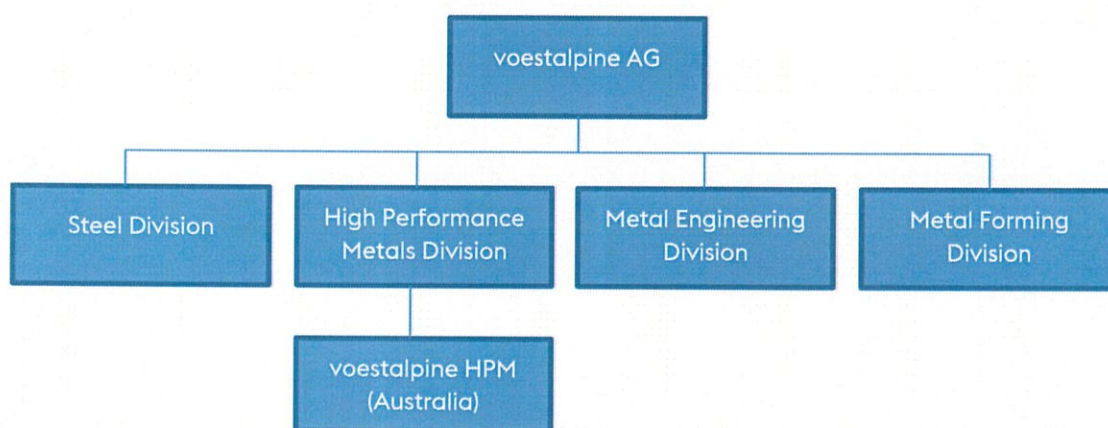
1. Identify the reporting entity
2. The reporting entity's structure, operations and supply chains
3. The risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls
4. The actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.
5. How the reporting entity assesses the effectiveness of these actions
6. The process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)
7. Any other relevant information

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2. STRUCTURE, OPERATIONS AND SUPPLY CHAINS

STRUCTURE

Our structure remains the same as in the last reporting period. We do not own or control any entities. We are ourselves 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:



OPERATIONS

The core business of voestalpine HPM is the wholesale supply of various metal bars to predominantly Australian businesses.

We operate warehouses in New South Wales, Victoria, Queensland, Western Australia and Tasmania. Our head office is located in Orchard Hills, Sydney. We have not opened any other warehouses or premises over the course of the last financial year.

Our warehouses, dispatch steel to all industries and at the time of submitting this Statement, we have a total of:

- 148 full time employees
- 2 part time employees
- 1 casual employees
- 2 labour hires in Melbourne

SUPPLY CHAIN

In the reporting period, 43% of our steel goods and 100% of other goods and services were procured locally in Australia. The remaining 57% of our goods and services were procured from the UK, Europe, China, Korea, Taiwan, India and the USA – 2% from our own mills and 37% were purchased through our in house trading house, sourced mainly from China. The remaining percentage is sourced through locally based agents and traders from various mills in countries as mentioned above.

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Key products and services that we procure are steel, transport, facilities management and contracted labour in Australia. Overseas procurement includes steel only. The percentages listed above are based on tonnages.

3. APPROACH TO IDENTIFYING MODERN SLAVERY RISK

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 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.

4. APPROACH TO ADDRESSING MODERN SLAVERY RISK

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 training on 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.

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

Suppliers are required to comply with our expectations laid out in the Group Code of Conduct.

5. BUILDING MATURITY AND ASSESSING EFFECTIVENESS

We continue to monitor our supplier responses and to consult with our business partners. These reviews will assist in determining if we are making a difference.

By providing staff with ongoing training and continuing discussions we will be raising awareness of these human atrocities. We commit to continuing improvement in our approach to assessing the effectiveness of modern slavery risk management.

WORKFORCE AND CAPABILITY-BUILDING

Every employee is onboarded with a contract of employment and online training including the Code of Conduct and Corporate Social Responsibility Policy.

A human rights learning module was also developed at Group level in FY21-22 and added to the learning plans of staff across the broader voestalpine Group, including our own personnel here in Australia. All employees, existing and new, within voestalpine HPM complete the training.

The hire and onboarding of contractors mitigates modern slavery risk. We currently engage one labour hire company for employing contract staff, ensuring contractors receive the same onboarding processes and wages as our employees.

GRIEVANCE AND REMEDY

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

6. PROCESS OF CONSULTATION

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

7. 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 the establishing 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

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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.

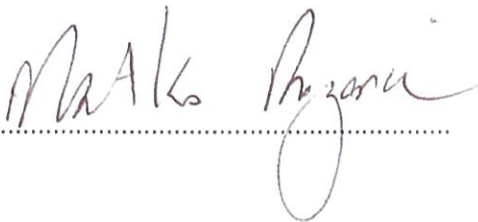
Human Trafficking and Modern Slavery

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.

8. 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).



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