D2 STEEL PTY LTD
ABN: 85 685 862 453
2-3 Dream Haven Court
Epping, 3076
d2steel.com.au

13/10/2026

Modern Slavery Policy Statement

1. Purpose and Commitment

D2 Steel is committed to conducting business responsibly and ensuring that modern slavery is not present within its operations or supply chains. We recognise our responsibility to identify potential risks, take appropriate steps to prevent exploitation, and respond to any concerns that may arise. D2 Steel does not tolerate modern slavery or practices that exploit individuals, whether occurring directly within our business or indirectly through our suppliers, contractors or other business relationships.
In line with the Modern Slavery Act 2018 (Cth), D2 Steel aims to implement appropriate measures to assess and manage modern slavery risks, promote ethical business practices and support efforts to eliminate all forms of modern slavery. Senior Management is responsible for overseeing this policy and supporting its effective implementation throughout the business.

2. Scope and Application

This policy applies to all D2 Steel senior management, employees, contractors, subcontractors, suppliers and other third parties engaged by or representing D2 Steel. We expect all parties working with D2 Steel to operate ethically, comply with relevant legislation and maintain appropriate standards in relation to labour practices and human rights. We will seek to work with suppliers and business partners to identify, assess and address any modern slavery risks within their operations or supply chains.

3. Definition of Modern Slavery

Modern slavery is defined in accordance with the Modern Slavery Act 2018 (Cth) and includes conduct covered by Divisions 270 and 271 of the Criminal Code Act 1995 (Cth), as well as trafficking in persons and the worst forms of child labour.
Modern slavery can take many forms, including:

- Slavery and servitude.
- Forced labour and debt bondage.

- Human trafficking.
- Forced marriage.
- Deceptive or coercive recruitment practices.
- The worst forms of child labour.
- Other forms of exploitation where individuals cannot freely control their circumstances or leave their situation.

4. Ethical Employment Standards

D2 Steel is committed to fair, lawful and respectful employment practices. We expect our employees, contractors, suppliers and business partners to uphold equivalent standards, including:

- Ensuring all work is undertaken voluntarily and without coercion.
- Prohibiting unlawful child labour and exploitative employment practices.
- Paying workers fairly and in accordance with applicable laws and industrial instruments.
- Ensuring working hours and conditions comply with relevant legal requirements.
- Maintaining a workplace free from discrimination, harassment, intimidation and exploitation.
- Respecting workers' rights to freedom of association and collective bargaining in accordance with applicable laws.

5. Risk Management and Compliance

D2 Steel works to identify, assess and minimise modern slavery risks through its Modern Slavery Procedure and associated business practices. These measures include:

a. Supplier due diligence: Assessing prospective and existing suppliers, where appropriate, to identify potential modern slavery risks and avoid relationships that present unacceptable risks.

b. Clear expectations: Communicating D2 Steel's ethical standards and expectations to employees, contractors, subcontractors and suppliers.

c. Reporting concerns: Encouraging the prompt reporting of suspected modern slavery, unethical labour practices or other potential breaches of this policy through appropriate reporting channels.

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d. Awareness and training: Providing relevant information and training, where appropriate, to help personnel recognise modern slavery risks and understand their responsibilities.
e. Review and improvement: Reviewing our approach to modern slavery risk management as required and implementing improvements where opportunities or concerns are identified.

6. Responsibility and Review

All individuals and organisations covered by this policy are expected to act consistently with its requirements and raise any concerns about suspected modern slavery.
D2 Steel's Senior Management retains overall responsibility for the implementation, monitoring and review of this policy. Any reported concerns will be considered and addressed appropriately, with further action taken where necessary.
This policy will be reviewed periodically to ensure it remains relevant to D2 Steel's operations, supply chain and applicable legal obligations.



Sam Brusco
Managing Director