

# Modern Slavery Statement

## Pipemakers Australia Pty Ltd

### 1. Introduction

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This statement sets out the steps taken by Pipemakers Australia Pty Ltd ACN 061 712 365 (**Pipemakers**) to address modern slavery risks in Pipemakers' business operations and supply chains during the FY23 financial year.

Pipemakers is committed to ensuring that there are secure management systems and procedures in place to prevent exploitations of human rights within Pipemakers itself and Pipemakers' supply chain.

Pipemakers consulted the relevant companies it owns or controls in the development of this statement.

### 2. Structure and operations

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Pipemakers is a leading Australian manufacturer and supplier of PVC piping to the construction and building industry. Pipemakers supplies plumbing materials, conduits, pressure pipes, civil piping products and electrical fittings and is committed to providing effective building solutions for customers' piping needs. Pipemakers has an expansive and diverse customer base who are predominantly wholesale customers across the Australian construction and building industry.

Pipemakers is a national brand providing service and distribution across Queensland, New South Wales, Western Australia, Victoria and South Australia.

### 3. Supply chain

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Pipemakers sources goods and services in the following categories: raw materials (in particular polyvinyl chloride and polyethylene resins), consumables, utilities, transport, plant, equipment, parts and repairs, human resourcing, information technology and other miscellaneous business spend.

Raw materials supply constitutes more than 80% of Pipemakers' spend on goods and services. The majority of raw materials are sourced from outside Australia from reputable international businesses, including in Korea, Taiwan and Thailand.

Other goods and services used by Pipemakers are sourced within Australia from Australian suppliers, but also from reputable international businesses.

Pipemakers strives to engage suppliers with a good reputation, ethics and reliable business practices. Pipemakers does not knowingly contract with or engage any businesses that are involved in modern slavery or human trafficking.

### 4. Description of risks of modern slavery

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Pipemakers considers the risk of modern slavery being caused by, contributed to or directly linked to its operations is low, driven by both geographic location, with all operations based in Australia, and by the human resources processes Pipemakers has in place. These include compliance with relevant laws, checking employees' wages and, where relevant, salary agreements and confirming corresponding payment, as well as conducting employment checks (either internally or externally).

Pipemakers considers the risks associated with the categories of goods and services sourced, as well as country of origin of goods and services in assessing the risk of modern slavery in its supply chain.

Some categories are seen as higher risk or having the potential for higher risk of modern slavery in supply chains. This includes raw material production, which may be sourced from geographies with a higher risk of modern slavery. In Australia, labour hire, cleaning and security services are sectors considered to have a higher risk of modern slavery.

The Global Slavery Index notes that the Asia and the Pacific region has some of the highest incidence of modern slavery. Pipemakers sources goods and services from countries in this region, with the accompanying higher risk of modern slavery in supply chains for the goods and services sourced from those countries.

Where a supplier is identified as higher risk, due to category and/or geographic location, Pipemakers looks to engage with that supplier to understand its modern slavery risk, with a view to managing that risk, as set out below.

## 5. Assessing and addressing modern slavery risks

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At Pipemakers, we understand the importance of raising awareness to aid the ending of modern slavery practices. To that effect, Pipemakers has implemented the following processes and tools to assist in the detection and prevention of modern slavery risks:

- a) **Supply chain mapping:** Pipemakers undertakes due diligence in respect of its key suppliers to ensure that these parties are aligned with Pipemakers' policies, codes and values. Supply chain mapping involves categorising suppliers by risks associated with their geographic location, size and industry.
- b) **Follow up questionnaire:** Pipemakers requires suppliers identified as "high risk" during the supply chain mapping exercise to complete a modern slavery risk questionnaire to ensure compliance with modern slavery laws and to identify any issues. Significant issues are escalated to senior management.
- c) **Supply contracts and due diligence:** Generally, supply contracts are entered into on the basis of Pipemakers' standard terms and conditions or negotiated contractual terms depending on the type of product or service and Pipemakers' affiliation with the third party. Pipemakers requires its suppliers to comply with all relevant laws and regulations and ensures that due diligence checks are carried out prior to engagement of third parties.
- d) **Training:** Awareness of modern slavery risks in the workplace are communicated to Pipemakers employees through toolbox talks and information sheets. Senior management and procurement personnel briefings are also carried out to raise awareness of modern slavery risks.
- e) **Supplier Code of Conduct:** Pipemakers has a Supplier Code of Conduct applicable to all of Pipemakers' suppliers. The Supplier Code of Conduct contains provisions specifically relating to anti-bribery and corruption, human rights including modern slavery, work health and safety and the environment.
- f) **Anti-Slavery Policy:** Pipemakers has adopted an Anti-Slavery Policy which affirms Pipemakers' commitment to upholding its responsibility to comply with all modern slavery laws and regulations.
- g) **Whistleblower Policy:** Pipemakers' Whistleblower Policy protects employees, service providers and suppliers who voice their concerns about certain events or conduct in the business that may be unlawful or unethical. The policy validates Pipemakers' efforts in safeguarding the confidentiality, wellbeing and career of any individual who asserts any issues that affect the integrity of Pipemakers' business operations.

## 6. Assessing effectiveness

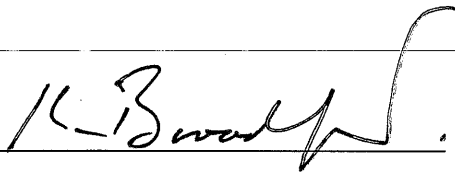
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Pipemakers is focused on continuously strengthening its procedures and processes to combat modern slavery practices and ensuring the protection of human rights. Pipemakers will continue to monitor, evaluate and assess the effectiveness of its established procedures by:

- a) monitoring Pipemakers' existing suppliers and undertaking risk assessments in relation to new suppliers to ascertain whether they pose a modern slavery risk and, if they do, to reduce that risk to the maximum extent possible;
- b) reviewing and updating training material to ensure that it is up to date, relevant and effective;
- c) reviewing Pipemakers' policies and Supplier Code of Conduct to ensure they remain relevant and in compliance with all applicable laws; and
- d) engaging with suppliers and key customers to verify they are following through with any modern slavery actions they have committed to undertaking.

This statement was approved by the Directors of Pipemakers Australia Pty Ltd, in their role as principal governing body of Pipemakers Australia Pty Ltd on 28 June 2024.

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Ken Broadfoot, Director