



Modern Slavery Statement

Stratco Group

2022-23 Financial Year



About the Stratco Group

This statement is made as required under the Australian Modern Slavery Act 2018 on the Stratco Group of companies.

The Stratco Group of companies is the consolidated entity consisting of SLECO Pty Ltd and the entities it controls.

Stratco supplies building products to both trade and retail customers with key products being roofing and rainwater goods, fencing, sheds, carports, verandahs and patios. These products are manufactured for local markets in Stratco's manufacturing facilities and are distributed directly to company owned stores and customers from these facilities. Stratco offers complementary products to be used in the construction of these products or in conjunction with these products. Some of these complimentary products are manufactured by Stratco with others being purchased from local and international suppliers.

Supply Chain

Stratco endeavours to engage with suppliers of good reputation, ethics and sound business practices. Stratco does not knowingly engage or contract with businesses that are involved in human trafficking or modern slavery. However, Stratco does acknowledge that there is a very real risk that other parties indirectly involved with Stratco's supply chain may contribute to modern slavery practices.

The sourcing of raw materials, goods and services for Stratco's operations are primarily controlled centrally, with sourcing decisions and contract negotiations being coordinated by the national supply chain team. This team sets and maintains policies and provides general directions for site specific purchasing activities. Regular consultation between national and state based purchasing personnel occurs to ensure consistency of approach is being maintained and that any changes in purchasing objectives or practices are clearly understood and adopted. This consultation occurs via regular group calls and video conferences as well as an annual in person meeting of all key stakeholders.

Supply Chain Modern Slavery Risks

The key modern slavery risks to Stratco's business relate to suppliers of raw materials and finished products from international operations particularly within the Asian region. Stratco's supplier selection and audit process continues to be refined to minimise the risk of modern slavery associated with this supply chain.

In addition to Stratco's selection and audit process Stratco's dealings with major suppliers are all undertaken directly, not via a third party, and involve long serving Stratco team members who are familiar with internal policies and procedures and the markets in which they are operating.

Stratco has utilised a variety of methods to identify and assess and communicate modern slavery risks within its business and supply chain that include:

1. *Supplier audits*: These audits include qualifying audits to assess the suitability of suppliers before they are approved as a supplier. Stratco also undertakes regular audits of existing suppliers to ensure that they are continuing to meet the standards observed and agreed to at the time selection was approved
2. *Supplier meetings*: Stratco continues to regularly meet with key suppliers to discuss performance, changes in business requirements and to ensure expectations of performance are being met
3. *Policy*: Stratco continues to regularly review and update sourcing/purchasing policies to ensure deficiencies in the policies are addressed as they are identified. Stratco's modern slavery policy is due for review in the coming reporting period.
4. *Whistleblower Policy*: Stratco Whistleblower policy enables confidential reporting of inappropriate conduct, illegal or unethical, relating to Stratco's operations. There were no reports relating to Modern slavery risks via this or other reporting channels during the reporting period
5. *Training*: Stratco continues to provide training to key personnel in relation to modern slavery risks and appropriate purchasing behaviours.
6. *Customers*: During the reporting period Stratco provided information, as a supplier, to some of its customers on activities undertaken by Stratco to identify and assess modern slavery risks within its supply chain.
7. *Consultation*: Regular meetings are held with all key supply chain personnel within Stratco's business and opportunities are provided for participants to raise concerns relating to modern slavery. The senior leaders within the

Stratco business are also requested to provide feedback on potential modern slavery risks within their areas of responsibility.

Effectiveness of activities to address Modern Slavery Risks

Stratco recognises that raising awareness of modern slavery risks both within our business and within our supply chain partners is an ongoing process that will require regular review and adjustment. As noted in previous statements audits of existing suppliers and qualification audits for potential suppliers provide the most immediate measure of awareness and compliance with modern slavery legislation.

Feedback from personnel involved in these audits has assisted in the fine tuning of the audit tools to ensure that the activities undertaken meet the business requirements of Stratco and also its obligations in relation to the Act.

The questions asked of Stratco by some of our customers who were undertaking their own modern slavery activities proved to be a useful gap analysis tool and assisted in improving some aspects of our approach to modern slavery.

Future activities

In the coming reporting period, the following key activities will be undertaken to further improve and assess Stratco's performance in relation to minimising Modern Slavery risks

1. Review of Modern Slavery Policy.
2. Develop additional policies and procedures relating to supplier selection and management and provide training on the same

This statement was approved by the undersigned directors in their role as Stratco's principal governing body on October, 2023



Alf Stratton
Chairman/Director
Stratco (Australia) Pty Ltd



Ben Miels
C.E.O./Director
Stratco (Australia) Pty Ltd