

# Modern Slavery Statement



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# INTRODUCTION



Apex Group Pty Ltd maintains a strict stance against the utilization of coercion, threats, or deceit to exploit individuals and erode their autonomy. We adamantly condemn all manifestations of modern slavery, encompassing human trafficking, slavery, servitude, forced labour, deceptive recruitment for labour or services, debt bondage, forced marriage, and child labour. These forms of exploitation represent grave infringements upon human rights. Our unwavering dedication rests in identifying and eradicating such risks from both our operations and supply chain.

In accordance with the Modern Slavery Act 2018 (Cth), Apex bears the responsibility to act conscientiously and disclose publicly the risks associated with modern slavery within our operations and supply chain. The contents of this declaration encompass the initiatives undertaken by Apex throughout the financial year 2023/24.



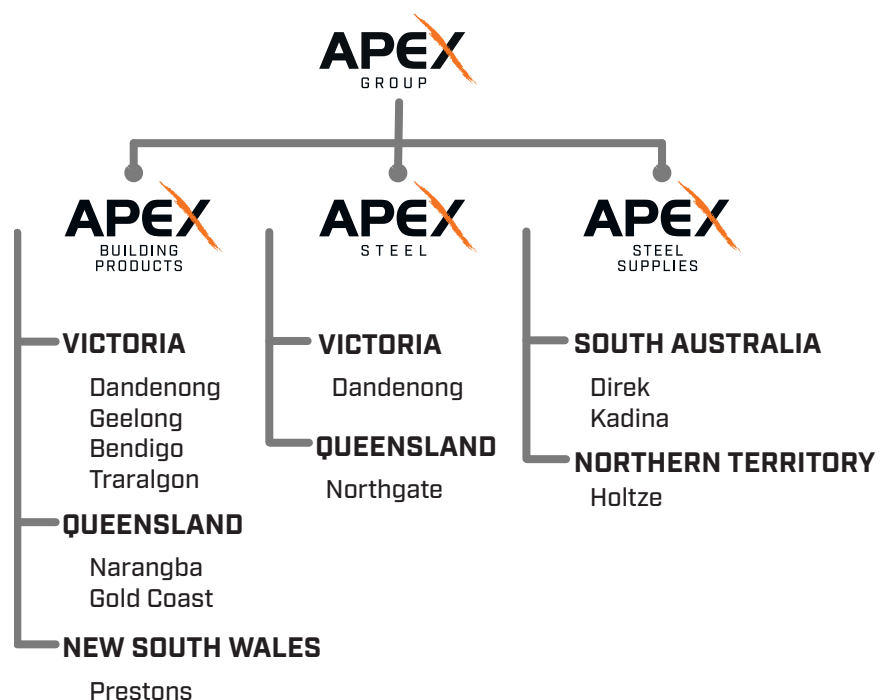
# THE APEX GROUP

## Our structure, operations and supply chain

The Apex Group stands as one of the most prominent privately owned steel manufacturers and distributors in Australia. It symbolizes the amalgamation of several significant steel enterprises within the country, extending a diverse range of products and services to both the public and trade clientele.

### OUR STRUCTURE

Apex boasts a workforce of more than 550 individuals, spread across 12 branches situated in various regions, including Victoria, Queensland, South Australia, New South Wales, and the Northern Territory.





## OUR OPERATIONS



### Building Products

We offer a wide range of steel building products such as roofing in multiple profile sizes cut to length, purlins, downpipes, gutters, roof accessories, battens and more.



### Long Products

We offer a wide range of merchant bar, RHS & structural steel including a large range of square & regular tube, flat & angle bar, universal beams/columns, and more.



### Steel - Sheet & Coil

We offer a wide range of steel sheet and coil products including cold rolled, hot rolled, COLORBOND © prepainted steel, electro galvanised, aluminium, stainless & more. We offer several services such as shearing, slitting, guillotining, and PE coating in order to meet any specific customer need.

## OUR SUPPLY CHAIN

The Apex Group predominantly procures materials and products from domestic suppliers, forming the cornerstone of our sourcing strategy. A proportion of our materials and products, however, is acquired internationally from suppliers based in regions such as New Zealand, Asia, and North America. We meticulously uphold a registry of our key suppliers, subject to regular review and updates as an integral part of our supplier evaluation and audit procedures.

Apex engages in the acquisition of materials and products intended for customer distribution, as well as for the provisioning of essential products and services to sustain our operational processes. To ensure the delivery of superior-quality products and services to our valued customers, it is imperative to establish partnerships with suppliers who align with the core values held by Apex. The methodology we adopt for sourcing goods and services hinges upon various factors, including the specific requirements, value, prevailing market dynamics, and the criticality of the materials in question.

# MODERN SLAVERY RISKS

Apex acknowledges that despite the relatively low likelihood of modern slavery within our supply chain, the concealed nature of exploitative practices and underreporting of cases necessitates a comprehensive appraisal of suppliers and service providers. This measure is crucial for the detection of potential instances of slavery and the subsequent implementation of necessary corrective measures.

A thorough investigative and audit procedure is sustained to enhance our comprehension of the supply chain. This effort aims to pinpoint areas where modern slavery risks may exist and to allocate priority to requisite interventions. Preliminary findings suggest that, overall, the risk of modern slavery remains low within both our operations and immediate supply chains.

Products for sale to customers	Non-trade services
<ul style="list-style-type: none"><li>• Building products (Imported)</li><li>• Long products (Imported)</li><li>• Sheet and coil (Imported)</li></ul>	<ul style="list-style-type: none"><li>• Courier transport</li><li>• Transport services</li><li>• Cleaning and hygiene</li></ul>
Non-trade products	
<ul style="list-style-type: none"><li>• Manufacturing machinery/parts</li><li>• Packaging materials</li><li>• Clothing (uniforms)</li><li>• Maintenance equipment</li><li>• Consumer electronics</li><li>• Cleaning/janitorial supplies</li></ul>	<ul style="list-style-type: none"><li>• Motor vehicles</li><li>• Electronic hardware /components</li><li>• Office and desk accessories</li><li>• Lighting fixtures/accessories</li><li>• Marketing material</li></ul>





# ACTIONS TO ADDRESS MODERN SLAVERY RISKS

To ensure utmost integrity, we engage in thorough audits of both our business operations and our supplier network. These audits are designed to identify any potential occurrences of bribery, corruption, and modern slavery. For instance, we conduct audits of the trading companies we engage with to ensure their exclusive collaboration with reputable steel mills.

During the fiscal year 2023/24, we executed a series of pivotal initiatives aimed at identifying and effectively addressing modern slavery risks within our own operations and across our supply chain. A comprehensive outline of these measures is provided in the following sections.

## **Supplier and Supply Chain Mapping**

As a fundamental step, we initiated an extensive mapping endeavour focused on our suppliers. This comprehensive exercise encompassed critical aspects such as the country of origin, a detailed roster of steel mills, the volume of steel procured, and the associated value of these acquisitions. The results underscore our current steel imports from a diverse spectrum of nations, notably including Vietnam, Taiwan, China, Japan, Korea, and New Zealand. It's noteworthy that while some of these countries carry a risk of modern slavery according to the global slavery index, the likelihood of modern slavery within the steel sector of these nations remains notably low.

Concurrently, we conducted an exhaustive mapping exercise targeting our office and equipment suppliers. This comprehensive evaluation encompassed parameters such as procurement volumes and key points of contact. This exploration culminated in the identification of 28 companies that provide office equipment and essential supplies to our operations, all of which are situated within Australia.

## **Desktop Evaluation**

We undertook additional evaluations of our foreign steel suppliers to ascertain the presence of any indicators of modern slavery risk.



## EFFECTIVENESS OF ACTIONS TAKEN

Apex recognizes that the fight against modern slavery demands sustained dedication and continuous assessment. It's crucial to monitor and appraise our efforts to extract valuable insights for enhancing our systems. This endeavour involves the identification or establishment of both quantitative and qualitative benchmarks.

Apex's strategy for managing modern slavery risks will undergo an annual review. The forthcoming assessment is scheduled for the culmination of FY25 and will be integrated into the subsequent year's modern slavery statement.

## CONSULTATION

Apex has a formal governance structure with Board-level oversight. The board are responsible for managing and monitoring corporate compliance, including reporting for modern slavery. The board meet annually during which the effectiveness of actions taken to address modern slavery risks will be discussed.

## ONGOING COMMITMENT

Apex's modern slavery risk management approach will be reviewed at least annually. The next review will take place at the conclusion of FY25 and included in next year's modern slavery statement.







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