



Steel Build International Modern Slavery Statement

2025

12/12/2025

Steel Build International Team

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Document type	Public Statement
Business number	19 668 813 223
Date	12/12/2025
Reporting Period	1 July 2024 – 30 June 2025
Approved by	Arthur Visedo, Director

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1. About this statement

Steel Build International is committed to identifying, assessing, and addressing risks of modern slavery in our operations and global supply chains. This statement outlines our approach and actions taken during the financial year ending 30 June 2025 (FY25), in accordance with the Modern Slavery Act 2018 (Cth). It is published on behalf of Steel Build International Pty Ltd and all its wholly owned operating subsidiaries (collectively, "Steel Build International", "Steel Builder Australia", or the "Company").

Transparency and Compliance: Global Reach and Universal Standards

Steel Build International and its controlled entities, including those in Australia and our key joint venture operations in **Vietnam**, are committed to upholding human rights across all business practices. We believe every individual should be treated with dignity and respect. Our efforts to ensure this are guided by the highest international standards, including **United Nations Guiding Principles on Business and Human Rights (UNGPs)**.

Guided by Our Purpose and Values

Our commitment to ethical practice is intrinsically linked to our **Purpose**—to deliver projects **on time** and strictly **in accordance** with **health and safety**, **fair trade**, and a **high standard** of quality.

Our **Core Values** drive every decision we make in this area:

- **Ownership:** Taking responsibility for the well-being of people in our value chain.
- **Consistency:** Applying our ethical standards uniformly across all projects and jurisdictions.
- **Transparency:** Openly reporting on our risks and the measures we take to address them.
- **Sustainability:** Ensuring our business practices protect both the planet and its people for the long term.

This statement describes the actions that Steel Build International has taken during FY25 to identify, assess and address modern slavery risks. This Statement covers functions, major projects and assets that were wholly owned and/or operated by Steel Build International or owned as a Steel Build International-operated joint venture ("operated assets" or "operations") for FY25. We collectively referred to them as '**operations**' or '**business**' to ensure our ethical footprint is as strong as our physical structures.

2. A message from Our Managing Director: Building Ethically



As the Managing Director of Steel Build International, I am privileged to present our Modern Slavery Statement for FY25. This document is more than a compliance exercise; it is a solemn declaration of our core values.

This Statement is a public, non-negotiable confirmation of our commitment to respecting human rights and our determination to eliminate modern slavery from every tier of our operations and complex supply chain.

Our Commitment

*This Statement clearly outlines the decisive actions we have taken over the past year to proactively identify, rigorously assess, and decisively mitigate the risks of modern slavery and human trafficking. Our goal is unambiguous: to ensure that exploitation has **no place** in any part of the Steel Build International operations.*

*We are committed to a journey of **continuous improvement and being transparent** about our efforts. We are committed to transparency in our reporting, strengthening our internal governance, and ensuring that our business partners uphold the same high standards we demand of ourselves.*

I confirm that this comprehensive statement has been thoroughly reviewed and approved by the Board of Directors of Steel Build International and is made in full compliance with the Modern Slavery Act 2018 (Cth).

3. Overview of the Business Operations

3.1. Our Structure.

Our Global Footprint: Where we Operate

Steel Build International is a dynamic structural steel erection company with significant operations spanning in Australia, mainly in Victoria, New South Wales and Queensland states.

A Strong Base in Australia

Our headquarters are in Brisbane, Queensland, at Level 1, 316 Adelaide Street, Brisbane City, QLD 4000, with a branch office in Melbourne at Level 6, Collins Street, Melbourne, VIC 3000.

Strategic Partnership in Vietnam

Beyond Australian shores, our international operations are significantly strengthened by our close partnership with **Steel Builder Vietnam**, with headquarters in Ho Chi Minh City, Vietnam, which supports our international supply.

Factory 1: N7 Street, Phu My 2 Industrial Park, Phu My Ward, Ho Chi Minh City.

Factory 2: DH423, Group 3, Ba Tri Hamlet, Tan Hiep Ward, Ho Chi Minh City.

Factory 3: Lot L, Street D.02, Chau Duc Industrial Park, Ngai Giao Commune, Ho Chi Minh City

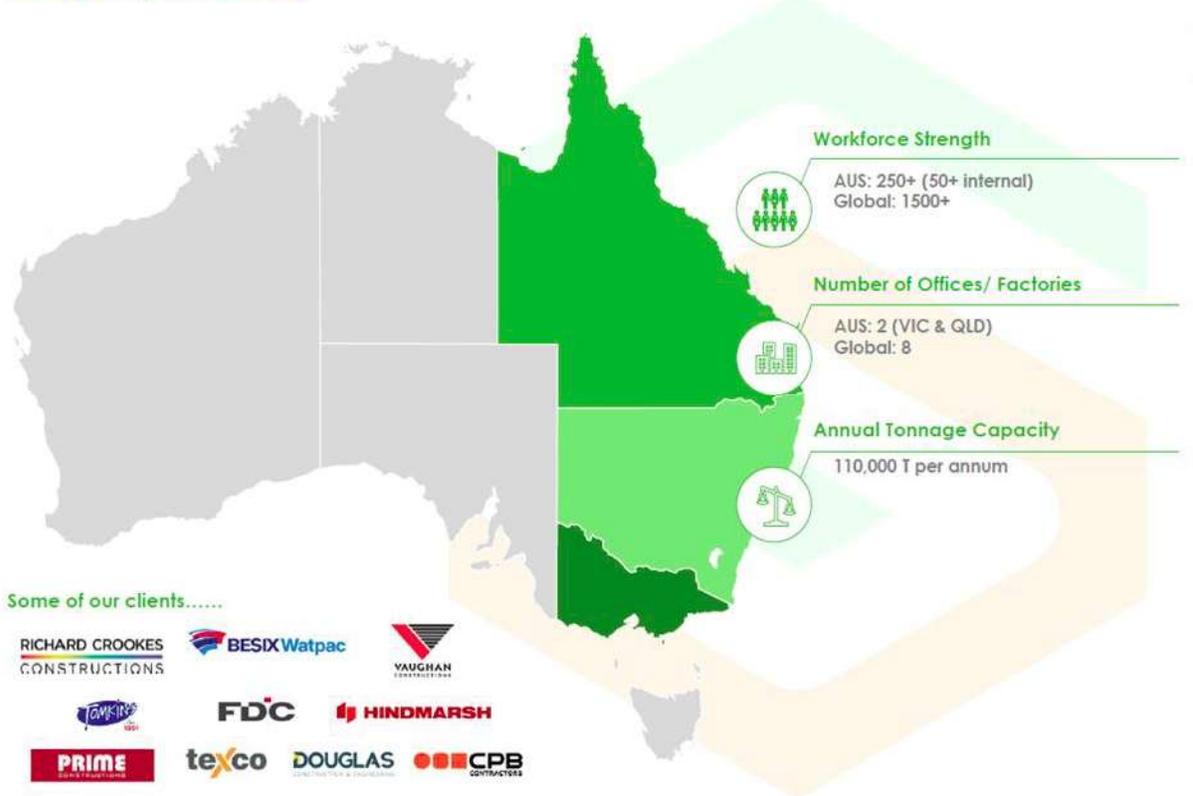
Our Factory Locations (VN)



3.1.1. Steel Build International Trading as “Steel Builder Australia”. Building Success with Integrity

Steel Builder Australia is a leading provider of end-to-end structural steel solutions, serving the commercial, industrial, and infrastructure sectors across Australia, operating in VIC, NSW and QLD states during FY25

Company Overview



*Our purpose, “Build Your Success,” is delivered through a commitment to **precision, innovation, and an unwavering focus on quality, safety and environment** in every project we undertake.*

Our Core Values: The Foundation of Our Ethics

Our operational excellence and ethical stewardship are intrinsically linked to the three core values that guide every member of our team:

1. **Ownership:** We take **full accountability** from concept to completion, proactively solving challenges and ensuring the integrity of our processes.
2. **Consistency:** We apply the **same high standards of quality and reliability** across every single project, ensuring predictable, high-level execution.

3. **Transparency:** We commit to open communication and clear reporting in all dealings, fostering trust and confidence with our clients and partners.

These values ensure that while we are building structures, we are simultaneously building a business that is **ethical, reliable, and fundamentally focused on the success and safety of our stakeholders.**



Ownership

We take full accountability for every project, from concept to completion, ensuring our clients can rely on us to deliver on promises and overcome challenges proactively.



Consistency

Quality and reliability are at the heart of everything we do. Our team applies the same high standards across every project, every time.



Transparency

Open communication and clear reporting keep clients informed at every stage, fostering trust, confidence, and strong partnerships.

3.1.2. Steel Builder Vietnam

Precision, Technology, and Sustainable Partnerships.

Steel Builder Vietnam (further – “**Steel Builder VN**”) specialises in the design, production, and installation of pre-engineered and high-tech structural steel buildings. Located in a key global manufacturing hub, their operations are integral to the Steel Build International supply chain. Steel Builder VN mission is centred on building **long-term, trusting partnerships** while making a positive contribution to community and sustainable development.

Pillar

 Sustainability

 Excellence in Delivery

Focus & Relevance to Ethics

Driven by environmentally friendly production and the use of green building materials. Their commitment, including membership in ResponsibleSteel™, directly signals a focus on ethical sourcing and sustainable practices crucial for combating modern slavery risks.

Dedicated to achieving high technical quality in design, fabrication, and installation. This includes expertise in meeting rigorous standards for projects like LEED-certified buildings, which often require strong ethical and environmental controls.

👉 Partnership & Community

Prioritising enduring client relationships and actively contributing to local economic growth and community well-being. This local focus reinforces their commitment to positive social impact in the regions where they operate.

4. Key Policies and Implementation

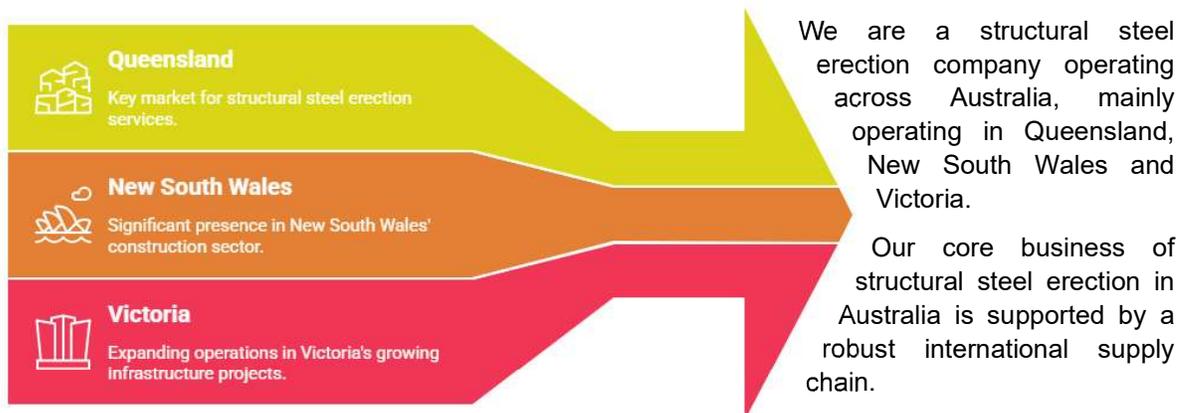
Policy Name	Relevance to the Modern Slavery Policy	Implementation mechanisms	Current Version & Date
Code of Conduct	At Steel Build International, our Code of Conduct defines the ethical standards expected by every employee and partner. It details our commitment to human rights and preventing modern slavery, as stated in our Modern Slavery Policy. We request all suppliers, subcontractors, and partners to comply with this Code as part of our shared responsibility for ethical practices in our supply chain.	Our Code of Conduct is provided to all suppliers and subcontractors and forms a contractual obligation for compliance. In addition, as part of the induction process, we request all subcontractors and suppliers to sign the Policy Acknowledgment Declaration, confirming their commitment to uphold our standards and ethical practices.	IMS-105, Version 02, 25/03/2025
Consultation and Participation of Workers Policy	This policy is essential for early risk identification. It guarantees that employees in our entities have secure channels for expressing concerns about conditions, safety, and ethics. This involvement is crucial for spotting and tackling modern slavery risks, ensuring workers' views are considered and their rights upheld.	Confidential Channels: we promote the use of a dedicated, third-party confidential online survey and online portal for anonymous reporting of ethical concerns, including suspected modern slavery. We also conduct scheduled worker forums and toolbox talks to ensure safe, direct consultation and feedback without fear of reprisal.	IMS-128, Version 01, 28/08/2025
Environmental Policy	Steel Build International aims to minimise environmental impacts and promote sustainability in operations and supply chain. Our commitment includes continuous improvement in resource efficiency and environmental initiatives. By integrating sustainability into our projects, we deliver steel solutions that meet client expectations while protecting the environment for future generations.	Our Environmental Policy is publicly accessible on our corporate website and widely communicated through internal channels to ensure awareness and compliance. Any breach of these standards will be thoroughly investigated and may lead to corrective measures, including disciplinary action where appropriate.	IMS-106, Version 01, 04/07/2025
Fair Work Information Statement	This statement ensures awareness of workplace rights under Australian law (e.g., minimum wage, maximum hours, flexible	The Fair Work Information Statement is provided to all new employees upon commencement of employment as part of their	IMS-108, Version 02, 19/09/2025

Policy Name	Relevance to the Modern Slavery Policy	Implementation mechanisms	Current Version & Date
	work). Ensuring all workers, especially vulnerable or migrant workers, understand this information is critical against wage exploitation and modern slavery.	induction package. Additionally, the statement is available in our internal server.	
Grievance Policy	The Grievance Policy is vital for detecting, reporting, and remediating human rights breaches, including modern slavery. It provides a clear, confidential process for raising concerns, ensuring prompt investigation and prevention of escalation, thus fulfilling our commitment to the UN Guiding Principles on Business and Human Rights.	The policy outlines specific channels for reporting, including direct management, external 3 rd party HR, and the confidential anonymous online survey. Furthermore, all managers receive training on their responsibility to handle grievances without prejudice and ensure the protection of the complainant.	IMS-110, Version 02, 25/03/2025
Modern Slavery Policy	This is the overarching foundational document that formalises Steel Build International's commitment to combatting modern slavery, human trafficking, and all forms of exploitation. It establishes the Company's zero-tolerance stance and mandates the application of due diligence procedures across the business and supply chain.	The policy is formally approved by the Board of Directors to ensure high-level governance and accountability across the Company Operations. Implementation mandates the use of risk assessments and third-party audits for high-risk suppliers and projects (as detailed in the "Actions Taken" section). Crucially, the policy is communicated internally to all employees and key business partners, ensuring visibility and clear compliance expectations.	IMS-114, Version 02, 25/03/2025
Procurement Policy	Steel Build International's Procurement Policy promotes ethical sourcing in our supply chain. We incorporate sustainability and human rights into procurement. Our approach considers international frameworks like the UN Guiding Principles, UN Global Compact, and UN Sustainable Development Goals to enhance our practices.	Supplier selection processes include mandatory criteria like adherence to our Modern Slavery Policy, environmental responsibility, and compliance with Australian standards. To manage risk, we use a Supplier Evaluation Form for high-value engagements (annual spend > \$50,000) or suppliers affecting our Integrated Management Systems. This evaluation features a risk rating system considering geographic location, industry risk, labour practices, and environmental performance. Higher risk suppliers undergo enhanced due diligence, including annual reviews and corrective action plans as needed.	IMS-124, Version 02, 31/07/2025
Whistleblower Policy	Steel Build International is committed to transparency and integrity in operations and supply	Under this policy, we provide an anonymous reporting channel via a secure Microsoft Form, accessible	IMS-120, Version 02, 25/03/2025

Policy Name	Relevance to the Modern Slavery Policy	Implementation mechanisms	Current Version & Date
	chain. We have a Whistleblower Policy for secure, confidential reporting of misconduct and strong protections for reporters. We take all reports seriously, investigate promptly, and address identified risks or breaches. This mechanism is key to our grievance and remediation process, supporting our commitment to human rights and ethical practices.	through our internal server and other channels.. This form is shared to stakeholders—including employees, subcontractors, suppliers, and workers within our supply chain—and can be used to report any concerns, including suspected modern slavery practices or unethical conduct.	
Work Health and Safety	At Steel Build International, health and safety are fundamental to our operations. We are committed to a workplace where everyone is protected, valued, and empowered to work safely. Through risk management, training, and adherence to standards, we aim to eliminate hazards and promote a safety culture across all projects.	Our Work Health and Safety Policy is publicly accessible on our corporate website and widely communicated through internal channels to ensure awareness and compliance. Any breach of these standards will be thoroughly investigated and may lead to corrective measures, including disciplinary action where appropriate.	IMS-121, Version 01, 04/07/2025

5. Structure, Operations

Australian Steel Erection Dominance



The operations with high risk of Modern Slavery exposure

Our intricate supply chain is fundamental to our operations and a key focus for our modern slavery due diligence. It includes:

- **Steel Fabrication & Sourcing (Vietnam):** Our vital partnership with Steel Builder VN for advanced pre-engineered and high-tech structural steel.
- **Logistics & Shipping:** The complex network moving materials and finished goods globally.
- **Subcontracted Erection Services:** The on-site labour teams who bring our structures to life.

Our Workforce

We are proud to have a dedicated team of **more than 1500 employees** across our Australian and Vietnamese operations. Each individual plays a crucial role in upholding our standards.

Commitment to Ethical Sourcing: ResponsibleSteel™

Steel Builder VN are proud members of **ResponsibleSteel™**, the global multi-stakeholder standard and certification program for the steel industry. This membership reflects our strong commitment to:

- **Minimising environmental impact.**
- **Ensuring responsible and transparent sourcing practices.**
- **Upholding human and labour rights** throughout the steel value chain.

6. Supply chain management and Due Diligence

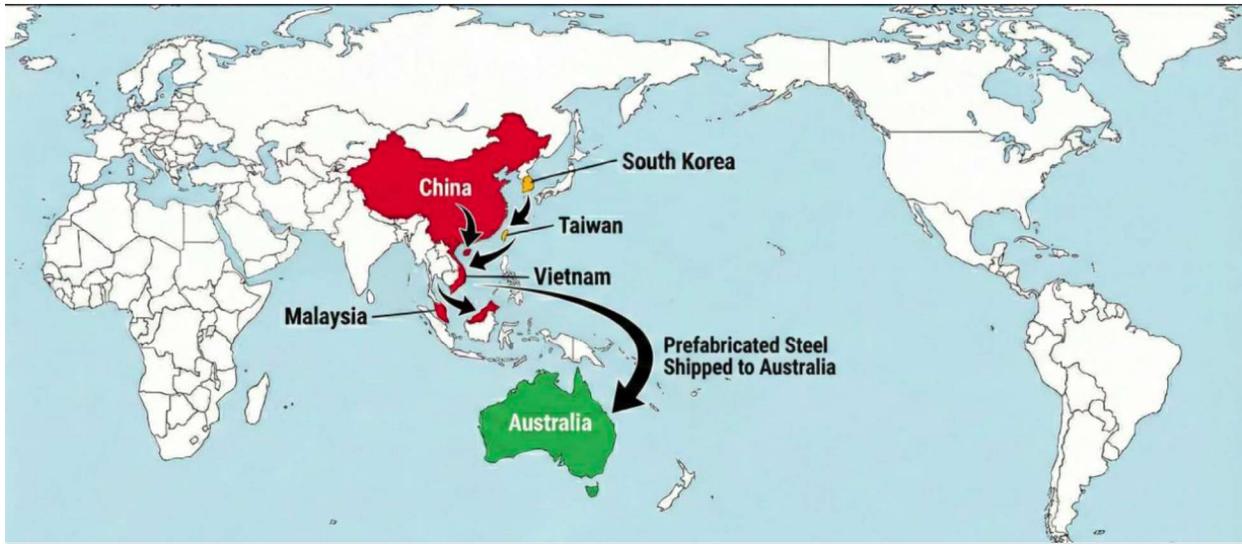
Our strategy for managing modern slavery risk is embedded directly into our supply chain management process, ensuring accountability from sourcing to delivery.

6.1. Ethical Sourcing and Traceability

Steel Builder Australia sources the majority of its steel and plate from Southern East Asia, ensuring full traceability through oversight by our Vietnam-based management team, including supply chain coordinators and shared enterprise resource planning systems, such as MRP.

At our Vietnam facility, we demonstrate ethical stewardship by implementing essential sustainability measures, including energy efficiency programs, waste minimisation strategies, and water conservation initiatives, which align with responsible manufacturing practices.

Steel Builder VN operates within a global supply chain and actively monitors the sourcing, delivery, and shipment of raw materials from key regions, including China, Malaysia, Taiwan, and South Korea. This oversight helps ensure transparency and accountability throughout our procurement process.



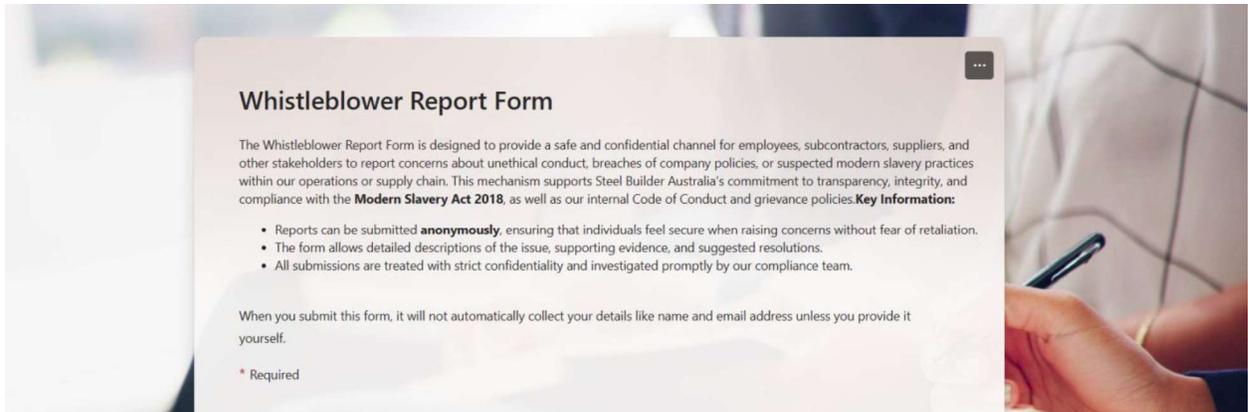
As Steel Build International operates within a global supply chain, we seek to work with suppliers who demonstrate responsible practices, including environmental sustainability and industry-recognised standards where possible. We aim to align with best practices for Australian building projects, including Green Star requirements, by engaging these suppliers that demonstrate and implement GBCA-recognised sustainability initiatives, such as operating SSA- verified Steel mills, being members of ResponsibleSteel™, and/or holding WSA CAP certification.

6.2. Enforcement and Monitoring Framework

Our **Code of Conduct** and **Modern Slavery Policy** are supported through **contractual obligations** and a multi-layered monitoring framework. These measures include:

- **Contractual Control:** We request that all subcontractors adhere to our ethical standards and safety guidelines, which are reviewed through **regular internal audits**.
- **Prequalification:** We conduct mandatory **supplier pre-qualification and onboarding checks**, including verification of labour practices against our internal supplier checklist.
- **Assessment & Audit:** We utilise a blend of **third-party audits** and detailed **self-assessment questionnaires (SAQs)** to assess compliance across our network.
- **Secure Reporting:** Our **Whistleblower Policy** provides secure and confidential reporting channels for any potential breaches of ethical or labour standards, ensuring all concerns are heard.
- **Corrective Action:** We maintain a **Non-Conformance Report (NCR) register** to track and document corrective actions. **Severe or repeated non-compliance** may result in contract termination.
- **Capacity Building:** We proactively provide suppliers (particularly Steel Builder VN) with **guidance and support** on ethical labour practices, focusing on improving modern slavery risk awareness, recognising **red flags** (especially in high-risk countries), and understanding reporting procedures.

Compliance is demonstrated through Australian-led oversight, including regular factory audits, review of supplier practices, and verification of traceability documentation against our Code of Conduct and Modern Slavery Policy requirements.



6.3. Partnerships and Continuous Improvement

Our due diligence is strengthened by maintaining **long-standing relationships** with the majority of our key suppliers. These enduring partnerships provide valuable **transparency** and enable a comprehensive understanding of their commitments to human rights and responsible sourcing practices.

These partnerships enable us to engage proactively on issues (if noticed), such as ethical labour practices, fair treatment of workers, and compliance with international standards. Through ongoing dialogue and collaboration, we work to ensure that our supply chain reflects our values and mitigates risks associated with modern slavery. This approach forms a key part of our due diligence process and supports continuous improvement in responsible sourcing across all operations.



The majority of Steel Builder VN raw and production materials are purchased through multi-year contractual agreements which include anti-bribery and corruption (ABC) and modern slavery clauses.

7. Risks of Modern Slavery

We recognise that the global and complex nature of the structural steel industry inherently elevates the risk of modern slavery in specific areas of our operations and supply chain. We categorise these elevated risks based on geography, sector, and the level of control we maintain.

Key Areas of Elevated Risk

Our risk assessment identifies vulnerabilities within the following areas:

Risk Category	Specific Vulnerability & Location	Why it is Elevated Risk
Manufacturing & Fabrication	Offshore steel manufacturing (Vietnam) and other overseas suppliers in regions with weaker regulatory and labour protections.	Risk of forced labour, excessive hours, and poor health/safety standards in factory environments.
Construction Labour	Subcontracted labour for on-site construction and erection services in Australia.	Risk of wage exploitation, deceptive labour hire practices, and debt bondage, particularly concerning vulnerable migrant workers.
Input Materials	Raw material sourcing (e.g., iron ore, coking coal) where transparency is limited, from Southern East Asia countries.	Difficulty in tracing origins and ensuring ethical labour practices at the start of the supply chain.
Logistics	Logistics and shipping networks (freight, port services, and transportation).	Risk of labour exploitation in remote, mobile workplaces (e.g., long-haul trucking and shipping crews) with low visibility.

Risk Assessment Methodology

These risks are not assessed in isolation. Our analysis is conducted based on a combination of factors:

- **Country Profiles:** Reviewing the prevalence of modern slavery and the strength of labour laws in the country of operation (e.g., Vietnam).
- **Supplier Practices:** Evaluating historical and audited performance of specific suppliers.
- **Industry Vulnerabilities:** Acknowledging risks inherent to the construction and manufacturing sectors globally.

Inclusion in Corporate Risk Register

We view modern slavery risk as a serious strategic business risk. Accordingly, it has been formally included in the Steel Build International Business Risks Register. Our primary supply chain risk is categorised as a geopolitical/socioeconomic-related risk due to its specific concentration within our main supply line originating from our Vietnam factory. In addition, we have identified the potential risk of labour exploitation within Vietnam.

R014	Labour Exploitation in Overseas Supply Chain (Vietnam operations)	Forced or underpaid labor in steel manufacturing, Reputational damage and legal non-compliance under Australian Modern Slavery Act, Disruption if unethical suppliers are removed	Moderate	Conduct supplier audits and require compliance with Supplier Code of Conduct; Implement traceability systems for steel origin; Engage third-party certification; Maintain alternate ethical suppliers and diversify sourcing.
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7.1. High-Risk Categories for Steel Builder Australia

1. Manufacturing and Fabrication (Vietnam)

Risks: Forced labour, excessive unpaid, or compulsory overtime.

Mitigation: Enhanced auditing: mandate on-site ethical audits (internal and 3rd party) focusing on working hours, living conditions, and worker interviews. Supplier Vetting: we have encouraged our Vietnam Partner (Steel Builder VN) to pursue third-party certifications. Traceability: we maintain full traceability by engaging with Vietnam-based management directly.

2. Labour Hire, Contractors & Subcontractors

Relying on subcontractors for steel erection across Australia.

Risks: Wage exploitation: Underpayment, illegal wage deductions, unsafe working conditions, lack of compliance with Fair Work Act and WHS standards. Deceptive recruiting: false promises of work or high wages made by rogue labour hire intermediaries. Subcontractor management, health and safety breaches, potential for undocumented labour



Mitigation: Strong onboarding, contractual obligations by embedding Modern Slavery Clauses and Fair Work compliance requirements into all subcontractor agreements. We have introduced site monitoring through the Site Connect platform and conduct regular Toolbox meetings. Site Connect supports geotagging, WHS inductions, and mechanisms to enhance safety and compliance on-site.

3. Raw Materials (Steel from South and East Asia)

Risks: Labour exploitation in steel manufacturing, environmental non-compliance, corruption.

Mitigation: Third-party audits, internal HSEQ reviews, and supplier compliance with our Code of Conduct, Modern Slavery Policy and their provided ISOs or other certificates in regards fair and ethical trade.

4. Shipping & Logistics

Steel imported from Vietnam involves international freight.

Risks: Modern slavery in shipping crews, long supply chains with limited visibility, excessive, prolonged contracts, restriction of movement while docked; non-payment of wages; substandard living conditions on vessels using 'Flags of Convenience'.

Mitigation: we engage shipping providers with ethical sourcing certifications and audit reports and documented adherence to the Maritime Labour Convention (MLC, 2006).



7.2. Acknowledgement of potential risks

Our Company operates within a global supply chain, sourcing fabricated steel from Vietnam and raw materials from manufacturers across South and East Asia, as well as engaging subcontractors across Australia for erection and installation services. We acknowledge that modern slavery risks may arise if any goods or services we procure—or their inputs—are produced, transported, or delivered using exploitative practices.

We recognise that these risks are more prevalent in the lower tiers of our supply chain, particularly in offshore steel manufacturing and international shipping, where visibility and direct influence are limited. Similarly, subcontracted labour in Australia can present risks related to fair work compliance and ethical employment standards, especially if there are any foreigners and immigrants working in Building sector.

Furthermore, while we maintain strong oversight of our steel supply chain and shipping coordination, we acknowledge that we do not have full visibility or direct control over the employment conditions of personnel working on vessels operated by third-party shipping providers. These crews are employed under the jurisdiction of international maritime regulations and the policies of their respective employers. To address this limitation, we engage only with reputable logistics partners who demonstrate compliance with international labour standards and ethical practices.

Overall, to address these challenges within our control, we have established a range of measures and business-as-usual processes designed to reduce modern slavery risks. These include supplier due diligence, independent third-party audits, internal HSEQ reviews, and the use of digital monitoring platforms such as Site Connect. Together, these measures enable us to identify, assess, and mitigate potential risks while promoting transparency, accountability, and ethical practices across our operations and supply chain.

8. Our commitment to Ethical Conduct and Fair Employment

At **Steel Build International**, our commitment to **integrity, fairness, and respect** is non-negotiable. Our ethical framework is the primary defence against modern slavery, ensuring all people connected to our business are treated with dignity.

Ethical Standards and Fair Workplace

Our **Code of Conduct** sets clear expectations for every employee, supplier, and subcontractor, requiring adherence to human rights principles and the **prevention of modern slavery**.

We commit to full compliance with Australian workplace laws, as reinforced by the **Fair Work Information Statement**. This ensures all workers receive **fair pay**, safe working conditions, and mandated entitlements.

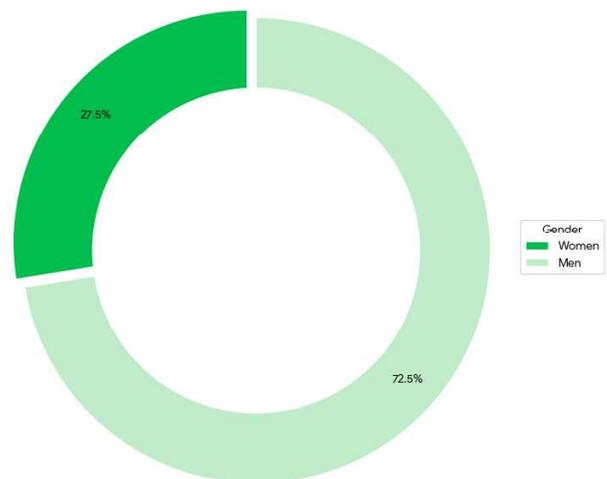
Diversity and Inclusion

We actively foster a workplace built on **meritocracy, inclusion, and diversity**, committed to eliminating discrimination and bias.

Progressing Gender Equality

We are proud of our progress in creating opportunities for all. The number of women in our business has **increased by 27.5%** over the past year.

Gender Representation at Steel Build International



Grievance Mechanism

Our **Dispute Resolution Policy and Procedure** provide a structured, multi-channel framework for prompt and fair resolution.

- **Reporting:** Stakeholders (including employees, suppliers, and subcontractors) can raise concerns formally in writing or **anonymously** via our **secure Microsoft Forms** channel.
- **Response:** Higher Management commits to a prompt review and a written response outlining findings and proposed actions, ensuring transparency and respect throughout the process.
- **Protection:** Retaliation against any individual raising a concern is strictly **prohibited**.

This mechanism is a **critical component** of our Modern Slavery Policy, ensuring workers in our supply chain have a safe way to report, breaches are promptly investigated, and **remediation processes** are in place for any confirmed cases of exploitation. All relevant policies (Grievance, Anti-Discrimination, etc.) are communicated during induction and reinforced via mandatory training.

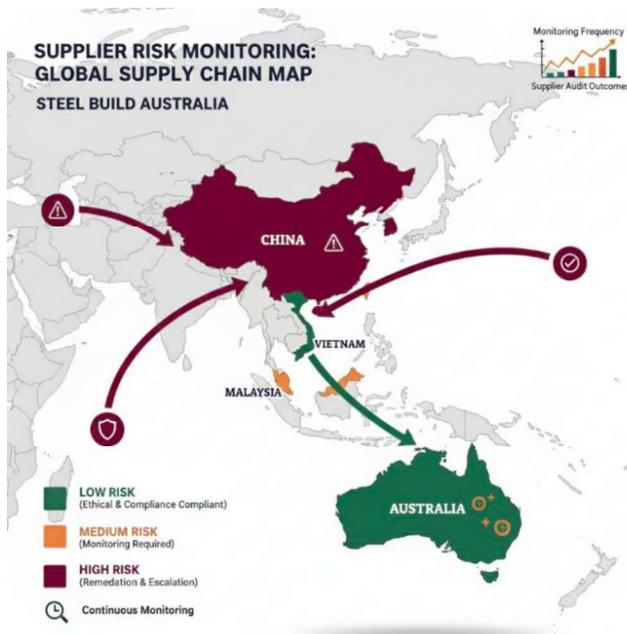
9. Actions Taken in FY2025

9.1. Policy Implementation

During FY25 Steel Build International focused on formalising its commitment and embedding anti-slavery clauses throughout its operations and supply chain.

Steel Build International upheld its commitment to ethical governance by reviewing and maintaining its Modern Slavery Policy (IMS-114, Version 2) and critically, by embedding anti-slavery clauses into all supplier contracts and the Code of Ethical Purchasing.

9.2. Due Diligence, supplier assessment



We strengthened our supply chain controls through targeted vetting and risk analysis:

- ✓ Conducted initial due diligence for new suppliers, including self-assessment questionnaires. Supplier risk assessments and audits.
- ✓ Mapped supply chain tiers and assessed geopolitical risks. Comprehensive mapping of direct and indirect suppliers, including geopolitical risk analysis.
- ✓ Contractual obligations requiring compliance with anti-slavery standards and our Code of Conduct.

9.3. Training and Awareness

Mandatory induction and ongoing training for employees on modern slavery risks, delivered via Citation HR for all Steel Build International employees.

Training includes awareness of exploitation indicators and reporting mechanisms.

9.4. Monitoring

We employed a comprehensive, technology-driven approach to monitor our operations and high-risk supply chain components, focusing on transparency and worker welfare:

- Initiated supplier reviews and internal audits.
- Monitored key supplier (Steel Builder VN) through digital tools (MRP system) and collaborative engagement.
- Feedback from stakeholders integrated into improvement plans.
- Internal audits conducted to verify adherence to policy.

Technology for Transparency

We adapted the Site Connect System to track subcontractor attendance and hours via geotagged data, while also providing a direct channel for reporting fair work, safety, and environmental concerns.

Payment Assurance

Employee wages are processed via Xero payroll, guaranteeing accuracy, timeliness, and integrity in payments.

Vietnam Oversight

Our key supplier, Steel Builder VN, is closely monitored through digital MRP tools, regular audits, and HSEQ reviews. Compliance is reinforced by Vietnam's Labour Code (2021), which guarantees fair wages, regulated working hours, and occupational health and safety standards. These protections are supported by trade unions and strengthened by Vietnam's ratification of key International Labour Organization (ILO) conventions, including those on forced labour, collectively ensuring ethical employment practices and preventing exploitation.

Traceability in International Shipping Operations



Steel Builder VN manages the transportation of steel products from its factories in Vietnam to Australia through established and consistent shipping routes. All steel is shipped in standardised containers via reputable international shipping lines, typically transiting through major ports such as Singapore. This predictable logistics process supports timely delivery and enables full visibility of shipment progress. As all of our shipments follow

standardised routes and container specifications, enabling full traceability from origin to delivery. We actively monitor logistics through digital tracking systems that provide vessel details, port history, and estimated delivery timelines. These measures support our commitment to mitigating modern slavery risks by maintaining visibility over transportation processes and ensuring our risk mitigation.

Continuous Improvement

Ongoing supplier reviews, audits, and stakeholder feedback meets our commitment to continuous improvement.

10. Remediation and Response

We are committed to swift, ethical, and effective action the moment a potential issue is identified. Our remediation and response strategy is built on the principles of **confidentiality, accountability, and the well-being of affected individuals.**

❖ Immediate & Ethical Remediation

- **Secure Reporting Channels:** ensuring zero-barrier reporting through anonymous and confidential mechanisms, including dedicated whistleblower channels and clear escalation procedures, ensuring all individuals can raise concerns without fear of reprisal.
- **Prompt & Confidential Investigation:** all allegations are treated with the highest level of seriousness and are investigated promptly, ethically, and in strict confidence by trained personnel. Our priority is to protect the identity and safety of the victim and the reporting individual.
- **Decisive Supplier Accountability:** We require immediate implementation of robust corrective action plans from any supplier found in breach of our policy. Failure to remediate swiftly and completely will result in immediate review and likely termination of the contract.
- **Collaboration with Authorities:** For the most serious concerns, we do not hesitate to escalate findings to relevant national and international authorities (e.g., the Australian Federal Police) to ensure justice and prevent further harm.

❖ Driving a Culture of Ethical Leadership

Modern slavery due diligence is not a box-ticking exercise – it is a core business imperative. We embed this responsibility from the top down.

- **Executive Ownership:** We secure **active engagement and personal commitment** from our senior management and project teams for ethical sourcing, fair work practices, and environmental stewardship across all operations.
- **Integrated Decision-Making:** These ethical principles are **compulsory** and are fully integrated into our procurement strategy, operational planning, and major investment decisions.
- ❖ **Comprehensive Due Diligence and Monitoring**
We move beyond basic checks to implement continuous, technology-enabled oversight of our supply chain.
 - **Advanced Risk Mapping:** We leverage sophisticated tools, such as Site Connect for real-time subcontractor monitoring and detailed Supplier Evaluation Forms, to conduct dynamic, data-driven risk rating across our entire value chain.
 - **Continuous Auditing and Verification:** We mandate regular, independent third-party audits and rigorous internal Health, Safety, Environment, and Quality (HSEQ) reviews, with a particular focus on high-risk jurisdictions, like our Vietnam operations.
- ❖ **Transparency and Continuous Improvement**
Our work against modern slavery is an ongoing journey of learning, adapting, and increasing transparency.
 - **Dynamic Risk Assessment:** Our risk profiles are reviewed and updated annually, not just based on internal audit findings but also in response to evolving geopolitical factors, emerging industry best practices, and new human rights legislation.
 - **Accountability in Action:** We commit to demonstrating our efforts by publishing our annual Modern Slavery Statement and comprehensive sustainability report (as required under GPFS (RDR) and AASB S2 reporting standards), ensuring clear accountability to our stakeholders and the public.
- ❖ **Building Global Capability**
We equip every individual involved in our value chain with the knowledge and tools to uphold human rights.
 - **Mandatory Comprehensive Training:** We provide mandatory and regular training to all employees on grievance mechanisms, fair work compliance, and environmental standards, ensuring they recognise and report risks. Moreover, we are looking to expanding these trainings for our subcontractors/ suppliers.
 - **Culturally Sensitive Resources:** We have prepared multilingual resources (e.g., Vietnamese whistleblower form) for our offshore suppliers and workers and plan to implement them next year. This initiative demonstrates our commitment to respecting local contexts and ensuring every worker’s voice can be heard.



11. Effectiveness Assessment

We measure the effectiveness of our anti-slavery framework not just by process completion, but by the tangible reduction of risk and our readiness to act.

KPI Focus	Metric	Result	Visual Outcome
Awareness & Training	Employee Training Completion Rate	100%	 Universal Competency
System Maturity	Monthly Compliance Reviews	Monthly Compliance Reviews	 Continuous Oversight

Our Commitment to Decisive Action

At Steel Build International, we view an effective response to modern slavery as one that proactively identifies current and emerging risks and takes decisive action to prevent and address any involvement in harm. We are committed to review any dispute or Modern Slavery reports, anonymous submissions in 3 to 5 business days, depending on report urgency. We are committed to investigating all identified issues and implementing remediation actions to reduce future risks and address current concerns. Where risks of modern slavery are assessed as severe or high, we will escalate and report them promptly to the relevant Australian authorities and in accordance with applicable legislation and company policy.

Given that Steel Build International was established in 2023, our business and associated modern slavery mechanisms are relatively new. We have spent the initial period focusing on the robust implementation of our due diligence and reporting systems. As of this statement's publication, we have not received any reports or confidential submissions through our whistleblower channels regarding possible modern slavery cases within our operations or supply chain.

Strengthening the Foundation

This year, our due diligence process, including supplier risk assessments, audits, and monitoring systems, was significantly enhanced through collaboration between our **Finance, HR and HSEQ teams**, forming the foundation of our ongoing improvement initiatives. We prioritised partnering with suppliers who share our deep commitment to ethical practices.

We are committed to working with suppliers who share our values and demonstrate a genuine commitment to ethical practices. Raising awareness, building knowledge, and increasing capacity across our workforce and supply chain are essential to reducing modern slavery risks. We continue to invest in **training and capability-building programs** so that our employees and subcontractors can confidently identify risks and take appropriate action.

Consultation

This statement was approved by Governing body of Steel Build International and developed in consultation with:

- ✓ *Procurement and HSEQ departments*
- ✓ *General Managers*
- ✓ *Project Managers*
- ✓ *Finance Managers.*

12. Our Achievements

Steel Builder AU and Steel Builder VN have achieved significant sustainability and governance milestones throughout our years of business development. These accomplishments reflect our commitment to ethical practices, environmental responsibility, and robust corporate governance. From implementing modern slavery risk management frameworks to strengthening supplier oversight and promoting fair labour standards, we have consistently advanced initiatives that align with global best practices. Our progress demonstrates a long-term dedication to building a transparent, responsible, and sustainable supply chain.



13. Closing Statement

This Modern Slavery Statement has been developed collaboratively by Steel Builder Australia in consultation with our HSEQ, HR, and Finance Department, ensuring alignment with our compliance, operational, and ethical obligations. The statement has been reviewed and approved by our Executive Leadership Team following a thorough consultation process with the Steel Builder VN Board and Senior Leadership Team.

The approach for this year's statement and the final draft was shared widely for **comment, discussion, and approval**, reflecting our commitment to transparency and stakeholder engagement. Importantly, this is **Steel Build International First Modern Slavery Statement**, prepared in response to our significant business growth and expansion during FY25. As a company established in 2023, we recognise the importance of embedding robust governance and ethical practices into our operations and supply chain from the outset.

We remain committed to continuous improvement and will review and refine our approach annually to ensure we meet our obligations under the **Modern Slavery Act 2018** and uphold our values of **Transparency, Ownership, and Consistency**.



Arthur Visedo,
Managing Director of
Steel Build International