

# Modern Slavery Policy



## Policy Statement

Beenleigh Steel Fabrications Pty Ltd ACN 010 942 999, a structural steel fabrication company, and BSF Mobile Cranes Pty Ltd ACN 119 342 880, a general crane hire company, both based in Logan on Brisbane’s southside and known collectively as BSF, have been trading for 43 years and 12 years respectively. The companies currently employ approximately 200 people.

BSF is committed to implementing management systems to minimise the risks and eliminate the incidence of modern slavery in its own business operations and supply chain partners.

This policy is a public expression of this commitment, and outlines the means of identifying the risks, mitigation strategies, and the measures for assessing the effectiveness of those strategies. These have been adopted in accord with the *Modern Slavery Act 2018*.

## Reporting Entity, Structure and Operations

BSF is a joint reporting entity in accord with section 14 of the *Modern Slavery Act 2018*. BSF’s registered office and principal place of business is 215 Gilmore Road, Berrinba QLD 4117.

Both entities are private companies incorporated in Australia and are owned and managed by two directors, Frank Boyes and Anthony Stoeckert.

BSF is an Australian industry leader in the supply, fabrication and erection of medium to heavy structural steel, servicing both the private and public sectors. Our fields of expertise include project management, design solutions, architectural finishes, precast concrete erection, shear studs and surface treatment. We directly employ crews of qualified boilermakers, welders, crane drivers and riggers thereby reducing the risk of potential modern slavey practices involving third party labour suppliers.

## Supply Chain

BSF have enduring relationships with valued suppliers and contractors which have been built over many years. The selection process is in accord with relevant OH&S and Quality Assurance standards, and demonstrable business integrity principles. We prioritise supporting local businesses that have the necessary skills and experience and that provide cost-effective services.

Our supplier due diligence strategy includes our resolve to:

- Engage with formal labour providers with an identifiable and distinct legitimate business entity.
- Perform risk assessment of suppliers and subcontractors in relation to any connection to modern slavery or other unethical hiring and recruitment practices such as:
  1. Sourcing labour or materials from countries with known human rights violations or a high proportion of migrant workers.
  2. Materials are sourced from industries that have previously been affected by undeclared, illegal or trafficked labour.
  3. Links in supply chain where migrant workers do not work under collective agreements.
  4. Links in supply chain where there is unskilled, temporary and/or seasonal labour.
- Identify any high-risk suppliers or subcontractors that may require a more detailed risk-assessment or workplace audit before engaging in further business.
- Implement measures to counter modern slavery including:
  1. Creating a culture that encourages supervisors and managers to talk informally to workers about issues or grievances they are experiencing such as harassment, bullying, control, coercion, or exploitation.

2. Looking for warning signs within supply chain participants that include:
  - Charging recruitment fees for workers.
  - Tying workers' accommodation to their employment status.
  - Sham contracting (misrepresenting employees as independent contractors).
  - Enforcing unrealistic and unmanageably brief lead times or work schedules.
  - Suspicious purchasing practices including methods that reduce traceability; unusual labour and materials invoicing; deposit requests for goods that do not usually require deposits.
  - Unlawful wage deductions or underpayments.
  - Employees personal bank account details shared by multiple people.
  - High shared occupancy at workers' addresses.
  - Signs of injury or malnourishment.

## Risks

BSF has identified potential risks of modern slavery practices in its supply chain, as follows.

Raw Steel & Steel Processing:

- Countries involved are known to have links to forced labour.
- It is difficult to discern the origin of some raw materials.
- Steel production processes can pose significant risks to the health and safety of workers.
- Few employment protections may be offered for performing hazardous work.

Indirect Goods (such as uniforms):

- Raw materials harvested and processed in countries that have known incidents of modern slavery in their textile industries.
- The clothing supply chain has a high risk of slavery because of poor working conditions, excessive hours worked and minimal pay.

Hardware and Machinery:

- Labour exploitation has been linked to migrant workers in the electronics manufacturing industry.
- Forced labour is a known incident in mines where critical components are extracted.
- Complex supply chains elevate the risks.

Contractors:

- Sham contracting.

## Actions

BSF has implemented a Modern Slavery Policy which is communicated to all staff by means of the sustainability module of their induction training. It is also broadcast on our website and provided to our contractors and suppliers. This Policy explains the various guises that modern slavery takes and reiterates our commitment to eradicating these practices within our business operations and supply chain.

By means of our Supplier Sustainability Procurement Questionnaire, we are able to perform meaningful risk assessments and monitor our suppliers', and therefore our own, progress in implementing the Policy.

## Assessment

BSF is committed to the continuous improvement of its business management systems, and its interactions with employees, contractors, suppliers, and consultants, especially in relation to the risks of modern slavery practices. This commitment is reflected in the assessment of the effectiveness of our Modern Slavery Policy and will be reported in the annual Modern Slavery Statement.

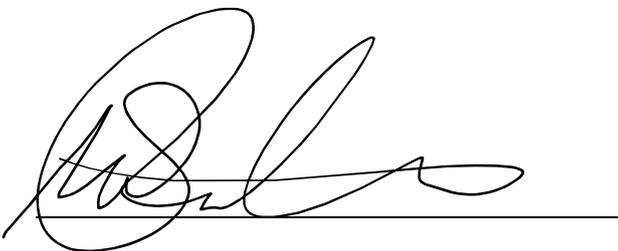
We will measure the number of employees completing the sustainability module and the depth of employee awareness of the Policy.

BSF undertakes to track and assess our suppliers' commitment to their risk mitigation strategies at least annually.

We will monitor and address any report made by employees regarding suspected instances of modern slavery within our organisation or supply chain.

During the reporting period this statement covers, we actively engaged and consulted with both companies we own and control in the development of this statement. We discussed details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions we intend to take to address these requirements, and provided them with relevant materials and updates.

**This statement was approved by the board of Beenleigh Steel Fabrications Pty Ltd and BSF Mobile Cranes Pty Ltd in their capacity as principal governing body of Beenleigh Steel Fabrications Pty Ltd and BSF Mobile Cranes Pty Ltd on 16 April 2024.**

A handwritten signature in black ink, appearing to read 'Anthony Stoeckert', is written over a solid horizontal line.

Signed, Anthony Stoeckert

Member of Principal Governing Body, Beenleigh Steel Fabrications Pty Ltd and BSF Mobile Cranes Pty Ltd