



Modern Slavery Statement

Stratco Group

2021-22 Financial Year



About the Stratco Group

This statement is made as required under the Australian Modern Slavery Act 2018 and covers the Stratco Group of companies that includes Stratco (Australia) Pty Ltd, Stratco (Qld) Pty Ltd, Stratco (NSW) Pty Ltd, Stratco Pty Ltd, Stratco (WA) Pty Ltd and Stratco (Alice Springs) Pty Ltd

The Stratco Group of companies are Australian proprietary limited companies and have operations in all States and Territories of Australia.

Stratco supplies building products to both trade and retail customers with key products being roofing and rainwater goods, fencing, sheds, carports, verandahs and patios. These products are manufactured for local markets in Stratco's manufacturing facilities and are distributed directly to company owned stores and customers from these facilities. Stratco offers complementary products to be used in the construction of these products or in conjunction with these products. Some of these complimentary products are manufactured by Stratco with others being purchased from local and international suppliers.

Supply Chain

Stratco endeavours to engage with suppliers of good reputation, ethics and sound business practices. Stratco does not knowingly engage or contract with businesses that are involved in human trafficking or modern slavery. However, Stratco does acknowledge that there is a very real risk that other parties indirectly involved with Stratco's supply chain may contribute to modern slavery practices.

The sourcing of raw materials, goods and services for Stratco's operations are primarily controlled centrally, with sourcing decisions and contract negotiations being coordinated by the national supply chain team. This team sets and maintains policies and provides general directions for site specific purchasing activities. Regular consultation between national and state based purchasing personnel occurs to ensure consistency of approach is being maintained and that any changes in purchasing objectives or practices are clearly understood and adopted.

Supply Chain Modern Slavery Risks

Stratco has utilised a variety of methods to identify and assess modern slavery risks within its business and supply chain that include:

1. *Supplier audits*: These audits include qualifying audits to assess the suitability of suppliers before they are approved as a supplier. Stratco also undertakes regular audits of existing suppliers to ensure that they are continuing to meet the standards observed and agreed to at the time selection was approved
2. *Supplier surveys*: To understand and increase the awareness of modern slavery risks within Stratco's supply chain Stratco has asked suppliers to provide information on their modern slavery activities and general awareness of Modern slavery legislation
3. *Supplier meetings*: Stratco regularly meets with key suppliers to discuss performance, changes in business requirements and to ensure expectations of performance are being met
4. *Policy*: A Modern Slavery Policy has been developed to affirm Stratco's commitment to comply with Modern Slavery legislation and to ensure Stratco's team members are aware of this commitment. This policy is supported by other purchasing policies that reinforce the behaviour required of Stratco team members involved in purchasing activities.
5. *Whistleblower Policy*: Stratco has established a Whistleblower policy to enable confidential reporting of inappropriate conduct, illegal or unethical, relating to Stratco's operations.
6. *Training*: Stratco continues to provide training to key personnel in relation to modern slavery risks and appropriate purchasing behaviours.

Effectiveness of activities to address Modern Slavery Risks

Supplier audits, surveys and meetings provide the most immediate measure of awareness and compliance with modern slavery legislation and expectations within our supply chain. Information obtained through these activities are reviewed by supply chain personnel and are used when selecting suitable suppliers.

This information also provides insight into geographical regions and supply groups where risks may be higher and greater diligence is required. Understanding this further improves our ability to adjust our training and if necessary, policies and procedures to address these risks.

Stratco recognises that raising awareness of modern slavery risks both within our business and within our supply chain partners is an ongoing process that will require regular review and adjustment. However, we are confident that the measures that have been implemented to date will serve as a good foundation to help us on this journey. Stratco is committed to continuously monitoring and strengthening its procedures and processes to ensure its obligations in relation to modern slavery are being met at all times.

Future activities

In the coming reporting period, the following activities will be undertaken to further improve and assess Stratco's performance in relation to minimising Modern Slavery risks

1. Update internal procedures and policies to further strengthen and highlight modern slavery responsibilities.
2. Improve supplier selection processes
3. Continue with activities already in progress as noted previously

This statement was approved by the undersigned directors in their role as Stratco's principal governing body on 12 December, 2022

Alf Stratton
Chairman/Director
Stratco (Australia) Pty Ltd

Ben Miels
C.E.O./Director
Stratco (Australia) Pty Ltd