



Modern Slavery Statement for
Macsteel International Australia Pty Limited
Financial Year ending 31 December 2020
As required under the Commonwealth Modern Slavery Act 2018

MACSTEEL INTERNATIONAL AUSTRALIA PTY LIMITED
"GLOBAL STRENGTH, LOCAL KNOWLEDGE"

LEVEL 1, 40 BURWOOD ROAD, HAWTHORN, VICTORIA 3122, AUSTRALIA. TEL +61 3 9805 0400
ACN: 000 904 978 ABN: 94 000 904 978
WWW.MITGR.COM.AU

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Identify the reporting entity

This Modern Slavery Statement covers the activities of Macsteel International Australia Pty Limited (“MIAUS”) ABN 94 000 904 978 as informed by the Commonwealth Modern Slavery Act 2018, for the period 1 January 2020 to 31 December 2020 (FY20).

Describe the reporting entity’s structure, operations and supply chains

Our Structure

Macsteel International Australia Pty Ltd is a company formed in Australia. Its registered office is Level 1, 40 Burwood Road, Hawthorn VIC 3122 and it employs 40 people in Australia.

It is a subsidiary of Macsteel International Trading Holdings BV (incorporated in the Netherlands) which is part of a larger group of entities operating around the world, namely Macsteel



Operations

Macsteel International Australia Pty Limited’s operations include:

- Sourcing of steel products
- Marketing and selling of steel products
- Logistics management
- Distribution of steel products
- Quality management
- Claims handling

Our Supply Chain

Macsteel International Australia Pty Limited supplied a wide range of steel products to customers in Australia and New Zealand. A comprehensive list can be found on our website at <https://www.mitgr.com.au/product>

Steel products are sourced from business operating in various countries. The significant countries that we source our steel from are Asia, the Middle East and Europe.

Logistics service providers are sourced from businesses domiciled in Australia.

Distribution services providers are sourced from businesses domiciled in Australia.

Macsteel International Australia Pty Limited employees individuals in Australia and contracts with agents in various other countries.

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

We recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

Risk assessment methodology

We developed a risk assessment methodology which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location and specific entity risk. Our initial risk assessment has indicated that our operations and supply chain overall have a low potential for modern slavery risks. Based on the sectors, products and geography of our supply chain, our risk profile is summarised in the table below.

Risk	Description of Risk
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.
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.
Geographic	There is a risk of the potential for modern slavery practices in the supply chain in certain international geographic locations in which MIAUS operates that may have a higher prevalence of modern slavery due to factors such as poor governance, compromised rule of law, conflict zones, being a centre of high migration inflows and socio-economic weaknesses such as poverty.
Specific Entity Risk	Certain companies or business 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. No such companies or businesses were identified in our supply chain.

Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes

Initial Risk Assessment

As noted above, we undertook an initial risk assessment to identify any key modern slavery risks that exist within our operations and supply chains. We prioritised further risk assessment on those operations and direct suppliers that we identified as potentially 'high risk' during our initial risk assessment (for example, based on sector or geography). Where necessary, we will conduct further desktop research to understand our key risk areas. We further prioritised those key risk business and supply relationships, based on where we had the greatest leverage to mitigate the potential modern slavery risks that existed in the relationship.

Supplier Questionnaire

We have also developed a detailed supplier questionnaire to understand the modern slavery risks with new and existing suppliers. We expect our suppliers to have anti-slavery policies or equivalent and where possible we will incorporate modern slavery clauses into our contracts with our suppliers.

Governance and accountability framework

MIAUS expects all suppliers in our supply chain to have no tolerance for modern slavery. The prevention, detection and reporting of modern slavery in any part of MIAUS business or supply chain is the responsibility of all those working for us. MIAUS's Board of directors has overall responsibility for approving MIAUS's annual modern slavery statement and ensuring that the company complies with MIAUS's disclosure obligations under Modern Slavery Laws.

Policies and procedures

MIAUS has two key policies and procedures to ensure we have strong frameworks to enable us to assess and address modern slavery risks, they are:

- Modern Slavery Policy for our business that establishes and communicates our commitment to addressing modern slavery risks in our business and driving an accountability for ethical business practices across our organisation;
- Grievance Procedure that supports and encourages employees to raise concerns without fear that their future employment prospects will be adversely affected.

These policies and procedures complement our existing governance framework which includes:

- Anti-Bribery and Anti-Corruption Policy;
- Diversity Policy;
- Whistleblower Policy; and
- Code of Conduct within our Corporate Governance Charter.

Supplier Site Visits

Where and when it is safe to do so (given risks and restrictions presented by COVID-19), MIAUS also intends to perform site visits to selected suppliers, particularly those that may be identified as having a potential risk to modern slavery to ensure they are operating safely and present no identified risk to modern slavery practices exists within those operations. Unfortunately that is unlikely to occur until 2022 due to current international travel restrictions.

Staff Training

MIAUS has developed and will roll out training sessions for all relevant staff across the business to enable everyone in the business to identify and report modern slavery risks and breaches.

Ongoing Commitment

We understand the importance of working collaboratively with our employees, suppliers and the broader industry to combat modern slavery. That is why during our first reporting period we took a number of steps to assess and address modern slavery in our operations and supply chains. We will continue on that path into our second reporting period.

How the reporting entity assesses the effectiveness of such actions

We are committed to reviewing the effectiveness of our actions by:

- regularly reviewing our modern slavery processes, with senior management meeting at least annually to consider whether we are appropriately identifying and evaluating our modern slavery risks, prior to reporting to the Audit and Risk Committee;
- when engaging a new supplier, assessing whether our existing risk management processes remain appropriate;
- conducting an annual review of our data sources, to ensure we are appropriately identifying and evaluating our modern slavery risks.

We also intend to monitor our performance against a number of key performance indicators. These will include:

- the percentage of relevant employees who have completed training on modern slavery;
- the number of suppliers requested to complete a detailed questionnaire; and
- the number of suspected or identified modern slavery incidents.

Describe the process of consultation with any entities that the reporting entity owns or controls

Not relevant to MIAUS.

Include any other information that the reporting entity, or the entity giving the statement, considers relevant

FY2021 focus

As this is our first statement, we recognise there are further steps we can take to assess and address the risks of modern slavery in our operations and supply chains and we are committed to a continual process of improvement around identifying and eliminating modern slavery risk.

In FY2021 we are committed to further developing our policies and procedures to ensure we are implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or our supply chains. The main focus areas will be around:

- internal training programs for employees.
- further development of the due diligence processes on existing and new suppliers through further developed questionnaires and procurement processes; and

Approval by the Principal Governing Body for the Reporting Entity

This Modern Slavery Statement has been approved by the Board of Directors on 30 June 2021:



Michael Minihan

Managing Director of Macsteel International Australia Pty Limited