

Modern Slavery Statement



1. Introduction

Barra Steel (Vic) Pty Ltd (ACN 092 043 653) (**'Barra Steel'**) is a steel fabrication company operating for over 28 years, employing over 58 employees with its headquarters being located Dandenong South, Victoria.

Barra Steel is committed to implementing systems and controls to minimise the risks and effectively eliminate the incidence of modern slavery within its own business operations and supply chains.

The statement is a formal expression of its commitment, identifying the risk and the mitigation strategies, as well as providing measures for assessing the effectiveness of the strategies which have been adopted by Barra Steel.

2. Operations, structure and supply chains

Structure & Operations

Barra Steel is a private company incorporated in Australia and owned and managed by its director, Ben Jones.

Its senior management team consists of the Director, General Manager, Senior Estimator, Project Manager and Human Resources Management.

Strategic decisions are made in consultation with its senior management team.

Barra Steel fabricates steel at its headquarters in Dandenong South.

Supply chains

Barra steel have enduring relationships with valued suppliers built over many years. It is proud to source 95% of its material locally in Australia and will continue to build relationships with local suppliers.

Barra Steel engages with formal labour companies with an identifiable and distinct legitimate business entity.

3. Modern slavery risks

Barra Steel has identified the following potential modern slavery risks in its operations:

1. Forced Labour or services including slavery, servitude and low skilled workers
2. Child labour

3. Health and safety conditions
4. Employment conditions

4. Actions taken to assess and address modern slavery risks

Barra Steel acknowledges that it may not always be able to eliminate modern slavery risks, in particular third-party engagements. However, Barra Steel has taken the following steps to identify and mitigate the modern slavery risks in its control to the best extent possible, and is always looking at ways to combat modern slavery.

Certification Schemes

Barra Steel engages frequent auditors to ensure its compliance with industry standards, including:

- ISO 9001
- Steel Sustainability Australia
- Steel Compliance Australia

Modern Slavery Policy

Barra Steel has introduced a Modern Slavery Policy which complements its existing policies and code of conduct. The policy identifies and sets out the actions that will be taken to identify, assess and address the risk of modern slavery in Barra Steel's operations and supply chains. This policy will be regularly reviewed and updated as required.

This policy will apply to all persons working for or providing goods and services to any entity within Barra Steel in any capacity, including employees, directors, suppliers, offices, agency workers, subcontractors and consultants.

Modern Slavery Training

Barra Steel provides its employees with in-person training on modern slavery to enable the employees and business to identify and report modern slavery risks and breaches.

Modern Slavery Statements

Barra Steel requests from all its suppliers a copy of its Modern Slavery Statement to ensure its compliance with modern slavery requirements. Barra Steel keeps track of these statements regularly to ensure it deals with suppliers whose ethical and legal obligations are in line with Barra Steel's.

For suppliers which are not obligated to report its modern slavery requirements, Barra Steel will implement a Modern Slavery Questionnaire for existing and new suppliers to complete in an effort to reduce external modern slavery risks.

Employment, grievance and redress

Barra Steel employees are provided with employment contracts in their first language, if requested, to ensure transparency in its contract terms and operations.

Barra Steel has a dedicated human resources management team to clarify or address any concerns employees may have in the course of their employment.

5. Assessment of effectiveness

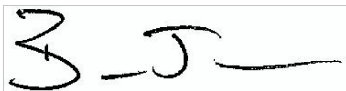
Barra Steel is committed to reviewing the effectiveness of its actions by:

1. Regularly reviewing its modern slavery processes with its management team at least once a year to ensure all relevant risks have been considered/and or incorporated;
2. Engaging further certification schemes and audits;
3. Regularly monitoring and ensuring that the modern slavery statements or questionnaires have been provided to Barra Steel and are up-to-date;
4. Review the number of suspected or identified modern slavery incidents;

6. Approval

This statement was approved by the principal governing body of Barra Steel on 23/08/2024

Signed and approved on 23/08/2024 by:



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Ben Jones

Director