

 **Steel Mains**
SINTAKOTE

Modern Slavery Statement

2025

Contents:

Letter from our CEO	3	Supplier Relationship	8
Modern Slavery Statement	4	Supplier Risk	9
Organisational Structure	5	Our Actions	10
Reporting Entity	5	Our Policies	10
About us	6	Measuring Effectiveness	12
Our Top Suppliers	7	Approval & Revisions	13



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.
- **The Employee Assistance program, allows employees up to 4 free confidential sessions for themselves and family members to speak on matters relating to any inappropriate, unethical or illegal behaviour,**
- Continuous improvement in respect of our efforts under this policy.

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



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**

140+ Years



Founded in

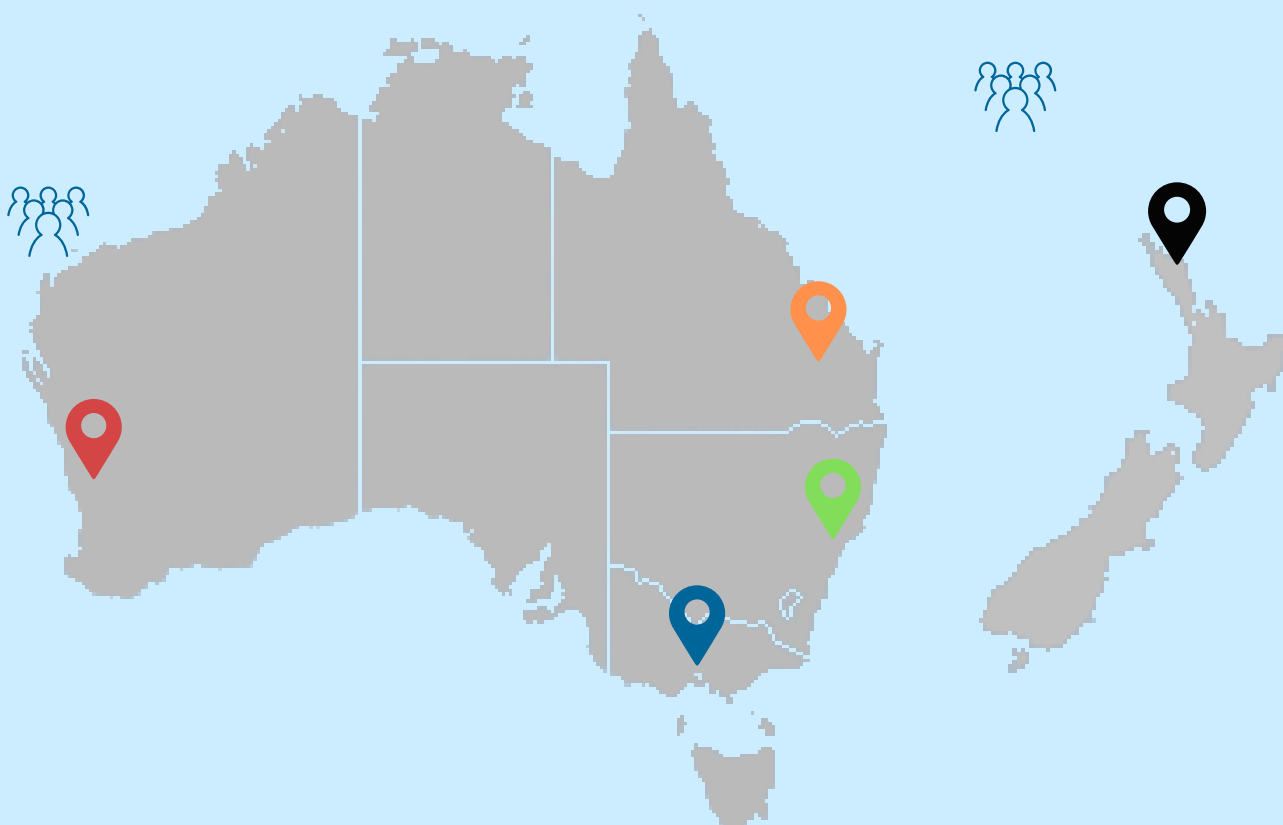
1878



Team Members

**220+
Employees**

Based on 2025 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.

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 2025 and 31 December 2025.

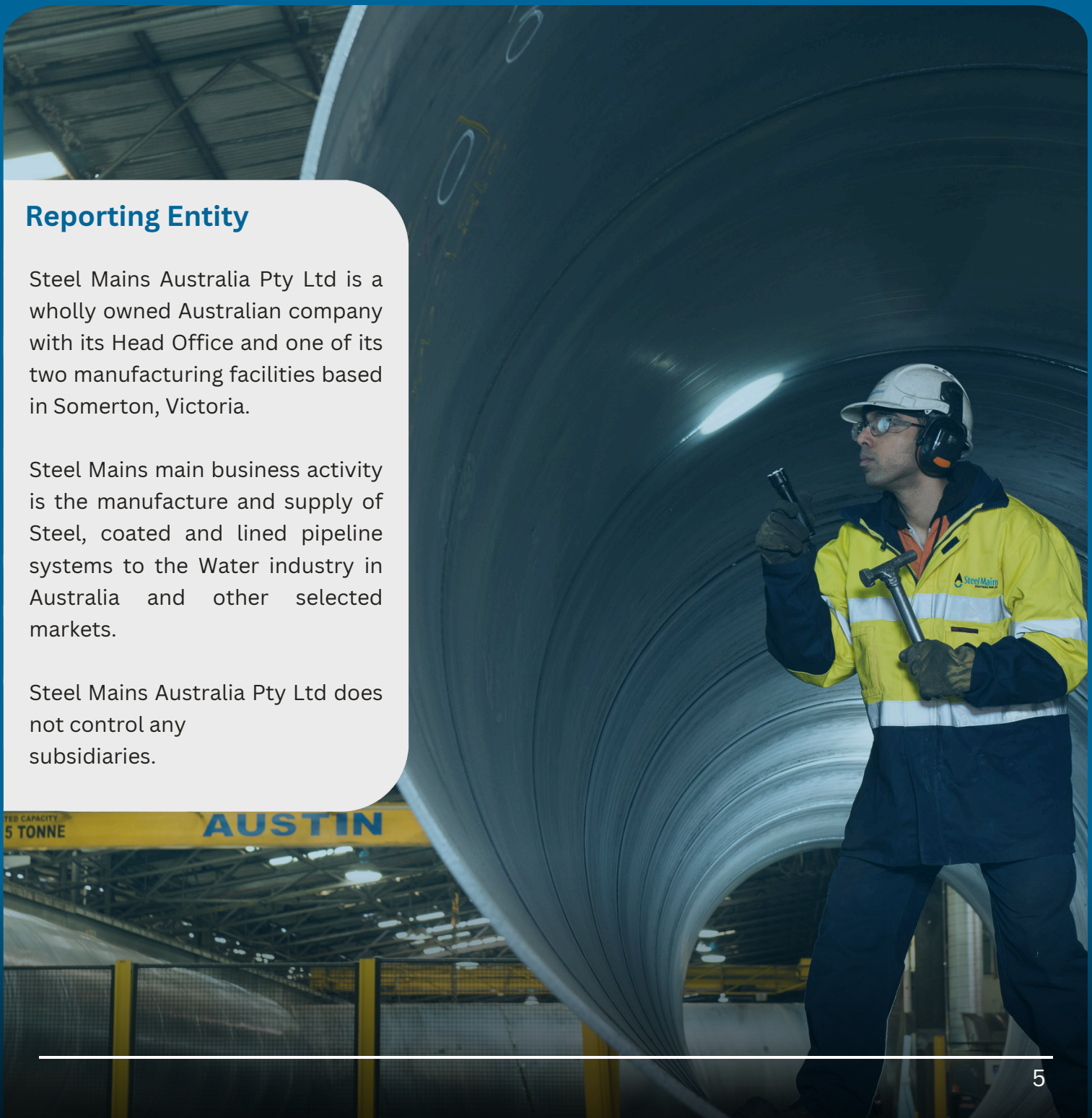
At Steel Mains, we have a zero tolerance for any actions or behaviours that are of a slavery-like practice. In stating so, we do not support any acts of Modern Slavery, human trafficking, forced marriages, the exploitation of child labour, people smuggling and any other action or behaviour which is in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



Supplier Categories



INDUSTRIAL SUPPLIERS

Equipment , machinery and technical components



ENGINEERING

SUB CONTRACTORS

Specialised construction services



ROAD TRANSPORT

Deliver raw materials and finished products across Australia



LABOUR

Skilled workforce engaged through approved labour partners



Key Inputs



STEEL

Core material used in pipeline production



Our commitment to reducing modern slavery risks includes fostering transparent, long-standing partnerships with suppliers. We seek to collaborate with those who reflect our values and support human rights, noting that assurance cannot always be guaranteed.

Steel Mains recognises that our suppliers are at different stages in their responsible sourcing journey. We are committed to sharing our experience and supporting their ongoing development. Through active engagement, we work to understand our own practices, policies, procedures, and identify opportunities for continuous improvement.

At Steel Mains, we are committed to maintaining a reliable and sustainable supply chain for our inbound raw materials and outbound finished products. We predominantly source from domestic suppliers, supporting a resilient and locally focused 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

Steel Mains currently directly supports 170 jobs in local labour across both its Somerton and Kwinana operation facilities, while also contributing to the sourcing of raw materials, products, and services from more than 400 local suppliers, representing up to 35,000 jobs across the supply chain.

As the majority of our goods and services are obtained from nationwide businesses, with only limited resources 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 sourcing and prioritise local sourcing where feasible.

Throughout this reporting period, Steel Mains undertook an internal assessment of our supply chain to identify and mitigate potential Modern Slavery risks. **Steel Mains is committed to developing emerging leaders within the business. We offer management development programs designed to equip our people with practical skills, support career growth, and strengthen our internal capability.**

Low Risk- Domestic Suppliers

Domestic suppliers have been assessed and will remain classified as 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 **97%** 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 2023), made up less than **0.1%** of our supply base during the reporting period, posing as an insignificant risk.

High Risk Suppliers

Suppliers operating in high-risk geographies (based on Global Slavery Index 2023) 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 2025, 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 2025 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.

During this reporting period, our focus shifted towards strengthening our overall approach to managing Modern Slavery risks. While we undertook several actions in the previous reporting period, this year we have taken a different direction by prioritising policy improvement, clearer oversight, and ongoing education across the business.

While conducting a survey, we have concentrated on reinforcing and strengthening our policies, including our Whistle-blower Policy. Steel Mains' continuous efforts to expand training to deepen the awareness for both staff and shop-floor employees, supports a more informed and consistent understanding of Modern Slavery risks throughout our supply chain.

As we continue to improve how we monitor and assess our progress, these strengthened efforts form an important ongoing basis for identifying, addressing, and preventing Modern Slavery risks moving forward.

Our Commitments and Ongoing Progress

Our findings were consistent with the previous assessment, and as a result, our priority focus areas remain the same.

FY2025 Commitments	FY2025 Actions	Measure of Effectiveness
Education - Build Awareness & Capability	- Delivered updated training on recognising and responding to modern slavery risks - Expanded awareness initiatives across the business - Embedded modern slavery content into onboarding and compliance programs	- Increased employee confidence in identifying risks - Shared knowledge helps teams support each other - Reflects our core value: Passion for delivering outcomes & helping each other succeed
Strengthen Supplier Monitoring	- Continued assessments of new and existing suppliers - Improved visibility of supplier progress and emerging risks - Regular follow-ups to support supplier capability building	- Earlier detection of risks - Enhanced supplier performance - Collaboration lifts ethical standards across the supply chain
Increase Policy Awareness across the Business	- Communicated modern slavery expectations business-wide - Provided guidance on risk areas and reporting channels - Integrated messaging into broader policy and compliance updates	- Employees better equipped to recognise and report concerns - Supports a culture of shared responsibility - Reinforces our value of helping each other succeed

Additional Progress Area

We will continue to review and refine our effectiveness to ensure our metrics remain relevant and fit for purpose.

FY2025 Commitments	FY2025 Actions	Measure of Effectiveness
Recommit to our Modern Slavery Statement	- Updated messaging to align with priorities and stakeholder expectations - Strengthened internal understanding through leadership engagement	- Stronger accountability and clarity - Improved alignment across teams - Supports consistent ethical decision-making

Approvals:

This statement was approved by Steel Mains' Board of Directors, in their capacity as principal governing body of Steel Mains, on 24 June 2026, and is signed by its Chief Executive Officer, as a responsible member of the Reporting Entity.

Revisions

Revision Date	Revision	Approval	Signed & Date
24/06/2026	Progress and commitment	Board of Directors & Dean Connell Chief Executive Officer	24/06/2026 



All Steel Mains trademarks and logos are owned by Steel Mains Proprietary Limited. All other brand or product names are trademarks or registered marks of their respective owners. Because we are continuously improving our products and services, Steel Mains reserves the right to change specifications without prior notice.

© 2026 Steel Mains Proprietary Limited.

All Rights Reserved.