

Modern Slavery Statement

(Valid until 30 June 2023)

1. Introduction

The Modern Slavery Act 2018 (Commonwealth) mandates that Metal Manufactures Pty Limited (MMPL) prepares a Modern Slavery Statement each financial year.

Modern slavery in all its various forms and guises is a crime in Australia and much of the world. MMPL are committed to acting ethically and with integrity in all its activities, and does not tolerate or condone modern slavery in any part of the organisation including in its supply chains. MMPL has implemented ongoing rigorous systems and controls to enforce this commitment.

This statement relates to the MMPL financial year 1 January 2021 to 31 December 2021.

2. About MMPL

MMPL is a private company limited by shares, incorporated and domiciled in Australia. Its registered office is 19-21 Loyalty Road, North Rocks, NSW 2151. A snapshot of MMPL's entities is as follows:

				
7	3,300+	11,500+	85,000+	412
100% owned divisions	Total staff	Active suppliers	Active customers	Total sites

The Group's principal activities during the financial year ending December 2021 consisted of the:

- Import, manufacture and distribution of metal tubing and associated accessories and fittings.
- Wholesale distribution of electrical, lighting, data products and related accessories and fittings.
- Wholesale distributions of civil infrastructure products.
- Wholesale distribution of thermo-plastic products.
- Wholesale distribution of security and monitoring equipment.
- Wholesale distribution of sign, digital and display solutions.

Goods are predominantly sourced from Australian-based global suppliers as well as local suppliers. Branches and sites are primarily located in Australia, with a small number of sites in New Zealand, and one 50:50 joint venture based in Hong Kong (a non-controlled entity).

3. Identifying and addressing modern slavery risks

MMPL acknowledges that it is susceptible to modern slavery risks in its supply chain. As part of the development of this Statement, MMPL has consulted with Senior Executives from each controlled business division to identify and address modern slavery risks. A summary of key risks, controls, and assessment processes are as follows:

Key risks	Ongoing controls in place	Assessment of effectiveness
Lack of accountability over modern slavery risks.	Executives trained on understanding and responding to modern slavery risks.	Business and Internal Audit track completion of Modern Slavery training.
Lack of appropriate internal policies and codes of conduct.	Regular review and updating of internal policies and codes of conduct in relation to modern slavery risks.	Business and Internal Audit review policies, procedures, and codes of conduct.

Key risks	Ongoing controls in place	Assessment of effectiveness
Staff unaware of policies and codes of conduct.	Divisions train their staff on policies, business ethics and code of conduct.	Business and Internal Audit track completion of training.
Supply chains susceptible to modern slavery risks.	^Divisions perform regular assessments of supply chains for susceptibility to modern slavery risks.	Business and Internal Audit checks completion of supply chain assessments.
Current and new suppliers and/or their suppliers engage in modern slavery.	Divisions perform due diligence reviews (including site visits) of new and current suppliers; include modern slavery risk clauses in contracts; perform modern slavery supplier surveys; review Modern Slavery Statements (as required).	Business and Internal Audit checks completion of due diligence reviews, with the use of third-party supply chain reviews
Feedback on modern slavery risks not captured or actioned.	Implement systems (e.g. confidential hotline) to obtain feedback from key internal and external stakeholders.	Internal Audit confirms 100% of feedback actioned.
Non-compliance with policies, lack of addressing breaches	Internal audits to assess compliance with internal policies.	Business and Internal Audit assess corrective actions to address breaches.
Unaware of latest legal developments and key risks.	Use external consultants to identify changes to modern slavery legislation, new developments and key risks.	Business and Internal Audit amends policies, controls and programmes as required.

^ For supply chain assessments, suppliers have been split into three tiers and review periods:

Tier 1 (in progress)	Tier 2 (in preparation)	Tier 3 (in planning)
<i>Period Jan 2020 to Dec 2022</i>	<i>Period Jan 2023 to Dec 2024</i>	<i>Period Jan 2025 to Dec 2026</i>
Primary suppliers	Secondary suppliers	Non-preferred suppliers
Global and national suppliers	National and local suppliers	Local suppliers
Highest risk due to global and national supply chain impact.	Moderate risk due to national supply chain impact.	Low risk due to localised supply chain.
80% of volume and value 10 to 140 suppliers per business	18% of volume and value up to ~1,400 suppliers / business	2% of volume and value up to ~7,500 suppliers / business
Agreements negotiated at a National Level	Agreements negotiated at a National and Regional level	Agreements negotiated at a Regional and Branch level
Executive level engagement	Regional level engagement	Branch level engagement
Executive level training	Branch manager training	Branch staff training
Supply chain mapping	Supply chain mapping	No supply chain mapping

4. Approval of this statement

This statement was approved by the Board of Metal Manufactures Pty Limited:



Colin Lamond
 Managing Director, Metal Manufactures Pty Limited
 9 May 2022