

## MODERN SLAVERY STATEMENT

### INTRODUCTION

Modern slavery is an umbrella term that describes serious forms of exploitation, including forced labour, slavery, servitude, debt bondage, the worst forms of child labour, forced marriage, deceptive recruitment, and human trafficking. Modern slavery is a serious violation of human rights and an exploitative crime that has devastating impacts on the health, safety, and wellbeing of its victims.

The International Labour Organization estimates that approximately 50 million people worldwide were living in conditions of modern slavery in 2021. Forced labour is the most prevalent form and disproportionately affects vulnerable populations, including children and young people, undocumented migrants, and individuals living in poverty.

Brown Engineering & Construction Pty Ltd ("Brown Steel") has prepared this Modern Slavery Statement. This Statement outlines our approach to identifying, assessing, and addressing the risks of modern slavery in our operations and supply chains, and sets out planned actions.

To support our reporting obligations and continuous improvement, Brown Steel has consulted Steel Sustainability Australia in developing our modern slavery risk management framework and supply chain due diligence strategy.

Brown Steel is committed to operating lawfully and ethically and to working with contractors, partners, and suppliers who share our values. We aim to be transparent in reporting our actions and progress, and we welcome feedback from stakeholders as we continue to strengthen our approach to addressing modern slavery risks.

### IDENTIFICATION OF THE REPORTING ENTITY

Brown Engineering & Construction Pty Ltd T/A Brown Steel  
ABN: 31 070 921 890

Brown Steel is a privately owned company registered in Queensland, Australia. The company operates a Structural Steel fabrication facility at **10 Watson Court, Torrington Q 4350**.

## ENTITY STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### STRUCTURE

Brown Steel has operated continuously for more than 30 years, with a strong focus on innovation and the sustainable management of people, products, and the environment. The company's primary activity is the fabrication of structural steel.

The majority of steel materials are sourced within Australia where possible, however due to Australian manufacturing reduction in the Steel sector over the years, where Brown Steel Suppliers cannot source from Australian owned and operated companies, our suppliers are forced to supply some steel from overseas manufacturers. Supplementary accessory products such as fasteners, are sourced both locally and internationally as required.

### OPERATIONS

Brown Steel employs approximately 300 employees across management, production, and distribution functions. All employees are based in Australia. Approximately 98% of the workforce is employed on a full-time basis, with the remainder engaged as part-time or casual employees.

### SUPPLY CHAINS

Brown Steel undertakes an annual review of all key suppliers. These categories include structural steel, purlins, fasteners, surface treatment, transport, consumables, and services.

### ACTIONS TAKEN TO IDENTIFY MODERN SLAVERY RISKS

The Act identifies eight forms of exploitation that constitute modern slavery:

- Trafficking in persons
- Slavery
- Servitude
- Forced marriage
- Forced labour
- Debt bondage
- Deceptive recruiting for labour or services
- The worst forms of child labour
- The worst forms of child labour include slavery-like practices or hazardous work involving children.

## RISK IN THE SUPPLY CHAIN

Brown Steel primarily sources materials directly from suppliers based in Australia. Materials are procured through secondary distributors or approved representatives. All importation and purchasing arrangements for overseas products is carried out by our suppliers in accordance with our Purchase Order Conditions stated the following:

Please Return a priced Order Confirmation ASAP  
Heat Numbers on Delivery Dockets must be noted.  
Material Test Certs (as per AS 5131:2016 Construction Category CC2) or LOC Required referencing relevant AS/NZS standard  
ALL STEEL TO BE ACRS CERTIFIED STEEL FROM  
ISO-14001 ENVIRONMENTAL MANAGEMENT CERTIFIED  
AND WORLD STEEL ASSOCIATION (WSA) CLIMATE  
ACTION DATA PROVIDER MEMBER - STEEL  
MANUFACTURERS.

GREENSTAR PROJECT - This is a Greenstar Project and therefore requires that 95% of the building's steel (by mass) is sourced from Responsible Steel Makers that have a valid ISO 14001 Environmental Management System (EMS) in place and has active membership of the World Steel Association's Climate Action Program (WSA CAP).

*The Supplier must comply with all Laws including but not limited to the Disability Discrimination Act 1992 (Cth), Modern Slavery Act 2018 (Cth), (where applicable to the Supplier) and the Human Rights Act 2019 (Qld) (where applicable to the Supplier).*

This project is a Construction Category CC2 as per AS/NZS 5131:2016  
As such this project requires Traceability of Materials, including all Test Certificates and/or Letters of Compliance in accordance with AS/NZS 5131:2016 Amd 1:2020 – Clause 5.2.3 and AS/NZS 5131:2016 section 4.1.2, 4.5.2, 5.2.1, 5.2.3, 6.2, for further details or contact our Head Office to discuss further

All Materials supplied are to conform with Brown Steel's Quality Management Plan QM 07/2011 Procedures AP-740 Purchasing and MP-753 Identification and Traceability requirements e.g. all relative items must have Heat Numbers, Batch numbers and necessary supporting documentation.  
Structural Steel Orders: All Materials should be supplied free of scale, within Specification tolerances and should comply with any mandatory testing requirements.

All suppliers must be either pre-approved or evaluated prior to being established for purchasing activities. Brown Steel purchases materials via their suppliers only from accredited mills that meet regulatory and Compliance requirements.

With approximately 1000% of first-tier suppliers based in Australia and 99% supplying goods and services locally, the risk of modern slavery is more likely to exist beyond first-tier suppliers and outside Australia.

Accordingly, Brown Steel's focus is on strengthening visibility beyond first-tier suppliers, enhancing supplier awareness, and continually improving supplier onboarding and due diligence processes.

## SUPPLY CHAIN RISK PROFILE

Product / Service	Supplier Location	Source	Risk Rating
Structural Steel	Local	Australia	Low
Structural Steel	Local	Imported	Low–Medium
Transport	Local	Australia	Low
Staff	Local	Australia	Low
Sundry Products	Local	Australia	Low
Sundry Products	Local	Imported	Medium
Consumables	Local	Australia	Low
Consumables	Local	Imported	Medium

## RISK IN OPERATIONS

As Brown Steel operates exclusively within Australia, where strong labour laws and regulatory oversight apply, the risk of modern slavery within direct operations is considered low. Brown Steel operates our Workshop under the registered and approved by the Fair Work Commission - **BROWN ENGINEERING & CONSTRUCTION PTY LTD T/AS BROWN STEEL AND CFMEU UNION COLLECTIVE AGREEMENT 2023-2027**

## ACTIONS TAKEN

### GOVERNANCE FRAMEWORK

Top management is responsible for implementing modern slavery obligations across their respective business areas. Brown Steel's policy framework supporting modern slavery risk management includes:

HRP-014 Modern Slavery Policy  
HRP-002 Code of Conduct Policy  
HSE-10-2011-P02 Health and Safety Policy. - Shortcut  
HRP-021 Confidentiality, Conflicts & Anti Corruption Policy  
HRP-010 EEO, Anti-discrimination and Harassment Policy  
AP-740 Purchasing

## SUPPLIER RISK MANAGEMENT FRAMEWORK

Brown Steel works collaboratively with key suppliers to identify, assess, and manage modern slavery risks and develop practical, commercial solutions. Where suppliers fail to take reasonable steps to prevent or prohibit modern slavery, Brown Steel may discontinue the commercial relationship.

Supplier risk management is primarily governed through the supplier onboarding process, which includes completion of an F-740-013 Subcontractors Questionnaire-Form, requiring suppliers to disclose their governance system.

The procurement team is responsible for integrating supplier risk management across the organization by:

- Centralising supplier approval and evaluation processes
- Providing employee awareness training on obligations under the Act
- Ensuring modern slavery clauses are included in applicable contracts
- Monitoring supplier compliance with the Act
- Conducting supplier risk assessments where appropriate
- Reviewing the Modern Slavery Statement annually

## ACTION ROADMAP

Brown Steel reviews its supplier base and confirmed minimal changes to key suppliers and Products at the end of every financial year. Based on this review, Brown Steel will continue working with suppliers to strengthen compliance with the Act, with a focus on:

- Previous Modern Slavery Statements
- Current policy portfolio
- Existing training materials
- Supplier onboarding processes and SAQs

## OUR ACTION COMMITMENTS

- Ongoing modern slavery awareness training for key stakeholders via e-learning modules
- Executive and Board briefings on obligations under the Act
- Supplier categorisation and reassessment of first-tier supplier risk
- Enhancement of policy frameworks following strategic review
- Review of external ESG data sources to support consistent supplier evaluation
- Development of the Modern Slavery Statement for the FY25 reporting period

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## ASSESSING EFFECTIVENESS

As actions are implemented, Brown Steel will identify appropriate effectiveness indicators and develop an impact measurement framework to assess progress in future reporting periods.

## CONCLUSION

This Modern Slavery Statement confirms Brown Steel's commitment to assessing, addressing, and monitoring modern slavery risks and to taking meaningful action to prevent human rights violations within its operations and supply chains.

## MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

### PRINCIPAL GOVERNING BODY APPROVAL

This Modern Slavery Statement was approved by the Director and the Executive Management Team of Brown Steel on 12th February 2026.

## SIGNATURE OF RESPONSIBLE MEMBER

This Statement is signed by a responsible member of Brown Steel in accordance with the Act.



Pat Brown  
**Managing Director**



**Pat Brown**  
**Managing Director**