

Modern Slavery Statement

Metroll Pty Ltd and Metroll Victoria Pty Ltd

1. Introduction

This statement sets out the steps taken by Metroll Pty Ltd ACN 001 446 439 and Metroll Victoria Pty Ltd ACN 005 505 135 (together referred to as **Metroll**) to address modern slavery risks in Metroll's business operations and supply chains during the FY21 financial year. This statement has been prepared as a joint statement pursuant to section 14 of the *Modern Slavery Act 2018* (Cth).

Metroll is committed to ensuring that there are secure management systems and procedures in place to prevent exploitations of human rights within Metroll itself and Metroll's supply chain.

Metroll consulted the relevant companies it owns or controls in the development of this statement.

2. Structure and operations

Metroll is an Australian manufacturer and distributor of a wide range of steel building products and is committed to providing effective building solutions. Metroll has an expansive and diverse customer base across government, infrastructure, mining, engineering, industrial, residential, rural and transport sectors. Metroll Pty Ltd and Metroll Victoria Pty Ltd are large proprietary companies that are part of a larger group of companies in the steel manufacturing and construction sector.

Metroll is a national brand with approximately 25 sites across New South Wales, Victoria, South Australia, Queensland, Northern Territory, Western Australia, and Tasmania.

Metroll Group manufactures and supplies a wide range of building products including roofing, cladding, panels, fencing, guttering, rainwater products and accessories.

3. Supply chain

Most of Metroll's products are manufactured and supplied directly by Metroll and sold to businesses and customers. The raw materials, consumables, human resourcing agencies and all other businesses utilised by Metroll in the course of its operations are primarily companies incorporated in Australia.

Metroll strives to engage suppliers with a good reputation, ethics and reliable business practices. Metroll does not knowingly contract with or engage any businesses that are involved in modern slavery or human trafficking, but Metroll acknowledges that there is always some risk that may contribute to modern slavery practices by virtue of contracting with third parties and being part of a supply chain.

Generally, supply contracts are entered into on the basis of Metroll's standard terms and conditions or negotiated contractual terms depending on the type of product or service and Metroll's affiliation with the third party. Metroll requires its suppliers to comply with all relevant laws and regulations and ensures that due diligence checks are carried out prior to engagement of third parties.

4. Assessing and addressing modern slavery risks

At Metroll, we understand the importance of raising awareness to aid the ending of modern slavery practices. To that effect, Metroll has implemented the following processes and tools to assist in the detection and prevention of modern slavery risks:

- a) **Supply chain mapping:** Metroll undertakes due diligence in respect of its key suppliers to ensure that these parties are aligned with Metroll's policies, codes and values. Supply chain mapping involves categorising suppliers by risks associated with their geographic location, size and industry.

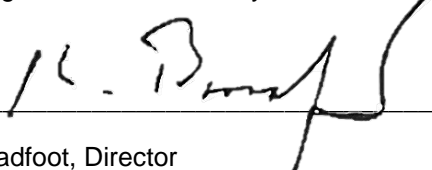
- b) **Follow up questionnaire:** Metroll requires suppliers identified as “high risk” during the supply chain mapping exercise to complete a modern slavery risk questionnaire to ensure compliance with modern slavery laws and to identify any issues. Significant issues are escalated to senior management.
- c) **Training:** Awareness of modern slavery risks in the workplace are communicated to Metroll employees through toolbox talks and information sheets. Senior management and procurement personnel briefings are also carried out to raise awareness of modern slavery risks.
- d) **Supplier Code of Conduct:** Metroll has a Supplier Code of Conduct applicable to all of Metroll’s suppliers. The Supplier Code of Conduct contains provisions specifically relating to anti-bribery and corruption, human rights including modern slavery, work health and safety and the environment.
- e) **Anti-Slavery Policy:** Metroll has adopted an Anti-Slavery Policy which affirms Metroll’s commitment to upholding its responsibility to comply with all modern slavery laws and regulations.
- f) **Whistleblower Policy:** Metroll’s Whistleblower Policy protects employees, service providers and suppliers who voice their concerns about certain events or conduct in the business that may be unlawful or unethical. The policy validates Metroll’s efforts in safeguarding the confidentiality, wellbeing and career of any individual who asserts any issues that affect the integrity of Metroll’s business operations.

5. Assessing effectiveness

Metroll is focused on continuously strengthening its procedures and processes to combat modern slavery practices and ensuring the protection of human rights. Metroll will continue to monitor, evaluate and assess the effectiveness of its established procedures by:

- a) monitoring Metroll’s existing suppliers and undertaking risk assessments in relation to new suppliers to ascertain whether they pose a modern slavery risk and, if they do, to reduce that risk to the maximum extent possible;
- b) reviewing and updating training material to ensure that it is up to date, relevant and effective;
- c) reviewing Metroll’s policies and Supplier Code of Conduct to ensure they remain relevant and in compliance with all applicable laws; and
- d) engaging with Metroll’s suppliers and key customers to verify they are following through with any modern slavery actions they have committed to undertaking.

This statement was approved by the Directors of Metroll Pty Ltd and Metroll Victoria Pty Ltd, in their roles as principal governing bodies of Metroll Pty Ltd and Metroll Victoria Pty Ltd on 22 February 2022.



Ken Broadfoot, Director