



MODERN SLAVERY STATEMENT 2023



1. Introduction & Approval



This statement is produced to comply with the Modern Slavery Act 2018 (Commonwealth Act) and is prepared for the Southern Steel Group ABN 003 067 838 and its wholly owned subsidiaries. This Modern Slavery Statement has been approved by the Board of Directors of the Southern Steel Group, which is the principal governing body. The statement was approved on 30th May 2024.

The Southern Steel Group seeks to do business with suppliers that share similar values and ethics to us. We place a high value on quality, consistency, and reliability of our suppliers and form long term relationships, which involves regular visits and exchanges. We recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that might contribute to modern slavery through our operations and supply chains, and to continuing improving our risk assessment approach.

A handwritten signature in white ink, appearing to read 'Peter Smaller', is positioned above the printed name and title.

Peter Smaller
Executive Chairman
Southern Steel Group

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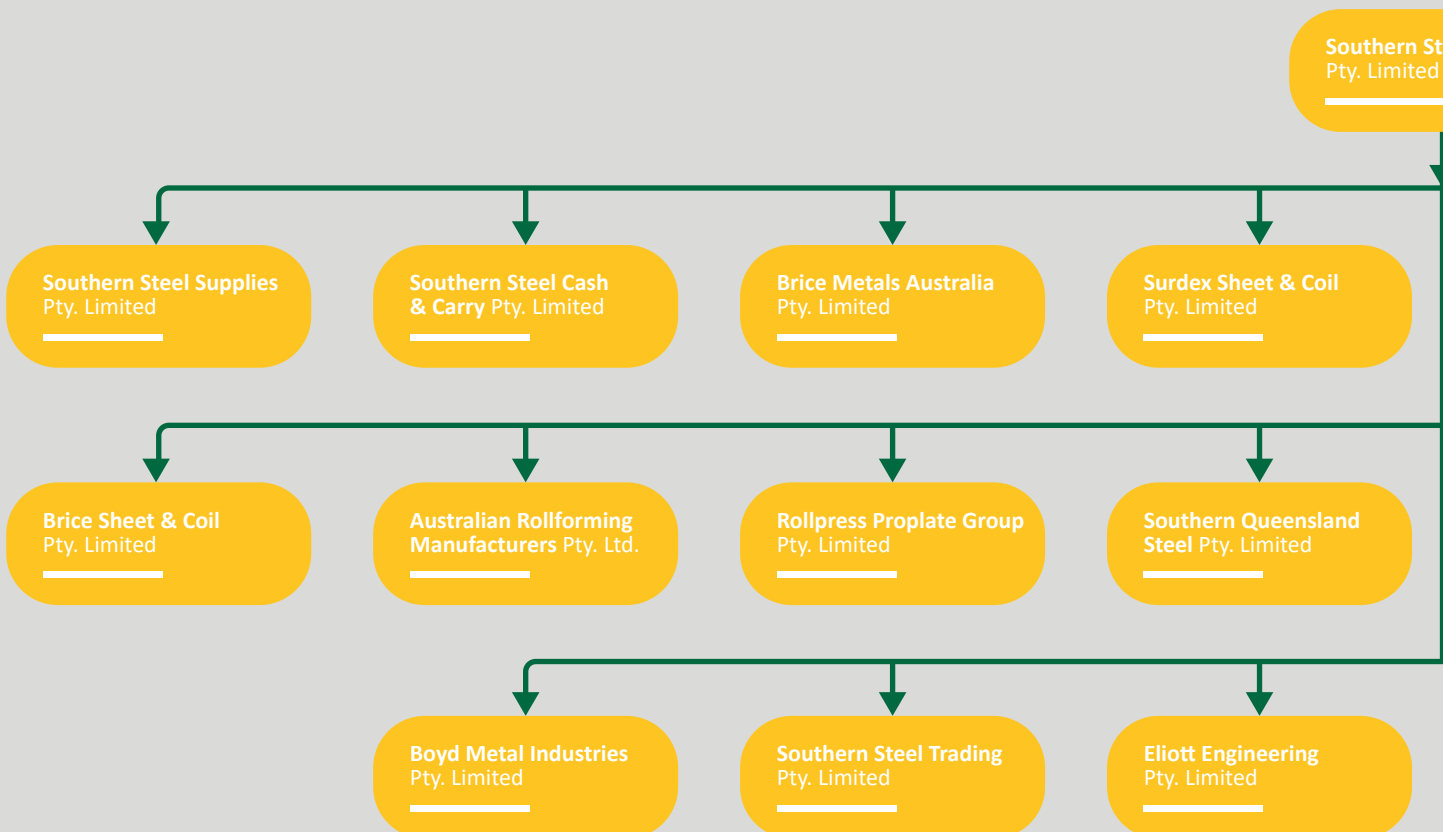
Web : www.southernsteel.com.au

2. About Southern Steel



Established in 1947, the Southern Steel Group is a family-owned and independent Australian business supplying, processing, and distributing a wide-range of steel products to the Australian steel fabrication, engineering, and construction sectors.

For further information about our companies please see our website at: <https://www.southernsteelgroup.com.au/company-directory/>



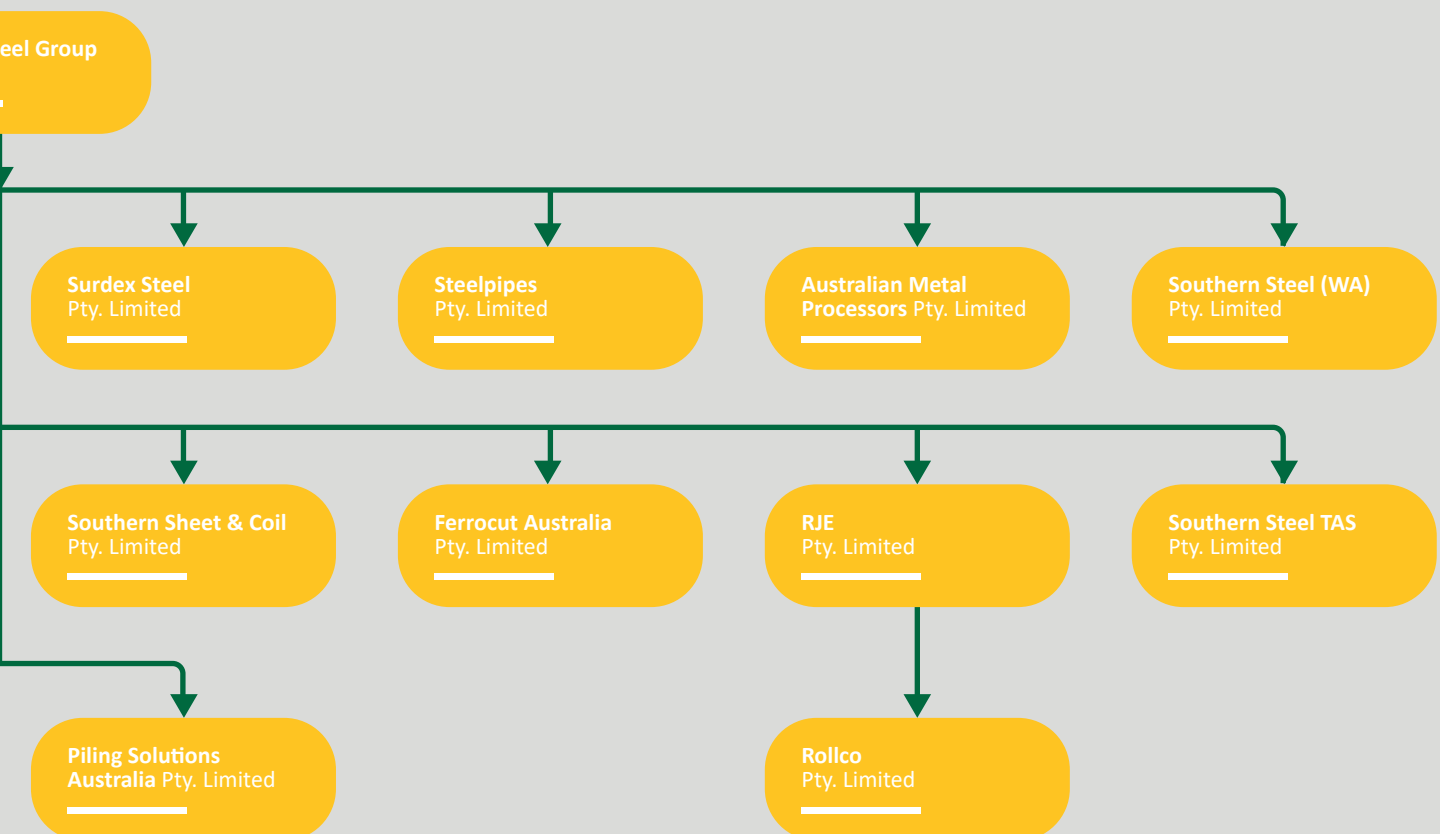
AUSTRALIA'S LEADING INDEPENDENT STEEL DISTRIBUTION & PROCESSING GROUP



2.1 Our Structure

The Southern Steel Group includes 21 subsidiary steel businesses under management. Our head office is at 319 Horsley Rd, Milperra, New South Wales 2214. The Southern Steel Group's network is represented in all Australian mainland states. The group's network covers steel products, sheet & coil, steel processing and distribution. The 21 subsidiaries in the network are:

1. Australian Metal Processors Pty Ltd
2. Australian Rollforming Manufacturers Pty Ltd
3. Boyd Metal Industries Pty Ltd
4. Brice Metals Australia Pty Ltd
5. Brice Sheet & Coil Pty Ltd
6. Elliott Engineering Pty Ltd
7. Ferrocut Australia Pty Ltd
8. Piling Solutions Australia Pty Ltd
9. RJE Pty Ltd
10. Rollco Pty Ltd
11. Rollpress Proplate Group Pty Ltd
12. Southern Queensland Steel Pty Ltd
13. Southern Sheet & Coil Pty Ltd
14. Southern Steel Cash & Carry Pty Ltd
15. Southern Steel Supplies Pty Ltd
16. Southern Steel TAS Pty Ltd
17. Southern Steel Trading Pty Ltd
18. Southern Steel (WA) Pty Ltd
19. Steelpipes Pty Ltd
20. Surdex Sheet & Coil Pty Ltd
21. Surdex Steel Pty Ltd





2.2 Our Operations

The Southern Steel Group is one of Australia’s largest steel supply, processing and distribution companies. We directly employ 1300 people across Australia in our 21 distribution, supply and processing business. Our steel products, sheet & coils are sourced predominantly from domestic steel mills, while the remainder are imported from Asia, Europe, and the Middle East.

Our long-term client portfolio is exclusively based in Australia and includes some of Australia’s most influential steel fabrication, engineering and construction companies.

The group’s network services small, medium and large enterprises with flexibility, humility and excellence in customer service and communication.



Employment

1300 people across Australia



Companies

21 businesses in our Group



Network

Small, medium and large enterprises



Market

Domestic and international

SOUTHERN STEEL GROUP AND ITS SPECIALISE IN PROVIDING THE FINEST SHEET & COIL, AND EXPERT STEEL DISTRIBUTION.





2.3 Our Supply Chains

Our supply chain is predominantly domestic in Australia, with the bulk of our steel supplies from Australian domestic mills run by BlueScope, Liberty, and Infrabuild.



We place a high value on quality, consistency, and reliability of supply from our supply chain partners. We maintain regular and long-term relationships with our suppliers and regularly visit their mills. During FY2022/2023 our senior management travelled to steel mills in Korea, Taiwan, Thailand, Singapore, Vietnam, and the UAE, and travelled to suppliers in Belgium, Germany, Italy, Netherlands, and Switzerland.

The remainder of our steel is imported from Asia, Europe, and the Middle East, specially from the following countries:

- Austria
- Belgium
- China
- Czechia
- Germany
- Republic of Korea
- Indonesia
- India
- Japan
- Malaysia
- New Zealand
- Sweden
- Taiwan
- Thailand
- Turkey
- United Arab Emirates
- Vietnam



3. Description of Risks of Modern Slavery Practices in our Operations and Supply Chains

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

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. We reviewed the Global Slavery Index to assess the prevalence of slavery in our sector and in the countries where our suppliers are operating. We then identified and mapped out our list of steel suppliers and other office and warehouse suppliers, the volume and value of our business with them, their locations, and countries of origin. Our initial risk assessment has indicated that our operations and supply chains have a low risk for modern slavery. Based on the sectors, production and geography of our supply chain, our risk profile is summarised below.



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 in some countries.



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 countries in Asia and the Middle East where the Southern Steel Group buys steel products due to factors such as poverty, weak governance, lack of enforcement of the rule of law, and high migration flows.



Specific Entity Risk

Certain companies or businesses 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.





4. Addressing the Risks of Modern Slavery and Effectiveness of Actions

We conduct audits of our businesses and suppliers to detect any instances of bribery, corruption, and modern slavery. For example, the trading companies that we trade with are audited to ensure they only deal with reputable steel mills and our senior management regularly visit the steel mills that are our major suppliers. During FY2022/2023, we undertook several key activities to identify and manage modern slavery risks in our own operations and within our supply chain. They are listed across.

✓ 1. Mapping our suppliers & supply chain

We conducted an extensive mapping exercise of foreign suppliers, including country of origin, list of steel mills, quantity of steel purchased, and value of steel purchased. The results shows that we currently import steel from 17 different countries including: Austria, Belgium, China, Czechia, Germany, Republic of Korea, Indonesia, India, Japan, Malaysia, New Zealand, Sweden, Taiwan, Thailand, Turkey, United Arab Emirates, and Vietnam. According to the global slavery index, some of these countries have a risk of modern slavery but there is a very low risk of modern slavery in the steel sector in these countries.

We also conducted an extensive mapping of office and equipment suppliers, including amounts purchased and contact people. We found 51 companies supplying office equipment and supplies to our businesses, all of them based in Australia.

✓ 2. Corporate desk assessment

We conducted further assessments on our foreign steel suppliers to verify if there was any evidence of modern slavery risk. This was done through desktop research by an environmental, social and governance (ESG) and human rights specialist.

✓ 3. Regular visits to our suppliers

Senior management regularly visit our foreign steel suppliers to build long term relationships and to ensure our values are compatible, as well as quality, consistency, and reliability of supply. These regular visits enable us to conduct onsite assessments of the operations of our suppliers. During FY2022/2023 our senior management travelled to steel mills in Korea, Taiwan, Thailand, Singapore, Vietnam, and the UAE, and travelled to suppliers in Belgium, Germany, Italy, Netherlands, and Switzerland.

5. The Process of Consultations and Future Plans

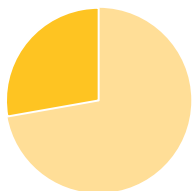
The process of consultation was extensive and at the highest management and leadership levels. The assessment and analysis were done under the guidance and oversight of the Executive Chairman.

Consultations took place with the General Managers of the 21 subsidiaries. An email questionnaire was sent out to the trading companies that we purchase steel from overseas.

In April 2023, the company adopted a supplier code of conduct, which is supported by the Supplier Safety, Health, Environment and Quality (SHEQ) and Modern Slavery questionnaire. The code of conduct and questionnaire has been sent to all suppliers, and it is now company policy to send to all new suppliers.

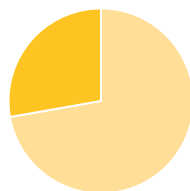
19 suppliers have already responded to the questionnaire. 75 percent of the suppliers that responded to the questionnaire said they are required to report under the Modern Slavery Act (Cth) 2018. Only one of the suppliers that is required to report does not have a policy or policies on modern slavery and a person or team responsible for overseeing modern slavery risks. Only one supplier said that they are aware of modern slavery risks in their business and supply chain. All the others said they are not aware of any areas of modern slavery risk. See graphs below.

Are you required to report on modern slavery?



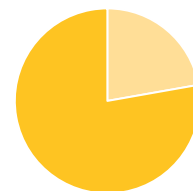
% YES % NO

Do you have policies to deal with modern slavery?

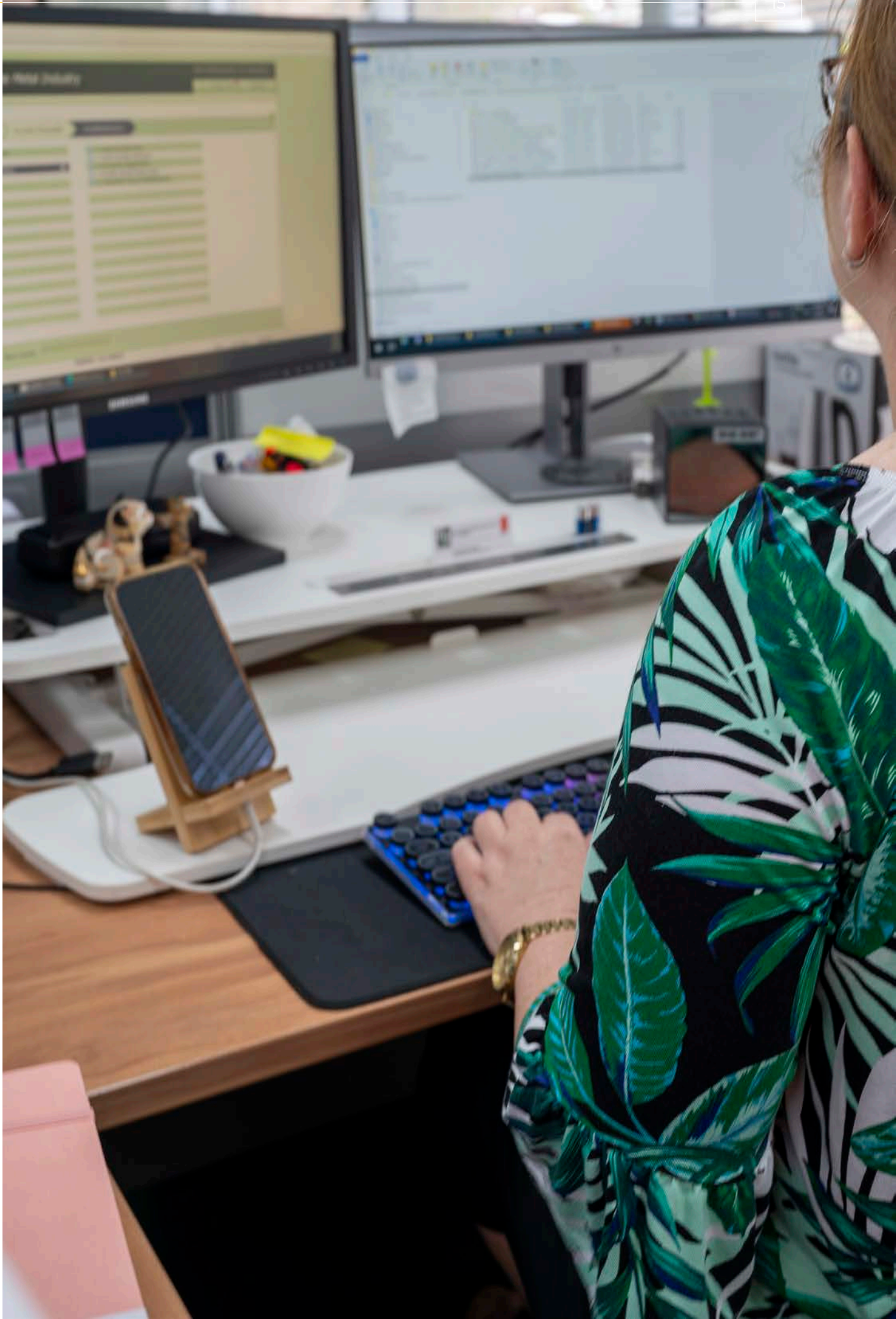


% YES % NO

Are you aware of any risks of modern slavery in your supply chains?



% YES % NO



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