

Modern Slavery Statement

(Valid until 30 June 2025)

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 2023 to 31 December 2023.

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:

				
9	4,000+	13,200+	101,000+	450
100% owned divisions	Total staff	Active suppliers	Active customers	Total sites

The Group's principal activities during the financial year ending December 2023 consisted of the:

- Import, manufacture and distribution of metal tubing and associated accessories and fittings.
- Wholesale distributions of cable, overhead conductors, electrical, solar, lighting, data products and related accessories and fittings.
- Wholesale distributions of hardware, ventilation, electrical, cable accessories, datacomms, test & measurement, switchgear, automotive & materials handling, and engineered solutions.
- Wholesale distributions of civil infrastructure products.
- Wholesale distributions of thermo-plastic products and sign, digital and display solutions.
- Wholesale distributions of security and monitoring equipment.
- Wholesale distributions of plumbing products.
- Wholesale distributions of mechanical and chemical fasteners, and building and construction supplies.
- Wholesale distributions of pipe, valves and fittings for active and passive fire companies, hydrant plumbing and the manufacturing of refractory hardware components.

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, one in Singapore 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 a legal firm, a compliance consultant and 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.	A representation of staff and Executives are trained in understanding and responding to modern slavery risks.	Business and Internal Audit & Risk Department track completion of Modern Slavery training. Up to Dec'23, an increased representation of executives and other staff have completed the training.

Key risks	Ongoing controls in place	Assessment of effectiveness
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.	The Internal Audit and Risk Department is continuously reviewing policies and engaging with key stakeholders to ensure they remain relevant in meeting the business compliance requirements.
Staff unaware of policies and codes of conduct.	Divisions train their staff on policies, business ethics and code of conduct.	New employees are made aware of key policies through the induction process. The policies are always readily available through the MM intranet. Internal Audit conducts reviews across the business, which will help identify areas where further training is required.
Supply chains susceptible to modern slavery risks.	[^] Divisions perform regular assessments of supply chains for susceptibility to modern slavery risks.	Business and Internal Audit & Risk monitor 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; review Modern Slavery Statements (as required).	Business and senior management monitor completion of due diligence reviews. In 2022, an external law firm assessed the top 5,000 suppliers across the business. Compliance consultants have been engaged to advise on various aspects including supplier due diligence and business site reviews to drive continuous improvement of compliance with the ESG requirements.
Feedback on modern slavery risks not captured or actioned.	Implement systems (e.g. confidential hotline) to obtain feedback from key internal and external stakeholders.	An updated Complaints/Employee Grievance Management Policy was issued in 2023. This provides an additional avenue for raising issues/concerns. The Whistleblower line is in place as per our whistleblower policy.
Non-compliance with policies, lack of addressing breaches.	Internal audits to assess compliance with internal policies.	Business and Internal Audit & Risk provide recommendations in relation to corrective actions to be taken when non-compliance issues arise, and they report directly to the Directors and the Board.
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 & Risk amends policies, controls and programmes as required.

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

Tier 1 (assessment reporting stage)	Tier 2 (in progress)	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.

Tier 1 (assessment reporting stage)	Tier 2 (in progress)	Tier 3 (in planning)
5 to 148 suppliers per business making up 80% of volume and value of procurement.	Up to ~ 1,066 suppliers / business making up 18% of volume and value of procurement.	Up to ~ 7,905 suppliers / business making up remaining 2% of volume and value of procurement.
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
28 June 2024