

 **Steel Mains**
SINTAKOTE

Modern Slavery Statement

2024

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Letter from our CEO

Steel Mains prides itself on setting the highest standards with regards to all aspects of our operational duties. Our stance on modern slavery reflects this commitment. We stay true to our purpose, values whilst fostering strong business relationships with our supply network.

Over the past 12 months, Steel Mains has conducted an assessment of our broader supply chain to identify potential risks related to Modern Slavery. This proactive approach supports our commitment to ethical and responsible sourcing. In parallel, we have introduced targeted training initiatives to enhance awareness, build internal capability, and ensure our teams are equipped to identify and respond to these risks effectively. These efforts form part of our ongoing commitment to continuous improvement in supply chain governance.

Although the overall risk of modern slavery within our supply chain is considered low, we recognise that no supply chain is entirely without risk. As such, we remain vigilant and proactive in identifying, assessing, and addressing any potential areas of concern. Our Modern Slavery Statement articulates our commitment to ethical sourcing and responsible business practices, and outlines the approach we take to mitigating these risks.

This statement forms part of a broader, long-term journey of continuous improvement. At Steel Mains, we are dedicated to fostering transparency, accountability, and sustainability within our procurement processes. We understand that the landscape of supply chain risk is constantly evolving, and we are committed to the ongoing review, refinement, and development of our systems and practices to ensure they remain effective, ethical, and aligned with our corporate values.

Dean Connell
Chief Executive Officer



Steel Mains has zero tolerance for any actions or behaviour that is of a slavery-like practice. In line with the Modern Slavery Act 2018 (Cth), Steel Mains Pty Ltd is committed to the identification and elimination of practices that support modern slavery practices within our business and supply chain.

We recognise the importance of protecting human rights and are committed to protecting the rights of all people. We strive to conduct our business in a responsible and ethical manner, by working with suppliers who align to our values.

Accordingly, we commit to:

- Assessing and monitoring the risks of Modern Slavery in a manner that is commercially sustainable for our business. Taking action towards minimising the risks of Modern Slavery is a significant aspect of our business and our supply chain with emphasis on high risk geographical locations and business transactions.
- Taking practicable steps to ensure that all employees of Steel Mains and our supply chain have a healthy understanding and respect for how their choices can impact basic human rights. Ensuring all employees do not, and our supply chain does not, by act or omission, engage in Modern Slavery. To support this, we deliver training annually to all employees.
- Developing and reviewing company policies that address modern slavery risks, including the Guide to Ethical Conduct and Whistleblower Policy. These policies are designed to ensure employees, contractors, and suppliers can raise any concerns confidentially and without retaliation.
- Continuous improvement in respect of our efforts under this policy.

Organisational Structure

This statement is submitted by Steel Mains Pty. Ltd. ABN: 73 004 843 056 (Steel Mains) under the Modern Slavery Act 2018 for the reporting period between 1 January 2024 and 31 December 2024.

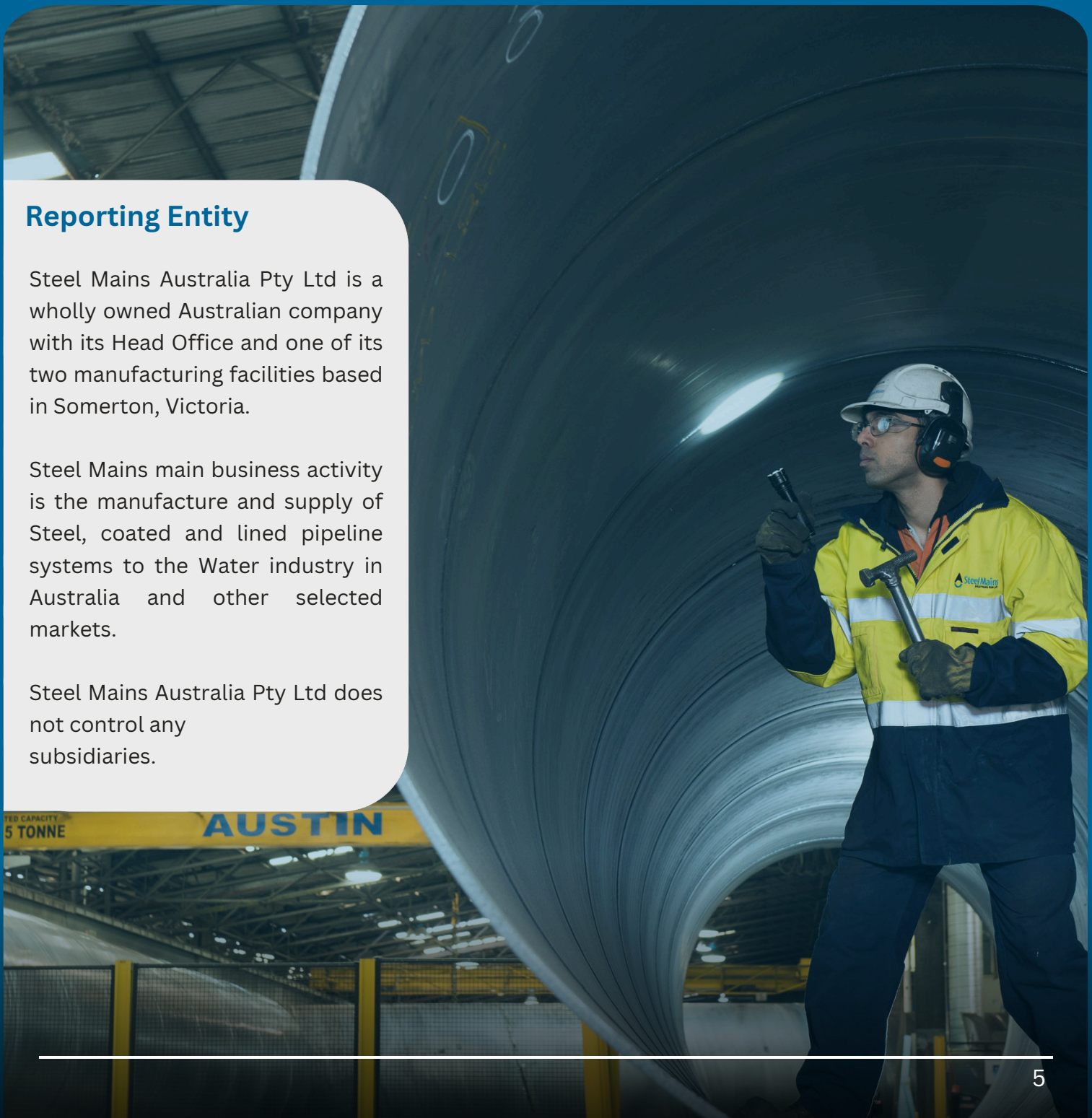
At Steel Mains, we have a zero tolerance for any actions or behaviours that are of a slavery-like practice. In stating so, we do not support any acts of Modern Slavery, human trafficking, forced marriages, the exploitation of child labour, people smuggling and any other action or behaviour which is in violation of the Modern Slavery Act 2018.

Reporting Entity

Steel Mains Australia Pty Ltd is a wholly owned Australian company with its Head Office and one of its two manufacturing facilities based in Somerton, Victoria.

Steel Mains main business activity is the manufacture and supply of Steel, coated and lined pipeline systems to the Water industry in Australia and other selected markets.

Steel Mains Australia Pty Ltd does not control any subsidiaries.



Who are we?



Steel Mains is Australia’s leading manufacturer and supplier of complete pipeline systems for the transport of water and wastewater.



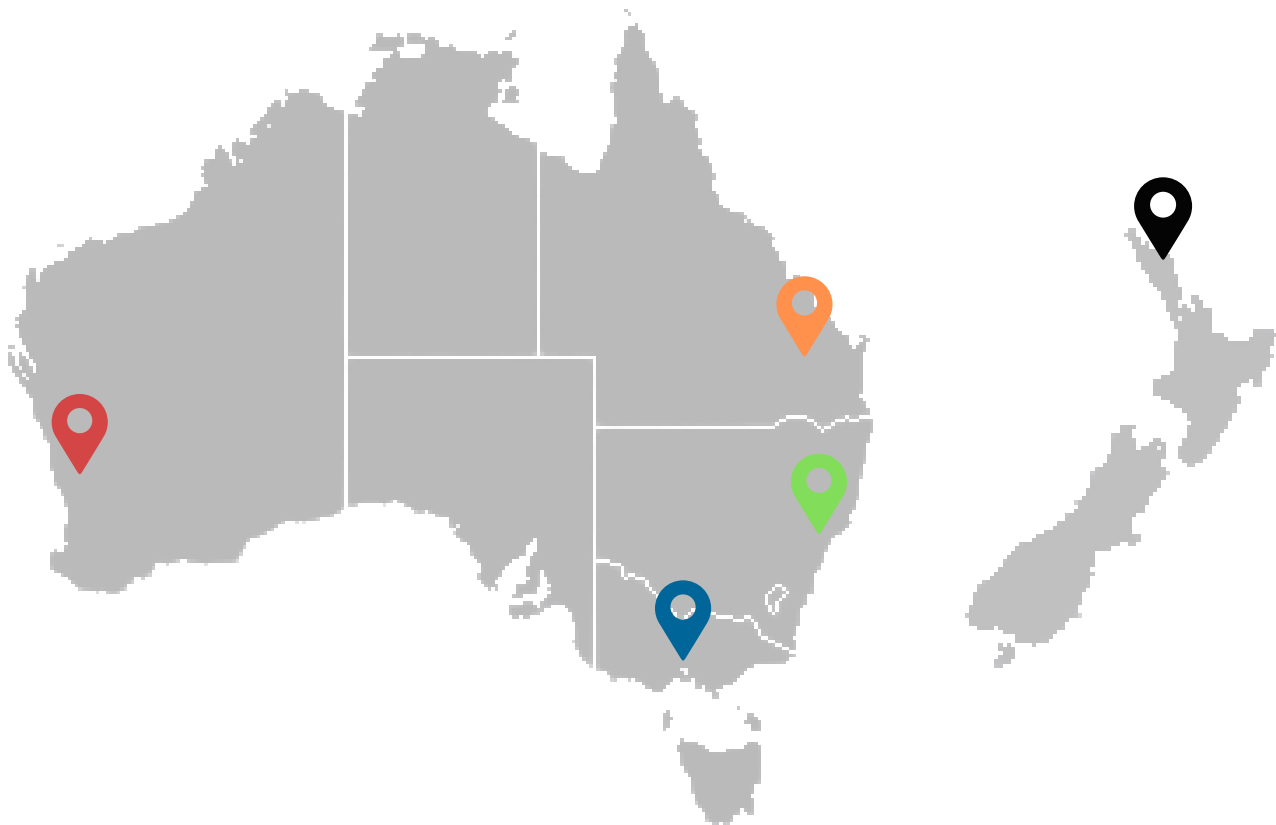
**Industry
Experience**
125+ Years



**Founded
in**
1878



Team Members
**220+
Employees**
Based on 2024 average headcount
including labour hire employees



National Service Centre



**Kwinana Manufacturing
Plant**



NZ Sales Office



**Somerton Manufacturing
Plant + Head Office**



NSW Office

Our Core Values

Passion for delivering outcomes.
Helping each other succeed.

Why We Exist

Steel Mains proudly provides long lasting
water infrastructure that builds
communities.

Our Top Suppliers



Part of our commitment to combating modern slavery, is building long-term and transparent relationships with suppliers. We strive to collaborate with suppliers who are committed to responsible business practices, align with our values, and support the protection of human rights, though we can not guarantee this in every instance.

Steel Mains acknowledges that our suppliers are at various stages in their responsible sourcing journey. We are dedicated to sharing our experiences and knowledge to support ongoing development. We engage with suppliers to understand their responsible sourcing methods and discuss opportunities for improvement.

At Steel Mains, we are dedicated to maintaining a reliable and sustainable supply chain for both inbound raw materials and outbound finished products. We primarily source our raw materials and goods from domestic suppliers, ensuring a strong local supply chain.

- **Ethical Partnerships:** We are committed to operating lawfully and ethically, partnering with suppliers who engage in responsible and sustainable business practices, share our values, and uphold human rights.
- **Domestic Distribution:** Our products are predominantly delivered within Australia by road, relying on a network of freight companies to transport our pipes safely from manufacturing facilities to laying sites across the country.
- **International Shipping:** Where required, we utilise container shipping to ensure the safe transportation of our pipes via ship.



Understanding our suppliers

Throughout the reporting period, Steel Mains undertook an internal assessment of our supply chain to identify and mitigate potential modern slavery risks. As the majority of our goods and services are procured from Australian businesses, with only limited sourcing from overseas, our operations and supplier base are largely situated in countries considered to be low risk for modern slavery. The overall risk within our supply chain is assessed as insignificant. Steel Mains continues to monitor international procurement and prioritise local sourcing where feasible.

Low Risk- Domestic Suppliers

Domestic suppliers have been assessed and will remain classified as presenting an insignificant risk, given their operation under Commonwealth guidelines and Australian legislation, as well as the ease of access to their operations for monitoring and evaluation. These suppliers accounted for 96% of our total supplier base during the reporting period.

Low Risk- International Suppliers

International suppliers operating in countries with strong anti-slavery laws (e.g., NZ, UK, Germany), generally maintain established internal policies and demonstrate a high level of transparency in their labour practices. Through assessment they present an insignificant risk and are placed under ongoing monitoring with minimal need for intervention.

Medium Risk Suppliers

Suppliers with partial visibility or based in countries with emerging regulatory frameworks, including those without modern slavery statements but operating in moderate-risk industries or regions (Global Slavery Index 2022), made up less than 0.2% of our supply base during the reporting period, posing an insignificant risk.

High Risk Suppliers

Suppliers operating in high-risk geographies (based on Global Slavery Index 2022) and/or without clear modern slavery policies or transparency. These suppliers accounted for less than 0.3% of our supply base during the reporting period, representing an insignificant risk to our supply chain.

Supplier Survey

Our Supplier Modern Slavery survey has been designed to evaluate the risk of modern slavery across our supply chain. In 2024, we contacted 120 suppliers to complete the supplier assessment. These suppliers were selected based on annual spend and transaction frequency.

Following the completion of our detailed risk assessment, our total supplier base has been categorised into two groups:

1. Suppliers for whom a Modern Slavery Assessment was deemed necessary.
1. Suppliers for whom a Modern Slavery Assessment was *not* deemed necessary.

This classification is based on a range of risk factors, including geographical location, supplier size, industry sector, and frequency of transactions.

Suppliers identified as having potential Modern Slavery risks within their operations will be given the opportunity to address and respond to survey questions. If their response is deemed unsatisfactory and a mutually acceptable resolution cannot be reached, Steel Mains will seek to source materials from alternative approved suppliers.

Education

Raising awareness and enhancing the understanding of modern slavery risks at Steel Mains helps staff identify and address these risks, contributing to their elimination.



Our Policies

Our policy framework reflects our approach to managing human rights and modern slavery risks and sets the expectations we have for our employees, customers and suppliers.

- Steel Mains' Modern Slavery Statement demonstrates to our employees, customers and suppliers what our stance is towards human rights.
- Steel Mains' Guide to Ethical Conduct describes the behaviours and actions required of employees when performing work tasks.
- Steel Mains' Whistleblower Policy provide all employees with the necessary means to raise concerns of compliance or suspected or actual misconduct relating to human rights and modern slavery.

Employment

Steel Mains prides itself on being an equal opportunity employer that embraces diversity and inclusion within its workforce. We are committed to operating in a manner that is consistently within the bounds of applicable enterprise agreements, industrial awards and relevant legislation. Steel Mains is committed to ensuring a respectful environment for both internal and external stakeholders of the business.

Additionally, part of our onboarding process involves the acknowledgment of our policies, which outlines the appropriate behaviours, actions and workplace conduct expected at Steel Mains.



The supply chain reviews for the 2024 period have now been finalised, with all assessed suppliers fully engaging in the self-assessment process. We are pleased to report that no cases or indications of Modern Slavery were identified through any of the targeted assessments conducted during this time.

The effectiveness of Steel Mains' actions to identify and eliminate potential incidences of Modern Slavery practices from our total supply chain will continue to be reviewed as part of our annual statement preparation and submission process.

The commitment required from our suppliers will be measured as a combination of their formal responses to our reviews, as well as their willingness to both participate in the reviews and their response to any identified areas of concern within their businesses.

Future Actions and Key Initiatives

Recommit to Our Modern Slavery Statement - Ongoing revision of our statement, will clarify our message to stakeholders and reinforce expectations for business activities.

Continue Assessing Our Supply Chain - We will continue to assess our current and new suppliers through Modern Slavery Assessments. This will allow us to track improvements, detect risks early, and strengthen ethical standards across our supply chain.

Education: We will enhance employee education to improve their ability to recognise, understand, and respond to risks related to Modern Slavery, ensuring a more responsible and transparent workplace.



Approvals:

This statement was approved by Steel Mains' Board of Directors, in their capacity as principal governing body of Steel Mains, on 4 June 2025, and is signed by its Chief Executive Officer, as a responsible member of the Reporting Entity.

Revisions

Revision Date	Revision	Approval	Signed & Date
04/06/2025	Our Actions	Board of Directors & Dean Connell Chief Executive Officer	04/06/2025 



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