



## Modern Slavery Statement

### Introduction

Calbah Industries Pty. Ltd, ABN 58 050 275 020, 17-29 Arkwright Drive, Dandenong South 3175, is a premier Design and Fabrication Engineering company supplying high quality steel products to major Infrastructure Projects around Australia and also services Mining, Oil & Gas, Rail and General Engineering.

Calbah Industries recognises that modern slavery is a global issue and extend beyond Australia's borders and into other countries. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

This statement is made pursuant to section 16 of the Modern Slavery Act 2018 and sets out the steps taken by Calbah Industries to prevent modern slavery and human trafficking from taking place in our supply chain. We are committed to achieving high ethical standards and acting with integrity in all areas of our business.

### Structure, Business and Supply Chains

Calbah was founded in 1995 by our Managing Director, Chester Baker, and has now grown to approximately 55 employees, operating from company owned, purpose-built premises based in Dandenong South, Victoria, Australia, with 3 new factories currently under construction.

Calbah has a senior Management team that covers Design, Operations, Sales and Administration.

We:

- **Buy** raw materials,
- **move** – transport raw and finished products,
- **sell** finished products to our customers.

Calbah Industries has long term business relationships with local suppliers such as steel supply, paint, nuts and bolts and some smaller businesses.

We also have established sound vendor relationships with a small number of Engineering companies based overseas. These overseas companies have supported Calbah Industries in supplying high quality products to the required specifications.

Calbah Industries customers are from Tier 1 Major Infrastructure projects around Australia, Oil & Gas sector, Tunnelling, Mining, Rail and general Engineering.



Calbah Industries has established sound and successful business relationships with almost all the major Infrastructure projects in Melbourne Road and Rail tunnels, Sydney Road and Rail tunnels, Snowy Hydro 2 Project, Brisbane Rail tunnel and Auckland, NZ rail Tunnel. We are the premier engineered steel and specialised equipment supplier to these projects.

Our Managing Director and Senior Management team have overall responsibility for ensuring this policy is implemented and complied with.

### **Risks of Modern Slavery Practices in our supply chains**

Calbah has established long term relationships with local suppliers such as steel mills and their distributors and paint manufacturers. We consider the overall risk of modern slavery existing within our immediate operations is low.

Calbah also has long term business relationships of engineered steel companies in overseas factories. It is those facilities that may carry a higher risk. To mitigate the risk, our company MD has made frequent visits to those facilities to ensure the risk of modern slavery is low and not practiced.

Our risk assessment and evaluation of our Overseas suppliers is based on observations and discussions made with production operational staff. We also use Bureau Veritas (BV) at these facilities to conduct further monitoring.

No Modern Slavery incidents have been identified or reported to Calbah Industries.

Our modern slavery risk potential is constantly evolving and is continually being monitored.

### **Policies, Training and Whistleblowing Protection.**

We have a zero tolerance to modern slavery and will make every effort to ensure we always contribute positively to the eradication of slavery, servitude, forced/child labour and human trafficking.

#### **Policies**

We have formal policies already in place that are intended to promote ethical and legally compliant business conduct. Our policies that contribute to this commitment to preventing the violations of human rights include:

#### **Code of Conduct**

Our business respects fundamental human rights and is committed to the principals set out within the legal regulations.



## **Whistle Blower**

We protect whistle blowers by encouraging openness and support for anyone who raises a genuine concerns in good faith. We are committed to ensuring no one suffers from detrimental treatment as a result of reporting their suspicions related to modern slavery.

## **Training**

We focus on ensuring our management team, at all levels, is not only responsible for abiding by this policy but also know how to address any relevant concerns raised by an employee(s). We train our staff on how to treat others with respect and courtesy, as well as ensure they adhere to our policies and procedures. This is an ongoing due diligence process.

## **Assessing Effectiveness**

We track and assess the effectiveness of our actions in several ways:

- Internal Tracking, including due diligence and training activities
- Internal assurance
- Monitoring asset and grievance mechanisms
- Engaging with business partners and external stakeholders for input and feedback.
- External Audits of our Policies and Procedures
- Functioning and effective governance mechanisms

The results of our effectiveness of actions and policies are reviewed at Calbah Management Review Meetings.

## **Collaboration**

Combating modern slavery requires collective, multi-stakeholder action focused on mitigating root causes, collaboration with all stakeholders and prevent and address their involvement (and their suppliers and customers) in modern slavery.

Key engagement with stakeholders

- Engaging with company staff – both office and workshop
- Management meetings and Toolbox meetings
- Senior Management reviews
- External Business Performance Audits – ISO 9001, ISO 14001 & ISO 45001
- Training Activities – inhouse and external
- Customer visits to Calbah
- Calbah visits to customers
- Supplier visits
- Community involvement
- Managing Director visits to Overseas manufacturing plants



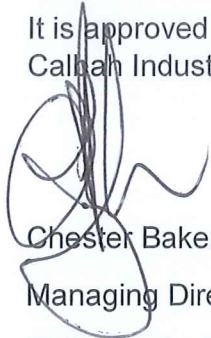
- Freight Forwarders handling shipping
- Transport companies

### **POLICY BREACH**

If any employee is found to be in breach of this policy, their misconduct will be managed accordingly, up to and including termination of employment. In the event of a supplier or contractor, where modern slavery is substantiated, the business will assess whether it is appropriate for the business relationship to continue and reserves the right to terminate the agreement without notice and the business reported to the authorities.

This statement is made pursuant to Part 2 Section 16 of the Modern Slavery Act 2018 and constitutes our modern slavery statement for the financial year ending 31 December 2023.

It is approved and signed by Chester Baker, Managing Director and sole director of Calbah Industries, the reporting entity.



Chester Baker

Managing Director

Calbah Industries, Pty Ltd.