MODERN SLAVERY STATEMENT 26



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MESSAGE FROM THE BOARD

At the Apex Steel Group, we remain committed to conducting our business with integrity, transparency and respect for human rights. We recognise our responsibility to identify, assess and address modern slavery risks within our operations and supply chains.

As an Australian steel company, most of our materials are sourced domestically from reputable suppliers, which reduces our exposure to certain higher-risk regions and supply chains. However, we acknowledge that modern slavery risks can exist at any level of a supply chain, including through imported products, raw materials and services.

During FY26, we continued to strengthen our approach to modern slavery risk management through supplier surveys, internal employee training and ongoing consideration of supply chain risks. These initiatives support our commitment to improving transparency, raising awareness and promoting responsible business practices.

We recognise that managing modern slavery risks is an ongoing process requiring continuous improvement, appropriate due diligence and engagement with our suppliers and employees.

This Modern Slavery Statement has been prepared in accordance with the *Modern Slavery Act 2018 (Cth)*. It outlines the actions taken during FY26 to assess and address modern slavery risks and reaffirms our commitment to respecting human rights throughout our operations and supply chains.

Nick Lachimea
Director
Apex Steel Group



INTRODUCTION

Apex Group Pty Ltd maintains a strict stance against coercion, threats or deception used to exploit individuals or restrict their freedom. We condemn all forms of modern slavery, including human trafficking, slavery, servitude, forced labour, deceptive recruitment for labour or services, debt bondage, forced marriage and the worst forms of child labour.

In accordance with the Modern Slavery Act 2018 (Cth), Apex recognises its responsibility to assess and disclose modern slavery risks within its operations and supply chains, and to describe the actions taken to address those risks.

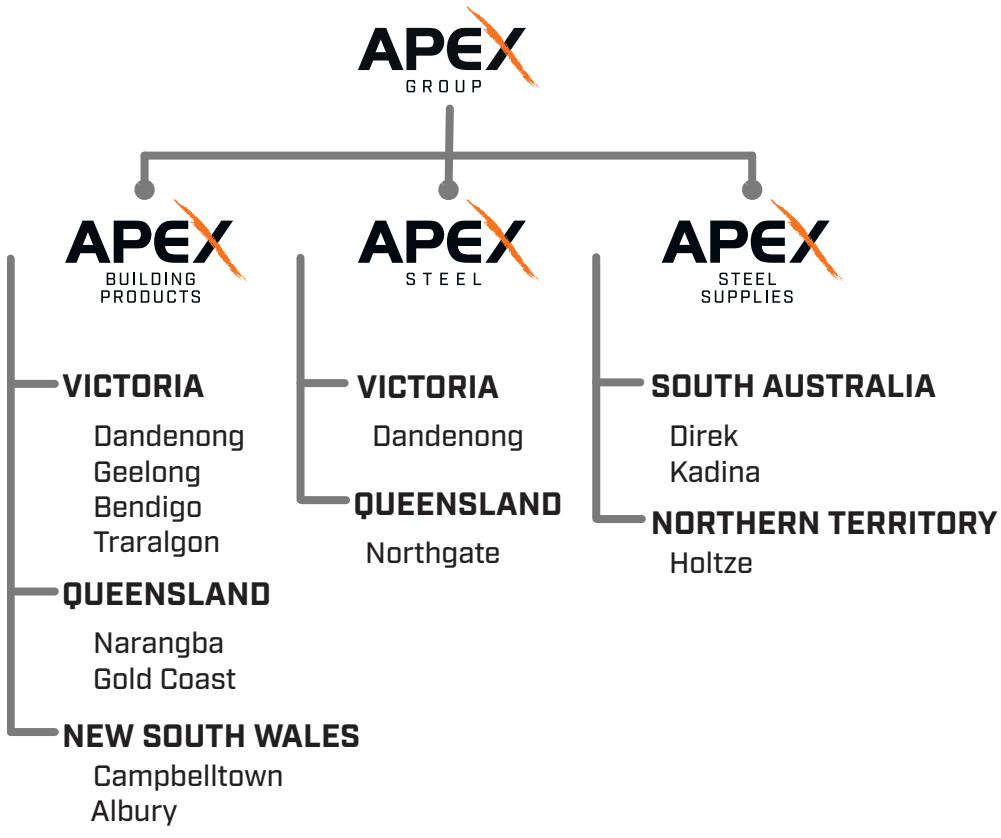
This statement outlines Apex's approach to identifying, assessing and addressing modern slavery risks during the financial year ending 30 June 2026.

OUR STRUCTURE

The Apex Group is one of Australia's prominent privately owned steel manufacturers and distributors, supplying a diverse range of steel products and associated services to public and trade customers.

Apex Group employs approximately 630 people across 13 branches in Victoria, Queensland, South Australia, New South Wales and the Northern Territory.

The Group comprises Apex Building Products, Apex Steel and Apex Steel Supplies, operating across the following locations:



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

Our supply chain is predominantly domestic, with some materials and products sourced internationally, including from New Zealand, Asia and North America.

Our suppliers provide steel and building products for distribution to customers, together with goods and services required to support our manufacturing, processing, warehousing, transport and administrative operations.

These include transport and logistics services, cleaning and hygiene services, machinery and equipment, maintenance supplies, packaging, uniforms, information technology and other operational goods and services.

Apex recognises that modern slavery risks may extend beyond direct suppliers into upstream supply chains, including raw material extraction, manufacturing, processing, transport and labour services.

We seek to work with suppliers who demonstrate responsible business practices and alignment with our ethical expectations. Supplier information, evaluations and risk considerations support our approach to understanding and managing

MODERN SLAVERY RISKS

Apex recognises that modern slavery risks can arise within both our operations and supply chains.

While our predominantly Australian workforce and reliance on domestic suppliers reduce exposure to certain risks, we acknowledge that modern slavery can occur in any country or industry.

The complexity of international supply chains, particularly those involving multiple tiers of suppliers, can make it difficult to identify labour practices and potential exploitation.

Areas of potential exposure within our supply chain include:

Products for sale to customers	Non-trade services
• Building products (Imported) • Long products (Imported) • Sheet and coil (Imported)	• Courier transport • Transport services • Cleaning and hygiene
Non-trade products	
• Manufacturing machinery/parts • Packaging materials • Clothing (uniforms) • Maintenance equipment • Consumer electronics • Cleaning/janitorial supplies	• Motor vehicles • Electronic hardware /components • Office and desk accessories • Lighting fixtures/accessories • Marketing material

ACTIONS TO ADDRESS MODERN SLAVERY RISKS

During FY26, Apex continued to develop its approach to identifying and addressing modern slavery risks within its operations and supply chains.

Key activities undertaken during the reporting period included:

- Supplier Survey: During FY26, Apex distributed a modern slavery survey to suppliers to gather information about their operations, supply chains, sourcing practices and measures in place to identify and address modern slavery risks.
  - The survey was designed to improve supply chain transparency, support supplier risk assessments and identify areas that may require further investigation or follow-up.
  - The information gathered through this process will assist Apex in strengthening its understanding of potential modern slavery exposure and identifying opportunities to improve supplier due diligence.
- Supplier and Supply Chain Risk Assessment: Apex continued to consider modern slavery risks associated with its supply chain, particularly in relation to imported steel products, international manufacturing and labour-intensive services.
  - Factors considered in assessing potential exposure include supplier location, product type, industry characteristics and the complexity of supply chain arrangements.

- Employee Training and Awareness: During FY26, Apex provided internal modern slavery training to employees to improve awareness and understanding of modern slavery and its potential impact on business operations and supply chains.
  - The training focused on recognising modern slavery risks, understanding potential indicators of exploitation and promoting responsible business practices.
  - Providing employees with an understanding of modern slavery supports the identification and escalation of potential concerns and reinforces Apex's commitment to ethical conduct.
- Policies and Governance: Apex maintains policies and internal processes supporting ethical business conduct, responsible procurement and compliance with applicable legislation.
  - These arrangements provide a framework for identifying and managing risks and supporting appropriate responses where potential concerns are identified.

Apex recognises the importance of periodically reviewing these arrangements to ensure they remain appropriate and effective.

EFFECTIVENESS OF ACTIONS TAKEN

Apex recognises that assessing the effectiveness of actions taken is an important component of its modern slavery risk management approach.

During FY26, Apex undertook activities aimed at strengthening its ability to identify and assess modern slavery risks, including the distribution of a supplier survey and the delivery of internal employee training.

The supplier survey provides a mechanism for gathering information about supplier practices and identifying potential areas of risk or opportunities for further engagement.

Employee training supports greater awareness of modern slavery risks and encourages employees to recognise and raise potential concerns.

While these initiatives represent progress in developing Apex's approach, further work is required to formally evaluate their effectiveness.

A formal management review of the modern slavery risk management approach was not completed during FY26. This has been identified as an area for improvement and will be included in planned activities for FY27.

Future effectiveness assessments will consider measures such as:

- Supplier survey response rates and findings.
- Identification and assessment of higher-risk suppliers.
- Follow-up actions arising from supplier survey responses.
- Employee training participation and completion.
- Modern slavery concerns identified or reported.
- Corrective actions and improvements implemented.
- Outcomes of periodic management reviews.

These measures will assist Apex in evaluating whether its activities are improving awareness, strengthening supply chain transparency and supporting the identification and management of modern slavery risks.

CONSULTATION

Apex recognises the importance of consultation and engagement in understanding and addressing modern slavery risks.

During FY26, Apex engaged with suppliers through the distribution of a modern slavery survey. This initiative sought information about supplier operations, sourcing practices, supply chains and approaches to managing modern slavery risks.

Internally, modern slavery training was provided to employees to increase awareness of potential risks and reinforce the importance of responsible business practices.

Apex intends to further strengthen consultation and oversight during FY27, including through the review of supplier survey responses and formal management consideration of modern slavery risk management activities.

ONGOING COMMITMENT

Apex recognises that identifying and addressing modern slavery risks requires ongoing due diligence, engagement and continuous improvement.

During FY27, Apex intends to focus on the following activities:

- Review and evaluate responses received through the supplier survey.
- Follow up with suppliers where responses identify potential risks, information gaps or areas requiring further clarification.
- Continue to assess modern slavery risks across trade and non-trade supply chains.
- Maintain modern slavery awareness and training for relevant employees.
- Strengthen supplier due diligence and documentation.
- Develop measures to monitor the effectiveness of actions taken.
- Complete a formal management review of Apex's modern slavery risk management approach.
- Identify and implement improvements arising from supplier assessments, employee feedback and management review.

Apex Steel Group remains committed to responsible business practices, respecting human rights and continuously improving its approach to identifying and addressing modern slavery risks throughout its operations and supply chains.

APEX

VISIT US

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