



**E**nvironmental

**S**ocial

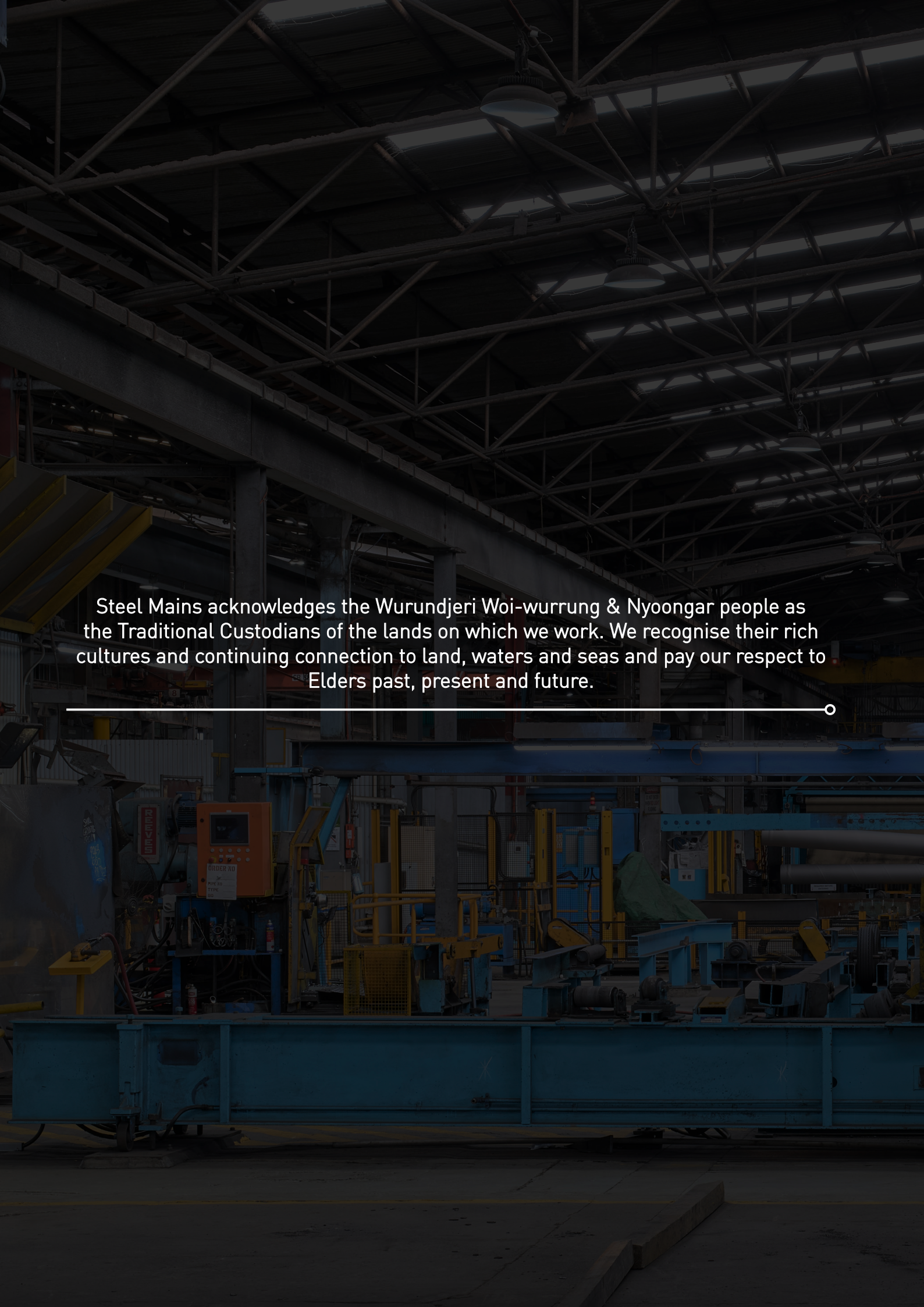
**G**overnance

Report 2025

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**Steel Mains**  
SOLUTIONS FOR LIFE



Steel Mains acknowledges the Wurundjeri Woi-wurrung & Nyoongar people as the Traditional Custodians of the lands on which we work. We recognise their rich cultures and continuing connection to land, waters and seas and pay our respect to Elders past, present and future.

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# CEO Message

## 2025 in Review & Looking ahead into 2026

*At Steel Mains, our purpose is to provide long-lasting water infrastructure that builds communities. In 2025, this purpose continued to guide our decisions as we strengthened our Environmental, Social and Governance (ESG) foundations and embedded sustainability into the way we operate.*

*Environmentally, we maintained our ISO 14001:2015 Environmental Management System and achieved SSA (Steel Sustainability Australia) Certification Level 3, delivered 96% diversion from landfill, implemented a water reuse system at Kwinana, and commenced a PhD research collaboration with Swinburne University and CSIRO. Our Zero Harm culture continued to drive strong safety outcomes, supported by disciplined risk management and the commitment of our people.*

*We also advanced ESG maturity through the establishment of an in-house climate-related risk assessment team, investment in a new HR and learning management system, and strengthened governance across cybersecurity, data protection, and responsible AI. Our ongoing partnership with WaterAid reinforced our commitment to supporting communities through access to clean water, sanitation, and hygiene.*

## Infrastructure for a Resilient Future

*As Steel Mains moves into 2026, our ESG journey has matured from a path of discovery into a framework of operational excellence. We have moved beyond “learning what needs to be done” to the execution of a sustainability roadmap to ensure that our goals and actions are well understood within the business and how they directly relate and contribute to the evolving circular, low-carbon economy.*

*In alignment with the AASB S2 Climate-related Disclosures requirements, we are progressing on a journey from voluntary alignment toward substantiated disclosures and strengthening our contribution to the United Nations Sustainable Development Goals (SDGs).*

*To stay competitive and reliable, our 2026 approach reflects common core priorities currently prioritised by many other Australian manufacturers:*

- Reducing Carbon in a Practical Way: We are building a clearer understanding of the carbon in our products so we can find realistic ways to reduce it. This also helps our customers meet their own supply chain (Scope 3 Emissions) requirements.*
- Building a More Resilient Operation: Sustainability is not just about the environment. It is about running a stronger, more reliable business. With ongoing pressure on global supply chains, we are strengthening Australian based production to support continuity, quality, and dependable supply.*
- Using Resources More Efficiently: We are continuing to improve how we use materials and manage waste. This includes looking at product life cycles, reducing unnecessary waste, and making better use of resources where practical.*

## Sustainable Water Supply

*Water infrastructure supports everyday life in growing communities. At Steel Mains, we help deliver the pipes and fittings networks that make reliable water possible. We are reducing our carbon impact by using renewable energy and improving how efficiently we use materials, so we can support better environmental outcomes now and into the future.*

*At Steel Mains, sustainability is part of everyday business. We continue to evolve how we manufacture, make decisions, and serve our customers. Our purpose stays the same: Providing infrastructure for life while responding to the needs of our customers, our people, and communities across Australia.*

**Dean Connell**  
Steel Mains CEO

# 2025 at a Glance

## Environmental



Maintained our Environmental Management System in compliance with **AS/NZS ISO 14001:2015** and SSA Certification Level 3



Achieved 96% diversion from landfill through reuse and recycling initiatives, including expanded Sintakote coating recovery recovery



Completed our first in house- climate-related risk assessment and opportunity assessment (first pass, internal assessment, non-assured), ahead of mandatory reporting requirements



Water reuse system at Kwinana, reducing water use, and commenced an PhD collaboration with Swinburne University and CSIRO

## Safety



All Injury Frequency Rate (AIFR) 10-year **performance shows a reduction in AIFR by 92%**



Total Recordable Injury Frequency Rate (TRIFR) 10-year performance shows a reduction in TRIFR by 77%



100% Completion of **Risk Reduction Projects**  
 - Fire Panel and Manual Call Points (MCP)  
 - Working in Isolation Safety Monitoring Device



Maintained Occupational Health & Safety Management System in compliance **with 45001:2018**

## Social



Promoted Wellbeing events that emphasises Diversity and Inclusion such as R U OK?.



Implemented new human resource management system which includes learning management system.



Contributed to our WaterAid partnership with over \$110,000 through gala balls sponsorships and fundraising activities



Collaborated with the Water Sector by sponsoring industry events to enhance innovation and professional growth

## Governance



Created an in house- climate-related risk assessment team and commenced initial climate-related risks and opportunities assessment



Released our Second ESG Report as part of our ongoing commitment to transparency and disclosure



Released our Modern Slavery Statement and Supplier Code of Conduct to ensure our sourcing activities are aligned with our ethical standards



100% Completion of Critical Training:  
 - Annual Guide To Ethical Conduct Training  
 - Cybersecurity  
 - Confidential Information

# About Steel Mains

## About Us

Steel Mains is Australia's leading manufacturer and supplier of complete steel pipeline systems for the transportation of water and wastewater, offering a total solutions approach to its customers. Throughout Australia and the rest of the world, steel pipelines have long been used in water supply, particularly where high pressures, difficult laying conditions or security of supply, have required the strength and durability of steel.

Steel Mains and its forerunners have traditionally been at the forefront of innovations in the water industry. Our expertise from manufacturing pipelines in Australia for over 150 years has evolved into the SINTAKOTE® steel pipeline system, providing Solutions for Life™.

Today, Steel Mains products and services cover a range of industry needs both within Australia and globally. We deliver products that are characterised by their quality, strength, durability, compliance and endurance.



## Steel Mains.... Solutions For Life™

## Why do we exist?

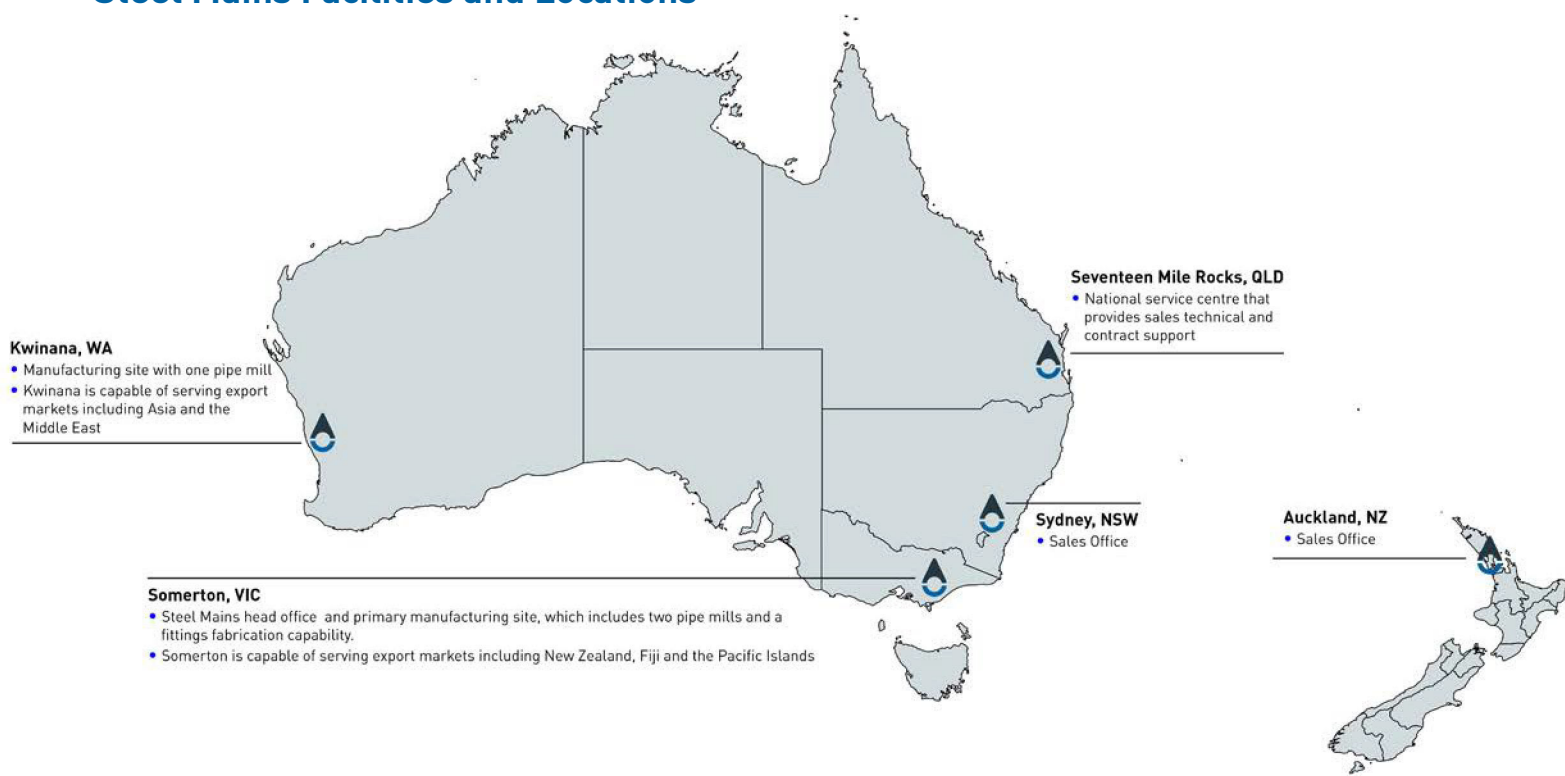
Steel Mains provides long lasting water infrastructure that builds and sustains communities.

## Our Core Values

Passion for delivering successful outcomes for our clients

Helping each other succeed

## Steel Mains Facilities and Locations



# Steel Mains' Capabilities

## Local Manufacturing – A Complete Solution Provider

The SINTAKOTE® Steel Pipeline System is recognised in the Australian water industry for providing technical and physical superiority over alternative protection and jointing systems for steel pipelines.

As a result, to maintain our high performing manufacturing facilities and manufacturing capability, Steel Mains has completed a number of major investments and upgrades to our Somerton and Kwinana facilities over the decades. These investments enable that our world class technology and production plants will continue to support Australia's water needs for many decades to come.

The decision to continuously invest has largely been due to the success of our SINTAKOTE fusion bonded polyethylene corrosion protection system and the unique configuration of our SINTAJOINT pipe rubber ring joint and its derivatives such as SINTALOCK® welded rubber ring joint.

These unique SINTAKOTE Steel Pipeline System products contribute to reducing the pipeline construction carbon footprint due to the distinct advantages provided in their design.

Steel Mains has over 70,000 tonnes of annual capacity to support project owners and contractors across the country through three world-class pipe production mills well positioned in Somerton, VIC and Kwinana, WA. Steel Mains offers steel pipe products made from Australian manufactured Hot Rolled Steel custom-built to specific project requirements. Unlike most suppliers, we deliver bespoke products, hence Steel Mains has embraced and tackled unique project challenges for over a century. Steel Mains manufactures steel water pipe from DN100 to DN2500 with pressures up to 6.8 MPa (68 Bar) depending on diameter.



### Somerton, VIC - 40,000 tonnes p.a. capacity

**Capability:** 2 x spiral mill + production line; fittings fabrication  
**Pipe Diameter:** 114-2,500mm  
**Pipe Thickness:** 5-20mm  
**Pipe Length:** 6.0 – 13.5 metres  
**Fittings:** Fabrication, end forming, coating and lining



### Kwinana, WA - 30,000 tonnes p.a. capacity

**Capability:** 1 x spiral mill + production line  
**Pipe Diameter:** 508-1,626mm  
**Pipe Thickness:** 5-20mm  
**Pipe Length:** 11.7 to 12.2 metres



# Priority Sustainable Development Goals

## ESG Approach

ESG Strategy 9

Steel Mains Priority SDGs 10

**3** GOOD HEALTH AND WELL-BEING

**5** GENDER EQUALITY

**6** CLEAN WATER AND SANITATION

**7** AFFORDABLE AND CLEAN ENERGY

**8** DECENT WORK AND ECONOMIC GROWTH

**9** INDUSTRY, INNOVATION AND INFRASTRUCTURE

**12** RESPONSIBLE CONSUMPTION AND PRODUCTION

**13** CLIMATE ACTION

# Environmental, Social, and Governance (ESG) Strategy

Steel Mains' ESG strategy aligns with 8 of the United Nations' 17 Sustainable Development Goals (SDGs). These goals provide a global roadmap for addressing urgent challenges and promoting a more sustainable and just future worldwide.

Steel Mains recognizes the importance of these objectives by integrating them into our ESG framework and linking them to key material issues identified as fundamental to our sustainability initiatives.

Steel Mains has prioritised 8 SDGs and integrated them into our core ESG

## Our 8 Priority SDGs



## 9 Material Elements across 3 Pillars



## 22 Key Outcomes & Initiatives

*Range of Programs and Actions Driving our Goals*
























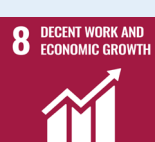




## Monitoring & Progress Overseen by the ESG Committee



# Steel Mains Priority SDG's

Steel Mains has identified areas of alignment between the Priority Sustainable Development Goals (SDG's) and the material elements of our ESG framework. This alignment links our key goals with global efforts in sustainability and social responsibility, as outlined below.

| Material Elements   | Key Goal  | Linked SDGs   |
|---|---|---|
| <b>Environmental</b>  |   |   |
|  <b>1. Climate Related Strategy</b>              | 1. Industry Best Practices<br>2. Climate - Related Strategy<br>3. Environmental & Sustainability Transparency |     |
|  <b>2. Climate Action and Energy</b>             | 4. Climate Impact<br>5. Clean Energy  |     |
|  <b>3. H<sub>2</sub>O &amp; Waste Management</b> | 6. Waste Generation Reduction<br>7. Sustainable Water Management  |     |
| <b>Safety and Social</b>  |   |   |
|  <b>4. Zero Harm Strategy</b>                  | 1. Safe Working Environment<br>2. OHS Management System<br>3. Workplace Wellbeing                             |    |
|  <b>5. Investing in Our People</b>             | 4. Development & Training<br>5. Diversity & Inclusion   |     |
|  <b>6. WaterAid Partnership</b>                | 6. Access to Clean Water<br>7. Community Awareness  |    |
|  <b>7. Industry Collaboration</b>              | 8. Water Industry Collaboration & Innovation  |    |
| <b>Governance</b>   |   |   |
|  <b>8. Governance &amp; Risk Management</b>    | 1. ESG Responsibility & Accountability<br>2. Risk Management<br>3. Transparency & Disclosure                  |    |
|  <b>9. Ethical Excellence</b>                  | 4. Ethical Operations<br>5. Ethical Sourcing<br>6. Data Safeguarding<br>7. Responsible AI-Driven Excellence   |    |

# Environmental

|   |    |
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| 7. Sustainable Water Management                   | 23 |

# Environmental

## Climate-Related Strategy

Linked SDGs

**9** INDUSTRY, INNOVATION AND INFRASTRUCTURE



**13** CLIMATE ACTION



Overall Goals

### E.1 Industry Best Practices

- Strengthen environmental and sustainability performance through adherence to recognised industry frameworks including Steel Sustainability Australia (SSA) certification and ISO-aligned environmental management practices.

### E.2 Climate- Related Strategy

- Develop and implement a climate management framework addressing climate-related risks and opportunities, including completion of an initial AASB S2 climate risk assessment.

### E.3 Environmental & Sustainability Transparency

- Promote transparency of environmental performance through public ESG reporting, environmental product declarations (EPDs), and climate disclosure alignment.



## Climate Action and Energy

Linked SDGs

**7** AFFORDABLE AND CLEAN ENERGY



**13** CLIMATE ACTION



Overall Goals

### E.4 Climate Impact

- Measure and monitor operational greenhouse gas emissions and implement initiatives that support emissions reduction across manufacturing operations.

### E.5 Clean Energy

- Increase the use of renewable energy sources and improve energy efficiency within operations, including continued development of solar generation and electrification opportunities.

## H<sub>2</sub>O & Waste Management

Linked SDGs

**6** CLEAN WATER AND SANITATION



**12** RESPONSIBLE CONSUMPTION AND PRODUCTION



Overall Goals

### E.6 Waste Generation Reduction

- Reduce waste generation through prevention, recycling and material reuse initiatives, including coating recycling

### E.7 Sustainable Water Management

- Improve water efficiency through reuse and recirculation systems, including water recovery and reuse

# Climate-Related Strategy

**9** INDUSTRY, INNOVATION  
AND INFRASTRUCTURE

**13** CLIMATE  
ACTION


Implement a climate-related strategy that integrates climate considerations into operational planning and long-term business resilience.

## Overall Goals

### E.1 Industry Best Practices

- Strengthen Environmental and Sustainable initiatives by following best practices and industry standards

### E.2 Climate- Related Strategy

- Implement structured climate risk management within the business

### E.3 Environmental & Sustainability Transparency

- Promote transparency of environmental and climate information by transparent reporting and product declarations

## Our 2025 Targets (U.N.O)

### Maintain Certification

AS/NZS ISO14001  
APCO Membership  
Steel Sustainability Australia Certification  
Level 3

### Extend

A Climate-Related Strategy by 2028 in line with upcoming mandatory reporting requirements

## Our Progress



### Maintained

AS/NZS ISO14001 Certification  
APCO Membership



### Achieved

Steel Sustainability Au Cert L3  
(Somerton)



### Ongoing

Participation in industry seminars and workshops to support implementation of climate-related reporting requirements



### Ongoing

Climate governance integrated into ESG reporting and operational planning



### Completed

In-house first pass climate risk assessment (first pass, internal assessment, non-assured) aligned with AASB S2 disclosure framework

# Industry Best Practices

## Environmental Certifications

Steel Mains continues to operate under environmental and sustainability certifications consistent with previous reporting periods. No material changes to certification status occurred during the reporting year.

Steel Mains retains Level 3 certification with Steel Sustainability Australia (SSA), demonstrating ongoing alignment with industry sustainability requirements across operations. Certification remains independently assessed, with further detail provided in the following section.

Certification to AS/NZS ISO 14001:2015, verified by SAI Global, remains current. External audits continue to confirm systematic management of environmental risks, compliance obligations, and operational impacts.

Steel Mains remains a participating member of the Australian Packaging Covenant Organisation (APCO), supporting compliance with national packaging stewardship obligations.

**SAI GLOBAL CERTIFICATE OF REGISTRATION**

This is to certify that the management system of: **Steel Mains Proprietary Limited** has been registered by INTERTEK SAI Global as conforming to the requirements of: **ISO 14001:2015**

The management system is applicable to: The manufacture of steel pipe and fittings including coating pipes with polyethylene or paint and lining cement mortar polyethylene or paint.

**Certificate Number:** CEM21041  
**Initial Certification Date:** 03 August 2009  
**Date of Certification Decision:** 107 July 2024  
**Issuing Date:** 24 July 2024  
**Valid Until:** 02 August 2027

**Cain Moldovean**  
 President, Business Assurance  
 SAI Global Certification Services Pty. Ltd.  
 Level 7, Suite 7.01  
 61 Clarence Street  
 Sydney NSW 2000  
 Australia

**SAI GLOBAL**

**STEEL SUSTAINABILITY AUSTRALIA CERTIFICATE OF COMPLIANCE**

**EEL MAINS nerton**  
 75 Patullo Lane, Somerton, VIC 3062, Australia  
 Certification L3 (V1.4)  
 6 March 2025 to 6 March 2026

Steel Sustainability Australia, operating under the Australian Steel Institute hereby certifies that this Company, at the nominated Site Location, is compliant to the requirements of the Steel Sustainability Australia Certification Program according to the Certification Level and the Exclusions as stated above.

13-06-237-2025

Australian Steel Institute Ltd (Steel Sustainability Australia)  
 10/10, 100 Pitt Street, Sydney NSW 2000, Australia  
 Suite 01 Ground Floor, 20 Pyre Road, Pyre NSW 2073, Australia

**Certificate of MEMBERSHIP**

This is to certify that **STEEL MAINS PROPRIETARY LIMITED** is a Member of the Australian Packaging Covenant Organisation

By becoming a Member of APCO and therefore a Signatory to the Australian Packaging Covenant, Members agree to shared commitments and joint responsibilities. Working with Government and Industry to achieve sustainable packaging through material reduction, design, targeted recycling rates, reduced waste to landfill, alternative materials and circular economy activities.

**Signatory to the Covenant since:** 13/11/2021

**Chris Foley, CEO**  
 Australian Packaging Covenant Organisation

**APCO** AUSTRALIAN PACKAGING COVENANT ORGANISATION

This certification remains the property of APCO and must not be displayed if registration is withdrawn.

## SSA Certification Level 3

Steel Mains has participated in the Steel Sustainability Australia (SSA) certification program since its establishment in 2023. Following comprehensive data collection and independent assessment processes completed in 2024, Steel Mains achieved SSA Level 3 certification and is currently undergoing recertification for 2026.

SSA certification verifies the implementation of structured Environmental, Social and Governance (ESG) management practices across steel manufacturing and supply chain activities. Level 3 certification represents the highest level within the program and reflects demonstrated performance in areas including responsible sourcing, environmental management, workforce safety, and corporate governance.

SSA certification is recognised under the Green Building Council of Australia Responsible Products Framework, enabling Steel Mains products to contribute toward Green Star project outcomes and supporting responsible procurement within the construction sector.

Through ongoing participation in SSA, Steel Mains continues to:

- Responsible sourcing and supplier governance processes across its supply chain
- Monitor environmental and safety performance
- Support circular economy principles
- Provide independently verified sustainability credentials to customers and stakeholders. SSA certification remains a key component of Steel Mains' broader sustainability framework and industry engagement. Provide independently verified sustainability credentials to customers and stakeholders



AUSTRALIAN STEEL INSTITUTE



# Climate Related Strategy

Implementation of the Steel Mains Climate Strategy continued during the reporting period, with no material changes to the overall strategic direction. The strategy focuses on sustainable operational practices, reduction of fossil fuel energy use, water conservation, minimisation of landfill waste, and responsible sourcing from approved suppliers.

Environmental considerations remain integrated into operational planning and day-to-day decision-making. Ongoing initiatives continue to improve energy efficiency, optimise manufacturing processes, increase renewable electricity use where practicable, and engage suppliers on emissions reduction opportunities.

During the reporting period, further assessment was undertaken to identify practical opportunities for reducing operational emissions, including evaluation of lower-carbon material options, logistics efficiency improvements, and process optimisation initiatives.

Recognised climate frameworks, including the Science Based Targets initiative (SBTi), are being used as a preliminary reference guidance to support understanding of emerging decarbonisation approaches. Steel Mains has not adopted formal SBTi targets and uses these frameworks as informational references rather than prescribed commitments.

Building on existing climate governance activities, Steel Mains completed its first climate risk assessment in preparation for Australia's mandatory climate reporting requirements under AASB S2: Climate-related Disclosures, ahead of reporting obligations applicable to Group 3 entities. The assessment considered physical and transition risks relevant to operations, supply chains, and market conditions.

Outcomes from this assessment will inform continued integration of climate risk management into governance processes and future disclosure readiness.



# Environmental & Sustainability Transparency

## Environmental Product Declaration (EPD)

Steel Mains maintains an independently verified Environmental Product Declaration (EPD) for its Sintakote Steel Pipe system. The EPD remains valid during the reporting period and continues to provide lifecycle environmental information supporting infrastructure design and procurement decisions.

The EPD assesses environmental impacts across a **full cradle-to-grave life cycle boundary**, covering raw material extraction, manufacturing, transportation, installation, operational considerations, and end-of-life scenarios. Reported datasets include resource consumption (energy, water, and materials) and emissions to air, water, and soil across recognised environmental impact categories including climate change, resource depletion, and environmental emissions.

Steel Mains' EPD applies a cradle-to-grave life cycle boundary, extending beyond manufacturing impacts to include installation and end-of-life scenarios.

Environmental  
Product  
Declaration



In accordance with ISO 14025 and EN 15804:2012+A2:2019/AC:2021 for:

**SINTAKOTE® Steel Pipeline System**

from

**Steel Mains Pty Ltd - Australia**



Programme: EPD Australasia, www.epd-australasia.com

Programme operator: EPD Australasia

EPD registration number: S-P-05494

Publication date: 2022-12-15

Valid until: 2027-12-15

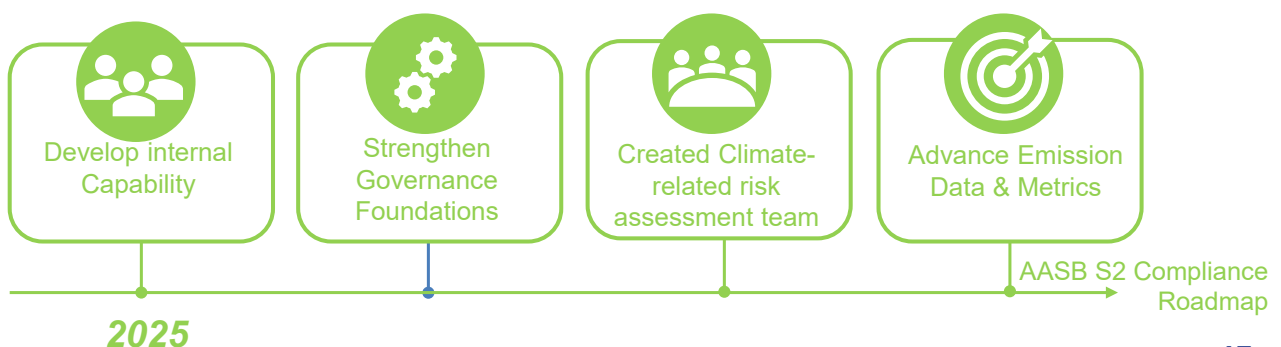
An EPD should provide current information and may be updated if conditions change. The stated validity is therefore subject to the continued registration and publication of data at www.epdaustralia.com



## Australian Sustainability Reporting Standard AASB S2 – Climate-related Disclosures

In 2025, Steel Mains started its journey toward readiness for AASB S2 by strengthening governance oversight, building internal capability, and establishing structured processes to understand and manage climate related risks.

- ✓ ESG personnel participated in targeted training and external webinars to develop a shared understanding of the new disclosure requirements.
- ✓ Governance foundations were reinforced through the completion of the AASB S2 Governance Checklist, helping to clarify responsibilities in preparation for future reporting.
- ✓ To support a more coordinated approach, a cross functional Climate Related Risks Assessment Team was established, and dedicated workshops enabled the business to complete its first pass and initial climate related risk assessment.
- ✓ At the same time, Steel Mains continued strengthened its emissions data by updating Scope 1 and 2 emissions and integrating information from our complete Scope 3 emissions assessment



# Climate Action and Energy

**7** AFFORDABLE AND CLEAN ENERGY

**13** CLIMATE ACTION


Take actions to address climate-related risks and emissions by improving energy efficiency, monitoring greenhouse gas emissions and supporting the transition to lower-carbon energy sources.

## Overall Goals

### E.4 Climate Impact

- Measure, monitor and manage greenhouse gas emissions while improving operational energy efficiency.

### E.5 Clean Energy

- Identify opportunities to increase the use of renewable electricity and lower-carbon energy sources across operations.

## Our 2025 Targets (U.N.O)

### Expand Emissions Measurement

Continue developing greenhouse gas accounting systems, including improved Scope 3 emissions data collection.

### Climate Risk Assessment

Complete an initial climate-related risk (first pass, internal assessment, non-assured) and opportunity assessment in preparation for AASB S2 climate disclosure requirements.

### Develop Decarbonisation Roadmap

Identify feasible emissions reduction opportunities across operations, including electrification, energy efficiency and renewable electricity integration.

## Our Progress



### Completed

In-house first pass climate-related risk and opportunity assessment (first pass, internal assessment, non-assured) undertaken to support upcoming AASB S2 climate reporting requirements



### Expanding

Improved data collection and emissions tracking, including expanded Scope 3 emissions assessment.



### Assessing

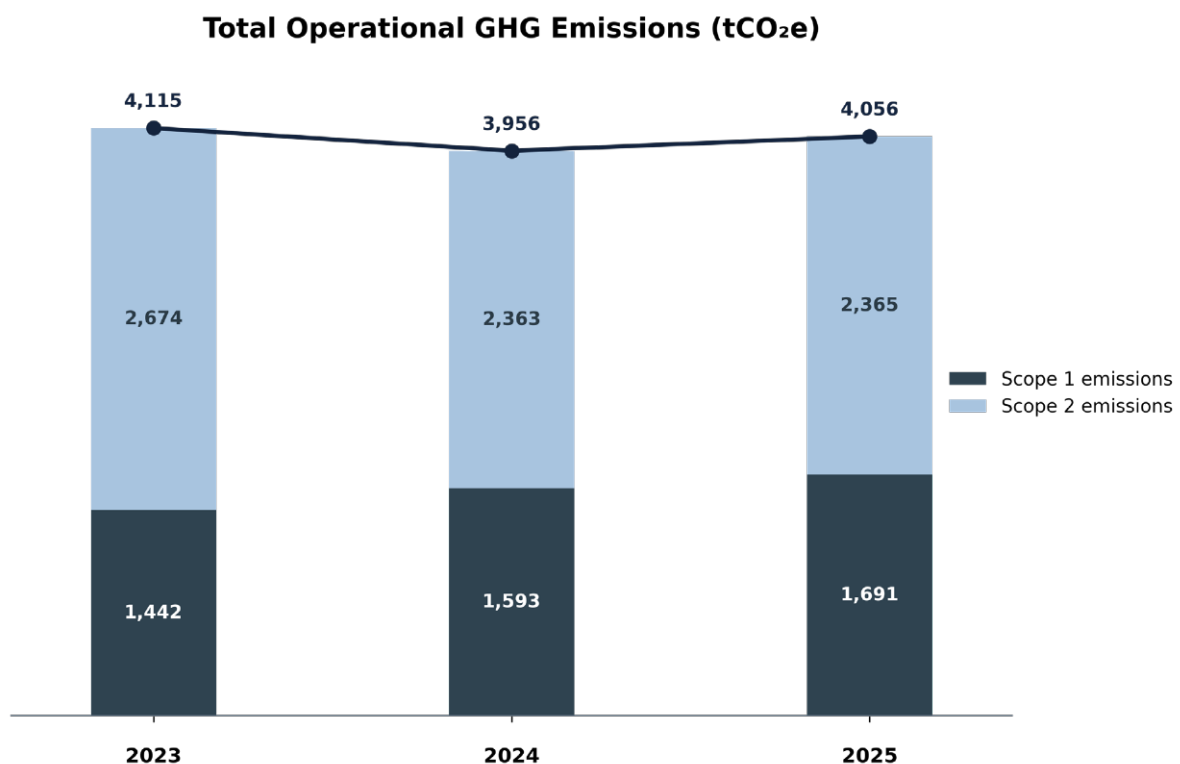
Further opportunities for renewable energy expansion and operational efficiency improvements.

# Climate Impact

## GHG Emissions

At Steel Mains, we are committed to reducing our operational carbon footprint while continuously improving the accuracy and transparency of our GHG emissions reporting. To support this, we continue to engage Pangolin Associates Pty Ltd as an independent third party to quantify and verify our emissions in alignment with best practice methodologies, including the Greenhouse Gas (GHG) Protocol.

Steel Mains applies an operational control approach to define its organisational boundary for greenhouse gas reporting. This includes our two primary manufacturing sites (Somerton and Kwinana), as well as our Head Office and National Service Centre. Scope 1 and Scope 2 emissions are measured across these operations, including natural gas consumption, fuels, synthetic greenhouse gases and purchased electricity.



### Scope 1 Emissions (1,690.6 tCO<sub>2</sub>e)

Scope 1 emissions arise primarily from direct fuel combustion within our operations. A significant portion of these emissions is attributable to natural gas consumption used in pipe heating and coating processes. The increase in 2025 reflects higher production throughput and increased gas consumption within our manufacturing operations.

### Scope 2 Emissions (2,365.3 tCO<sub>2</sub>e)

Scope 2 emissions arise from purchased electricity used to power our operations. Electricity emissions have decreased from 2023 levels and remained stable year-on-year. This reflects ongoing operational efficiency and improved energy management across our facilities.

# Clean Energy

## Carbon Offsets

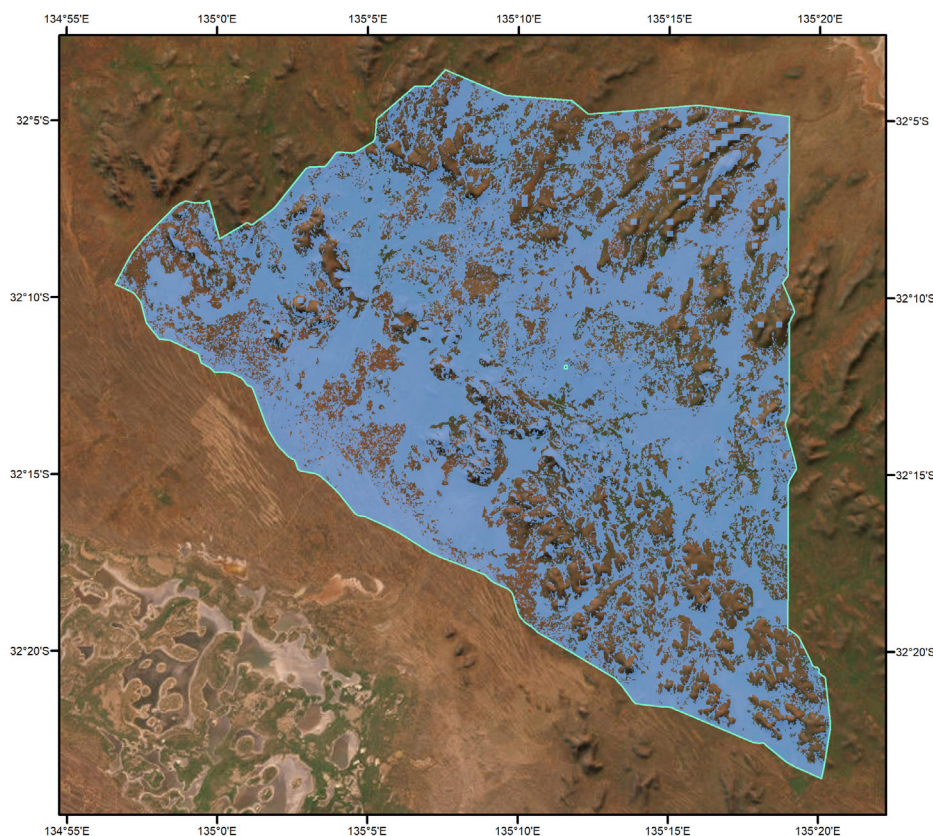
Steel Mains voluntarily purchases and retires Australian Carbon Credit Units (ACCUs) through the Australian National Registry of Emissions Units (ANREU).

During the reporting period, 396 ACCUs (vintage 2024–25) were retired, offsetting approximately 10% of CY2024 operational emissions.



The units were sourced from the South Australian Conservation Alliance – Site #2 project (ERF139932), a registered Emissions Reduction Fund initiative that generates verified abatement through human-induced regeneration of native vegetation.

The project supports landscape restoration in South Australia and is associated with partnerships involving Traditional Owner representatives in the Gawler Ranges region, contributing to long-term stewardship of native ecosystems.



Carbon offsets form one component of Steel Mains' overall emissions management strategy. Direct emissions reduction through operational efficiency and energy transition initiatives remains the primary focus.

# H<sub>2</sub>O & Waste Management



Ensure sustainable management of water and waste by increasing reuse, recycling and operational resource efficiency.

## Overall Goals

### E.6 Waste Generation Reduction

- Reduce waste generation through prevention, recycling and third-party reuse initiatives across manufacturing operations.

### E.7 Sustainable Water Management

- Reduce reliance on mains water through reuse and recirculation initiatives while maintaining compliance with trade wastewater quality requirements.

## Our 2025 Targets (U.N.O)

#### Maintain High Landfill Diversion

Continue waste-diversion initiatives, including recycling and third-party reuse of production materials.

#### Circular Material Initiatives

- Sintakote recycling program
- Steel scrap recovery
- Container deposit scheme participation

#### Improve Water Efficiency

Implement water recirculation systems to reduce reliance on mains water across operations.

#### Maintain Water Compliance

Trade wastewater maintained within regulatory limits at all facilities.

## Our Progress



#### Completed

Waste diversion initiatives maintained across operations with ~96% of waste diverted from landfill.



#### Managed

Trade wastewater within water quality limits



#### Implemented

Water reuse system introduced at the Kwinana facility, recirculating water from settling pits for equipment washing and bump roller lubrication.



#### Impact

Water recirculation system reduced mains water consumption by up to 100,000 litres during 2025.

# Waste Generation Reduction

Steel Mains continues to actively monitor and manage waste generated across manufacturing operations, with a focus on reducing landfill disposal and increasing material recovery.

As part of our internal reporting, Steel Mains measure that 96% of total waste was diverted from landfill. Third-party reuse remains the primary pathway for material recovery, accounting for approximately 72% of total waste generated, with a further 24% recycled. Landfill disposal represented approximately 4% of total waste.

## Waste Intensity per Tonne of Pipe Produced



Year-on-year performance reflects continued improvement in resource efficiency. Landfill volumes decreased by 22% compared to the previous reporting period, while material reuse increased by 10%. These outcomes reflect targeted efforts to redirect production scrap, process waste, and by-products toward beneficial reuse pathways.

Waste tracking systems remain integrated with production data, enabling performance monitoring against operational metrics and supporting the identification of further waste reduction opportunities.

### Year-on-Year Waste Data

|          | 2024     | 2025               |
|----------|----------|--------------------|
| Landfill | 429.4 t  | 335.4 <b>-22%</b>  |
| Recycled | 2318.5 t | 2134.3 <b>-8%</b>  |
| Reuse    | 5248.9 t | 5831.5 <b>+11%</b> |

Steel Mains will continue focusing on practical waste minimisation initiatives across steel scrap recovery, plastic off-cut recycling, and process efficiency improvements to strengthen circular economy outcomes across operations.

# Circular Economy

## Sintakote Recycling

Steel Mains collaborates with our Sintakote supplier to recycle coating waste generated at our Somerton plant. Through this initiative, excess Sintakote material is collected and processed for reuse, reducing material waste and improving resource efficiency.

In 2025, **approximately 5.6 tonnes of Sintakote waste** was recycled through this program, preventing the material from being sent to landfill and supporting circular material use within the plastics industry.



# Sustainable Water Management



Steel Mains continues to implement water reduction strategies to minimise reliance on mains water across our operations.

At our Kwinana facility, recycled water is incorporated into cement lining processes, with approximately 25% recycled water used in cement mixes (based on process controls). Recycled water systems are also integrated throughout the cement lining cycle to reduce potable water consumption further.

Water is also reused during hydrostatic testing of pipes, enabling the same water to be used across multiple test cycles and reducing overall water demand.

During the reporting period, a water recirculation system was implemented at the Somerton facility, based on an existing system operating at Kwinana. The system captures water from settling pits and recirculates it for equipment washing and bump roller lubrication.

According to internal measurements, this initiative reduced potable water consumption at Kwinana by up to 100,000 litres during 2025, supporting improved operational water efficiency.

Steel Mains continues to assess further opportunities to increase water reuse across both facilities.

# Safety & Social

|   |    |
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# Safety & Social

## Zero Harm Strategy

Linked SDGs

**3** GOOD HEALTH AND WELL-BEING



Overall Goals

### S.1 Safe Working Environment

- Achieve a high safety performance to create and maintain a safe working environment

### S.2 OHS Management System

- Maintain our Occupational Health and Safety Management Systems in line with international best practices

### S.3 Workplace Wellbeing

- Support well-being initiatives and ongoing provision of assistance program

## Investing in Our People

Linked SDGs

**5** GENDER EQUALITY



**8** DECENT WORK AND ECONOMIC GROWTH



Overall Goals

### S.4 Development & Training

- Support our people's personal and professional development through structured training and on-the job learning

### S.5 Diversity & Inclusion

- Foster a diverse and inclusive culture within our employees, suppliers, customers and the community

## WaterAid Partnership

Linked SDGs

**6** CLEAN WATER AND SANITATION



Overall Goals

### S.6 Access to Clean Water

- Partner with WaterAid as a Gold Member and event sponsors

### S.7 Community Awareness

- Raise awareness of the water crisis and the importance of water as a natural resource

## Industry Collaboration

Linked SDGs

**9** INDUSTRY, INNOVATION AND INFRASTRUCTURE



Overall Goals

### S.8 Water Industry Collaboration and Innovation

- Encourage industry collaboration and innovation

# Zero Harm Strategy



Implement a “Zero Harm” Strategy to prevent harm to our employees, contractors, customers, the environment, and the community.

## Overall Goals

### S.1 Safe Working Environment

- Achieve a high safety performance to create and maintain a safe working environment

### S.2 OHS Management System

- Maintain our Occupational Health and Safety Management systems in line with international best practices

### S.3 Workplace Wellbeing

- Support well-being initiatives and ongoing provision of assistance program

## Our 2025 Targets (U.N.O)

- < 59.8**  
AIFR (all Incident Frequency Rate)
- < 9.8**  
TRIFR (total Recordable Incident Frequency Rate)
- 100%**  
Completion rate of Risk Reduction Projects
- Maintain**  
Our OHS Management System Certification
- Promote**  
R U OK? Day
- Maintain**  
Our Employee Assistance Program

## Our Progress

- Achieved**  
2025 YTD AIFR is 20
- Achieved**  
2025 YTD TRIFR is 10
- Completed**  
Risk Reduction Projects
- Maintained (certified)**  
Our Occupational Health & Safety (OHS) Management System Certification
- Promoted**  
R U OK? Day
- Maintained**  
Our Employee Assistance Program

# Safe Working Environment



Steel Mains Zero Harm Strategy (ZHS) aims to prevent harm to its employees, neighbouring communities and the environment. This allows Steel Mains to achieve resilient sustainable manufacturing that survives and adapts to future challenges.

## Steel Mains ZHS is facilitated through the following pillars:



**Clear vision & expectations**

Establishing clear HSE objectives for various functions at all levels of the organisation.

Engagement and consultation with various stakeholders while actively reporting all health, safety, and environmental issues, along with implementing necessary controls.

**Commitment & Engagement**



**Risk management & mitigation**

Managing risks in our operations through process safety are paramount to achieving our Zero Harm goals.

It is equally important to raise awareness across the workforce to prevent the recurrence of unwanted events or unsafe conditions.

Constantly reviewing our management systems against everchanging legislative requirements & seek continuous improvements through Risk Reduction Projects.

**Continuous review of the HSEMS**



**Integrating sustainability principles**

Identifying and implementing opportunities that create value by integrating sustainability principles into our activities, using resources efficiently, minimising waste and physical impact.

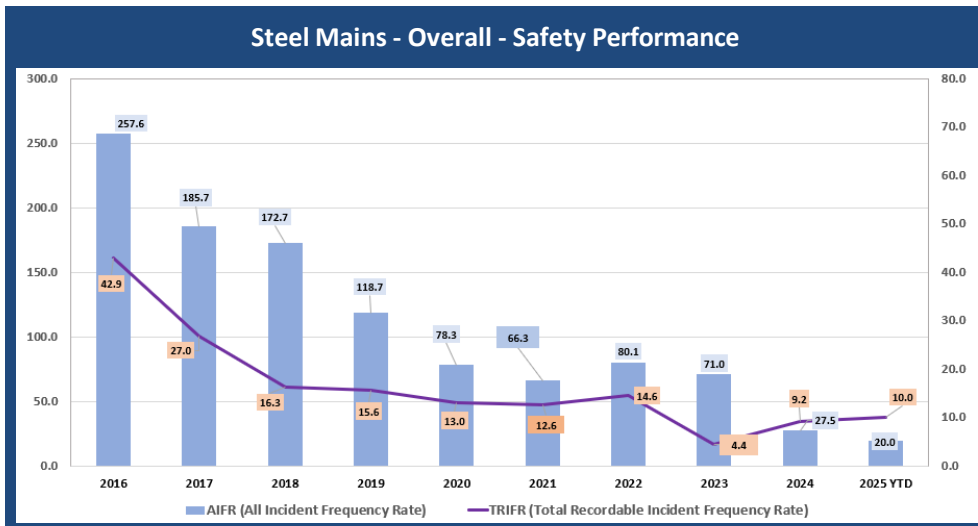
# Safety Key Performance Indicators

**Key Performance Indicators (KPIs) are essential for Steel Mains to evaluate the safety performance, identifying areas for improvement, and ensuring compliance with safety standards. This ensures that Steel Mains upholds a high safety standards within the industry.**

Since its inception back in 2016, Steel Mains takes pride in its strong safety culture that advocates continuous improvement. In 2025, we continued to finish off with a strong safety performance:

Lagging OHS indicators and Positive outcomes

- All Injury Frequency Rate (AIFR) 10-year performance shows a reduction in AIFR by 92%
- Total Recordable Injury Frequency Rate (TRIFR) 10-year performance shows a reduction in TRIFR by 77%
- Improve hazard reporting by engaging all levels of workforce. For 2025, a total of 468 hazards were identified with a closure of 88%.
- Enhance site inspections and audits covering all manufacturing activities. For 2025, a total of 192 HSE Inspections and 29 Internal Audits conducted.



Loss Time Injury (LTI) free days achieved by end of 2025:

- Somerton 54 days
- Kwinana 629 days

Improve incident reporting by engaging all levels of workforce. For 2024, a total of 57 minor incidents raised with an investigation closure rate of 96%.

- For 2025, a total of 264 HSE-relevant Actions were highlighted with a closure of 96%.
- Enhance training competency across all manufacturing activities. For 2025, 48 toolbox trainings were conducted across various functions of the workforce.



# OHS Management System

**Steel Mains maintains an Occupational Health & Safety Management System in compliance with the requirements of ISO 45001:2018 for the processes associated with the manufacture and supply of steel pipe and fittings.**

Steel Mains achieved zero major and minor non-conformances during the annual surveillance ISO45001:2018 certification. This further reaffirms Steel Mains long-standing position and commitment to uphold our high safety standards.

## CERTIFICATE OF REGISTRATION

**This is to certify that the management system of:**  
**Steel Mains Proprietary Limited**  
 Main Site: 125-175 Patullos Lane, Somerton, Victoria, 3062, Australia  
 has been registered by INTERTEK SAI Global as conforming to the requirements of:  
**ISO 45001:2018**  
 The management system is applicable to:  
 The manufacture of steel pipe and fittings including coating pipes with polyethylene or paint and lining cement mortar polyethylene or paint.

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**Certificate Number:**  
OH500139  
**Initial Certification Date:**  
10 December 2019  
**Date of Certification Decision:**  
11 June 2025  
**Issuing Date:**  
11 June 2025  
**Valid Until:**  
14 June 2028

*Rathin Grover*  
**Rathin Grover**  
 President, Business Assurance  
 SAI Global Certification Services Pty. Ltd.  
 Level 7, Suite 7.01  
 45 Clarence Street  
 Sydney NSW 2000  
 Australia

In the issuance of this certificate, INTERTEK SAI Global assumes no liability to any party other than to the Client, as per the Certification Agreement. This certificate's validity is subject to the organization maintaining their system in accordance with the agreed upon system's certification. Validity may be confirmed via email at [certificate.validation@intertek.com](mailto:certificate.validation@intertek.com) or by scanning the certificate remains the property of INTERTEK SAI Global, to whom it must be returned upon request.

Page 1 of 1

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# Risk Reduction Projects

**Steel Mains seeks continuous improvement of its safety standards through Risk Reduction Projects. The objective is to decrease the likelihood and impact of potential risks through proactive measures.**

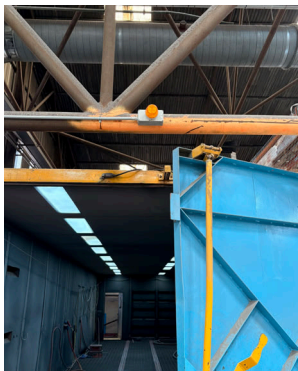
## Fire Panel and Manual Call Points (MCP) Upgrades

Steel Mains Somerton completed a significant upgrade to its site fire detection and alarm system, replacing a fire panel originally installed in the 1960s. As part of the upgrade, new wiring was installed to all manual call points (MCPs) to ensure consistent system integrity and dependable activation in the event of an emergency



## Working in Isolation Safety Monitoring Device

Steel Mains has introduced a wearable working in isolation monitoring device for operators in the finishing blaster. The device detects falls and activates an external beacon to alert nearby personnel. An SOS button allows operators to manually trigger an emergency response. Alerts are sent directly to relevant managers for immediate communication. This initiative strengthens lone worker safety.

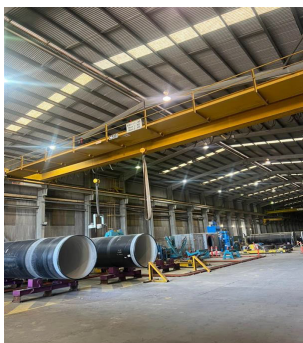


**Fall Down Alert!**  
 BLE Loc:  
 Loc Time:24/10/2025  
 13:12:50  
 Alarm Time:24/10/2025  
 13:12:44  
 Battery:100%  
[www.google.com/maps?q=-37.7077644,144.8579841](http://www.google.com/maps?q=-37.7077644,144.8579841)



## Recommissioning of South HWT Crane (KWI)

The recommissioning of the South HWT crane was completed to enhance operational safety and reliability. The project included full inspection, maintenance, and functional testing of all safety critical systems, with defects rectified prior to service. This has significantly reduced the risk of lifting incidents and unplanned downtime.



# Workplace Wellbeing

## R U OK? Day 2025

As a business, we proudly recognise and promote R U OK? Day nationally, as part of our ongoing commitment to fostering a supportive and mentally healthy workplace. This day serves as a reminder of the importance of checking in with colleagues, friends, and loved ones, and creating a culture where mental health is openly discussed and prioritised.

In 2025, we celebrated R U OK? Day by gathering for morning teas across the company, where we shared real life stories and encouraged open conversations about mental health. The 2025 message focused on “R U OK?” any day of the year.” reinforcing the idea that checking in with others should not be limited to a single day but should be an ongoing practice in our daily lives.



### Employee Assistance Program

Prioritising mental health is essential, particularly during challenging times. We recognise the importance of providing support, which is why our Employee Assistance Program (EAP) is available to all employees and their families.

The EAP offers confidential, short-term counseling services, connecting individuals with qualified professionals who can assist in navigating both work-related and personal challenges.

# Investing in our People



Invest in our employees through solid recruitment practices, training and development

## Overall Goals

### S.4 Development & Training

- Support our people’s professional development through structured training and on-the job learning

### S.5 Diversity & Inclusion

- Foster a diverse and inclusive culture within our employees, suppliers, customers and the community

## Our 2025 Targets (U.N.O)

### Development and Training

Internal training on Employment Hero and upskilling programs.

### Promote

D&I Events during the year and cultural awareness through internal communications.

### Management Development Program

Focusing on building emerging leaders and capability

## Our Progress



### Development and Training

Training in Employment Hero and capability building.



### Promoted

D&I events, such as Harmony Day and raising cultural awareness via internal postings.



### Pending

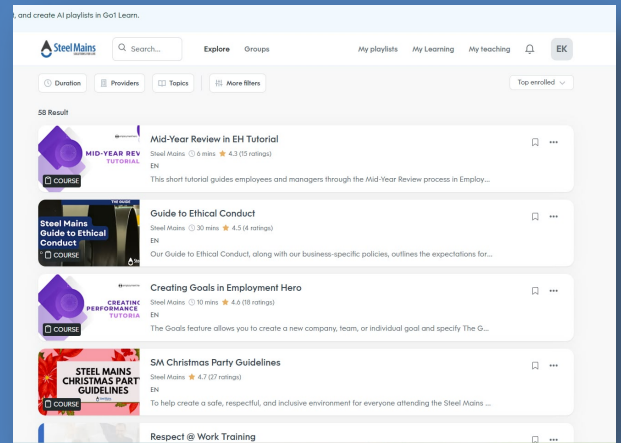
Management Development Program  
-Outlined a proposed schedule for integration in 2026.

# Development & Training



Steel Mains recognises that ongoing training and capability development are critical to maintaining a safe, skilled and high performing workforce, and to supporting the long-term sustainability of the business.

During 2025, we invested in the implementation of a new human resource management system which includes learning management system, Employment Hero, to strengthen the governance, consistency and traceability of training across the organisation. The system enables structured delivery of training, improved monitoring of compliance based learning, and greater visibility of employee development activities.



In addition, Steel Mains invested approximately \$78,000 in external training and upskilling programs. This investment focused on priority risk and capability areas, including work health and safety, engineering and technical competency, and soft skills development such as leadership, communication and people management. These initiatives support our ESG objectives by enhancing safety outcomes, building technical capability, supporting leadership development and ensuring our workforce is equipped to meet operational, regulatory and future business requirements.



# Diversity & Inclusion

Steel Mains' continued commitment to diversity and inclusion is reflected in our annual reporting to the Workplace Gender Equality Agency (WGEA). Each year, we submit transparent workplace data in line with requirements of the Workplace Gender Equality Act 2012. This includes information on gender representation, pay equality, and employment practices.

As part of our 2025 WGEA submission, Steel Mains reported a 14.7% median total remuneration gender pay gap, compared with a 10.8% benchmark for our industry comparison group. This outcome reflects the structure of our workforce, where a higher proportion of men work in operation roles attracting overtime, loading, and allowances. The gender pay gap does not indicate unequal pay for equal work but highlights the overall distribution of men and women across different job types and pay structures at Steel Mains.

Steel Mains uses findings from WGEA reporting to strengthen transparency and accountability as an organisation. The insights from WGEA data assists us in identifying any trends, monitoring progress and informing us on any future actions that may need to take place to enable we support a fair and equitable workplace. This is significant within a predominantly blue-collar environment, helping enable an equal opportunity to all that remains evident in our policies, practices, and decision making.

## Harmony Day 2025

Steel Mains proudly celebrated Harmony Day, recognising the strength and value of cultural diversity within our workforce. As an organisation, we believe that an inclusive and diverse workplace fosters innovation, collaboration, and a strong sense of belonging.

At Steel Mains, we are fortunate to have a workforce that represents a wide range of backgrounds, cultures, and experiences. The celebrations across our business served as a reminder that embracing our differences strengthens not only our workplace culture but also the broader community. By championing inclusivity every day, we create an environment where all employees feel valued and empowered to contribute their best.



## Industry Research & Collaboration

In 2025, Steel Mains commenced an Industry PhD collaboration with Swinburne University of Technology and CSIRO Data61 under the CSIRO Industry PhD Program. The project focuses on developing an AI enabled predictive quality management system for pipe manufacturing. By analysing sensor and production data, the research aims to improve quality monitoring, reduce wastage and support process optimisation within a live manufacturing environment.

The program brings together industry, university and CSIRO supervision through a four year applied research model designed to address practical operational challenges. For Steel Mains, the collaboration provides an opportunity to explore advanced data analysis and machine learning techniques to strengthen quality control and support more efficient manufacturing processes.

Research activities will incorporate real production data and operational inputs from Steel Mains facilities. This approach allows new analytical methods to be tested in an industrial setting while contributing to the development of tools that can improve manufacturing reliability, product quality and resource efficiency.



# WaterAid Partnership

6 CLEAN WATER AND SANITATION



Invest in WaterAid Partnership aimed to achieve universal and equitable access to clean water, sanitation systems and good hygiene

## Overall Goals

### S.6 Access to Clean Water

- Partner with WaterAid as a Gold Member and event sponsors

### S.7 Community Awareness

- Raise awareness of the water crisis and the importance of water as a natural resource

## Our 2025 Targets (U.N.O)

### Maintain

WaterAid Partnership as a Gold Member

### Sponsor 3

WaterAid Gala Balls across different states

### Sponsor 2

Employees to attend the WaterAid supporter trip to raise awareness about WaterAid work

### Share

Presentation at local school to raise awareness of the importance of water as a natural resource

## Our Progress



### Maintained

WaterAid Partnership as a Gold Member



### Sponsored

3 WaterAid Gala Balls sponsored



### Completed

2 Employees attended the WaterAid supporter trip to raise awareness about WaterAid work



### Completed

Completed Presentations at local school to raise awareness of the importance of water as a natural resource

# WaterAid Partnership

During 2025, Steel Mains continued its ongoing support and partnership with WaterAid. Our charitable efforts remain focused on supporting local communities that lack access to clean water.

This collaboration with WaterAid is closely aligned with core approach of “Solutions for Life” and help build stronger communities. Our partnership is driven by Steel Mains’ core values, ensuring that our contributions have a meaningful and lasting impact.

Key focus areas in our charitable impact includes:

Strong Partnership

Alignment to Core Values

Access to Clean Water

## Our Impact on Fundraising Events Throughout Australia

In 2025, Steel Mains supported WaterAid Gala Balls across the country, participated in auctions, and sponsored the NSW Golf Day, all to raise funds for essential WaterAid projects. These events bring together supporters of the water sector to generate resources for clean water, sanitation, and hygiene, demonstrating our dedication to creating a positive impact in the community.



# WaterAid Supporter Trip

Gerard White and Shane Ellis represented Steel Mains during the 2025 WaterAid Supporters Trip to Timor-Leste.

During the visit, Gerard and Shane observed WaterAid’s WASH programs in rural areas of Timor-Leste, witnessing the significant impact of donations and support. They traveled to the village of Loidahar, engaging with WaterAid staff and local residents to gain insight into the daily difficulties they face in accessing clean water and sanitation.

Additionally, they met with the Deputy Prime Minister of Timor-Leste and the Timor-Leste Water Authority, learning about how WaterAid collaborates with various government levels to strengthen policies aimed at creating lasting change.



WaterAid Supporters with the local community in Timor-Leste

Gerard White and Shane Ellis, representing Steel Mains

*Steel Mains supports this initiative to strengthen ties between our employees and WaterAid’s communities while improving our knowledge of clean water and sanitation challenges.*

## Community Awareness

Our initiatives in engaging with our community include:



Shaping tomorrow’s leaders



Importance of the Urban Water Cycle



ESG lead presenting the Urban Water Cycle

Steel Mains is passionate about building knowledge for tomorrow’s leaders and future generations, emphasizing the critical importance of water as a natural resource. During National Water Week, our ESG Lead, Nathaly Cansdell, delivered a presentation on the urban water cycle at a local school.

The students embarked on an educational journey with Pip the Water Drop, following water from its first raindrop through dams, the water treatment plant, and eventually to urban areas and sewage treatment facilities.

# Water Industry Collaboration and Innovation



Industry collaboration is vital as it combines diverse expertise and resources, fostering innovation

## Overall Goals

### S.8 Water Industry Collaboration and Innovation - Encourage industry collaboration and innovation

#### Our 2025 Targets (U.N.O)

- Sponsor**  
AWA SA Water Conference
- Sponsor**  
AWA VIC Young Water Professional Events: Melbourne, Perth, Newcastle
- Sponsor**  
Tactic Events in Port Augusta: Conference and Trade Expo, Golf Day
- Attend**  
Water Industry Conferences

#### Our Progress

- Sponsoring VIC, NSW, SA & WA AWA Young Water Professional Events
- Sponsoring AWA Water Conferences, Tactic Event in Port Augusta
- Attended Ozwater '25 Water New Zealand Conference

# Water Industry Collaboration and Innovation



**Steel Mains works closely with a wide network of partners across the water industry. We believe collaboration is the foundation of innovation and progress. By engaging with diverse industry leaders, we combine expertise to deliver forward thinking solutions. These partnerships strengthen our capabilities and keep us up-to-day with industry developments.**

## AWA Young Water Professionals Events 2025 Sponsorships

Sponsored by Steel Mains, the Young Water Professionals events celebrate emerging talent in the water industry with an evening of networking. This year, the annual ball was held across Victoria, NSW, and Western Australia, with Steel Mains representatives from diverse areas of expertise in attendance. These gatherings offered valuable opportunities to connect with peers and industry leaders.



### Ozwater '25

Steel Mains was proud to be part of this year's Ozwater event, held in Adelaide. It was an especially exciting occasion, with our team showcasing a range of innovative new products. As always, Ozwater provided an excellent platform to connect with peers and strengthen relationships across the industry. We value these opportunities as they play a vital role in fostering collaboration and supporting both personal and professional growth.



## Water Industry Events

Steel Mains proudly sponsored and represented at various other water industry events across Australia.

A Gold Sponsor for Tactic, the Tactic Conference and Trade Expo in Port Augusta provided a valuable platform to engage with local suppliers, companies, and communities. The AWA SA Water Conference explored a wide range of topics relevant to water in South Australia and across the water industry. Qwater 25 Conference, held in Gold Coast, was another event attended by Steel Mains connecting our representatives with the industry. Also Sponsored by Steel Mains was Tactic's Golf Day in Port Augusta.



### New Zealand Events

Steel Mains is proud to participate in key water industry events across New Zealand. The Water New Zealand Conference was a great example of Steel Mains investing in international considerations, interacting with exhibitors from roughly 50 countries.



# Governance

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# Governance

## Governance and Risk Management

Linked SDGs



Overall Goals

### G.1 ESG Responsibility & Accountability

- Strengthen ESG Responsibility, Accountability, control and procedures

### G.2 Risk Management

- Enhance the risk management process with current activities including climate-related risks and opportunities

### G.3 Transparency and disclosure

- Promote and disclose ESG information in line with recognised frameworks and mandatory requirements

## Ethical Excellence

Linked SDGs



Overall Goals

### G.4 Ethical Operations

- Conduct operational and commercial activities in line with high standards of ethical conduct

### G.5 Ethical Sourcing

- Source products and services from ethical and responsible suppliers

### G.6 Data Safeguarding

- Implement protocols that ensure confidentiality and cybersecurity, protecting sensitive information from unauthorised access

### G.7 Responsible AI-Driven Excellence

- Adopt AI-Driven Initiatives promoting responsible use of AI tools

# Governance and Risk Management



Strengthen ESG governance, risk management processes, transparency and disclosure

## Overall Goals

### G.1 ESG Responsibility & Accountability

- Strengthen ESG Responsibility, Accountability, control and procedures

### G.2 Risk Management

- Enhance the risk management process with current activities including climate-related risks and opportunities

### G.3 Transparency and Disclosure

- Promote and disclose ESG information in line with recognised frameworks and mandatory requirements

## Our 2025 Targets (U.N.O)

**Maintain**  
An ESG Committee to oversight ESG activities

**Extend**  
Climate-related financial disclosures on governance by 2028 in line with upcoming mandatory requirements

## Our Progress

- Maintained**  
Inclusive ESG Committee
- Released**  
Second ESG Report in March 2025 for FY2024
- Created**  
In-house cross-functional climate-related risk assessment team
- Progressing**  
With climate-related risks and opportunities assessment

# ESG Responsibility & Accountability

## Board Oversight

### Steel Mains Board of Directors

Oversees ESG strategy and performance against KPI's

Steel Mains Board of Directors remains engaged in oversight ESG related corporate strategy and activities to ensure compliance and targets are monitored in line with regulatory and corporate governance objectives.

Steel Mains Board, where necessary will engage expertise from specialists, external parties and consultants to remain well informed of emerging compliance requirements, risk and opportunities, to continue to evolve effective and appropriate ESG corporate strategy.

The Board periodically reviews reports provided by management on ESG strategy execution, activity and progress against agreed and established reporting KPIs. These can include, tracking progress against targets, energy efficiency initiatives, and other sustainability metrics.

Steel Mains Board of Directors, while maintaining oversight, has delegated responsibility and management of ESG strategy and actions to Steel Mains CEO.

### Chief Executive Officer

Key responsible for developing and managing ESG strategies

### ESG Lead

Lead the Committee and support the management of ESG-related functions

### ESG Committee

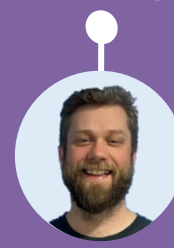
Nathaly Cansdell  
*ESG Committee Lead*



Simeon Moulas  
*Sales & Marketing*



Ben Twigg  
*Environment, Sustainability & Internal Training Lead*



Danish Khairen  
*Production Manager, WA*



Olivia Barale  
*HR Manager*



Chris Gleeson  
*HSE Coordinator*



## Management Role

The Steel Mains CEO plays a key role in implementing Board directives and shaping strategy to ensure the business meets its ESG governance requirements.

In 2025, Steel Mains' ESG Lead continued to drive, align, and coordinate the organisation's sustainability-related activities. Reporting directly to the CEO, the ESG Lead supports and facilitates the ESG Committee, providing regular updates on progress and priorities.

The ESG Committee, comprising of cross-functional business representatives, works collaboratively to champion ESG initiatives, monitor performance, and manage progress against established ESG targets, actions, and initiatives.

# Risk Management

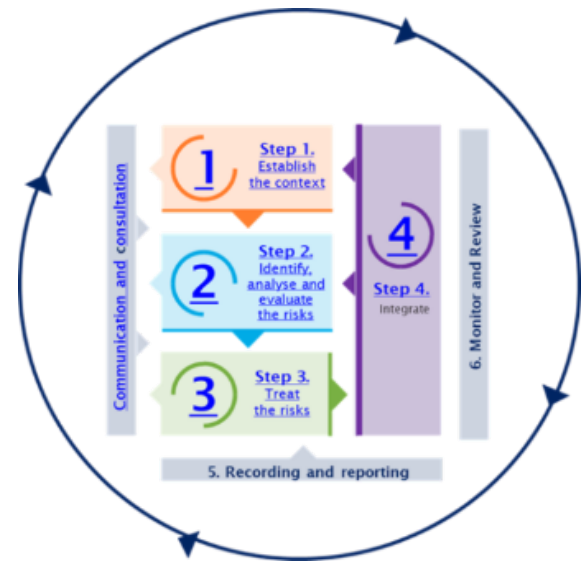


Steel Mains has adopted a comprehensive risk management framework designed to anticipate potential business challenges, assess their impact, and ensure organisational preparedness. This framework is underpinned by a structured risk control process that uses a risk scoring matrix to identify, evaluate, and prioritise risks. Through this process, potential threats are reviewed with the aim of eliminating or mitigating them before they materialize.

In 2025, Steel Mains began expanding its existing enterprise risk management framework to integrate climate-related risks. This work reflects both evolving regulatory expectations and our commitment to understanding how physical and transition climate risks may influence our operations, supply chain, and customers.

To support this integration, Steel Mains has adopted a six-step climate-related risk and opportunities assessment framework aligned with ISO 31000 and ISO 14091.

During 2025, a first in-house climate-related risks assessment (first pass, internal assessment, non-assured) was undertaken by a multidisciplinary team representing sustainability, commercial management, operations, supply chain, quality assurance, engineering, marketing, finance, and human resources. This process was supported by scenario-based analysis, hazard identification, and insights gathered through a series of cross-functional workshops. As this work progresses, Steel Mains aims to embed climate considerations into enterprise-wide decision-making, risk governance, and long-term business planning, ensuring our organisation remains resilient and prepared for future climate impacts.



Steel Mains six-step climate-related risk and opportunities assessment framework

# Transparency and Disclosure

This ESG Report represents Steel Mains' third sustainability publication and reflects the significant progress we have made over the past year. Building on the foundations established in earlier reports, we advanced several key initiatives to strengthen our sustainability performance and prepare for regulatory requirements. During the reporting period, Steel Mains expanded the scope and accuracy of its emissions data, working with external specialists to undertake more detailed carbon footprint analysis and identify priority improvement areas. We continued a gap-assessment activities aligned with Australia's mandatory climate-related disclosure framework and continued to build internal capability through targeted training and climate-reporting education sessions.

Our collection of Environmental, Social, and Governance reports comprises the following documents:

This ESG Report (2025)

Our Environmental Product Declaration (EPD)

Our Annual Modern Slavery Statement

# Ethical Excellence

**8** DECENT WORK AND ECONOMIC GROWTH



**9** INDUSTRY, INNOVATION AND INFRASTRUCTURE



**12** RESPONSIBLE CONSUMPTION AND PRODUCTION



Promote sustainable growth by engaging in commercial activities with operational and ethical excellence across our supply chain

## Overall Goals

### G.4 Ethical Operations

- Conduct operational and commercial activities in line with high standards of ethical conduct

### G.5 Ethical Sourcing

- Source products and services from ethical and responsible suppliers

### G.6 Data Safeguarding

- Implement protocols that ensure confidentiality and cybersecurity, protecting sensitive information from unauthorised access

### G.7 Responsible AI-Driven Excellence

- Adopt AI-Driven Initiatives promoting the responsible use of AI tools

## Our 2025 Targets (U.N.O)

#### Review Delivery

Steel Mains Guide To Ethical Conduct to be delivered online

#### Reach 100% staff

Participation in the Annual Guide To Ethical Conduct Training & Respect at Work training

#### Maintain

Policies and procedures in line with regulatory compliance

#### Release

Modern Slavery Statement and Supplier Code of Conduct

#### Reach 100% Sales and NSC staff

Participation in Confidential Information Training

#### Develop

AI tools in SharePoint to automate certain tasks

## Our Progress



#### Updated

Steel Mains Guide To Ethical Conduct now delivered through online LMS



#### Completed

Annual Guide To Ethical Conduct Training



#### Maintained

Policies and procedures in line with regulatory compliance



#### Released

Modern Slavery Statement and Supplier Code of Conduct



#### 100 % Sales and NSC staff

Participation in Confidential Information Training



#### Developed

AI solution in SharePoint to automate certain tasks

# Ethical Operations

## Guide to Ethical Conduct

During the 2025 reporting period, we continued to embed and reinforce our Guide to Ethical Conduct, which was refreshed and reissued nationally in 2024 to reflect our values and commitment to integrity.

Ethics and conduct training continued to be delivered across the organisation, reinforcing expectations around ethical behaviour and responsible decision-making. During the period, delivery of this training commenced transitioning to online delivery via Employment Hero, improving consistency, accessibility and comprehension, while strengthening governance through improved tracking and oversight of completion.

The Guide to Ethical Conduct addresses key conduct and risk areas relevant to our operations, including sexual harassment, the responsible use of artificial intelligence, and the protection of information and organisational assets in the context of increasing digitalisation and cybersecurity risk.

The Guide applies to all individuals who represent our organisation, including employees, contractors, board members and suppliers, and supports a culture of integrity, respect and accountability.



## Whistleblower Policy

At Steel Mains, we prioritize integrity and transparency across all our business and financial operations. Our Whistleblower Policy details the procedure for raising concerns and explains the support, protections, and remedies available to those reporting suspected or confirmed misconduct.

This policy aims to promote a culture of accountability and ethical behavior, ensuring adherence to legal and regulatory requirements while maintaining strong corporate governance. It encourages individuals to report improper or unethical actions, providing clear safeguards for those who come forward in good faith.

# Ethical Operations



## Commercial Excellence

In 2025, Steel Mains continued to develop its team in line with ethical and commercial standards to ensure successful project delivery. We recognise the efforts of our National Service Centre – with another member achieving the World Commercial & Contract Management Practitioner Certification in 2025.



This certification supports our goal of Commercial Excellence by enhancing project delivery, governance, and customer satisfaction. Steel Mains remains committed to investing in our people's growth to maintain a strong, ethical commercial function.

# Ethical Sourcing

## Modern Slavery

Steel Mains has zero tolerance for any actions or behaviour that is of a slavery-like practice. In line with the Modern Slavery Act 2018 (Cth), we are committed to identifying and eliminating any practices that may support modern slavery within our business and supply chain.

Throughout 2025, we continued to survey our key suppliers and extended supply chains to better understand potential risks and take proactive steps to reduce and mitigate them. Through ongoing assessment, collaboration, and responsible sourcing, we strive to uphold ethical labour practices and ensure our operations and partnerships align with our values of integrity and respect.

## Supplier Code of Conduct

At Steel Mains, our commitment to ESG principles extends beyond our internal operations to our entire supply chain.

Our Supplier Code of Conduct plays a crucial role in ensuring that the suppliers we engage with uphold the same ethical, social, and environmental standards that define our business.

This policy sets clear expectations for our suppliers, covering key areas such as human rights, workplace safety, environmental sustainability, and ethical business practices. It reinforces our zero-tolerance stance on forced labor, child labor, discrimination, harassment, and corruption, while also promoting fair wages, responsible resource use, and compliance with legal and regulatory obligations.



By embedding these standards into our ESG strategy, we actively mitigate risks, drive positive social impact, and ensure responsible sourcing across our supply chain. We also encourage our suppliers to self-assess, report concerns, and take corrective actions, strengthening transparency and accountability. Through this approach, Steel Mains continues to foster a sustainable, fair, and ethical business ecosystem.

# Data Safeguarding

## Annual Confidential Information Training

**100%**  
Sales, Marketing  
and Contract  
Management  
staff trained

Via New  
E-Learning  
Platform  
Employment  
Hero

Protecting  
sensitive  
information is an  
important focus  
at Steel Mains

In 2025, our Sales and Contract Management staff completed mandatory annual training focused on the proper handling and protection of confidential information. Delivered through our E-Learning Platform Employment Hero, this training ensures that sales and project employees are well-equipped to manage confidential data responsibly. By prioritising the security of confidential information, we aim to build and maintain the trust of our customers and stakeholders, ensuring that their data is handled appropriately.

## Data Security- Achievements

Steel Mains prioritises data security and has invested significantly in our IT infrastructure & cybersecurity training throughout 2025. We have identified increasing numbers of phishing attacks and have responded by introducing year-round phishing simulation training. Other notable achievements as part of our continual efforts to improve cybersecurity include: implementing a new ERP system, aligning our IT infrastructure with Essential Eight Maturity Level 1, and upgrading essential hardware.

### New ERP System Implemented

- ✓ Process improvements to limit access to confidential information.
- ✓ Improved security and role-based access controls.
- ✓ Streamlined reporting to increase transparency.

### Commenced Aligning with Essential Eight Maturity Level 1

- ✓ Commenced cloud migration projects.
- ✓ Furthered network segregation to improve cybersecurity defences.
- ✓ Reviewed and upgraded antivirus protections in response to evolving cybersecurity threats.

### Phishing Simulations

- ✓ Year-round cybersecurity training and attack simulations for all employees.
- ✓ Custom phishing simulations designed to replicate current threats & AI-assisted attacks.

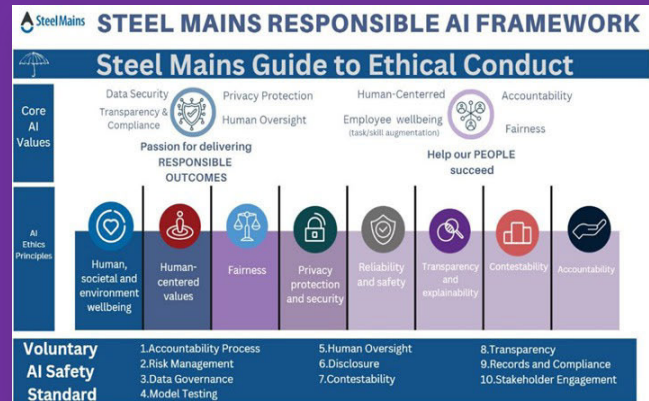
### Hardware Upgrades

- ✓ Aligning hardware with best practice cybersecurity.
- ✓ Retiring old hardware with potential vulnerabilities.

# Responsible AI-Driven Excellence

Steel Mains is committed to a proactive approach to AI governance. Our Responsible AI Framework continues to guide the way we adopt and manage emerging AI technologies.

We approach the exciting opportunities of AI with a firm commitment to ethical conduct and our core values – a passion for delivering outcomes and helping our employees succeed.



## 2025 AI Highlights



### Leveraging AI in SharePoint

Smart Labelling & Filing for Historical Documents



### Smart Document Processing

AI-Powered Contract Management & Data Extraction



### Encouraging Experimentation

Fostering Employees Creativity & Curiosity to Explore New AI Tools



## In Focus AI Cybersecurity

We recognise the growing risks of AI data leakage & cybersecurity attacks.

We have proactively taken steps to keep our employee's and customer's data safe in the face of this growing threat:

- AI Data Safety Training as part of our Handling Confidential Information course.
- Enterprise Data Protections on our general-use generative AI tools.
- Formal application & assessment process for new AI tools.
- Regular machine-audits and firewall scans to block unapproved AI applications.
- Company-wide AI training.



## Our AI Journey to Date



**Our AI-Driven Excellence Team is Formed**

**AI Policies & Guidelines Published**



**Enterprise AI Chatbot Provided to All Employees**

**Trialling Specialised AI Tools with Departments**



**Embedding AI Into Business-as-Usual Workflows**

### A Commitment to Continual Improvement

We recognise AI adoption is a journey, and one we are committed to as a business.

Throughout 2025, we have trialled specialised AI tools with our different departments – including our contract, quality & assurance, and training teams.

We have begun embedding these solutions into our business-as-usual processes, to deliver faster, better, and more efficiently than ever before.

For more information about the United Nations Sustainable Development Goals, please visit the website <https://www.un.org/sustainabledevelopment>

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