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## Modern Slavery Statement 2023/2024

### Stirlings Performance Steels Pty Ltd

ABN: 79 625 765 200

- **Business Profile:**

Stirlings Performance Steels is a privately owned and operated business based in Western Australia. Founded in 1973, we currently employ more than 150 employees nationally between our operations in different states such as Western Australia, Tasmania, Queensland, Victoria, and New South Wales, as well as Sales and Business Development staff in South Australia.

We provide a wide variety of services across Australia, such as Sales & Customer Service, Laser, Sawing, and Polishing, Logistics, and stocking of high-quality stainless and performance steels to a vast variety of industries in which the majority is commercially focused.

We are driven to satisfy our customers, suppliers & employees, utilising improvement, innovation, technology & teamwork to present our best solutions and provide top-quality products, outstanding service & excellent value.

Stirlings Performance Steels takes pride in having zero tolerance for the violation of the Modern Slavery Act 2018 (Cth).

Modern Slavery Act involves situations where coercion, exploitation, threatening behaviour, and or deception are used to undermine the freedom of others. Outlined by the Australian Federal Government regarding regulations and reporting requirements, this statement serves as information presented by Stirlings Performance Steels for the 2023/2024 financial year based on modern slavery risk assessment.

Stirlings Performance Steels is committed to reducing the risk of modern slavery practices and, moreover, developing an organisational culture that recognises human rights and seeks to avoid complicity in human rights abuses.

- **Business Partner Industries:**

Being a stockholding, processing & distributor of Stainless and Performance Steel products business, the following Industries/Stakeholders were identified as regulars attained by Stirlings Performance Steels:

- Freight and logistics
- Industrial equipment, parts, and consumables
- Manufacturers & Suppliers



- Equipment hires
- Facilities management services
- Labour

- **Risks of modern slavery practices in the operations and supply chain:**

Being a stockholding, processing & distributor of Stainless and Performance Steel products business, the following risks were identified:

✓ Supply Chain Risks:

The steel industry often sources materials from different regions, which may have weak labour protections. Also, overseas manufacturers, importers, and processors of steel products may be from areas with a higher risk of exploitation. In addition, workers in the logistics and transportation sectors may face long hours and excessive work, especially in subcontracted logistics operations.

✓ Operations - Workforce Risks:

Workers in specific environments such as Warehousing, processing, and distribution may rely on temporary low-paid jobs or migrant workers, who may be vulnerable to exploitation. Furthermore, workers in processing and distribution may face unsafe work conditions.

- **Assessment and action of our modern slavery risk:**

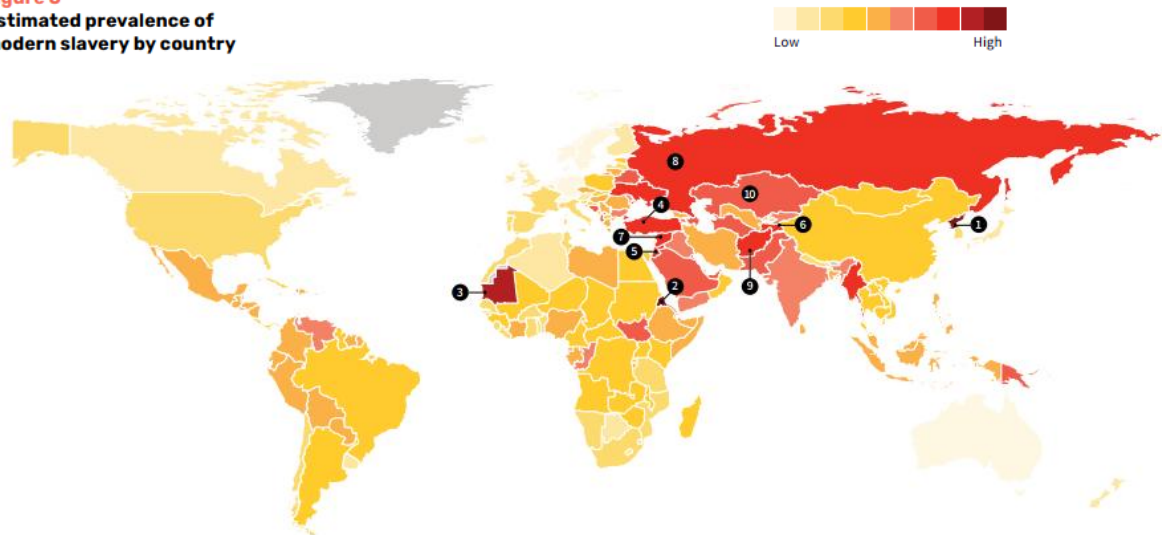
Proudly, Stirlings Performance Steels holds its Human Rights & Modern Slavery Policy as an internal living document and part of the business's daily routine. In addition, the following actions are placed:

1. Continuous rollout of a Modern Slavery Questionnaire to be completed by the suppliers.
2. Continuous rollout of the Modern Slavery Awareness Training and refresher training for the Leadership Team. Educate employees on identifying and reporting modern slavery risks through its policies and reporting channels.
3. Review indicators of levels of Modern Slavery annually based on global public data such as the [Global Slavery Index 2023](#), which estimates the proportion of individuals living under modern slavery for each geographic area and country.
4. Stirlings also annually assesses labour conditions based on Fairwork guidelines and awards pay guides to ensure adherence to Australian Standards.
5. Also, regular reviews of safety standards and actions based on safety representatives' reports and safety committees' consultations run throughout the year.



a. The current [Global Slavery Index 2023](#) data assessment identified the prevalence of Modern Slavery as below:

**Figure 5**  
**Estimated prevalence of**  
**modern slavery by country**



- **Assessing, Evaluating Effectiveness and Entity:**

Aiming to assess the effectiveness of the Modern Slavery Questionnaire and Training, Stirlings Performance Steels is committed to the following steps:

1. Monitor and review the adherence and answers from the Suppliers Questionnaire annually. Moreover, the senior management team will discuss and address any abnormalities with the company's managing director.
2. The Human Resources Department is responsible for monitoring, reviewing and inducting the leadership team into the Modern Slavery Practices, Training and Policies. In addition, maintaining up-to-date policies and procedures based on the Modern Slavery Act 2018 and following the Australian Border Force Guidelines.
3. Further actions and monitoring procedures will be reviewed and placed based on findings from the questionnaires and training needs.
4. Stirlings Performance Steels **states that it owns no other entities.**

- **Improvement Commitment:**

Stirlings Performance Steels is committed to continuously reviewing our interactions and impact on the global community. Our internal auditing will continue to comply with the Modern Slavery Act 2018 (Cth) and produce an annual statement reporting on the risks within



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our operations. We will continue to communicate with all internal and external stakeholders to address our modern slavery risks.

- **Support Documents:**

- ✓ Stirlings Performance Steels – Supplier Modern Slavery Self-Assessment Questionnaire.
- ✓ PM 6.01 - Human Rights & Modern Slavery Policy
- ✓ PM 1.01 - Company Handbook
- ✓ Modern Slavery Act 2018
- ✓ Global Slavery Index 2023
- ✓ Quality Systems Manual QM1

This statement was approved by the principal governing body of the reporting entity, the Managing Director, on 10/03/2025.



David Stirling  
**Managing Director**  
Stirlings Performance Steels Pty Ltd

