

Spantec Systems: Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out Spantec Systems Pty Ltd actions to understand potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 July 2023 to 30th June 2024.

As part of the construction products and construction activity sector, we recognise that we have a responsibility to take a robust approach to managing the risk of slavery and human trafficking.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of the Spantec Systems Pty Ltd.

- Spantec Systems Pty Ltd consists of manufacturing, design and engineering and distribution of steel flooring systems, and associated products.

We currently trade in the Australian market.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Employee code of conduct Our code makes it clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing the supply chain.

- **Supplier/Procurement code of conduct** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to

demonstrate that they provide safe working conditions where necessary, treat employees with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship. All suppliers that we classify as a mid to high risk or coming from a region that may be classified as a higher risk are required to complete documentation outlining that they abide by our modern slavery code of conduct. Spantec conducts desk top audits of our supply partners through <https://modernslaveryregister.gov.au/>

- Recruitment/Agency workers policy We use only specified, reputable employment agencies in our internal human resource departments to source labour and verify the practices of any new agency that it is using before accepting workers from that agency.
- Due diligence We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:
 - Mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking;
 - Evaluating the modern slavery and human trafficking risks of each new supplier
 - Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
 - Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified;
 - Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

Policies: Responsibility for putting in place and reviewing policies and the process by which they were developed is shared between the Business Systems Manager and the General Manager.

- Risk assessments: Responsibility for putting in place the process and broad organisational responsibility for human rights and modern slavery risk analysis is shared between the Business Systems Manager and the General Manager.
- Investigations/due diligence: Responsibility for ongoing investigations/due diligence falls under Supply & Logistics Department headed by the Business Systems Manager.
- Training: Training has been provided for key staff where in their roles, exposure to human rights and modern slavery practices is possible. This training will be completed at a minimum of every two years.

Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- Developing a system for supply chain verification, whereby we evaluate potential suppliers before they enter the supply chain; and
- Reviewing our existing supply chains whereby we evaluate all existing suppliers.

Training

We require Supply Chain, HR, Sales, Marketing & Managers within our organisation to complete training on modern slavery.

Our modern slavery training covers:

- Our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.
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Awareness-raising programme

As well as training staff, we have raised awareness of modern slavery issues by circulating a series of emails to staff.

The emails explain to staff:

- The basic principles of the Modern Slavery Act;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

2024 Commitment

The below outlines the approach we committed to in 2024.

- This year we have increased our employee understanding of Modern Slavery, assisting with identifying and addressing risks of Modern Slavery in our operations and supply chains.
- Assessed the majority of our key suppliers based on expenditure to identify the inherent risks of Modern Slavery.
- Review our current Modern Slavery self-assessment questionnaire to ensure effectiveness, aimed at improving completion rates and better identify potential risks of Modern Slavery.
- Continuing to strengthen our due diligence procedures to better understand the Modern Slavery risks posed by potential new suppliers.

Effectiveness

Spantec continues to assess the effectiveness of its actions in comparison to industry standard and practices.

Spantec have a range of ways on how we assess the effectiveness of its actions, including:

- Established process to review the actions we have taken, including annual review by our Modern Slavery Working Group.
- Internal audits of specific steps taken to assess and address modern slavery risk.
- Working with suppliers to check how they are progressing, including any actions they have put in place to address modern slavery risks.

Future Commitment

Spantec remains dedicated to retaining and further strengthening practices to continuously reduce any possible slavery and human trafficking risks. Our ongoing commitment to reducing Modern Slavery will be:

- Modern Slavery working group to continue to meet annually to review our current risk assessment process, action plans, training, future commitments and review of our Modern Slavery Statement.
- Business Systems Manager to continue the ongoing review of our supply chain to identify any weaknesses and rectify any areas of concern.
- Completion of Modern Slavery self-assessments by all key & minor suppliers including, ongoing engagement and consultation to identify and prevent slavery within the supply chain.
- Review and update training module to ensure relevance and effectiveness prior to training commencement, all Modern Slavery Training to completed every 2 years.
- Continuously review and improve current policies & processes to include specific references to Modern Slavery & Human Trafficking..

Approval

This statement was approved on 1st May 2024 by the Management Group of Spantec Systems Pty Ltd on behalf of Spantec Systems Pty Ltd.

 Recoverable Signature

X Grant Irvine

Grant Irvine

General Manager

Signed by: 174961c4-7dd4-411b-a8ba-a5a76a83b89f