

QSS Modern Slavery Statement

58 Tingara St, Pinkenba Q 4008



Qld Steel and Sheet Modern Slavery Statement 2024

QSS Modern Slavery Statement

Table of Contents

1. Definition	3
2. Purpose	3
3. QSS Policies	4
4. Types of Exploitation.....	4
5. Procurement Processes	4
6. Supply Chains	5
7. Due Diligence and Risk Assessment.....	5
8. Remediation.....	6
9. Document Control.....	6
9.1 Document Owner.....	6
9.2 Version History.....	6
Appendix 1: Relevant Laws applicable to QSS	7
Appendix 2: Sample Risk Assessment Framework for Suppliers	9
Appendix 3: Types of Exploitation	10

QSS Modern Slavery Statement

1. Definition

Modern Slavery is a term used to describe any form of human trafficking, slavery, servitude, debt bondage, forced marriage, child or forced labour and is where offenders use serious forms of exploitation for any person who is forced, deceived or coerced into labour of any type. It is a crime where victims are subjected to abuse, inhumane and degrading treatment. It is a serious violation of an individual's dignity and human rights.

The Anti-Slavery International organisation defines that modern slavery occurs when an individual is exploited by others for either personal and / or commercial gain.

Modern Slavery It is not just an international problem. With our extensive trade links with the APAC region where most victims of modern slavery are based it is highly relevant to Australian businesses.

It affects disadvantaged sectors of our community including migrant, remote or socially isolated communities and individuals. Industries affected can be remote such as agriculture or sweatshops for clothing retailers, or cleaners and security guards working in isolation at night in empty buildings.

The Australian Federal Government has introduced The Modern Slavery Act 2018 (Cth) which came into force 1 January 2019. It is designed to ensure larger companies and other entities (currently revenue over A\$100 million) in Australia to report on how they are preventing and addressing modern slavery risks in their operations and supply chains.

2. Purpose

Qld Steel and Sheet (QSS) is committed to the highest standards of conduct and ethical behaviour and does not tolerate or condone any form of Modern Slavery in our own business, our suppliers, contractors or any other vendor we do business with. Whilst we sit outside the mandatory reporting requirements of the Federal legislation, we are committed to preventing, detecting and responding to Modern Slavery risks in our operations and supply chains.

We constantly review our risk assessment criteria for our supply chain with our key areas of focus being:

- Review our risk assessment to identify gaps and actions/controls across our various operations to create the development of QSS's Modern Slavery Strategic Roadmap.
- Monitor and resolve risks in our supply chain.
- Increase collaboration within our networks and with our partners, to strengthen our response to modern slavery.
- Review Procurement training and education material

QSS Modern Slavery Statement

3. QSS Policies

Existing QSS policies and Procedures form part of our commitment to mitigate Modern Slavery include:

3.1 QSS Code of Conduct Policy

3.2 Whistleblower Policy

3.3 Supplier Code of Conduct

3.4 Procurement and Supplier Management Policy

It is vital our whole workplace is aware of the risks of Modern Slavery and we provide training to all staff to ensure there is vigilance across our complete business network.

4. Types of Exploitation

Within the Modern Slavery Act 2018 (Cth) there are eight defined types of serious exploitation. These are clearly defined in both Australian and International Law. Forms of Exploitation includes human trafficking, Slavery, Servitude, forced and/or child labour. There are detailed explanations contained in Appendix 3.

QSS is determined to eliminate exploitation of any type within our supply chain and organisation.

5. Procurement Processes

Although there are strong Government frameworks in place, some Employers continue to undertake practices that are exploitative and breach legal requirements. Within Qld the identified areas of vulnerability and risk are within the migrant and young worker cohorts and across service type industries.

QSS recognises it is imperative to understand how our suppliers may be open to high-risk factors identified internationally as predictors of modern slavery and unethical practices. In addition to known high risk factors and predictors, modern slavery may occur in our domestic and international operations and procurement activities.

Our Procurement Processes are constantly monitored and updated as part of our Supply Chain Risk Assessments with new and old suppliers subject to ongoing screening. If we identify any high risk factors, either directly or indirectly, further investigation is undertaken with the supplier.

QSS Modern Slavery Statement

6. Supply Chains

According to Qld Govt statistics, the Asia Pacific region has the highest prevalence of modern slavery and it is suggested to be > 60% of the global estimate. Where products, labour or raw materials are sourced from our region, it is reasonable to expect a high likelihood of exposure to indirect modern slavery. QSS will endeavour always to ensure our suppliers in any region and specifically APAC, are not party to any form of modern slavery, directly or indirectly.

The QSS supply chain uses both domestic and international suppliers from around Australia and the Asia Pacific region. It is imperative known countries or regions where contemporary forms of modern slavery are known to occur are highlighted by our suppliers in our procurement process.

Our Suppliers must complete our Supplier Checklist and adhere to our Supplier Code of Conduct and Procurement and Supplier Management Policy.

We will continue to engage with all suppliers to ensure they have an internal focus on eliminating Modern Slavery.

7. Due Diligence and Risk Assessment

QSS strives to continuously improve our processes and policies to prevent the practices of Modern Slavery throughout our business practices.

As part of our ongoing processes managing our supply chain we are focussed on identifying risks that may cause or contribute or be directly linked to modern slavery practices. We have created a Risk Management Framework to mitigate these risks from our supply chains.

This Template lists all Suppliers and an assessment of their business in relation to Modern Slavery.

Example:

Supplier	Country	Comments	Slavery Statement on Website	Risk
-----------------	----------------	-----------------	-------------------------------------	-------------

QSS Modern Slavery Statement

8. Remediation

As part of our Supply Chain mapping, we undertake a due diligence process to ensure all our direct suppliers are engaged in their own supply chain monitoring as well as conducting their own Risk Assessments.

If we identify a supplier as medium to high risk, we will conduct further assessment and require the completion of a Risk Questionnaire. This will be escalated within all organisations to senior management.

If anyone within our QSS supply chain becomes aware of any suspected incidents or potential risks of Modern Slavery they are encouraged to come forward. This includes staff, vendors, contractors or any other persons.

This can be done by:

- Contacting the CEO directly
- Following procedure in the Whistleblower Policy
- Report anonymously in writing to CEO

We encourage an open policy without fear of retribution for anyone to discuss their concerns. An investigation will be conducted and acted on as required.

9. Document Control

9.1 Document Owner

NAME	TITLE
Cecily McGuckin	Director, QSS

9.2 Version History

The following table defines the version controls and revision history details for this document:

Version	Date	Revision Summary	Author	Reviewer	Approver
1	30/01/24	New document	Jacki Knight		

QSS Modern Slavery Statement

Appendix 1: Relevant Laws applicable to QSS

Queensland

a) Labour Hire Licensing Act 2017 (Qld)

In 2018, the Labour Hire Licensing Act 2017 (LHL Act) established a mandatory licensing scheme to monitor labour hire providers and protect workers. It requires all providers in Queensland to be licensed, including providers based either interstate or overseas who supply workers to Queensland. The Labour Hire Licensing Compliance Unit reviews all licence applications, investigates allegations and instances of non-compliance with the LHL Act.

b) Human Rights Act 2019 (Qld)

The Human Rights Act (HR Act) protects the human rights of every person in Queensland when they interact with the **government, police, public hospitals, public schools and other organisations doing work for the Queensland Government**. It puts people first by making sure that the public sector thinks about human rights when they make decisions and deliver services.

Freedom from forced work, protection from torture and cruel, inhuman or degrading treatment and freedom of movement are explicitly protected in the HR Act.

By protecting an individual's human rights and ensuring suppliers to government deemed to be public entities have shared accountability, the Queensland Government is already helping prevent slavery. The due diligence in decision making that takes into account human rights will also benefit supply chain management that supports ending modern slavery and human exploitation.

Australia

a) Modern Slavery Act 2018 (Cth)

The Australian Parliament passed the Commonwealth Modern Slavery Act 2018 (the Act) on 29 November 2018. The Act established a national Modern Slavery Reporting Requirement (Reporting Requirement) and entered into force on 1 January 2019.

The legislation includes:

- a definition of modern slavery
- mandatory annual reporting on modern slavery in supply chains
- actions being taken to assess risk and address instances of modern slavery that are identified
- providing the opportunity for progressive maturity for agencies and businesses to continuously improve processes that identify and respond to risk factors or breaches

The introduction of the Act requires entities that conduct business in Australia with an annual revenue of at least AU \$100 million to comply with the Act and publish annual Modern Slavery Statements in an online register.

QSS Modern Slavery Statement

b) Criminal Code Act 1995 (Cth)

The Criminal Code Act 1995 (Cth) outlines slavery, slavery-like and trafficking offences. All investigations under these offences are carried out by the Australian Federal Police (AFP) and prosecutions are undertaken by the Commonwealth Director of Public Prosecutions (CDPP).

c) Fair Work Act 2009 (Cth)

The Fair Work Act 2009 (Cth) (the FW Act) is the primary instrument establishing a national industrial relations system for employment standards and workplace protections for the private sector workforce (approximately 87 per cent of the Australian workforce¹). The Fair Work Ombudsman is empowered to investigate breaches of the provisions under the FW Act. In 2017, the FW Act was amended with the introduction of the Fair Work Amendment (Protecting Vulnerable Workers) Bill 2017 (Cth) to include provisions to protect vulnerable workers, particularly acknowledging the growing concerns for migrant workers, as highlighted in the Global Slavery Index Country Report for Australia.

International

There are nine core international human rights instruments, with committee of experts established to monitor implementation by its Parties. Australia is a party to the Universal Declaration of Human Rights (1948) and has ratified many human rights treaties, including:

- the International Covenant on Civil and Political Rights
- the International Covenant on Economic, Social and Cultural Rights
- the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment.

Additionally, Australia supports the UN Guiding Principles on Business and Human Rights which were unanimously endorsed by the UN Human Rights Council in 2011.

QSS Modern Slavery Statement

Appendix 2: Sample Risk Assessment Framework for Suppliers

Supplier	Questions
1	What Countries do you source products and services from
2	Do you conduct independent audits of supplier operations
3	Have you mapped your supply chain
4	How many tiers in your supply chain are mapped
5	What Policies do you have regarding Modern Slavery
6	What standards are your employees and contractors obligated to follow
7	What training do your employees and contractors undertake in regard to Modern Slavery
8	If Modern Slavery is identified in your supply chain what sanction and remediation process do you undertake
9	How many employees do you have, where are they located and what is their employment status
10	Do you use Labour Hire contractors
11	Do your employees and contractors have access to independent whistleblower persons
12	Are the conditions your employees and contractors work in safe
13	Are employees compensated fairly for their work
14	Do employees have the right to join a trade union if they wish to
15	Are you aware of any low skilled migrant workers working in your supply chain

QSS Modern Slavery Statement

Appendix 3: Types of Exploitation

Within the Modern Slavery Act 2018 (Cth) there are eight defined types of serious exploitation. These are clearly defined in both Australian and International Law.

1) Trafficking in persons

Describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.

2) Slavery

Describes situations where the offender exercises powers of ownership over the victim including the power to make a person an object of purchase and use their labour in an unrestricted way.

3) Servitude

Describes situations where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work.

4) Forced marriage

Describes situation where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.

5) Debt bondage

Describes the situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length or nature of the services are not limited and defined.

6) Deceptive recruiting for labour or services

Describes situations where the victim is deceived about whether they will be exploited through a type of modern slavery.

7) Worst forms of child labour

Describes situations where children are:

- Exploited through slavery or similar practices, including sexual exploitation; or
- Engaged in hazardous work which may harm their health, safety or morals; or
- Used to produce or traffic drugs.

8) Forced labour

Describes situation where the victim is either not free to stop working or not free to leave their place of work

Not all instances of worker exploitation are considered Modern Slavery. Practices such as poor or unsafe working conditions, long hours or wage theft are not examples of Modern Slavery and are dealt with by organisations such as the Fair Work Commission.