



Steel Mains
SINTAKOTE



Steel Mains
SOLUTIONS FOR LIFE

Modern Slavery Statement

2023

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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 and values whilst fostering strong business relationships with our supply network.

Whilst we have adopted measures to help promote and maintain a strong ethical supply chain, we recognise that we are on a continuous journey in fulfilling our commitment.

We will continue to strive for excellence and work together with our partners and supply chains to promote a safe workplace both within Steel Mains and beyond.



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 may 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 are committed to operating our business lawfully and ethically and aim to partner with suppliers that are aligned to our values.

Accordingly, we commit to:

- Assessing and monitoring the risks in a manner that is commercially sustainable for our business, taking action to eliminate Modern Slavery in our business and our supply chain with the emphasis on high risk geographical locations and business transactions.
- Working with all employees of Steel Mains and our supply chain to support, increase awareness and respect for how their choices can impact basic human rights. This commitment will be actioned by various means on an ongoing basis through annual training for all employees.
- Maintaining and implementing company policies with the business and supply chains including the company Guide to Ethical Conduct and Whistleblower Policy which allows employees, contractors and suppliers the ability to raise concerns in a confidential manner.
- Conduct due diligence on local and global supply chains with review of supplier contracts to ensure they contain terms that are consistent with the Act.
- Taking steps to reduce and address any occurrence of Modern Slavery in our business or supply chain.
- 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 2023 and 31 December 2023.

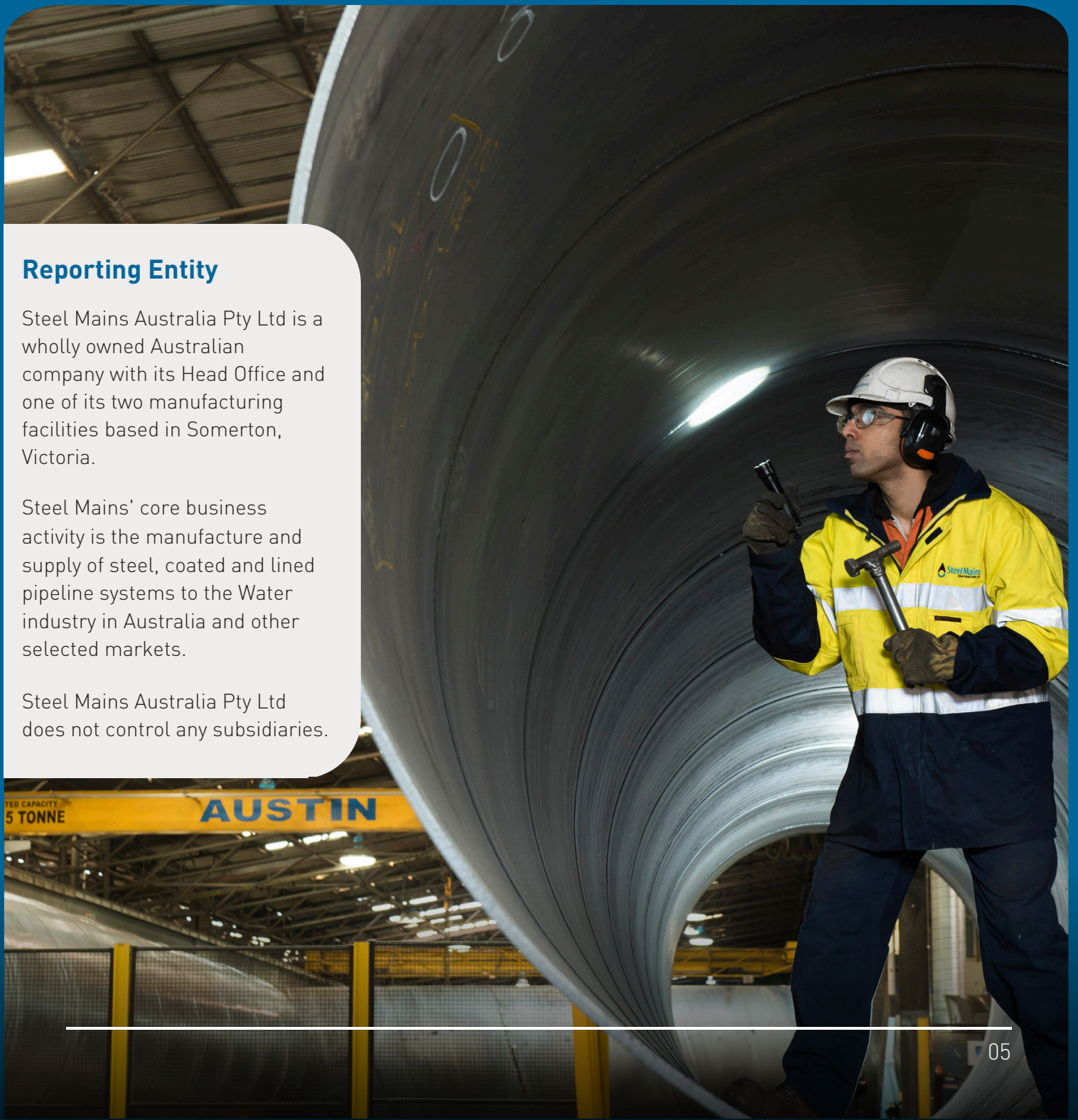
At Steel Mains, we have zero tolerance for any actions or behaviors resembling slavery where we can control and maintain clear oversight. We understand there are risks in our broader supply chains and are continually exploring ways to achieve clearer visibility to address these potential risks. In stating 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' core 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.

Founded

1878

Industry Experience

125+ Years

Team Members

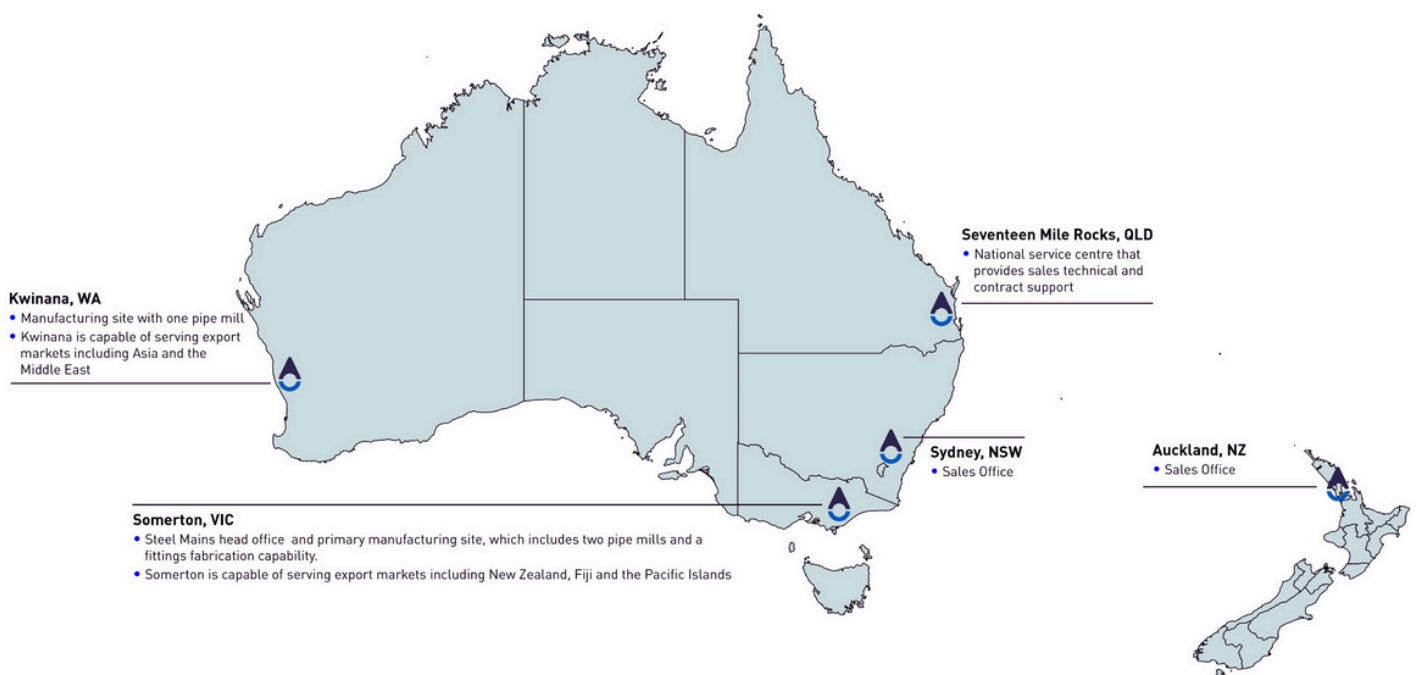
245+ Employees

Our Core Values

Passion for delivering outcomes
Helping each other succeed

Why we exist

Proudly providing long lasting water infrastructure that builds communities.



At Steel Mains, we take pride in upholding a dependable and sustainable supply chain for both inbound raw materials and outbound finished products. Sourcing most of our raw materials and goods from domestic suppliers.

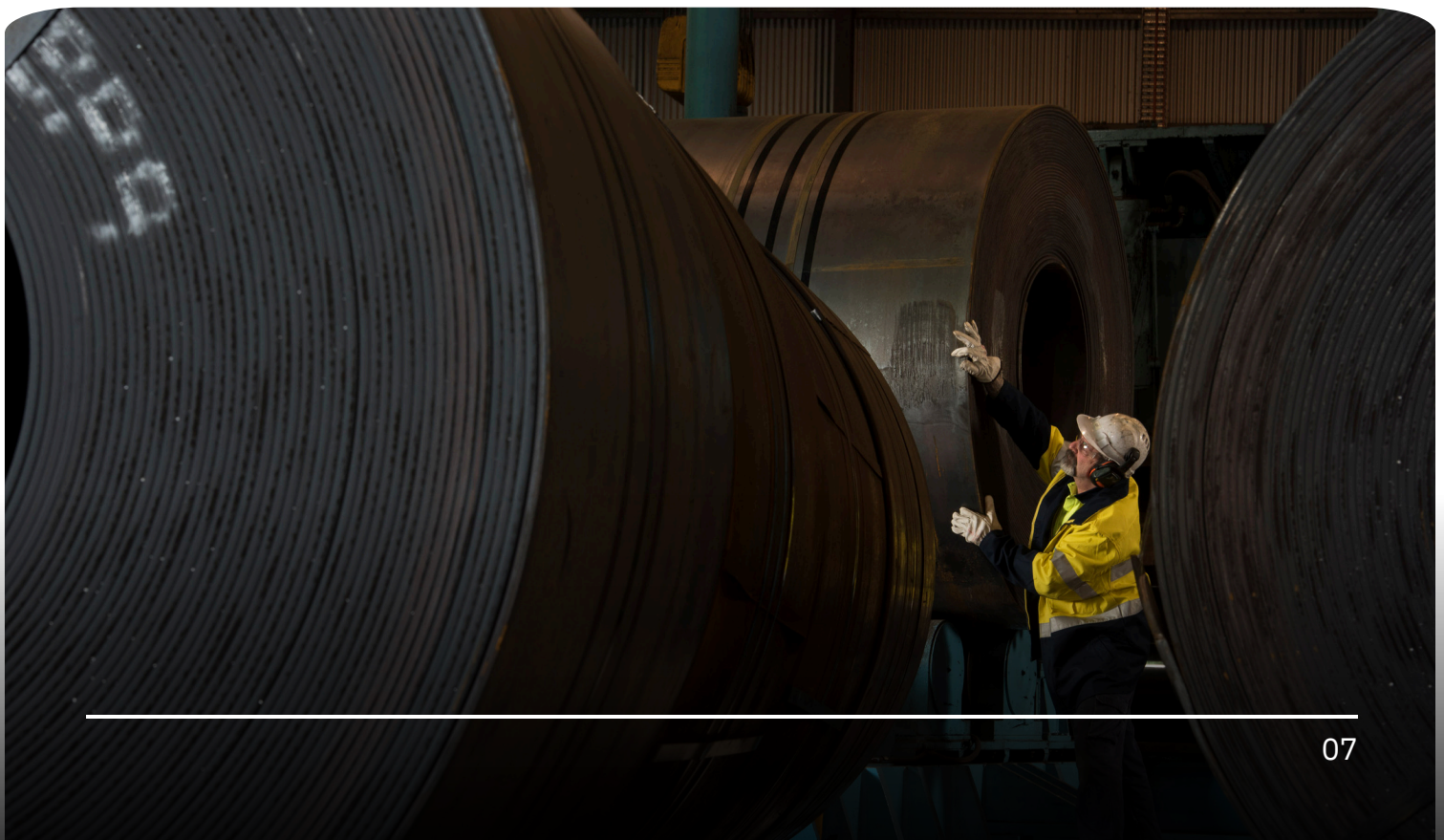
Steel Mains is committed to operating lawfully and ethically, which is why we aim to partner with suppliers who are engaged in responsible and sustainable business practices, who share our values and uphold human rights.

Predominantly, Steel Mains' product is delivered to the Australian market by road. We rely on a network of freight companies to safely transport our pipe from manufacturing facilities to laying sites across the country. For international markets, Steel Mains utilises international shipping lines by containerising the pipes for safe transportation via ship.

Our Approach

Part of our approach to understanding potential risks of Modern Slavery, was to conduct an internal assessment of our current supply chain. Our goods and services are primarily sourced from Australian businesses, with occasional ad-hoc procurement activities made from overseas suppliers.

Given our Australian-based workforce and the fact that our suppliers primarily operate in Australia or low risk countries, the risk of modern slavery with Steel Mains is generally perceived as low.



Our Top Suppliers

We understand and acknowledge that within the extended supply chains of our key suppliers, there remains a potential risk of modern slavery.



Industrial supplies sourced from Australian based suppliers



Labour sourced from Australian businesses



Australian based engineering sub contractors



All road transport providers are Australian based



Australian based steel suppliers



Supplier Relationships

Part of our commitment to combating modern slavery, is building long-term and transparent relationships with suppliers. We are proud to collaborate with suppliers who actively engaging in responsible business practices, align with our values and uphold human rights. By remaining to foster strong business relationships with over 120 suppliers, we place significant emphasis on ensuring the sustainability of our supply chain.

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 and 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.



While we identify existing modern slavery risk management actions to be beneficial, we understand that the evolution of these processes is necessary in our approach to eliminate modern slavery.

To ensure that our actions align with our commitment to eliminating modern slavery, we will continue to monitor the effectiveness of our controls. It is important for us to adapt our approach to addressing modern slavery, ensuring it remains effective and fit for purpose.

Future Actions

Identify due diligence activities - Practices entail a more thorough assessment of prospective and active suppliers, to ensure alignment of our values.

Training initiatives - Through implementation of Modern Slavery training it would give our employees the necessary knowledge to understand, identify and respond/report risks associated with Modern Slavery.

Maintain and evolve our Modern Slavery Statement - Steel Mains will revise and make the necessary changes to the pre-existing Modern Slavery statement. Through it's revision, our message will be clearly defined to stakeholders, also reinforcing our expectations when conducting business activities.



Approval & Revisions


Approval

This statement was approved by the board of Steel Mains Pty Ltd in their capacity as principal governing body of Steel Mains Pty Ltd.



Dean Connell
Chief Executive Officer

Revisions

Revision Date	Revision	Approved by	Sign/Date
23 August 2024	Include new section titled 'Approval'	Dean Connell Chief Executive Officer	 23/08/2024



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