

Modern Slavery Statement

Italsteel is a family-operated company that takes pride in the welfare and safe treatment of all employees, suppliers, and clients.

We take the Modern Slavery Act seriously and are committed to eliminating any and all risks of slavery or human trafficking within our operations. We recognise that there is a potential risk for modern slavery in the supply chain sector of the industry and therefore take all measures to ensure legitimacy and fair treatment from suppliers. Italsteel follows a process of assessing, monitoring, and reviewing all processes to guarantee the safety of all people involved. It is our duty to share our progress and speak out against any misconduct.

It is consistent with our philosophy that we expect a culture of high ethical standards, including compliance with applicable laws, and contractual and other obligations. This statement supports the intent of international conventions, treaties, and protocols relevant to combatting modern slavery and the Modern Slavery Act 2018.

Organisational Structure

Italsteel is a steel fabricator and installation company, producing a diverse range of products to be used for construction. The services provided include steel fabrication, surface treatment, transportation, and installation with 40 years of experience. Products fabricated include beams, columns, stairs, braces, cast-in plates, intended to be installed in government, community, and industrial projects.

Supply Chains

Our supply chains pose the highest risk of modern slavery engagement, so we ensure to do our due diligence in assessing each company. Our steel is supplied by mostly Australian companies which is a low-risk geographic location, who source steel from many international steel mills, the United Arab Emirates, Korea, Thailand and China, so it is in our best interests to regularly examine these corporations to ensure safety.

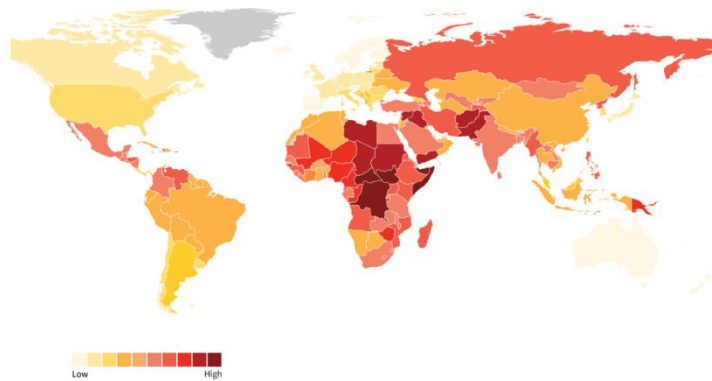
A register of our suppliers is maintained and reviewed regularly, with a focus on those based in regions with any history of labour abuse.

Risk Assessment

Italsteel will work proactively to identify and reduce modern slavery within our supply chains and operations amongst our stakeholders and we expect all organisations we engage with to do the same. Our risk assessment procedure involves the consideration of several modern slavery risk indicators, the types of products and services, geographical location and specific entity risk. Assessment of risk should be conducted prior to any new business partnerships, and regularly throughout the activity.

All business is to be conducted based on ethical and sustainability principles, such as:

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



The Global Slavery Index {refer to appendix A} assesses the risk possibilities and acts as a guide.

Suppliers

Suppliers must ensure that there is no modern slavery in their supply chains and operations. Modern slavery has the potential to exist in the supply chain through forced labour, child labour, debt bondage, human trafficking, or discriminatory employment practices. It is important that if any of this occurs, for us to be aware and act out against it.

Italsteel is required to screen and evaluate all new suppliers before entering any obligations between the two entities. Prospective suppliers are automatically disqualified from working with Italsteel if they are knowingly or deliberately engaged in activities that compromise the fundamental principles of this statement.

Incorporating Modern Slavery into Other Policies

When existing policies undergo policy review or new policies are under development, policy owners are required to identify existing modern slavery commitments that can be enhanced, incorporated, and further protected.

Our Modern Slavery Statement is accessible to all employees and is strongly enforced in all the work that we are involved in.

Communications, Engagement and Training

Italsteel's stakeholders will be provided communications (and training when required) to enhance their understanding of the causes and humanitarian impact of modern slavery, the Modern Slavery Statement, and our approach to limiting the risk of modern slavery within our supply chains and operations.

Italsteel's staff with purchasing responsibilities are provided additional training on the Italsteel Supplier Code of Conduct, Italsteel contractual terms, and supporting suppliers to undertake due diligence. This extra understanding of warning signs will greatly decrease any chance of creating relationships those who partake in unethical behaviour. Collaborative efforts are key in eliminating the dangers of modern slavery, everyone must be informed and actively speaking out.

Reporting Unethical or Unlawful Conduct

A key part of supporting ethical standards is enabling Italsteel's stakeholders to feel free and safe to speak up when there are reasonable grounds to suspect that people are not acting ethically or in accordance with laws and obligations. Any victims of modern slavery will be protected and supported during the reporting process, ensuring their wellbeing is being carefully considered.

This anonymous reporting system will create an easy environment for notification of unethical conduct. Any suspected or reported activity will be investigated and reviewed to determine if the trading relationship should be terminated.

Continuous Improvement

We are committed to applying a continuous improvement approach to how we reduce the risk of modern slavery practices within our supply chains and operations, emphasising our zero-tolerance policy. We will seek feedback from Italsteel's stakeholders regarding the success or otherwise of the actions we have taken to reduce the risk of modern slavery.



Ken Patterson
General Manager

03 May 2024

Dated