



Document Title: Steel Blue Modern Slavery Statement
Original Approval Date: July 2019
Last Review Date: April 2023

OVERVIEW

Steel Blue is committed to supporting the eradication of slavery, human trafficking and child or forced labour, and to the promotion of ethical and lawful business practices with all business partners including employees, customers and suppliers in compliance with International Labour Organisation (ILO) conventions and associated Australian legislation and regulations.

REPORTING PERIOD

This policy applies to the reporting period January 1st, 2022, to December 31st, 2022, Australia, This policy applies to the reporting period April 6th, 2022, to April 5th, 2023, United Kingdom.

REPORTING ENTITY, STRUCTURE, OPERATIONS AND SUPPLY CHAINS

This policy applies to Footwear Industries Pty Ltd, trading as Steel Blue (the “Reporting Entity”) and its three (3) subsidiary companies; Footwear Industries North America, Inc. and Steel Blue Europe (EMEA) B.V. Footwear Industries UK Limited. Footwear Industries Pty Ltd is incorporated in Australia; employs 86 employees globally (correct as of 18th April 2023), with its Head Office located in Perth, Australia.

Steel Blue is an Australian owned private company operating within the safety footwear industry. The wholesale business model sees its products distributed to end users via a network of approved specialist PPE distribution partners. The following value-chain demonstrates the level of vertical integration as well as highlighting the company’s core competencies of product research, development and design, wholesale, sales and marketing.

Research and Development	= Steel Blue
Manufacturing	= Steel Blue / Outsourced
Inbound Logistics	= Steel Blue / Outsourced
Wholesaling	= Steel Blue
Outbound Logistics	= Outsourced
Distribution	= Distributors (Steel Blue Customers)
Sales and Marketing	= Steel Blue

SUPPLY CHAINS

Steel Blue has a global supply chain. Our supply chain relationships include suppliers from the following sectors: Information, Communications, and Technology; Property Services (including Utilities, Cleaning, Waste Management and Security); Logistics and Correspondence; Vehicle and Equipment Maintenance; Consulting Services; Marketing; Print and Promotional Goods and Services; Office Supplies; and Corporate Clothing. Our principal manufacturing partner is in Jakarta Indonesia.

MODERN SLAVERY RISK ASSESSMENT AND MANAGEMENT

The key risks identified relate to:

- Logistic providers not complying with Modern Slavery Policy.
- Down-stream raw material providers of our manufacturing partner not complying with Modern Slavery policies.
- The substitution of materials from approved suppliers with materials from non-approved suppliers who do not comply with Steel Blue Modern Slavery Policy.

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Steel Blue's Board Audit and Risk Committee, along with the Executive Management Team, proactively consider and address risks through the implementation of thorough and effective annual and ad-hoc risk assessments. This process includes the regular review and assessment of the below outlined actions to ensure their effectiveness.

The following actions have been, and continue to be, undertaken:

- 4 pillar SMETA external audits on our principal manufacturing partner resulting in no 'zero tolerance' concerns.
- Joint strategy plan with manufacturing partner to work through any identified corrective action plans.
- Full disclosure in the manufacturing agreement with principal manufacturing partner.
- Internal audits of manufacturing partner and key supply chain partners including physical visits to ensure working environment complies with Steel Blue policies and benchmarks.
- Vendor and supplier assessments prior to being approved as a Steel Blue supplier, including, where possible, a walkthrough of the manufacturing facility for direct observation of workers and worker conditions.
- Approved suppliers are re-assessed and required to achieve Steel Blue base requirement of no 'zero tolerance' issues.
- Human Rights Compliance letters issued to all key suppliers.
- Work in collaboration with manufacturing partner in assessing down-stream raw material suppliers.
- Desktop audits of down-stream suppliers as required.
- Consolidation of raw material suppliers to minimise risks and allow for greater control.

Moving forward to mitigate the risk of modern slavery we will focus on these areas.

1. Supplier assessment against Steel Blue human rights compliance form.
2. Steel Blue employee training.
3. Develop reporting logs.



MONITORING OUR EFFECTIVENESS

Action	Measure	Detail
Supplier Assessment	<ul style="list-style-type: none"> Ethical sourcing compliance for 100% of suppliers. Third party compliance audits with our principal manufacturing partner. Supply Chain Mapping 	<ul style="list-style-type: none"> Ethical sourcing policy has been issued to suppliers relating to finished product and is being extended to logistical suppliers. Sedex audit completed September 2022 Register developed and being maintained
Training	<ul style="list-style-type: none"> Number of people within Steel Blue who have received modern slavery training. 	<ul style="list-style-type: none"> Training initiated for key staff members.
Reporting control	<ul style="list-style-type: none"> Log of reported issues withing the supply chain 	<ul style="list-style-type: none"> No reports made to date.

RESPONSIBILITIES

Management:

Managers have a responsibility to ensure they demonstrate respect for all human rights and ensure employees, suppliers and contractors engaged with, and/or on behalf of Steel Blue, understand, comply with, and adhere to the policy and procedure utilising the Modern Slavery Checklist outlined in the Human Rights Compliance Form (FMHR011).

Employees:

All Steel Blue employees shall ensure they understand and adhere to the guidelines and standards defined in this policy. Steel Blue expects any person who is representing the organisation to respect and support all human rights and to report to management any concern that a supplier or contractor is engaging in human trafficking, slave or child labour or any other modern slavery activity.

Consultation:

Steel Blue is managed through our management team in head office. We consulted the relevant companies we own or control in the development of this statement.

RELATED DOCUMENTS / INFORMATION	
Australia Federal Legal References:	Modern Slavery Act 2018 NSW Modern Slavery Act 2018
United Kingdom Legal References	Modern Slavery Act 2015
International Legal References:	ILO Convention 29, Convention 105 and 2014 Protocol to C29 on forced labour; ILO Convention 138 and Convention 182 on child labour; ILO Convention 111 and Convention 110 on equality and non-discrimination; and ILO Convention 87 and Convention 98 on freedom of association.
Next Review Date:	April 2024

Approval

This statement has been prepared with input from and in consultation with the Steel Blue Executive Leadership Team and the respective accountable management team.

This statement was approved by the Board of Footwear Industries PTY LTD on the 18th of April 2023.

Peter Bell
 Chief Executive Officer
 Footwear Industries PTY LTD