

Modern Slavery Statement

ARC-POL-10 Rev:05 12/05/2025



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Prepared by	Approved by	Date	Rev No
Jawaad Ali	Andrew Moir	12/05/2025	05



About

ArcStructural is a privately owned steel fabricator with an abundance of expertise and skilled team of project managers, steel fabricators, welders and riggers servicing top tier builders across Melbourne. With its steel fabrication facility located just 20 minutes from Melbourne's CBD, ArcStructural can complete complex jobs quickly and efficiently without compromising quality.

Our Motto

Deliver without Excuse

Commitment

ArcStructural is committed to sustaining the highest possible standards of ethical conduct and integrity in every aspect of our company's operations. In accordance with this commitment, we recognise that it is our outmost duty to actively confront and combat human trafficking and modern slavery in our supply chains and business operations.

Introduction

ArcStructural is determined to open and transparent company practices, our steel fabrication firm adheres strictly with industry-specific rules and regulations. We prioritise compliance to sustain the highest standards, placing a priority on ethical practises in all aspects of our operations. Our steadfast adherence to legal and regulatory norms defines our operating culture. Whether it be in our manufacturing process or business operations. This Statement on Modern Slavery is issued in accordance with the Modern Slavery Act 2018.

Structure and Operations

ArcStructural is a privately owned fabrication business based in Truganina, VIC, employing around 35 staff.

Since beginning operations in 2020, we have delivered complex, design driven projects for top-tier construction companies, with a strong focus on health, high-rise buildings, educational facilities, infrastructure, and commercial projects.

We are committed to quality, safety, and sustainability in all aspects of our operations. Client collaboration is central to our approach, ensuring our practices support the protection of

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human rights. We will be continuously improving our modern slavery program and building partnership grounded in integrity, transparency, and ethical conduct. In line with our obligations under the Modern Slavery Act, we will actively engage with clients, suppliers, and subcontractors to identify and address modern slavery risks as a shared responsibility.

Supply Chain

To ensure the smooth execution of our construction operations, we rely on collaboration with a range of suppliers and subcontractors. While these engagements are essential, it also carries a potential risk of exposure to modern slavery either directly within our operations or indirectly through extended supply chains. Although we work predominantly with a trusted network of preferred partners, we acknowledge the critical importance of identifying and addressing modern slavery risks, regardless of their existing compliance frameworks.

To mitigate these risks, we have established a rigorous supplier and subcontractor selection process as part of our procurement strategy. This process is designed to ensure adherence to all relevant modern slavery legislation while also promoting commercially sound and mutually beneficial relationships.

Risk in Supply chain.

Modern slavery risk in the steel supply chain is a substantial concern for companies across various industries. Modern slavery risk in steel supply chain refers to the potential for exploitation, coercion, and forced labour within the various stages of production, processing, and distribution of steel products. This risk can manifest in different forms, including forced labour, exploitative labour practices, particularly in regions or countries where labour regulations are weak, and workers are vulnerable to abuse.

Risk Assessment

This assessment covers all aspects of our organization's operations, including but not limited to supply chain management, recruitment, and subcontracting. Addressing modern slavery risk in supply chain requires a proactive and multi stakeholder approach involving collaboration between companies, governments, NGOs, and other stakeholders to create more transparent, accountable, and ethical supply chains.

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Type of Risk

Modern slavery is a critical and persistent violation of human rights, encompassing practices such as:

Forced labour:

Forced labour within the steel supply chain pertains to instances in which individuals are obligated to engage in work due to threats or coercion, experiencing minimal to no autonomy over their working circumstances.

Exploitative Labor Practices:

Workers involved in steel production, such as steel mills, may face exploitative conditions, including long working hours, low wages, and lack of safety measures.

Subcontracting and Outsourcing:

Subcontracting and outsourcing can lead to the exploitation of labour in smaller, less regulated facilities or informal sectors.

Migrant Workers and Human Trafficking:

Use of migrant workers who may be vulnerable to exploitation, including human trafficking, poses a significant risk in the steel supply chain.

Child Labour:

Child labour can be found in various industries, including those with global supply chains, where products may be manufactured or sourced through systems that exploit child labour.

Mitigation:

To tackle modern slavery concerns, we have established a thorough supplier and subcontractor selection process during procurement. This process ensures compliance with all modern slavery regulations and legislation while also fostering a commercially beneficial outcome for all parties.

Implementing rigorous supplier audits to ensure compliance with ethical labour standards.

Regularly assess working conditions in steel production facilities, collaborate with industry organizations promoting fair labour practices to improve labour standards.

Implementing strict contractual obligations for suppliers, ensuring they adhere to ethical labour standards and regularly monitor subcontractors for compliance.

Implementing robust recruitment policies for ensuring fair treatment of migrant workers.

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Steps to be Implemented.

ArcStructural will enact the following measure to mitigate the risk of modern slavery within its operations and supply chains.

- 1. **Supplier Engagement:** We will actively communicate our commitment to eliminating modern slavery to our suppliers and work closely with them to implement effective countermeasures.
- 2. **Supplier Audits:** Regular audits of suppliers will be conducted to confirm compliance with our standards and identify opportunities for improvements.
- 3. **Remedial Action:** When issues are identified, ArcStructural will work with suppliers to develop and implement improvement plans and resolve cases of non-compliance with our standards.

Response & Actions

ArcStructural enforces a zero-tolerance policy against modern slavery and human trafficking. We are unwaveringly committed to stopping these practises in our supply chains and operations. Our guidelines and practices consist of, but are not restricted to:

- 1. **Supplier Code of Conduct** We expect that our suppliers uphold moral principles consistent with our dedication to ending modern slavery. To make sure our supply chain partners align with our beliefs, we will perform due diligence on them.
- 2. **Employee Education**: We will offer our employees training that addresses the risks of modern slavery in addition to the need of moral business practises. This training is provided to relevant staff members to ensure compliance and awareness.
- Reporting Misconduct: To address any issues or suspicions about modern slavery,
 ArcStructural will put in place a private reporting system for both suppliers and
 workers. Every report is looked at carefully, and appropriate actions will be taken in
 response.
- 4. **Continuous Improvements:** To make sure that our policies and procedures are effective in combating modern slavery, we will continuously evaluate and improve them. Working together with stakeholders is essential because it enables us to pinpoint problem areas and apply best practises to our strategy.

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Training

At ArcStructural training is a central part of our business framework to ensure that all employees are aware of their responsibilities.

We at ArcStructural are dedicated to respecting human rights and using moral business practices in all aspects of our supply chains and operations. As we continue our fight against modern slavery, we understand how critical it is for us to raise awareness and provide our staff with skills and resources they need to spot and deal with cases of modern slavery.

Other policies

ArcStructural has put in place policies on Bullying and Violence, Discrimination and Harassment, Work Health and Safety, and other policies to ensure that its workers work in a safe environment.

Approval and Review

We are committed to conduct a comprehensive review annually or when an amendment is made by the government and update as necessary to reflect changes in our business operations.

This Modern Slavery Statement has been approved and signed by Andrew Moir as Sole Director and principal governing body of ArcStructural Pty Ltd.

SIGNED:

NAME: ANDREW MOIR

POSITION: SOLE DIRECTOR

DATE: 12/05/2025

NEXT DATE OF REVIEW: 12/05/2026

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