



BWS INDUSTRIES PTY LTD

ABN: 70 355 335 060

218 Canterbury Road, BAYSWATER NTH, VIC 3153

MODERN SLAVERY STATEMENT -DECLARATION FORM-

Version #	Issue Date
1	30/06/2023

NAME: LEO VALENTINI

POSITION: MANAGING DIRECTOR

SIGNATURE: 

DATE: 3, 8, 2023

Modern Slavery Statement

This Modern Slavery Statement has been prepared by BWS Industries Pty Ltd ABN 70 355 335 060 in accordance with the Modern Slavery act 2018.

BWS Industries is dedicated to respecting and upholding human rights throughout our business operations. We believe that everyone deserves to be treated with dignity and respect, and we strive to align our business operations and practises with the Australian Federal Legislation.

Our strategy for Sustainable Supply Chain

BWS Industries is committed to maintaining a long-term supply chain that is free from workplace exploitation, including modern slavery. A new Supply Chain Sustainability Manager role was created this year to support the ongoing development of BWS's responsible sourcing plan.

We understand that to be the best at what we do, we must have good ties with our suppliers both globally and locally. Our suppliers are key resources for our company, and we know that success is a two-way street. BWS is devoted to long-term environmental, social, and economic value creation, and growth through sustainable sourcing practises.

We evaluate our supplier chains based on materiality and sustainability risk considerations. As a result, certain existing and potential new suppliers need to demonstrate that their business practises fit with BWS's expectations.

Governance and Policies

We are committed to sustainable governance, and we have established clear accountability structures for managing and carrying out all our sustainability responsibilities, including those concerning modern slavery. The creation of the Modern Slavery Statement backs us in carrying out our duties in the areas of risk management, ethics and compliance, legal procedures, corporate governance, and sustainability.

Modern Slavery risks found in our Supply chain.

Our suppliers are mostly Australian based companies. But our suppliers do source steel from all around the world.

Australia, like the other G20 countries, is vulnerable to modern slavery because of the products it imports. The Global Slavery Index reveals that workers are exploited across a variety of industries and at every stage of the supply chain and majority of forced labour is found in the lowest levels of supply chains, specifically in the production of raw materials and their extraction where there is less control.

Hence, we cannot say that we are immune to the fact that all the items or services we purchase, or their components, were created, transported, or offered are free from modern slavery.

However, we do have systems in place and a systematic process to conduct supplier's due diligence before we go ahead with the procurement. Effective implementation of this system enables us to be able to safeguard our company from getting linked to modern day slavery of any form directly or indirectly.

BWS Industries has procurement policy in place, that requires raw materials to be supplied by sources who pledge their commitment to a zero-tolerance for Modern Slavery. Such sources are expected to meet the requirements of ResponsibleSteel™ or compliance to SSA Section 4.1 – E items i-iii.

Risk Assessment and management framework

The management of significant risks, especially those related to Modern slavery, is a priority for BWS Industries.

A balanced approach is what we seek when it comes to managing uncertainty in the attainment of strategic and commercial results.

There are established rules, procedures, and controls that help us ensure that decisions are made as close to the source of risk as feasible. The oversight of our senior management enables us to actively own and manage risks.

Our team members and business partners are encouraged in making moral judgements that are in line with our values and expected standards of conduct. We are aware that reducing the risks of modern slavery calls for clear direction and action, for our customers, suppliers, related parties, shareholders, and community in accordance with the Modern Slavery Act 2018.

Actions taken to eliminate modern Slavery risks in the Supply Chain.

- We prioritise the suppliers based on risk and leverage, engage with them, and try to enforce improvement plans through assessments.
- We have safeguards in place such as undertaking a supplier screening by conducting thorough supplier's due diligence, which are reviewed with suppliers throughout contract negotiations and onboarding.
- Our internal communication channels and the modern Slavery statement issued by BWS specifically establishes our take on the modern slavery. Any violation of these requirements and standards will be investigated, and disciplinary action may be taken.
- Any issues, particularly those involving human rights and modern slavery, is made clear through our training on our code of conduct and how we operate here at BWS.
- When something is not right, such as modern slavery or other labour rights violations in our operations or supply chains, BWS encourages its staff, contractors, and other stakeholders (including suppliers and their staff) to report it.
- BWS is dedicated to protecting everyone who speaks up, and we do not accept retaliation or other negative consequences for making a report.
- A series of Roundtable discussions on Modern Slavery is held at BWS and participated by all senior managers, employees working in the office and at the factory to increase internal understanding and education on modern slavery. The goal of these conversations and workshops is to foster a culture of enquiry, awareness, discussion, and learning.
- We work with our suppliers to understand the levels of our common value chain and the threats of modern slavery therein. We work together with other businesses in the sector, to increase our knowledge of the problems caused by modern slavery in our supply chain and to develop cooperative solutions.
- We do intensive checks on the suppliers of raw materials and recyclable materials and included them in our continuous assessment model. We work with suppliers to spot any subcontracting activity and to make sure they are aware of the fact that, subcontractors may be more likely to engage in labour exploitation or modern slavery.