



**FY23/24 MODERN
SLAVERY STATEMENT**

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(Walk Free 2023, 2023)

Directors' Statement

This statement is made pursuant to the Australian *Modern Slavery Act 2018 (Cth)* (the Act) by Enviro Pipes Pty Ltd (ABN 84 130 666 518) ("Enviro Pipes") for the financial year 1 July 2023 to 30 June 2024 and has been approved by the Board of Directors.

Enviro Pipes makes this statement in its capacity as a reporting entity (as defined by the Act).

The Act was first introduced in 2018 – 6 years ago – as a means of eradicating forced labour, modern slavery, human trafficking and the worst forms of child labour. The UN Sustainable Development Goal 8.7 seeks to achieve its targets by 2030. A basic timeline to achieve change would suggest that this year, 2024, we should be halfway there.


Sadly, statistics show that the number of people impacted by modern slavery since 2018 worldwide has increased by 25%.

Enviro Pipes is a wholly owned Australian company. We take pride in manufacturing to Australian Standards and supplying HDPE pipe and fittings for pressure and non-pressure applications. Our business is accredited to ISO 14001:2015 and ISO 9001:2015.

Our accreditations are a credit to our most valuable resource – our people. We take pride in providing a safe workplace where our workers come first. Our workforce is diverse in age, gender, ethnicity, background and experience. Our people are encouraged to bring different perspectives and problem-solving approaches to our workplace each day. In supporting our staff, we are

In signing this statement, we, as the Board of Directors, confirm our approval of this Statement by and on behalf of Enviro Pipes Pty Ltd.

Signed this 18th day of December 2024.


Joe Horvat
Director

committed to a culture that embraces respect and integrity and fosters an environment where everyone's behaviour is ethical and transparent.

We are committed to this not only for our workplace but for workplaces globally. Enviro Pipes will continue:

- to do all that is within its control; and
- will encourage its suppliers and customers

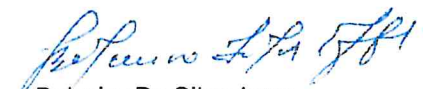
to make choices that will help eradicate modern slavery and human trafficking.

When we completed our first Modern Slavery Statement it was a new and unknown process. As we interact with suppliers and customers in 2024, we are happy to complete Modern Slavery Surveys or provide copies of our policies or past statements. This interaction means that people are paying attention to the issue of modern slavery.

Enviro Pipes is only a very small part of an enormous worldwide economy. Enviro Pipes has a zero-tolerance policy to the exploitation of individuals.

It is our hope that as companies make more ethical choices about who they deal with and how they treat their people Modern Slavery will become a thing of the past.

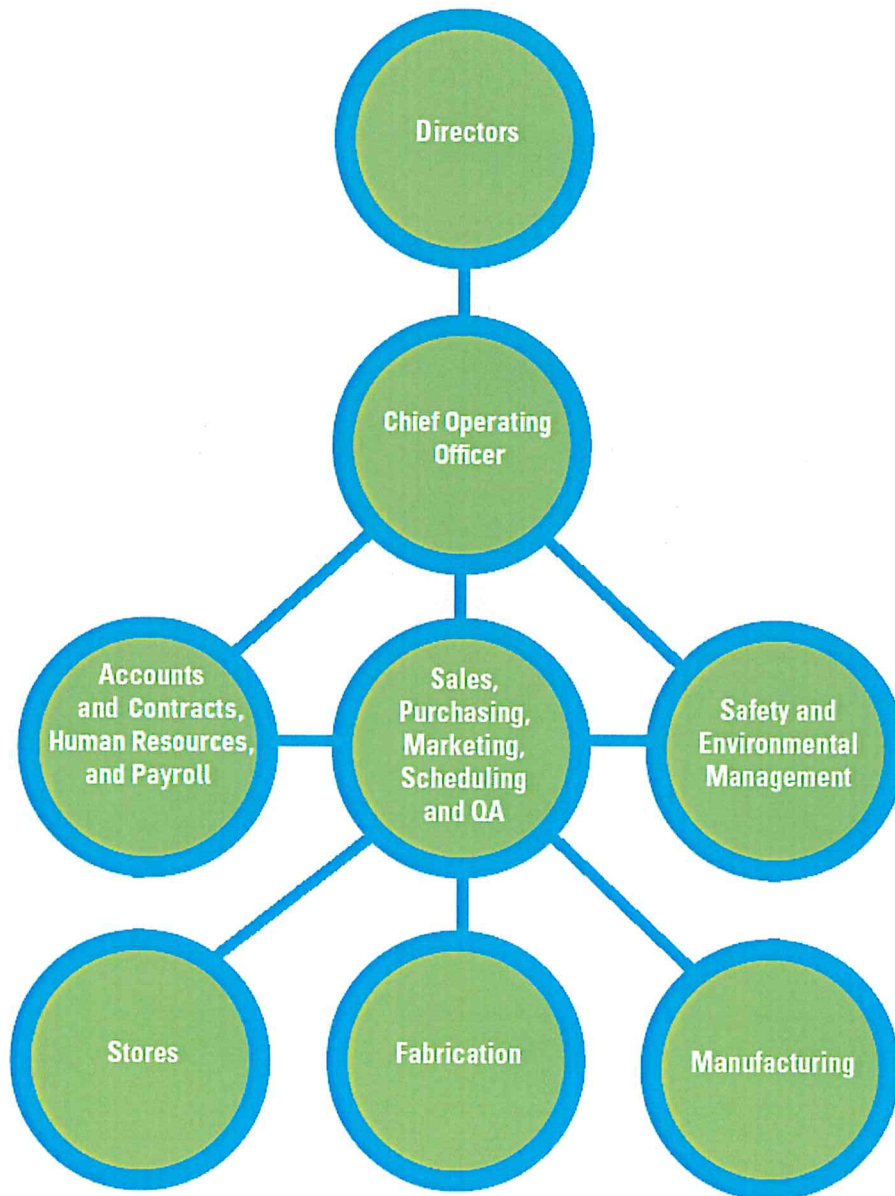
We, as an organisation, are committed to doing all we can to prevent Modern Slavery.


Belmiro Da Silva Jorge
Director

Structure

Enviro Pipes is a privately owned proprietary company limited by shares. The company has two Directors, Mr Joe Horvat and Mr Belmiro Da Silva Jorge.

We operate from our registered head office in Perth, Western Australia, and have branches in Melbourne, Victoria, and Brisbane, Queensland.



Operations

Enviro Pipes specialises in manufacturing High-density Polyethylene (HDPE) pipe, fittings, custom spool work, and tanks suitable for a diverse array of applications, such as stormwater management, sewage systems, potable water supply, gas transmission, reticulation, and drainage solutions. Certified to meet Australian Standards AS/NZS4130, AS/NZS4131, AS/NZS5065, AS/NZS4129, ISO9001, and ISO14001, our products have garnered approvals from notable bodies like local councils, WSAA, Main Roads, and Water Utilities.

Our team, spanning just under a hundred employees across three facilities nationally, remains dedicated to delivering top-notch customer support and high-quality products pivotal for infrastructure projects that directly impact people's daily lives.

While procurement, fabrication, human resources, and commercial management are centralised at the head office, sales, stores, and manufacturing activities are distributed across our Australian locations. Aligned with ethical and moral principles, Enviro Pipes values equality and fosters an inclusive organisational culture that prioritises treating all individuals with dignity and respect.

We strictly prohibit any conduct construed as bullying, intimidation, discrimination, sexual or workplace harassment, underscoring our commitment to nurturing an inclusive and diverse workforce.

Our recruitment and selection processes prioritise merit-based criteria to attract top talent.

Our organisational structure promotes openness. We encourage transparent communication between the workforce and management.

We actively encourage clients, suppliers, and contractors to engage in open dialogue, fostering collaborative efforts for the betterment of everyone involved in our interactions.

Supply Chain

Long before the introduction of the Act, Enviro Pipes appreciated the value of conducting business with ethical like-minded companies. With over 50 years of experience in this industry our directors have worked with many of our suppliers since before the Enviro Pipes business commenced.

Our contractual arrangements range from one-off purchase orders governed by our Standard Terms and Conditions, through to large value fixed term contracts.

When evaluating potential suppliers, we do not limit our selection to price. While we consider varying aspects including price, lead times and reliability, we provide a full, fair, and reasonable opportunity for Australian businesses to bid for the supply of goods and services we require.

But more importantly we look for suppliers who value their people, make ethical choices in their operations and align with our Code of Conduct.

Since 2018 we have included an assessment of the risk of Modern Slavery for any new supplier.

Given our long history making ethical choices in suppliers, when we started making enquiries with our suppliers to prepare our Modern Slavery Statements, we did not expect to find any issues. Irrespective of the length of time we have interacted with a supplier they have all been treated equally. We ask open and genuine questions to determine whether there are any issues with Modern Slavery in our supply chain.

We hope that this will encourage our national suppliers to consider their workforce and ensure that Modern Slavery practices are not happening here in Australia or at our supplier locations overseas.

Risks of Modern Slavery Practices in our Operations and in Supply Chains

The risk of Modern Slavery in our supply chain is continually monitored and assessed. We conduct risk assessments of our own operations in our supply chain and every time we consider new business relationships. We do not only consider Modern Slavery up our supply chain but also the risks of Modern Slavery when we accept purchase orders from our customers.

Predominantly, our Tier 1 (direct) suppliers are Australian companies. However, we appreciate that their goods may not always be Australian sourced.

We work with those companies to ensure that they continue to source the materials from reputable suppliers whose workforce is properly looked after.

Where our materials come directly from overseas, we have worked with our suppliers for a number of years. We undertake due diligence before accepting any new supplier into our supply chain.

In accordance with the OECD 2018 recommendations, we have assessed our risk of adverse impact on Modern Slavery. That consideration includes whether we caused an act of Modern Slavery or did we in any way contribute to it or was it otherwise directly linked to our business.

Our operational risks are limited to our operations here in Australia. We do not manufacture overseas and our overseas suppliers are limited.

We communicate with our staff and do not believe that any member of our staff is impacted by Modern Slavery, directly or indirectly.

Our supply chain risks are minimised by strict due diligence processes before including new suppliers in our chain. Those processes apply to all suppliers irrespective of size or prospective benefit to our operations.

The OECD recommends:

Assess the enterprise's involvement with the actual or potential adverse impacts identified in order to determine the appropriate responses. Specifically, assess whether the enterprise: caused (or would cause) the adverse impact; or contributed (or would contribute) to the adverse impact; or whether the adverse impact is (or would be) directly linked to its operations, products or services by a business relationship (s2.3) (OECD, 2018)

Our Actions to Assess and Address Risk

Rather than pointing the finger at others and expecting them to act, we believe in our actions and words. We assess and address risk starting with our own workspaces. Enviropipes recognises that the main asset to any successful business is its people. Potentially they are also the most vulnerable.

“In times of globalisation and the constant demand for cheaper consumer products and faster delivery times, many global corporations have shifted production to countries where cheaper labour is available.” (Ahmed, 2022)

While Enviro Pipes could have chosen to manufacture overseas the Directors have been clear. They want to sell products that are proudly made to the highest standards in Australia by a workforce employed in excellent conditions.

The 2023 Trafficking in Persons Report (US Department of State, 2023) highlighted a significant increase in the targeting of vulnerable and marginalised people because of the use of the internet to find employment opportunities. Often these vulnerable people end up as victims of modern slavery practices.

Enviro Pipes acknowledges that the internet is the modern way of finding employment opportunities. However, we only use reputable employment websites to advertise our available positions. We promote equality in employment – we want capable, loyal workers, irrespective of race, ethnicity, gender identity, or age. We want people who will respect their fellow staff and the workplace ethics. We personally interview staff at our sites to ensure we are employing a person who freely wants to work with us. We do not allow agencies to become involved or in any way control our staff and their working conditions. Again, it is a small, but relevant choice in protecting our employees.

By making these choices we are:

- Avoiding the risks of modern slavery in our own workforce
- Avoiding the risk of manufacturing overseas where we may not have a complete and transparent view into the conditions that are faced by our manufacturing workforce

We are making our workforce visible, valued and respected. Our staff are treated fairly and without discrimination.

We have policies in relation to Work Health and Safety and Modern Slavery and a Code of Conduct (that addresses appropriate and inappropriate behaviour, including workplace bullying, harassment and the overriding requirement to be respectful of and towards others) to be followed by our employees.

We have a zero-tolerance for all forms of child or forced labour and all other forms of slavery in our operations and our supply chain.

We are currently implementing a new portal that will allow us to screen our new suppliers and to assess their compliance with Modern Slavery rules and the risk that incorporating them into our supply chain might pose.

ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS	
Country Risks	Quantification of the countries where the Suppliers are located. Information is gathered from The Index and risks are determined by Enviro Pipes management team and reviewed by the Directors
Sector Risks	Suppliers in vulnerable sectors must conduct a documented self-assessment questionnaire to confirm that the Supplier complies with local laws, they must not be in a region subject to international sanctions and provide sufficient proof that the minimum labour standards of its operations and its subsidiaries, as defined by the local laws of where the business or supplier operates are met.
Supplier Risks	<p>These risks are assessed by considering the relationship the Supplier has with financial institutions or business partners which may be funding trafficking or slavery operations. Enviro Pipes conducts due diligence checks necessary to ensure the persons or entities connected with its activities are not subject to targeted financial sanctions, by considering the following</p> <ul style="list-style-type: none"> (i) Using existing credible assessment of entities in its supply chain, such as audit reports, Non-Government Organisations (NGO) Sector Review, and any Modern Slavery Statements submitted by the suppliers. (ii) Reviewing the Australian DFAT Consolidated List, which lists persons and entities listed under Australian sanctions laws. (iii) Preparing and communicating Modern Slavery policies and procedures with Staff and Suppliers. (iv) Collaborating with Suppliers to understand modern slavery risks in the area in which the supplier operates and actions that have been carried out or are planned to mitigate those risks. (v) To reduce risk of financial and relationship stress between Enviro Pipes and its supply chain; Enviro Pipes payment processes ensure suppliers are paid promptly. (vi) Applying the principles of continuous improvement to its area of accountability. Enviro Pipes seeks to address the risks of modern slavery in its operations by considering
Employee Risks	<p>Substandard working conditions, discrimination, forced work or unpaid work. Enviro Pipes seeks to address the risks of modern slavery in its workforce by: -</p> <ul style="list-style-type: none"> i) Providing workers with employment contracts in accordance with the Fair Work Act 2009 as determined by independent legal reviews. ii) In accordance with the Charter of Human Rights and Responsibilities Act (Vic), Enviro Pipes acknowledges every person has the right to freedom of association with others, including the right to form and join trade unions. iii) Enviro Pipes provides training to all workers in the right to refuse work, reporting of bullying and/or harassment, and the role and responsibilities of their position.

How Effective are Our Actions

We do not expect that we are a big enough organisation that we will be able to rid the world of Modern Slavery by ourselves. However, we hope to identify any Modern Slavery issues within our own supply chain and ensure that where it is within our means that those issues are remedied.

We hope that by making careful, considered and researched choices in our business we can influence others in our supply chain to do the same.

We encourage all our suppliers to continue to improve their modern slavery risk management approach.

Consultation

“In Asia and the Pacific, the Middle East, the Americas and Europe, between 4 and 6 percent of children are said to be in child labour, and the percentage is much higher in Africa (21.6%), with the highest rate in sub-Saharan Africa (23.9%),”

*Human Rights Council Special Rapporteur Tomoya Obokata
(Lederer, 2022)*

We are a wholly owned company. We know each member of our staff. Our directors maintain an open book policy, encouraging our staff to come forward and discuss with us any item of concern but particularly any instances of Modern Slavery.

We control the risks of Modern Slavery in our staff from the outset with interviews and by ensuring that our staff are eligible to work in Australia, that they are happy to work with Enviro Pipes and understand that they can and should always maintain an open dialogue with us.

Suppliers are assessed prior to engagement. We work to ensure that we maintain proactive and meaningful communication with our suppliers. By ensuring that we are dealing with ethical like-minded organisations we minimise the risk that our actions could cause detriment to the workers, employees or local communities in which our suppliers do business.

We have a Grievance process. This can be used by our staff, our suppliers and any person who does business with our company. Those grievances are reviewed and addressed in a timely manner in accordance with our documented policies and procedures.

References

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