



REOZONE

Modern Slavery Statement

2024

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Guide to Reozone's Modern Slavery Statement **Compliance**

In line with the Australian Modern Slavery Act 2018, this table provides an overview of where each reporting criterion is addressed within Reozone's FY2024 Modern Slavery Statement. Please use the page numbers listed to navigate directly to the relevant sections.

Australian Modern Slavery Act 2018 reporting criteria	Reozone FY 2024 Modern Slavery Statement response by page
(1) Identify the reporting entity and (2) describe the structure, operations and supply chains of the reporting entity	5 - 9
(3) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	10 - 14
(4) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	13 - 15
(5) Describe how the reporting entity assesses the effectiveness of such actions	16
(6) Describe the process of consultation with any entities that the reporting entity owns or controls. In the case of a reporting entity covered by a statement under section 14 – the entity giving the statement	17
(7) Include any other information that the reporting entity, or the entity giving the statement, considers relevant	18



A message from our General Manager

“As the General Manager of Reozone, I want to emphasise the critical importance of addressing modern slavery within our industry. This is not just a pressing global issue but a profound human tragedy that affects millions, often hidden in plain sight. At Reozone, we recognise that it is our moral duty to ensure that every facet of our operations and supply chains minimises the risk of exploitation as much as possible. We are unwavering in our commitment to this cause, and we believe our actions can help raise the ethical standard across the entire industry.

We are committed to partnering with suppliers who align with our core values of quality, consistency, and reliability. We prioritise building long-term, mutually beneficial relationships through regular visits and open communication. Acknowledging the potential risks of modern slavery within our operations and supply chains, we take proactive responsibility to mitigate these risks. We are dedicated to continuously refining our risk assessment processes to ensure ethical practices and uphold our commitment to human rights.”



A stylized, handwritten signature in black ink, which appears to read 'Stuart De Brincat'.

Stuart De Brincat
General Manager

16 September 2024

1. Modern Slavery: About this Statement

Reozone Pty Ltd (ACN 141 459 127), operates as a unit trust serving as the trustee of the Reozone Unit Trust (ABN 48 784 895 894), with its registered office located at L3/239 Church Street, Parramatta NSW 2150. The organisation functions independently and is not part of a larger corporate group. Employing 84 staff members, including casual personnel, Reozone remains committed to upholding ethical standards and promoting human rights across its operations and supply chains.

This Modern Slavery Statement has been prepared in accordance with the Modern Slavery Act 2018 (Commonwealth). It articulates Reozone's commitment to eradicating modern slavery and human trafficking in all its forms. Recognising that modern slavery manifests across diverse sectors and geographies, the company is resolute in its efforts to identify, address, and mitigate risks associated with its operational and supply chain activities.

Reozone does not own or control any other entities, further emphasising its autonomous operational structure. The company acknowledges that modern slavery risks may exist not only across various sectors and geographies but also within the products and services it procures. Through fostering a culture of integrity and responsibility, Reozone strives to ensure its practices contribute positively to societal well-being. By undertaking sustained, collaborative, and proactive initiatives, Reozone seeks to effect meaningful change in the global fight against modern slavery while reinforcing its commitment to ethical business conduct.

2. About Reozone: Our Structure

Reozone has been proudly operating since 2010, built on a business model driven by our commitment to delivering the best possible steel reinforcement services to our clients, with a focus on efficiency and speed. As one of New South Wales' leading suppliers of steel reinforcement products, Reozone leverages over 30 years of experience in the construction industry. We specialise in delivering high-quality, tailored solutions designed to meet the unique needs of our clients. Our expertise spans all aspects of reinforcement, including the precision manufacturing of rebar, the supply of premium concrete reinforcing mesh, and a comprehensive range of associated accessories. Our strong reputation spans a wide range of sectors, from residential and commercial to industrial and mining projects.



What truly sets us apart is our commitment to excellence, driven by our core values of clear communication, steadfast transparency, and unwavering integrity. With a strong emphasis on safety and sustainability, meticulous scheduling accuracy, and a team of dedicated professionals, we ensure a superior experience for our clients at every stage of their project. Central to our long-standing success is our exceptional team of highly skilled professionals. With extensive expertise across the construction and manufacturing industries, our team consistently implements innovative solutions, underpinned by a commitment to quality and safety in every project.

At Reozone, we are guided by our commitment to **quality**, **safety**, integrity, and **sustainability**. These principles shape our actions and define our dedication to delivering exceptional service and premium-quality products. Our focus on environmental responsibility and **trust** supports us in building strong, lasting **relationships** with our clients and communities, always striving to do what's right for a better future.

At the core of Reozone's philosophy is an unwavering focus on customer satisfaction. We understand that every project, regardless of its size or complexity, requires a bespoke approach. Our clients trust us to deliver not only speed and efficiency but also reliability and peace of mind, ensuring a smooth, seamless process from start to finish. We take pride in simplifying the experience for our clients, while never compromising on the high standards that define Reozone's reputation.



2.1 Our Operations

Reozone exemplifies a steadfast commitment to high-quality operational practices through a comprehensive approach encompassing procurement, logistics, maintenance, and sustainability. Headquartered at 50-52 Links Road, St Marys NSW 2760, Reozone is a leading supplier of reinforcement steel to the Australian construction industry. The organisation operates across multiple locations, with its facilities at 50-52 Links Road and 9 Charles Street, St Marys, dedicated to manufacturing deformed bar in coil (DBIC) and deformed bar in length (DBIL) for multi-residential, commercial, industrial, infrastructure, civil, and mining sectors. Additionally, its warehouse at 14 Eddie Road, Minchinbury NSW 2770, focuses on manufacturing DBIL and supplying reinforcing mesh and associated accessories for the single-dwelling residential market.

Services, Repair and Maintenance

Reozone's repair and maintenance operations focus on the upkeep and optimisation of our internal plant equipment to ensure smooth and efficient production processes. Our dedicated team is responsible for the regular inspection, servicing, and repair of equipment, minimising downtime and maximising productivity. By proactively addressing potential issues, we maintain the integrity and reliability of our machinery, ensuring that it operates at peak performance. We prioritise safety and efficiency, adhering to strict maintenance schedules and industry best practices to extend the lifespan of our equipment and support the seamless operation of our business.

Raw Materials

Reozone's procurement process is founded on a commitment to ethical sourcing and the eradication of modern slavery within our supply chain. We prioritise a diverse and resilient supply chain to ensure continuity of supply, selecting suppliers that align with our rigorous policies. All mills in our network are required to adhere strictly to these policies, ensuring the ethical and transparent sourcing of materials. We adhere to rigorous testing protocols and certification to guarantee the superior quality of our products, supported by industry-recognised certifications such as ACRS (Australian Certification Authority for Reinforcing Steel). This comprehensive approach reinforces Reozone's dedication to maintaining the highest standards of quality, integrity, and social responsibility throughout our operations.



Production

Reozone's production operations are focused on delivering high-quality reinforcement materials with precision, efficiency, and safety. We adhere to stringent testing protocols to ensure full compliance with industry standards, including ACRS. This ensures that all materials meet or exceed the required specifications, providing our clients with reliable and durable products for their projects. In addition, Reozone places great importance on regular forecasting and open communication with clients, allowing us to proactively manage supply and delivery timelines to meet project demands. Through a combination of rigorous quality control and strong client relationships, we play a vital role in the successful and safe completion of construction projects across various sectors.

Transport

Reozone's logistical operations are strategically designed to ensure the efficient and timely delivery of reinforcement materials to projects, prioritising precision and reliability. Our production and logistics team manages the entire process, from order processing and production to distribution, ensuring all products meet required specifications and are delivered as scheduled. With streamlined systems and a cohesive team, Reozone effectively coordinates production, transportation, and provides real-time updates to clients. This robust logistical framework underpins our commitment to excellence, helping clients stay on track while minimising disruptions to project timelines.

With a robust and reliable supply chain sourced from vetted local, domestic, and international suppliers, Reozone ensures its products meet rigorous quality standards. This meticulous approach allows the company to deliver reliable products while consistently meeting customer deadlines. Supported by streamlined logistics and tailored solutions, Reozone ensures timely and precise deliveries, providing exceptional customer service across residential, commercial, industrial, and mining sectors. By maintaining a focus on operational excellence and innovative solutions, Reozone continues to be a trusted partner in the Australian construction industry.



2.2 Our Supply Chain

Reozone is committed to maintaining a robust and ethical supply chain that supports its reputation as a trusted supplier of premium-grade reinforcement steel and associated products. By fostering long-term relationships with reliable partners and implementing stringent quality control measures, Reozone ensures its operations meet the highest standards of excellence. These efforts are underpinned by sustainable practices and a focus on delivering tailored solutions to meet the diverse needs of its clients across various sectors.

Supply Chain Practices

Reozone sources premium-grade reinforcement steel and associated products from trusted suppliers across a robust and diverse supply chain. The entity works with approximately eight key suppliers, procuring DBIC and DBIL from South Korea, Vietnam, Taiwan, Turkey, and the United Arab Emirates through partners like Australian Steel Traders Pty Ltd, Dith Australia, Macsteel International Australia, Sanwa Pty Ltd, and Thyssenkrupp Materials. Structural formwork (Bondek) is procured domestically from Bluescope Lysaght, while connecting, fixing, lifting, and anchoring technology is sourced locally from Leviat Pty Ltd and SRG Global Products Pty Ltd, both based in Sydney, NSW. In addition, Reozone maintains a sustainable waste management practice by selling steel scrap wastage to Complete Metal Industries Pty Ltd, an Australian-based organisation.

Long-Term Partnerships & Quality Assurance

All supplier relationships are stable, long-term, transactional B2B partnerships designed to ensure consistent quality, reliability, and mutual trust. Once procured, raw materials undergo precise processing and rigorous quality control at Reozone's facilities to meet stringent standards. Finished products are then delivered to construction sites as specified by customers, ensuring transparency and responsibility throughout the entire supply chain. This approach enables Reozone to consistently provide high-grade, reliable reinforcement steel products tailored to meet the needs of its diverse client base.



3 Risk Identification

At Reozone, we are unwavering in our commitment to ethical business practices, prioritising the proactive identification and mitigation of modern slavery risks across our operations and supply chains. This dedication reflects our broader values of transparency, integrity, and responsibility, ensuring we contribute meaningfully to global efforts against exploitation and human rights abuses.

Our approach begins with a structured, thorough assessment of risks inherent in our operations and the activities of our suppliers. Leveraging the Modern Slavery Assessment Tool (MSAT), we evaluate critical risk factors, including geographical regions, industry sectors, and workforce characteristics. These evaluations enable us to assign tailored risk scores—Inherent and Unmitigated Risk Scores—providing a clear view of vulnerabilities within our supply chain. These insights empower us to design targeted mitigation strategies that address specific risk areas effectively.

To address identified risks, we are taking decisive steps to enhance our remediation processes. Reozone is actively developing and implementing robust grievance mechanisms, enabling individuals to safely report concerns related to modern slavery without fear of reprisal. Internally, we are strengthening our policies, procedures, and training programs to ensure employees and partners are equipped to identify and respond to potential risks appropriately.

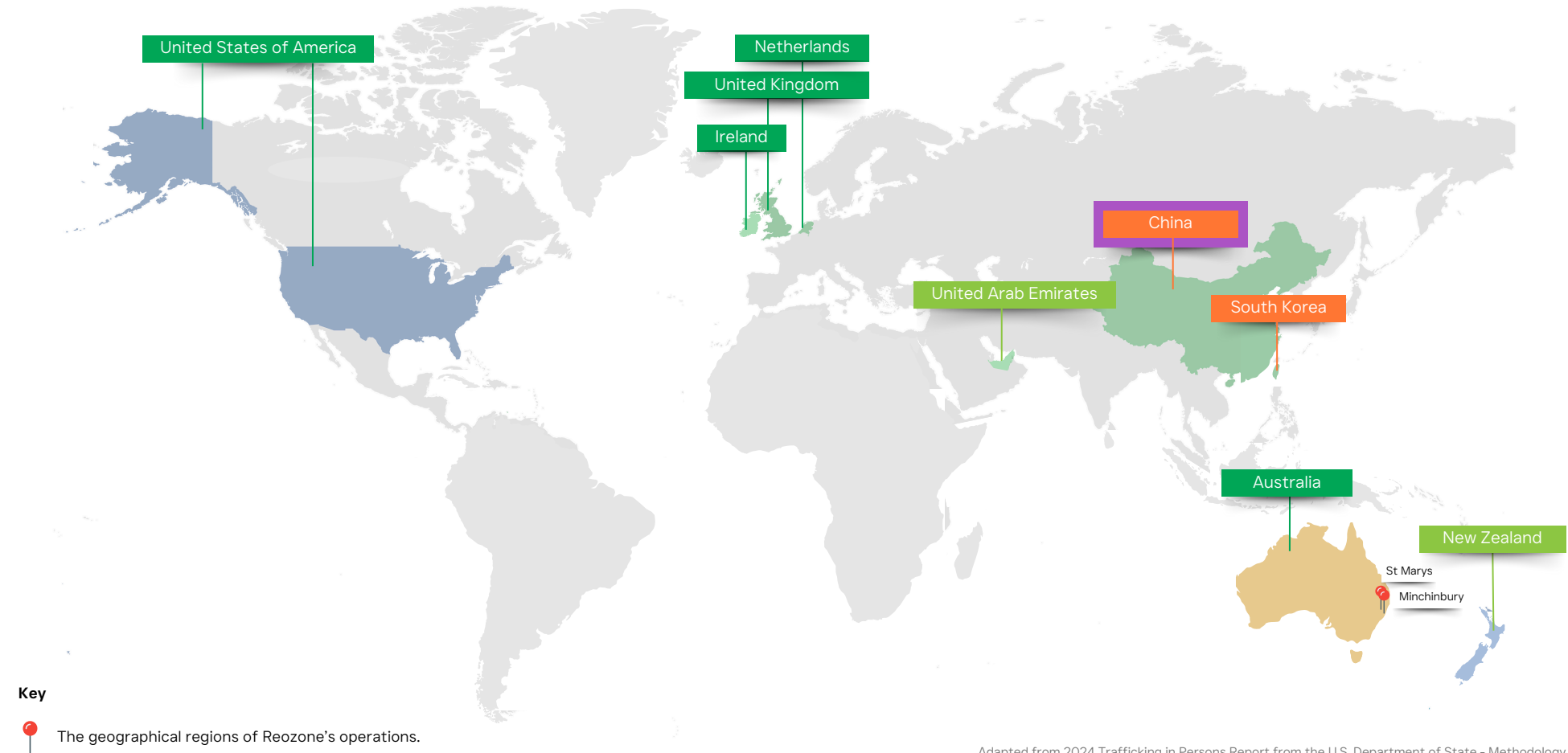
Collaboration remains a cornerstone of our strategy. By engaging with our suppliers, we foster open communication and support their efforts to identify and address any gaps in their policies and practices. We encourage suppliers to adopt higher standards of transparency and ethical conduct, reinforcing a shared commitment to combating modern slavery.

Reozone also recognises the importance of continuous improvement. We are dedicated to refining our risk identification, due diligence, and remediation methodologies to align with evolving best practices and legislative requirements. This includes regular training for employees and suppliers, as well as ongoing reviews of our processes to ensure they remain effective and impactful.

By integrating these initiatives into our operations, Reozone not only ensures compliance with modern slavery regulations but also actively contributes to a global movement against exploitation. Together with our employees, suppliers, and stakeholders, we aim to uphold human rights, foster accountability, and promote sustainable, ethical supply chains that reflect our commitment to doing what is right.

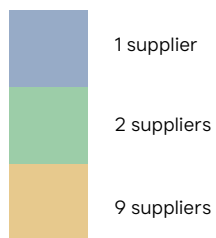


3.1 Geographical Risks

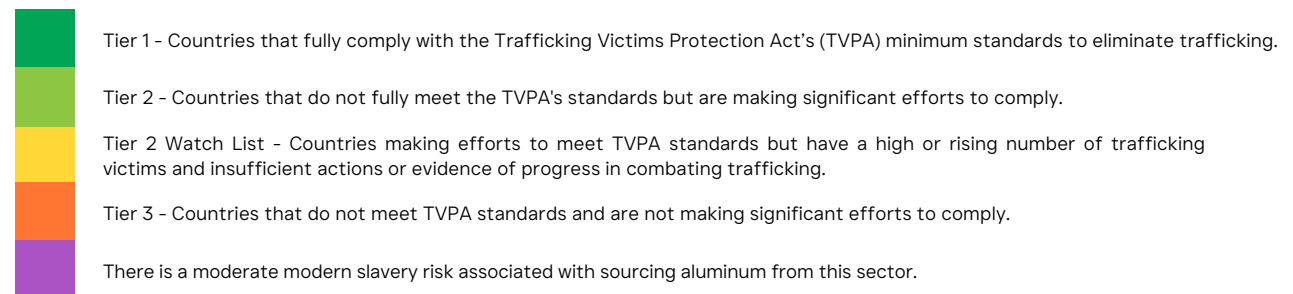


Adapted from 2024 Trafficking in Persons Report from the U.S. Department of State - Methodology.

Supplier Countries of Operation by Volume



Modern Slavery Risk Rating



3.2 High Risk Sectors: Overview and Supplier Distribution

Modern slavery encompasses various forms of exploitation and coercive practices that deprive individuals of their freedom and dignity. It includes forced labour, debt bondage, forced marriage, human trafficking, and child labour. The International Labour Organisation (ILO) estimates that over 40 million people globally are victims of modern slavery. Recently, supply chain transparency has become a key policy strategy for governments aiming to combat this issue.

Reozone acknowledges that modern slavery is a significant compliance concern in its industry and has revised its policies through its Quality, Health, Safety & Environmental (QHSE) Management System to align with changes in Australian legislation. Committed to continuous improvement, Reozone enhances transparency in its supply chains by engaging directly with stakeholders and implementing risk identification strategies. To ensure employees understand our policies, Reozone offers a comprehensive induction programme for new staff.

Our suppliers operate across various sectors, some classified as high-risk due to prevalent human trafficking activities, as highlighted in the ILO and UNICEF reports published in 2021. The following graphics illustrate the high-risk sectors relevant to our suppliers, presenting numerical data on the number of suppliers associated with each sector.

High Risk Sectors		Operations	Production	Sourcing
	Construction	2	3	5
	Transport / Storage	1	1	2
	Wholesale	1	1	-
	Mining / Quarrying	2	1	2
	Manufacturing	4	1	5

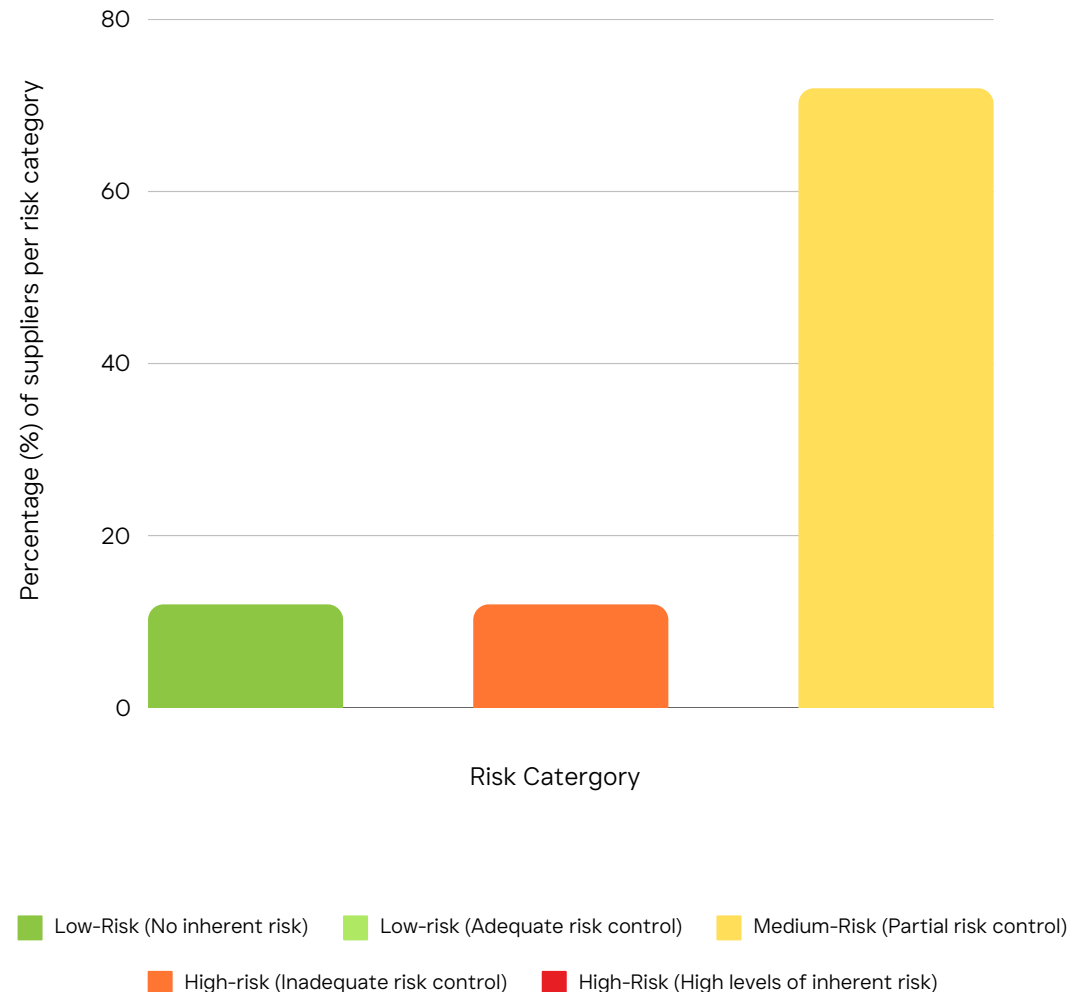


3.3 Modern Slavery Risks: Operations & Supply Chain

Reozone is resolutely committed to mitigating the risk of modern slavery across all facets of our operations, supply chains, and business partnerships. We uphold stringent ethical standards and expect every individual connected to our organization—whether directors, employees, suppliers, contractors, or consultants—to embody these values.

The assessment of modern slavery risks within our supply chain is determined by two key factors: country of origin and category risk. Country of origin risk is based on data from the 2024 Trafficking in Persons Report (TIP), which evaluates the location of our direct suppliers, and where possible, the location of their own suppliers. Category risk, on the other hand, is assessed by analysing the labour requirements, particularly unskilled labour, and the complexity of the supply chain associated with a particular spending category.

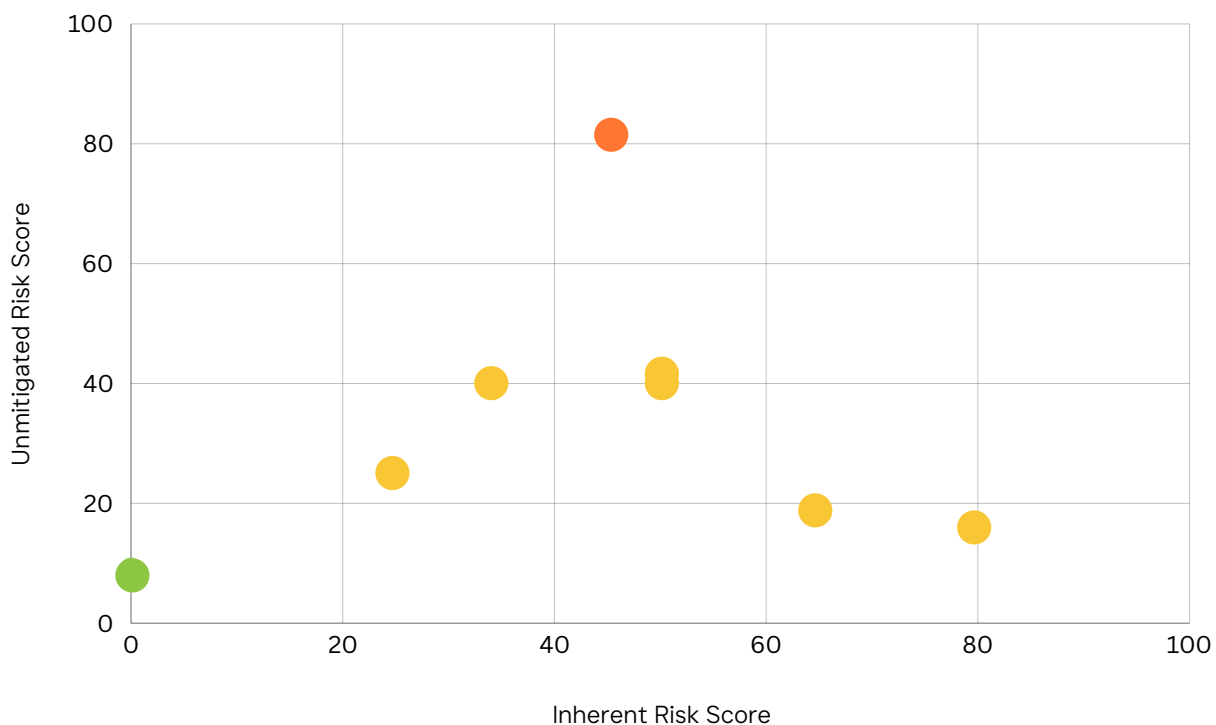
Supply chain complexity is a significant factor, as it encompasses intricate supplier relationships, layered contract structures, and multi-tiered supply chains where pinpointing the exact country of origin can be challenging. By evaluating both country and category risk, we can derive an overall risk rating for each supplier. These combined assessments have been applied across our supplier network to generate a comprehensive risk profile, as illustrated in the bar graph below.



Reozone conducts an annual assessment of modern slavery risks in our operations and supply chain. The identified risks from the previous section were determined through our comprehensive assessment process. During the reporting period, we conducted these assessments across our operations and performed a bulk review of our suppliers. Each supplier was asked to complete a self-assessment questionnaire. Once submitted, their responses were analysed to assign a modern slavery risk score and corresponding risk category.

To determine these risk categories, we first evaluated each supplier's responses for risks inherent to their operations, production, and sourcing, establishing an Inherent Risk Score. This score factored in geographical location, type of goods, industry sector, and workforce characteristics that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Following this, we assessed each supplier's policies and procedures, assigning an Unmitigated Risk Score, which indicated whether a supplier maintained inadequate, partial, or adequate risk control measures. Finally, we aggregated and averaged these risk scores, resulting in an overall Aggregated Inherent Risk Score and Aggregated Unmitigated Risk Score for our supply chain.



■ Low-Risk (No inherent risk)
 ■ Low-risk (Adequate risk control)
 ■ Medium-Risk (Partial risk control)
 ■ High-risk (Inadequate risk control)
 ■ High-Risk (High levels of inherent risk)

5. Consultation Process and Commitment to Ethical Sourcing

Reozone Pty Ltd does not own or control any other entities, making this criterion not applicable to our Modern Slavery Statement. Nonetheless, our focus remains on fostering ethical practices and ensuring due diligence within our supply chain and internal operations.

A supplier questionnaire was developed in consultation between our internal team, external stakeholders, and modern slavery advisors, specifically targeting the trading companies from which we source raw materials. This questionnaire was meticulously designed to align with our objectives of assessing and addressing potential risks within our supply chain. By gathering critical information regarding supplier policies and practices related to modern slavery, Reozone evaluates compliance with ethical standards and identifies areas necessitating further scrutiny or improvement.

Reozone also fosters transparency and collaboration with suppliers, promoting an enhanced understanding and adherence to human rights standards. This supplier questionnaire serves as a foundational tool for ensuring ethical compliance throughout our supply chain and underscores Reozone's commitment to upholding human rights and ethical sourcing practices.

Internally, our Modern Slavery Statement underwent thorough review and approval by Reozone's management team and the Quality, Health, Safety, and Environment (QHSE) team. The approach for this year's Statement, along with the final draft of the report, was shared internally for comment, discussion, and formal approval, reinforcing our collaborative approach to ethical governance.

In March 2024, Reozone formalised its commitment to ethical sourcing and human rights protection through the establishment of a Supplier Code of Conduct policy. This policy, aligned with the principles of the Modern Slavery Act, requires suppliers to implement robust measures preventing human rights abuses within their operations and supply chains and to report any related concerns.

This comprehensive approach exemplifies Reozone's unwavering commitment to ethical practices and due diligence in compliance with modern slavery standards, addressing the consultation process with both external suppliers and internal teams.

6. Statement on Reozone's Commitment to Combating Modern Slavery

As the Managing Directors and principal governing authorities of Reozone, we are committed to addressing the risks of modern slavery within our operations and supply chains. This Modern Slavery Statement reflects our dedication to ethical practices, transparency, and responsible sourcing. Reozone recognises the importance of continuous improvement in our processes to mitigate the risks of exploitation, and we are resolute in upholding the highest standards of human rights and dignity across our supply chain.

Looking forward, we are setting continuous improvement goals to track the effectiveness of our anti-slavery initiatives. These include specific targets, such as encouraging greater supplier adherence to standards, expanding training efforts, and conducting additional risk assessments in the next reporting period.

Reozone is dedicated to transparency in our reporting. We commit to providing annual updates on our progress, outlining key achievements and areas for further action, ensuring our stakeholders remain informed and engaged in our efforts.

We will continue to monitor, review, and enhance our practices to support a sustainable and equitable future. We extend our appreciation to our partners, suppliers, and employees for their dedication to fostering a supply chain free from modern slavery.

We will continue to work on the following initiatives to ensure we have a robust framework to promote the awareness of modern slavery and support our staff in being able to identify modern slavery:

- Collaborating with high-risk suppliers to encourage alignment with our policies.
- Reviewing and implementing policies in line with modern slavery.
- Implementing supplier questionnaires when opening new accounts to ensure awareness of modern slavery risks and the presence of policies to identify and mitigate these risks

Reozone's 2023-24 Modern Slavery Statement was approved by the principal governing body and signed on 16 September 2024 by Aaron Hadfield and John Incollingo, in their capacities as directors and principal authorities of the corporate trustee, Reozone Pty Ltd (ACN 141 459 127).



Aaron Hadfield
Director

16 September 2024



John Incollingo
Director

16 September 2024



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