



Modern Slavery Statement 2020

Atlas Steels P/L (the company) is a major importer, stockist and distributor of various finished and semi-finished Metals and Metal products with operations based throughout Australia.

This statement sets out the company's zero approach policy to modern slavery and human trafficking and details the steps we are taking to address these risks and affirm our commitment to preventing slavery and human trafficking within our business and supply chains.

Organisational Structure

Atlas Steels P/L oversees various business units across Australia and undertakes business activities around Metals and Metal Products - importing, exporting, distribution, processing, and finishing.

Suppliers

The supply chains from which our materials and services are obtained are based in Australia, New Zealand, Asia, and Europe. A register of our key suppliers is centrally maintained, is reviewed and updated on a regular basis as part of the company's Supplier Evaluation Audit procedure.

Risk Assessment

One of the potential major human rights risks facing the company is the existence of modern slavery in our supply chains. This reflects the fact that Atlas Steels has a global supply chain that procures a range of products and services from many providers within Australia, New Zealand, Asia, and various countries around the world.

Modern slavery has the potential to exist in the supply chain through a variety of circumstances including: Forced labour, Child labour, Debt bondage, Human trafficking, Abuse of requirements for a minimum living wage and Discriminatory employment practices.

It is important to our business and part of our corporate governance that we lead by example and demonstrate that we have set and operate to the highest possible standards, to act responsibly and ethically at all times and accordingly, we would expect the same from our suppliers, service providers, contractors and trading partners.

Due Diligence and Remediation

The company works with its trading partners, suppliers, and service providers to identify and understand the impacts of its activities on business so that benefits can be realised, and negative impacts limited.

The company undertakes due diligence when considering new suppliers, it encourages long term trading relationships and makes clear our commitment to responsible corporate behaviour in all business activities.

Due diligence is implemented to prevent and mitigate adverse impacts and the company provides access to remedy through effective grievance mechanisms.

All trading partners, suppliers and service providers are required to comply with the appropriate Code of Conduct, policies, and standards on human rights as outlined in the Modern Slavery Act 2018, and also with regards to ethical business practices, WHS/OHS safety, and Environmental legislation.

The due diligence process is initiated by a risk assessment of traders, suppliers, and service providers prior to contract award. Once they have passed the initial risk assessment and subsequently enters into a contract with the company and its related business units, their performance is continuously monitored over the term of their contract arrangement with the business for any new risks or issues that may arise in that time.

Atlas Steels P/L also has mechanisms in place for employees and third parties to anonymously report suspected or actual illegal activity or breaches of Company Policy, including the Company's Code of Business Conduct and Whistle-blower Policy.

Employees and third parties can access an externally operated whistle-blower system through an online portal, by phone or email. Each whistle-blower disclosure received is investigated and reported to the senior executives of the company. Atlas Steels P/L external grievance procedure ensures all grievances are managed in a systematic, fair, timely and transparent manner.

Consultation

Atlas Steels management of modern slavery risks falls within its overall approach to protecting human rights. The foundation documents for human rights protection are the Company's Code of Business Conduct, Discrimination & Equal Opportunity Policy, and Human Rights Policy.

These documents outline Atlas Steels approach to establishing essential standards of personal and corporate conduct and behaviour expected of everyone who works for, or with the company including directors, employees, contractors, suppliers, and business partners. They also outline clear requirements on the identification and management of issues associated with forced labour and slavery within supply chains.

Below these documents sit specific policies and guidelines that ensure the highest standards are achieved across the business.

Through contractual arrangements and procurement principles, trading partners, consultants, agents, contractors, and suppliers are required to comply with the Code of Conduct and Human Rights Policy. The Company's standard terms and conditions also require that minimum standards in ethical business practices, safety, and environment, be met.

Training and Awareness

To assess our effectiveness in preventing modern slavery within our operations and supply chains, we will review and develop the following key performance indicators and will report them in our future modern slavery statements.

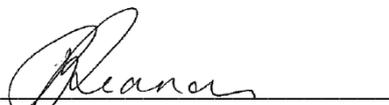
- Inclusion of Human Rights Policy in all new employee inductions and annual re-inductions for existing employees and contractors.
- Inclusion of Modern Slavery and Human Trafficking statement on all applicable purchase orders outlining the company's position to these illegal activities.
- Implement Anti Modern Slavery and Human Trafficking training for key members of staff who manage supplier relationships for the business.
- Implement actions to strengthen our risk assessments and supply chain mapping.
- Develop a Human Rights Policy to be published on all company websites.

Ongoing Commitments

We will continue to emphasise to our suppliers and service providers our commitment to ensuring that modern slavery and human trafficking is not part of our supply chain.

This Modern Slavery and Human trafficking statement will be reviewed and published on an annual basis and will be updated, as necessary.

This statement was approved by the board of directors on the 15th September 2020.



John Pearson
Regional Director