



## Modern Slavery Statement

**BWS Industries Pty Ltd**

**ABN 70 355 335 060**

This Modern Slavery Statement has been prepared by **BWS Industries Pty Ltd** in accordance with the requirements of the **Modern Slavery Act 2018 (Australia)**.

BWS Industries is committed to respecting and upholding human rights across all aspects of our business operations and supply chains. We recognise that modern slavery is a global issue and acknowledge our responsibility to identify, prevent and address risks of modern slavery within our operations and supply chains.

We believe that all people deserve to be treated with dignity, fairness and respect, and we strive to ensure our business practices align with Australian laws, ethical standards and responsible sourcing principles.

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### **(a) Reporting Entity**

The reporting entity for this statement is:

**BWS Industries Pty Ltd**

ABN: 70 355 335 060

BWS Industries is an Australian company engaged in structural steel fabrication and related manufacturing services for commercial and industrial sectors.

This statement covers the activities and operations of BWS Industries Pty Ltd for the relevant reporting period.

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### **(b) Structure, Operations and Supply Chains**

BWS Industries operates in Australia and provides structural steel fabrication and related services for construction and industrial projects. Our operations include:

- Procurement of raw materials such as structural steel
- Steel fabrication and manufacturing
- Delivery of finished products to construction and infrastructure projects
- Collaboration with suppliers, subcontractors and service providers

Our supply chain primarily consists of:

- Australian-based suppliers of steel and fabrication materials
- Equipment and consumable suppliers
- Logistics and transport providers
- Maintenance and service contractors

Although most of our direct suppliers are in Australia, many source raw materials such as steel from international markets. As a result, parts of our supply chain may involve countries or regions where labour standards and oversight vary.

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### **(c) Risks of Modern Slavery Practices**

BWS Industries recognises that modern slavery risks may exist within global supply chains, particularly in industries involving raw material extraction and manufacturing.

According to research such as the Global Slavery Index, exploitation can occur across various industries and stages of production, particularly in:

- Raw material extraction (such as iron ore and other metals)
- Steel manufacturing and processing
- Recycling industries
- Logistics and transportation
- Subcontracted labour services

While the majority of BWS Industries' suppliers operate within Australia, we acknowledge that upstream suppliers may source materials internationally. This creates potential risks related to:

- Forced labour in raw material extraction
- Labour exploitation in overseas manufacturing
- Use of subcontracted labour without appropriate oversight

BWS Industries therefore recognises that it cannot guarantee that every component within its supply chain is entirely free from modern slavery risks. However, we are committed to implementing effective processes to identify, assess and mitigate such risks.

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### **(d) Actions Taken to Assess and Address Risks**

BWS Industries has implemented a number of processes and policies designed to identify and reduce modern slavery risks within our operations and supply chain.

#### **Supplier Due Diligence**

We conduct supplier screening and due diligence before engaging new suppliers. This includes:

- Reviewing supplier business practices
- Assessing compliance with labour and human rights standards
- Evaluating sustainability and ethical sourcing practices

Suppliers may also be required to demonstrate compliance with recognised industry frameworks or meet requirements under relevant steel industry sustainability standards.

#### **Procurement Policy**

BWS Industries maintains a procurement policy that requires suppliers to commit to a zero-tolerance approach to modern slavery and labour exploitation.

Suppliers are expected to:

- Comply with applicable labour laws
- Ensure ethical working conditions
- Avoid forced labour, child labour and human trafficking
- Promote responsible supply chain practices.

## **Supplier Engagement**

We work collaboratively with suppliers to:

- Improve transparency within the supply chain
- Identify subcontracting arrangements
- Encourage continuous improvement in labour and human rights practices.

## **Internal Awareness and Training**

BWS Industries conducts internal education and awareness initiatives, including:

- Roundtable discussions on modern slavery
- Staff training on our Code of Conduct
- Communication of expectations regarding ethical conduct and labour rights

These initiatives aim to foster a culture of awareness, accountability and ethical decision-making.

## **Reporting and Whistleblower Support**

BWS Industries encourages employees, contractors, suppliers and other stakeholders to report concerns relating to modern slavery or labour rights violations.

We are committed to protecting individuals who raise concerns in good faith and do not tolerate retaliation against anyone who reports potential misconduct.

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## **(e) Assessing Effectiveness of Actions**

BWS Industries monitors the effectiveness of its actions to address modern slavery risks through:

- Periodic review of procurement and supplier due diligence processes
- Ongoing monitoring of supplier compliance with procurement requirements
- Internal discussions and risk management reviews by senior management
- Continuous improvement of policies and procedures relating to ethical sourcing

Where potential risks are identified, BWS Industries works with suppliers to implement improvement plans and corrective actions where necessary.

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## **(f) Consultation Process**

This statement has been prepared in consultation with senior management and relevant internal stakeholders involved in:

- Procurement
- Operations
- Risk management
- Corporate governance

Where relevant, BWS Industries also engages with suppliers and business partners to promote transparency and awareness regarding modern slavery risks within our shared supply chains.

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**(g) Other Relevant Information**

BWS Industries recognises that addressing modern slavery is an ongoing process requiring continuous improvement and collaboration.

We remain committed to:

- Strengthening supply chain transparency
- Improving supplier engagement and risk assessment processes
- Increasing staff awareness and training
- Supporting industry initiatives that promote responsible and ethical sourcing.

By embedding these principles into our governance and operational frameworks, BWS Industries aims to contribute to the global effort to eliminate modern slavery.

**Approval**

This statement was approved by the Director of BWS Industries.

Signed:



Name:

Dom Valentini

Date:

05/03/2026

Position:

Director