

1. Introduction & Approval

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) and outlines the steps taken by Oriem Pty Ltd to assess and address risks related to modern slavery in its operations and supply chains.

Oriem Pty Ltd is committed to ethical business conduct, human rights protection, and eradicating modern slavery risks from our operations and supply chains. We acknowledge that modern slavery includes forced labour, human trafficking, child labour, and debt bondage, and we strive to ensure that our business activities do not contribute to these issues.

This statement has been approved by the Board of Directors of Oriem Pty Ltd on 17/07/2025.






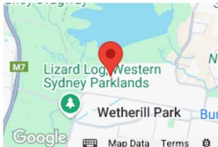



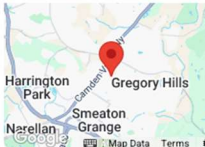
Matthew Hardy

Matt Hardy
General Manager
Oriem Pty Ltd

2. About Oriem Pty Ltd

2.1 Our Structure

Oriem Pty Ltd is an Australian-based steel processing and distribution company, serving the construction, infrastructure, and engineering sectors. Our corporate headquarters is in Wetherill Park, Sydney, and we operate through a network of facilities across New South Wales, Australia. A full breakdown of the sites is included below:

Wetherill Park	Seven Hills	Milperra	Penrith	Gregory Hills
				
Unit 3, 189 Newton Road Wetherill Park NSW 2164 (02) 9129 9100	Unit 3, 110 Station Road Seven Hills NSW 2147 (02) 9129 9102	110 Ashford Avenue Milperra NSW 2214 (02) 9129 9101	27 Altair Place Penrith NSW 2750 (02) 9129 9103	41 Central Hills Drive Gregory Hills NSW 2557 (02) 9129 9104
Monday to Friday 7am-3pm	Monday to Friday 6:30am-4:30pm Saturday 7am-11am	Monday to Friday 6:30am-4:30pm Saturday 7am-11am	Monday to Friday 6:30am-4:30pm Saturday 7am-11am	Monday to Friday 6:30am-4:30pm Saturday 7am-11am
				

2.2 Our Operations

Oriem specialises in concreting and associated steel reinforcing distribution, and processing. Our key operational activities include:

- Supplying steel & concreting products to Australian and international markets
- Operating multiple retail concrete consumables supply sites, and steel processing facilities
- Engaging with a broad supplier base, including domestic and international steel mills
- Partnering with construction, engineering, and manufacturing firms

2.3 Our Supply Chains

Our supply chain comprises domestic and international steel manufacturers, raw material suppliers, logistics providers, and service providers. The majority of our products are sourced from Australia, Europe, and Asia, with key suppliers operating in:

- Australia (domestic mills and processors)
- China, Spain, South Korea (international steel mills)
- Turkey, Malaysia (other supply chain partners)

We recognise that some of these regions present a higher risk of modern slavery due to weak governance, limited labour protections, and economic pressures.

3. Risk Assessment & Identification

3.1 Risks in Our Industry

The concrete and reinforcing industry's are highly globalised, with raw materials, manufacturing, and logistics spanning multiple jurisdictions. We acknowledge the following modern slavery risks:

- Forced labour risks in mining and raw material extraction
- Exploitation of migrant workers in steel mills and factories
- Supply chain opacity, particularly in third-party contractors and sub-tier suppliers
- High-risk countries with weak labour laws and enforcement

3.2 Our Risk Assessment Methodology

Oriem Pty Ltd acknowledges that the risks posed by modern slavery fall into 4 key areas:

3.2.1 Sector/Industry

There is a risk of the potential for modern slavery practices in the supply chain of the steel manufacturing sector because of its characteristics, products, and processes, such as the widespread reliance on unskilled workers as an industry practice and relaxed labour and safety regulations in some countries.

3.2.2 Product/Service

There is a risk of the potential for modern slavery practices in the supply chain of steel production because of the way that the product is produced, provided or used such as competitive markets that are subject to price pressure, cyclical production and high risk raw materials used as inputs.



3.2.3 Geographic

There is a risk of the potential for modern slavery practices in the supply chain in certain countries in Asia where Oriem Pty Ltd buys steel products due to factors such as poverty, weak governance, lack of enforcement of the rule of law, and high migration flows.

3.2.4 Specific Entity Risk

Certain companies or businesses may pose a risk of the potential for modern slavery due to their known poor human rights and/or labour practices record, poor governance structures and a lack of robust policies and/or responsible purchasing practices.

3.3 Overall Assessment of Risk

To assess these risks, we:

- Conducted a geographical risk assessment based on the Global Slavery Index
- Mapped our key suppliers and their labour practices
- Identified sector-specific risks, such as reliance on temporary or migrant workers
- Reviewed contractual obligations and supplier due diligence processes

Our risk assessment identified potential vulnerabilities in raw material procurement and outsourced manufacturing.

4. Addressing the Risks of Modern Slavery

4.1 Supplier Due Diligence & Oversight

Oriem Pty Ltd has implemented a supplier assessment framework, which includes:

- Supplier Code of Conduct: Outlining ethical standards and modern slavery compliance expectations
- Pre-contractual due diligence: Assessing supplier labour policies and governance
- Ongoing audits and site visits: Conducting regular ethical audits for high-risk suppliers
- Contractual obligations: Ensuring suppliers comply with the Modern Slavery Act

4.2 Supplier Engagement & Collaboration

We work closely with our suppliers to mitigate modern slavery risks by:

- Establishing long-term partnerships with reputable steel manufacturers
- Encouraging open dialogue about ethical labour practices
- Supporting continuous improvement in supplier working conditions

4.3 Internal Controls & Policies

Oriem Pty Ltd has adopted the following internal measures:

- Whistleblower Policy: Providing employees and suppliers with secure channels to report concerns
- Human Rights Policy: Ensuring compliance with international human rights laws
- Procurement Guidelines: Integrating modern slavery risk assessments into supplier selection