

Modern Slavery Policy

Introduction:

Phoenix Steel Sales Pty Ltd ATF The Phoenix Unit Trust (trading as Phoenix Metalform) is committed to the highest standards of ethical conduct, human rights, and social responsibility. This includes preventing all forms of modern slavery across our operations and supply chains.

This policy is made in accordance with the *Modern Slavery Act 2018* (Cth) and reflects our zero tolerance for slavery, servitude, forced labour, debt bondage, deceptive recruiting, and human trafficking.

Reporting Entity:

This policy and the accompanying Modern Slavery Statement are made by **Phoenix Steel Sales Pty Ltd ATF The Phoenix Unit Trust** and approved by its **Board** (the principal governing body).

Structure, Operations and Supply Chains:

Phoenix is an Australian-owned metal manufacturing and fabrication business operating across Australia. Our operations include the sale, design, cutting, pressing, welding, and forming of metal products for the commercial and resources sectors.

We source materials such as steel coils and fittings from both local and international suppliers, including from **China, Indonesia, Vietnam, and the USA**—regions with known modern slavery risks according to the Global Slavery Index 2025.

Modern Slavery Risks:

We recognise the potential risks of modern slavery in:

- Overseas supply chains, particularly in the sourcing of raw materials
- Subcontracted services like cleaning or transport
- Inconsistent supplier monitoring or documentation

While direct operations are assessed as low risk, indirect risks may arise in countries with high slavery prevalence or low regulatory oversight.

Actions to Assess and Address Risk:

Our response includes:

- Annual review of supplier contracts to require compliance with modern slavery legislation
- Prioritisation of supplier engagement based on geographic and industry risk
- Training relevant staff to identify and manage modern slavery risks
- Encouraging suppliers to operate in accordance with our standards
- Reviewing supplier practices through engagement and, where appropriate, audits

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Review/Version: E

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Measuring Effectiveness:

We assess our effectiveness through:

- The number of contracts that reference modern slavery requirements
- The number of suppliers reviewed or engaged on modern slavery topics
- Annual internal reviews at management meetings
- Improvements to due diligence and supplier engagement processes

Consultation Process:

This policy and statement have been developed in consultation with internal departments across Phoenix Metal Group, including operations, procurement, and compliance. No other entities are owned or controlled by the Trust.

Governance and Approval:

Employees breaching this policy may face disciplinary action, including dismissal. If a supplier is found to be involved in modern slavery, we will review the relationship and will terminate the contract immediately.

This policy was approved by the **Board of Trustees** of Phoenix Steel Sales Pty Ltd ATF The Phoenix Unit Trust on **30 July 2025**. It will be reviewed annually, or earlier if required under law.



Peter Daly, Managing Director, Phoenix Steel Sales Pty Ltd ATF The Phoenix Unit Trust

Dated 31st July 2025

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