

Modern Slavery Statement

Metecno Pty Ltd (trading as Bondor)

1. Introduction

This statement sets out the steps taken by Metecno Pty Ltd ACN 096 402 934, which trade as, amongst other things, Bondor (**Metecno**) to address modern slavery risks in Metecno's business operations and supply chains during the FY20 financial year. This statement has been prepared pursuant to section 14 of the *Modern Slavery Act 2018* (Cth).

Metecno is committed to ensuring that there are secure management systems and procedures in place to prevent exploitations of human rights within Metecno itself and Metecno's supply chain.

2. Structure and operations

Metecno is an Australian manufacturer and distributor of insulated sandwich panels and associated building products and is committed to providing effective building solutions. Metecno has an expansive and diverse customer base across [agricultural, commercial, industrial, education and residential sectors. Metecno is a large proprietary company that is part of a larger group of companies in the [steel manufacturing and construction sector].

Metecno is a national brand with approximately 11 sites across Queensland, NSW, Victoria, Tasmania, SA & WA. Metecno has approximately [250] employees who provide high quality and long-lasting services and products.

Metecno manufactures and supplies a wide range of building products including [insulated sandwich panels, for roofing and walling.

3. Supply chain

A substantial part of Metecno's products is manufactured and supplied directly by Metecno and sold to [distributors, installers, other manufacturers, builders and asset owners] customers. The raw materials, machinery, consumables, human resourcing agencies and all other businesses utilised by Metecno in the course of its operations are primarily companies incorporated in Australia.

Metecno strives to engage suppliers with a good reputation, ethics and reliable business practices. Metecno does not knowingly contract with or engage any businesses that are involved in modern slavery or human trafficking, but Metecno acknowledges that there is always some risk that may contribute to modern slavery practices by virtue of contracting with third parties and being part of a supply chain.

Generally, supply contracts are entered into on the basis of Metecno's standard terms and conditions or negotiated contractual terms depending on the type of product or service and Metecno's affiliation with the third party. Metecno requires its suppliers to comply with all relevant laws and regulations and ensures that due diligence checks are carried out prior to engagement of third parties.

4. Assessing and addressing modern slavery risks

At Metecno, we understand the importance of raising awareness to aid the ending of modern slavery practices. To that effect, Metecno has implemented the following processes and tools to assist in the detection and prevention of modern slavery risks:

- a) **Supply chain mapping:** Metecno undertakes due diligence with respect of its suppliers and proposed suppliers to ensure that these parties are aligned with Metecno's policies, codes and values. Supply chain mapping involves categorising suppliers by risks associated with their geographic location, size and industry.

- b) **Follow up questionnaire:** Metecno requires suppliers identified as “high risk” during the supply chain mapping exercise to complete a modern slavery risk questionnaire to ensure compliance with modern slavery laws and to identify any issues. Significant issues are escalated to senior management.
- c) **Training:** Awareness of modern slavery risks in the workplace are communicated to Metecno employees through toolbox talks and information sheets. Senior management and procurement personnel briefings are also carried out to raise awareness of modern slavery risks.
- d) **Supplier Code of Conduct:** Metecno has a Supplier Code of Conduct applicable to all of Metecno’s suppliers. The Supplier Code of Conduct contains provisions specifically relating to anti-bribery and corruption, human rights including modern slavery, work health and safety and the environment.
- e) **Anti-Slavery Policy:** Metecno has adopted an Anti-Slavery Policy which affirms Metecno’s commitment to upholding its responsibility to comply with all modern slavery laws and regulations.
- f) **Whistleblower Policy:** Metecno’s Whistleblower Policy protects employees, service providers and suppliers who voice their concerns about certain events or conduct in the business that may be unlawful or immoral. The policy validates Metecno’s efforts in safeguarding the confidentiality, wellbeing and career of any individual who asserts any issues that affect the integrity of Metecno’s business operations.

5. Assessing effectiveness

Metecno is focused on continuously strengthening its procedures and processes to combat modern slavery practices and ensuring the protection of human rights. Metecno will continue to monitor, evaluate and assess the effectiveness of its established procedures by:

- a) monitoring Metecno’s existing suppliers and undertaking risk assessments in relation to new suppliers to ascertain whether they pose a modern slavery risk and, if they do, to reduce that risk to the maximum extent possible;
- b) reviewing and updating training material to ensure that it is up to date, relevant and effective;
- c) reviewing Metecno’s policies and Supplier Code of Conduct to ensure it remains relevant and in compliance with all applicable laws; and
- d) engaging with Metecno’s suppliers and key customers to verify they are following through with any modern slavery actions they have committed to undertaking.