

Modern Slavery Statement: FYE 31 December 2020





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.

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:

				
6	3,100+	7,000+	81,000+	410
100% owned divisions	Total staff	Active suppliers	Active customers	Total sites

The Group's principal activities during the financial year ending December 2020 consisted of the:

- Import, manufacture and distribution of metal tubing and associated accessories and fittings.
- Wholesale distribution of electrical, lighting, data products and related accessories and fittings.
- Wholesale distribution of thermo-plastic products.
- Wholesale distribution of security and monitoring equipment.
- Wholesale distribution of sign, digital and display solutions.

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.

3. Identifying and addressing modern slavery risks

MMPL acknowledges that it is susceptible to modern slavery risks in its supply chain, and has ongoing processes in place to identify and address modern slavery risks. A summary of key risks and controls are as follows:

Key risks	Ongoing controls in place
Lack of accountability over modern slavery risks.	MMPL's Executives have overall accountability for responding to modern slavery risks.
Lack of appropriate internal policies and codes of conduct.	Regular review and updating of internal policies and codes of conduct in relation to modern slavery risks to maintain currency and appropriateness.

Key risks	Ongoing controls in place
Staff unaware of policies and codes of conduct.	Staff provided with regular education and information on company policies, business ethics and code of conduct.
Supply chains susceptible to modern slavery risks.	^Ongoing assessments of supply chains for susceptibility to modern slavery risks.
Current and new suppliers and/or their suppliers engage in modern slavery.	Due diligence reviews (including site visits) of new and current suppliers. Standard supplier contract includes modern slavery risk clauses. Modern Slavery supplier surveys. Relevant suppliers required to provide Modern Slavery Statement.
Feedback on modern slavery risks not captured or actioned.	Various mechanisms (e.g. confidential hotline) implemented to obtain feedback from key internal and external stakeholders.
Non-compliance with policies, lack of addressing breaches	Regular internal audits to assess compliance with internal policies, and assessments of actions to address breaches.
Unaware of latest legal developments and key risks.	Engagement of external consultants to identify changes to modern slavery legislation, new developments and key risks.

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

Tier 1	Tier 2	Tier 3
<i>Review period Jan 2020 to Dec 2022</i>	<i>Review period Jan 2023 to Dec 2024</i>	<i>Review period Jan 2025 to Dec 2026</i>
Primary suppliers	Secondary suppliers	Non-preferred suppliers
Global suppliers	Global and local suppliers	Local suppliers
Highest risk due to global supply chain impact.	Moderate risk due to national supply chain impact.	Low risk due to localised supply chain.
80% of volume and value 10 to 120 suppliers per business	18% of volume and value ~ 900 suppliers per business	2% of volume and value ~4,500 suppliers per business
Negotiated at a National Level	Negotiated at a National and Regional level	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

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
30 April 2021