Modern Slavery Statement

(Valid until 30 June 2026)

1. Introduction

The Modern Slavery Act 2018 (Commonwealth) mandates that Metal Manufactures Pty Limited (MMPL) prepares a Modern Slavery Statement each financial year.

Modern slavery in all its various forms and guises is a crime in Australia and much of the world. MMPL are committed to acting ethically and with integrity in all its activities, and does not tolerate or condone modern slavery in any part of the organisation including in its supply chains. MMPL has implemented ongoing rigorous systems and controls to enforce this commitment.

This statement relates to the MMPL financial year 1 January 2024 to 31 December 2024.

2. About MMPL

MMPL is a private company limited by shares, incorporated and domiciled in Australia. Its registered office is 19-21 Loyalty Road, North Rocks, NSW 2151. A snapshot of MMPL's entities is as follows:

9	5,500+	16,000+	98,000+	670+
100% owned divisions as noted in appendix A	Total staff	Active suppliers	Active customers	Total sites

The Group's principal activities during the financial year ending December 2024 consisted of the:

- Import, manufacture and distribution of metal tubing and associated accessories and fittings.
- Wholesale distributions of high, medium and low voltage cable, overhead conductor, optical ground wire cable, electrical, solar, lighting, data products and related accessories and fittings.
- Wholesale distributions of hardware, lighting, ventilation, electrical, datacomms, test & measure, switchgear and other materials.
- Wholesale distributions of civil infrastructure products.
- Wholesale distributions of thermo-plastic products, sign, digital and display solutions.
- Wholesale distributions of security and monitoring equipment.
- Wholesale distributions of fasteners and associated products.
- Wholesale distributions of pipe, valves and fittings for active and passive fire companies, hydrant plumbing and the manufacturing of refractory hardware components.
- Wholesale distributions of plumbing and bathroom supplies.

Goods are predominantly sourced from Australian-based global suppliers as well as local suppliers. Branches and sites are primarily located in Australia, with a small number of sites in New Zealand and one 50:50 joint venture based in Hong Kong (a non-controlled entity).

3. Identifying and addressing modern slavery risks

MMPL acknowledges that it is susceptible to modern slavery risks in its supply chain. As part of the development of this Statement, MMPL has consulted with Senior Executives and/or procurement departments from each controlled business division, as well as a legal firm and consultants to identify and address modern slavery risks.

The consultation process with all business divisions, noted above, involved supplier reviews/assessments, actions taken where modern slavery issues occurred (if any), changes to and updates in relation to modern slavery risks, industry involvement, as well as training and other employee wellbeing initiatives.

A summary of key risks, controls, and assessment processes are as follows:

Key risks	Ongoing controls in place	Assessment of effectiveness
Lack of accountability over modern slavery risks.	A representation of staff and Executives are trained on understanding and responding to modern slavery risks.	Business and Internal Audit & Risk track completion of Modern Slavery training. Up to Dec'24, an increased representation of executives as well as other staff have completed the training.
Lack of appropriate internal policies and codes of conduct.	Regular review and updating of key documents in relation to modern slavery risks.	Business and Internal Audit & Risk continually review key internal documents such as policies & procedures and make changes where required. During 2024, work commenced to further refine the employee onboarding policies, checks and controls. In 2025 we will create a specific Modern Slavery policy which will cross-reference to current policy points with the aim of increasing clarity and transparency.
Staff unaware of policies and codes of conduct.	Divisions train their staff on policies, business ethics and code of conduct. As part of the onboarding process a new employee receives and is required to acknowledge the receipt of key policies. In addition, the employee contract has statements in relation to Policy Compliance, the provision of the Governments Fair Work Statement and MM being an employee of Equal Opportunity.	In support of the new employee's onboarding process, a line manager has an onboarding checklist which specifically mentions Policy Sign-off.
Supply chains susceptible to modern slavery risks.	Divisions perform regular assessments of supply chains for susceptibility to modern slavery risks.	In 2025 we are implementing the SEDEX platform (Supply Risk Management Platform) to enhance our understanding and therefore decision making in relation to modern slavery supply chain risk.
Current and new suppliers and/or their suppliers engage in modern slavery.	Divisions perform due diligence reviews (including site visits) of new and current suppliers; include modern slavery risk clauses in contracts; perform modern slavery supplier surveys; review Modern Slavery Statements (as required). During 2025 we will engage with SEDEX (Supply Risk Management Platform) with the objective to further enhance the management of modern slavery and broader ESG risks in our supply chains.	Business monitor completion of due diligence reviews. Business and Internal Audit & Risk to review and monitor the rolling out of the SEDEX platform, and its effectiveness in identifying and managing modern slavery risks.
Feedback on modern slavery risks not captured or actioned.	Implement systems (e.g. confidential hotline) to obtain feedback from key internal and external stakeholders. During 2023 an updated Complaints Management Policy was issued providing for additional avenues of raising issues. The Complaints Management Policy and Whistleblower Hotline posters are displayed in all employee general areas,	Internal Audit & Risk and Human Resources monitor HR complaints or grievances to ensure they are addressed in a timely fashion. Whistleblower compliance and activities are monitored by the Whistleblower Protection Officers.

Key risks	Ongoing controls in place	Assessment of effectiveness
	such as lunch rooms, and issued to all new employees.	
Non-compliance with policies, lack of addressing breaches.	Internal audits to assess compliance with internal policies.	Business and Internal Audit & Risk assess corrective actions to address breaches and reports directly to the Directors / the Board.
Unaware of latest legal developments and key risks.	Use external consultants to identify changes to modern slavery legislation, new developments and key risks.	Business and Internal Audit & Risk review and amend policies and controls as required.

For supply chain assessments, suppliers have been split into three tiers and review periods:

Tier 1 (assessment reporting stage)	Tier 2 (assessment reporting stage)	Tier 3 (in planning)
Period Jan 2020 to Dec 2022	*Period Jan 2023 to Dec 2025*	*Period Jan 2025 to Dec 2026*
Primary suppliers	Secondary suppliers	Non-preferred suppliers
Global and national suppliers	National and local suppliers	Local suppliers
Highest risk due to global and national supply chain impact.	Moderate risk due to national supply chain impact.	Low risk due to localised supply chain.
80% of volume and value 5 to 150 suppliers per business	18% of volume and value up to ~ 1,300 suppliers / business	2% of volume and value up to ~ 8,000 suppliers / business
Agreements negotiated at a National Level	Agreements negotiated at a National and Regional level	Agreements negotiated at a Regional and Branch level
Executive level engagement	Regional level engagement	Branch level engagement
Executive level training	Branch manager training	Branch staff training
Supply chain mapping	Supply chain mapping	No supply chain mapping

The implementation of the SEDEX platform will enhance our management/transparency of our suppliers going forward in relation to modern slavery.

4. Approval of this statement

This statement was approved by the Board of Metal Manufactures Pty Limited:

Colin Lamond
Managing Director, Metal Manufactures Pty Limited
27 June 2025

Appendix A – 100% owned divisions

Below are the 100% owned divisions of Metal Manufactures Pty Limited:

Business Division	Principal Activities
MM Kembla	Import, manufacture and distribution of metal tubing and associated accessories and fittings.
MM Electrical Merchandising	Wholesale distributions of high, medium and low voltage cable, overhead conductor, optical ground wire cable, electrical, solar, lighting, data products and related accessories and fittings.
Rushmore Distributors	Wholesale distributions of hardware, lighting, ventilation, electrical, datacomms, test & measure, switchgear and other materials.
MM Infrastructure	Wholesale distributions of civil infrastructure products.
MM Plastics	Wholesale distributions of thermo-plastic products, sign, digital and display solutions.
MM Security	Wholesale distributions of security and monitoring equipment.
MM Fasteners	Wholesale distributions of fasteners and associated products.
Antec Construction Products and Antec Refractory	Wholesale distributions of pipe, valves and fittings for active and passive fire companies, hydrant plumbing and the manufacturing of refractory hardware components.
Tradelink	Wholesale distributions of plumbing and bathroom supplies.