

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of

Apex Steel Group - Apex Building Products Pty Ltd (ABN 27 078 974 115)

as defined by the *Modern Slavery Act 2018* (Cth)¹ (“the Act”) on 23 July 2025

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of

Apex Building Products Pty Ltd

as defined by the Act²:



Joseph Calleja, Director, Group Managing Director

4 Cojo Place, Dandenong South VIC, 3175

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	
b) Describe the reporting entity's structure, operations and supply chains.	1
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	4
d) Describe 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.	4
e) Describe how the reporting entity assesses the effectiveness of these actions.	5
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	5
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	-

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

- Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.
- Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

MODERN SLAVERY STATEMENT

25



content of modern slavery statement

01 Message from the board

02 Introduction

Structure

03 Operations
Supply Chain

04 Modern slavery risks

Actions to address modern slavery risks

05 Effectiveness of actions taken
Consultation
Ongoing commitment

MESSAGE FROM THE BOARD

At the Apex Steel Group, we remain committed to conducting our business with integrity, transparency, and respect for human rights. We recognise our responsibility to identify, prevent, and address modern slavery risks within our operations and supply chains.

As an Australian steel company, most of our materials are sourced domestically from reputable suppliers, which lowers our exposure to higher-risk regions. However, we acknowledge that no supply chain is without risk. We continue to strengthen our due diligence, supplier engagement, and internal processes to ensure we meet the highest ethical standards.

This Modern Slavery Statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) and was approved by the board of directors in their capacity as principal governing body of the Apex Steel Group on 23 July 2025. It sets out the actions we have taken during FY25 to assess and manage modern slavery risks, and reaffirms our ongoing commitment to human rights.



Joe Calleja
Managing Director
Apex Steel Group



INTRODUCTION

Apex Group Pty Ltd maintains a strict stance against coercion, threats, or deceit used to exploit individuals or erode their autonomy. We condemn all forms of modern slavery, including human trafficking, servitude, forced labour, deceptive recruitment, debt bondage, forced marriage, and child labour.

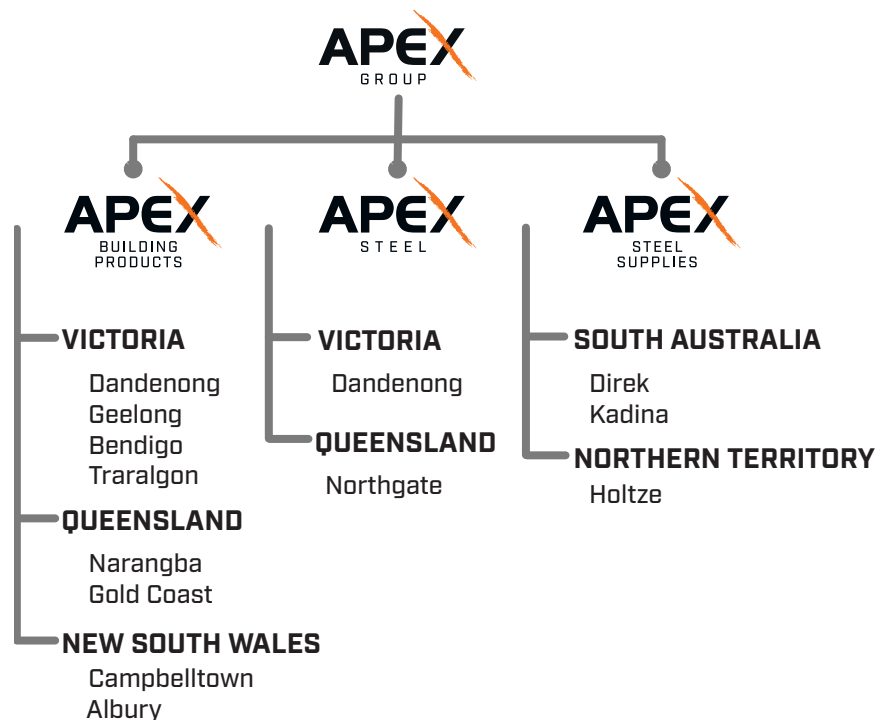
In line with the Modern Slavery Act 2018 (Cth), we acknowledge our obligation to assess and disclose modern slavery risks within our operations and supply chain. This statement details the actions and initiatives undertaken throughout FY25.

The Apex Group stands as one of the most prominent privately owned steel manufacturers and distributors in Australia. It symbolizes the amalgamation of several significant steel enterprises within the country, extending a diverse range of products and services to both the public and trade clientele.



OUR STRUCTURE

Apex Group employs more than 550 people across 13 branches in Victoria, Queensland, South Australia, New South Wales, and the Northern Territory. We are one of Australia's largest privately owned steel manufacturers and distributors, supplying building products, long products, and sheet & coil steel to public and trade customers nationwide.



OUR OPERATIONS



Building Products

We offer a wide range of steel building products such as roofing in multiple profile sizes cut to length, purlins, downpipes, gutters, roof accessories, battens and more.



Long Products

We offer a wide range of merchant bar, RHS & structural steel including a large range of square & regular tube, flat & angle bar, universal beams/columns, and more.



Steel - Sheet & Coil

We offer a wide range of steel sheet and coil products including cold rolled, hot rolled, COLORBOND © prepainted steel, electro galvanised, aluminium, stainless & more. We offer several services such as shearing, slitting, guillotining, and PE coating in order to meet any specific customer need.

OUR SUPPLY CHAIN

Our supply chain is predominantly domestic, with some imported materials sourced from New Zealand, Asia, and North America. Suppliers are assessed regularly through evaluation and audit processes, with a focus on alignment to Apex values and ethical standards.



MODERN SLAVERY RISKS

While our reliance on Australian suppliers reduces risk, the complexity of international trade means some risks remain. Key areas include:

- Imported building products, long products, and sheet & coil.
- Non-trade services such as transport, cleaning, and courier services.
- Non-trade goods such as uniforms, machinery parts, packaging, and IT equipment.

We recognise the hidden nature of exploitation and maintain a thorough review process to identify risks across both direct and indirect suppliers.

Products for sale to customers	Non-trade services
<ul style="list-style-type: none"> • Building products (Imported) • Long products (Imported) • Sheet and coil (Imported) 	<ul style="list-style-type: none"> • Courier transport • Transport services • Cleaning and hygiene
Non-trade products	
<ul style="list-style-type: none"> • Manufacturing machinery/parts • Packaging materials • Clothing (uniforms) • Maintenance equipment • Consumer electronics • Cleaning/janitorial supplies 	<ul style="list-style-type: none"> • Motor vehicles • Electronic hardware /components • Office and desk accessories • Lighting fixtures/accessories • Marketing material

ACTIONS TO ADDRESS MODERN SLAVERY RISKS

During FY25, Apex implemented the following measures:

- Supplier mapping – identifying country of origin, mill data, procurement volumes, and key contacts.
- Supplier audits – assessing compliance with ethical standards and reviewing risk profiles of overseas suppliers in regions such as Vietnam, Taiwan, China, Japan, Korea, and New Zealand.
- Office and equipment supplier review – confirming Australian-based supply chains for key operational goods.
- Awareness and training – continuing to build staff understanding of modern slavery and ethical procurement practices.





EFFECTIVENESS OF ACTIONS TAKEN

Apex monitors the effectiveness of our actions through annual reviews, supplier feedback, and internal audits. The Board reviews modern slavery compliance annually and ensures improvements are integrated into our broader governance and risk management framework.

The next full review of our risk management approach will take place at the conclusion of FY26, with outcomes incorporated into the following Modern Slavery Statement.

CONSULTATION

Consultation across our business units and supply chain partners remains central to our approach. We are committed to:

- Regularly reviewing our suppliers and risk assessments.
- Increasing transparency in our sourcing and procurement practices.
- Strengthening training and awareness across our workforce.
- Working collaboratively with industry partners to promote ethical supply chains.

ONGOING COMMITMENT

Apex Steel Group reaffirms its ongoing commitment to eliminating modern slavery risks and upholding human rights in all aspects of our business.



VISIT US

 @ApexGroupAUS

 www.apexsteel.com.au