



# 2024

## MODERN SLAVERY STATEMENT

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This statement was approved by the board of Italtsteel, in their capacity as principal governing body of Italtsteel, on the 24<sup>th</sup> of October 2024.

It outlines our ongoing commitment to preventing modern slavery, the measures we have implemented, and our plans to enhance these efforts. We are dedicated to continuously improving our practices and collaborating with stakeholders to eradicate modern slavery in all its forms.

# INTRODUCTION & APPROVAL



FABIO GISMONDI  
MANAGING DIRECTOR





# STRUCTURE, OPERATIONS & SUPPLY CHAINS

## STRUCTURE

Italsteel is a family owned and operated company with approximately 80 people working from our facilities, at 14 wildfire Road, Maddington, Western Australia. Italsteel takes pride in the welfare and safe treatment of all employees, suppliers, and clients.



# **STRUCTURE, OPERATIONS & SUPPLY CHAINS**

# **OPERATIONS**

**Italsteel is a steel fabrication and installation company, producing a diverse range of products to be used in the construction industry. Backed by over 40 years of experience, our services include steel fabrication, surface treatment, transportation, and installation.**

**Italsteel fabricates a range of products, including beams, columns, stairs, braces, and cast-in plates.**



# STRUCTURE, OPERATIONS & SUPPLY CHAINS

# SUPPLY CHAINS

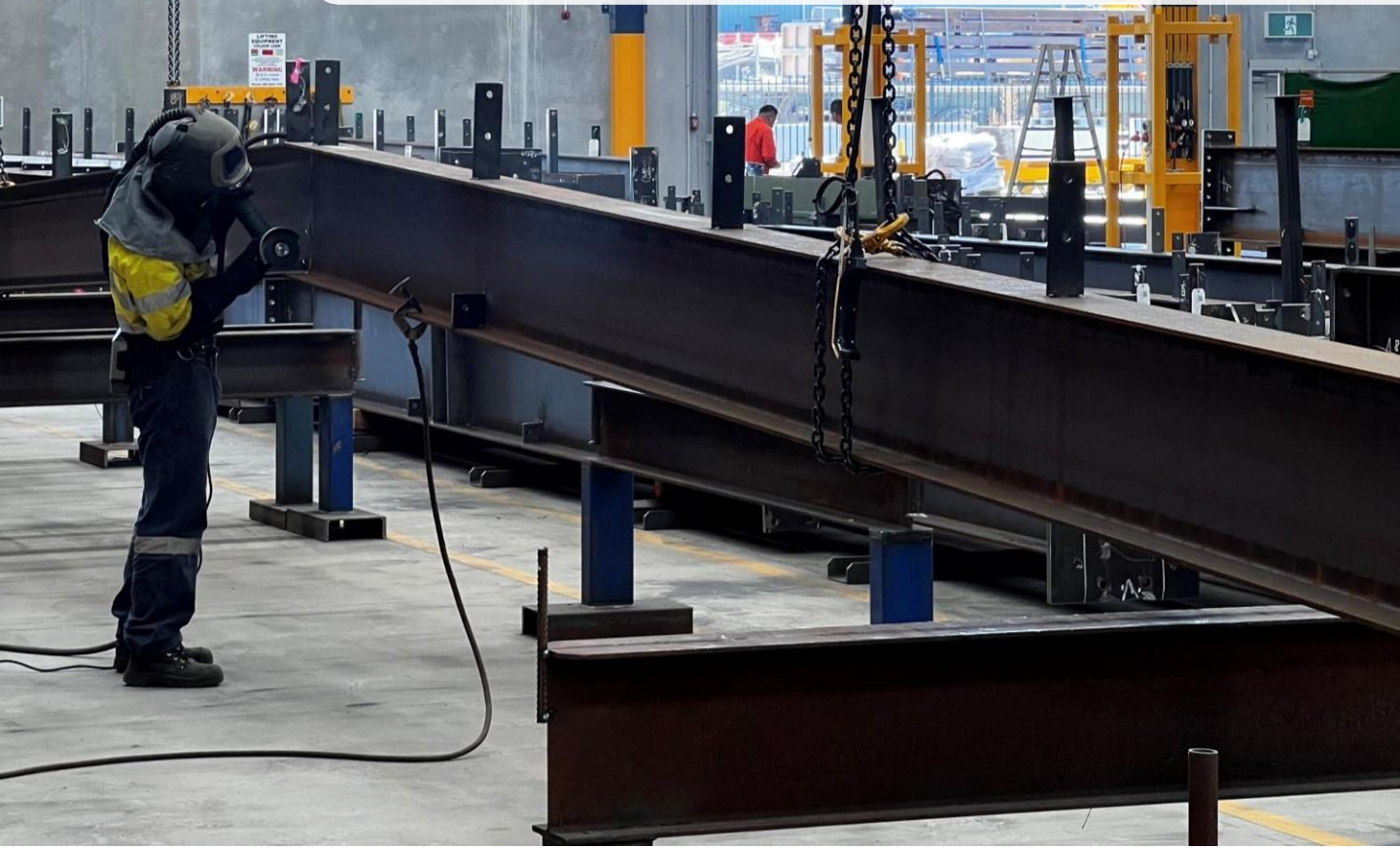
Italsteel's supply chains pose the highest risk of modern slavery, so it is a must that we do our due diligence in assessing each of our suppliers.

Most of our steel comes from Australian suppliers, which is considered a low-risk location. However, these suppliers source steel from international mills in the United Arab Emirates, Korea, Thailand, and China.

It is crucial for us to regularly evaluate these corporations to ensure safety.

We maintain and regularly review a register of our suppliers, focusing particularly on those based in regions with a history of labour abuse.

# RISK ASSESSMENT



**One of the primary human rights risks Italtsteel faces is modern slavery within our supply chains.**

**This risk is increased due to global supply, sourcing various products and services from overseas providers.**

**Modern slavery can infiltrate supply chains through forced labour, child labour, debt bondage, human trafficking, inadequate wages, and discriminatory practices.**



# RISK ASSESSMENT

**Italsteel works proactively to identify and mitigate modern slavery risks in our supply chains and operations.**

**When assessing suppliers of both labour and material, Indicators such as product and service types, geographical locations of suppliers, and specific entity risks, are accounted for in the assessment .**

**All business partnerships are regularly reviewed throughout the business relationship.**





# MITIGATION

**Leading by example and ensuring ethical and responsible business conduct, is vital to Italsteel's operations, as outlined in our Modern Slavery Statement.**

- .We ensure that all team members are well-informed about the risks and strategies regarding modern slavery.**
- .We provide clear guidance on our Supplier Code of Conduct and the principles of due diligence**
- .We empower our entire team to recognise potential risks and take action to avoid unethical businesses.**
- .It's through this collective responsibility that we strengthen our commitment to preventing modern slavery**



# MITIGATION

**Italsteel stakeholder awareness is provided;**

- **To enhance understanding of the causes and humanitarian impact of modern slavery**
- **On the Modern Slavery Statement, and our approach to limiting the risk of modern slavery within our supply chains and operations.**

**All business activities are conducted based on principles of ethical and sustainable practices, including:**

- **Humanity**
- **Impartiality**
- **Conservation of human resources**
- **Social sustainability**
- **Unity**



# ASSESSING THE EFFECTIVENESS

To ensure the effectiveness of our actions in combating modern slavery, Italtsteel has implemented the following measures:

## **Regular IMS Audits:**

- Audits are conducted to ensure compliance with our anti-slavery policies and standards. These audits are followed by thorough

## **Management Reviews:**

- To assess findings, implement corrective actions, and continuously improve our practices.

## **Supplier Assessments:**

- Annual supplier assessments are reviewed to ensure they adhere to our ethical standards and practices.

## **Feedback:**

- Maintaining open lines of supplier feedback, allowing any concerns or incidents related to modern slavery to be reported



**Italsteel does not own other entities. However during the reporting period, where a controlled entity is engaged, we set expectations, raised awareness, and understood their strategies for mitigating modern slavery risks.**

**Reporting requirements of the Modern Slavery Act 2018, have been reviewed and actions have been outlined to ensure compliance with these obligations. Relevant materials and updates have additionally been made available and supplied.**

# CONTINUOUS IMPROVEMENT



**By implementing these measures, Italtsteel continuously improve our efforts to prevent modern slavery and ensure ethical and responsible business practices throughout our supply and operations.**

**We seek feedback from Italtsteel's stakeholders, including industry groups, and experts, to stay informed about global trends and collaborate on initiatives to reduce the risk of modern slavery.**



**Italtsteel**

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