

# Modern Slavery Statement 2022/2023



This thyssenkrupp Modern Slavery Statement covers the fiscal year 2022/2023 (ended September 30, 2023). The statement complies with the requirements of the UK Modern Slavery Act (2015), the Australia Modern Slavery Act (2018) and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (2024). It describes the activities thyssenkrupp Group (thyssenkrupp AG and its affiliated subsidiaries)<sup>1)</sup> have undertaken throughout the financial year to strengthen our processes and better understand the risks of modern slavery and human trafficking in our global operations and supply chains. When we use the term human rights, modern slavery as well as human trafficking are included unless pointed out otherwise. Content specific to the operations and supply chains of thyssenkrupp Materials Australia Pty Ltd (ABN 94 078 033 520), which is a private company and wholly owned subsidiary of the global conglomerate thyssenkrupp AG as well as a reporting entity under the Australia Modern Slavery Act, is indicated as such. All general group wide policies and management approaches also cover our Australian and Canadian entities.

<sup>1)</sup> thyssenkrupp AG and its subsidiaries are referred to as a "group". The group comprises the entities included in the legal scope of consolidation. Subsidiaries are companies controlled indirectly or directly by thyssenkrupp AG which are included in the consolidated financial.

## Fundamental information about the group

The thyssenkrupp Group is led strategically by thyssenkrupp AG. Founded in 1999 as a stock corporation under German law, the company has registered offices in Essen and Duisburg. Corporate headquarters is located in the ruhr tech kampus essen in Essen. The Executive Board of thyssenkrupp AG sets the strategy for the Group's development and steers the businesses, the corporate functions, and the service units. The segments are generally divided into business units and operating units. As of September 30, 2023, 320 companies and 20 investments accounted for by the equity method are included in the consolidated financial statements; overall, we consolidate companies from 48 countries. In the past fiscal year, our business activities were bundled in seven segments:

- **Material Services:** Global materials distributor, customer-specific processing, warehousing and logistics services, intelligent solutions for more sustainable, digital supply chains
- **Bearings:** Manufacture of slewing rings, antifriction bearings and seamless rolled rings for wind energy and various industrial applications
- **Forged Technologies:** Manufacture of forged components and system solutions for the resource, construction and mobility sectors
- **Automotive Technology:** Volume supplier of chassis and powertrain components, assembly and logistics partner, supplier of body assembly lines and volume producer of lightweight body parts
- **Steel Europe:** Production of flat carbon steel for the automotive industry and many other sectors, establishing climate-neutral steel production as part of the tkH2Steel transformation project, further implementation of Strategy 20-30 with a focus on premium products with higher stability, optimized surfaces and thinner, higher-performance sheets for electromobility
- **Marine Systems:** System provider in submarine and surface vessel construction and in maritime electronics and security technology
- **Multi Tracks:** Plant construction, including the chemical and cement industries, supplier of powertrain and battery production lines and manufacturer of springs and stabilizers for the automotive industry, provider of technologies for highly efficient electrolysis plants, in particular for the production of green hydrogen on an industrial scale

To enhance the visibility of thyssenkrupp's capabilities in paving the way for and shaping the green transformation and to give the businesses operating in this growth market a new profile within the group, in the 4th quarter of fiscal year 2022/2023 we decided to realign our portfolio effective October 1, 2023. Specifically, we combined our key technologies for the decarbonization of industry in a new Decarbon Technologies segment. Bearings and Forged Technologies were transferred to the new Decarbon Technologies segment and to the Automotive Technology segment respectively.

thyssenkrupp AG is responsible for the strategic management of the group. The individual segments in the thyssenkrupp group take decentralized decisions, especially as regards operational management, but continue to operate under the strong umbrella brand thyssenkrupp. The aim is for the businesses to use the freedom needed to focus as much as possible on their customers and markets and thus offer a convincing price/performance ratio for their products and services. We want to foster an entrepreneurial climate that speeds up decision-making, increases efficiency, and puts the customer first.

For more information, please see the thyssenkrupp [Annual Report 2022/2023](#).

thyssenkrupp Materials Australia Pty Ltd (ABN 94 078 033 520) is a subsidiary of the global conglomerate thyssenkrupp AG, located in Germany. thyssenkrupp Materials Australia is a leading private company in the diverse industries of Steel Trading, Non-Ferrous Distribution and Construction. It is also known for importing a broad range of steel, steel-related, and non-ferrous related products into the Australian and New Zealand markets. The company is associated with the brand names thyssenkrupp Materials Australia and thyssenkrupp Materials Trading Australia. The legal entity of thyssenkrupp Materials Australia Pty Ltd has 49 employees. The local head office is located in Chatswood (New South Wales). thyssenkrupp Materials Australia is made up of two Materials Services Divisions: Trading and Materials. The Trading division imports and sells steel products mainly to stockholders and provides supply chain logistic services for these raw and semi-finished materials to ensure that they meet the distribution needs of our customers. The Materials division provides mainly aluminum metals, as well as offering in-house value-added services to complement our product range where we can customize products to meet our client's specific needs. The businesses are located in Wetherill Park and Chatswood (New South Wales). thyssenkrupp Materials Australia has long term relationships with almost all main suppliers, these relationships have developed into partnerships.

### Supply chain

In our corporate group, procurement is committed to being a reliable partner for general management and for all parties along the value chain, contributing significant and measurable value to the competitiveness of thyssenkrupp's product and service portfolio and to mitigate risks in the supply chain. As we are committed to highest standards regarding sustainability and compliance, we place utmost importance on responsible procurement practice.

We believe that these are key success factors going forward: Our procurement teams working closely together with their internal partners across multiple functions; applying state-of-the-art procurement methods and tools; and continuing on the journey towards digital procurement processes. All this is driven by the individual companies within thyssenkrupp, in line with their specific business and market requirements. The Procurement &

Supply Management service lines provide professional support and create synergy effects from pooling spend and expertise across thyssenkrupp.

The goods needed for thyssenkrupp Materials Australia's products and services are steel, non-ferrous metal and steel related products. We differentiate between the international

supply chain to transport goods and products to Australia and the local supply chain (transport, shipping and customer service) to transport goods from suppliers and warehouse to customers. The main international suppliers are located in China, South East Asia and Turkey, but also across other European countries and the United States.

## Consultation

This Statement has been prepared by thyssenkrupp's department Technology, Innovation & Sustainability in collaboration with experts from other group functions and service lines, e.g. Legal & Compliance, Controlling, Accounting & Risk, Human Relations Management, Procurement & Supply Management as well as

Communications. In addition, a meaningful dialogue with key functions from the companies that are required to report under the Australia Modern Slavery Act and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act have been conducted.

# Human Rights Due Diligence

## Governance

thyssenkrupp is strongly committed to upholding highest standards in sustainability, including environmental and social responsibility as well as good corporate governance. Of course this includes the respect for human rights as a core value at thyssenkrupp. We are committed to:

- the United Nations International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights)
- the core labor standards promulgated by the International Labour Organization's (ILO)
- the principles of the United Nations Global Compact
- comply with all applicable laws, statutory provisions and standards in countries where we operate or are based
- comply with relevant human rights and environmental obligations
- the implementation of these frameworks throughout the whole group.

These global human and labor rights requirements are the basis for the thyssenkrupp human rights approach. Our approach is a well-established overall process looking back to a long company history. As a global corporate group, we do not only have an impact on the human rights of our own employees but also on the human rights of the employees of our suppliers and the neighborhoods we operate in. Our holistic approach therefore covers our corporate culture, governance and organization, risk

management, measures including communication, monitoring, grievance mechanisms and a continuous improvement process. We view human rights as an interdisciplinary task. Technical experts from various Group Functions are responsible for different individual human rights aspects. This integrated approach is also reflected in the responsibilities of our board members. Whereas in the reporting year our Chief Executive Officer bears the overall responsibility for the topic of sustainability and Legal & Compliance, our Chief Financial Officer is responsible for our groupwide risk management and our Chief Human Resources Officer is responsible for the topics Human Resources. The subject matter experts from different group functions regularly come together to discuss human rights activities and identify cross-functional and multi-stakeholder needs for further enhancements of our human rights approach. Our subject matter experts include representatives from the departments Technology, Innovation & Sustainability, Legal & Compliance, Controlling, Accounting & Risk, Human Relations Management, Procurement & Supply Management as well as Communications. In addition, there is a regular exchange between these departments and the experts from our group companies, ensuring that better practice examples are identified and communicated across the thyssenkrupp Group.

Various policies and agreements ensure minimum human rights standards throughout the thyssenkrupp Group. These policies are not only our written commitment but also actively create awareness for human rights of our management boards, the leadership teams and our employees. Our policies and activities

are regularly reviewed and advanced where necessary. This becomes even more important as the German Act on Corporate Due Diligence Obligations in Supply Chains which has come into effect on January 1, 2023 has given us another impetus to

further strengthen our efforts to safeguard highest standards for our suppliers as well as for our own business operations. More information can be found in the [Human Rights](#) section on our website.

## Risk Management

thyssenkrupp's groupwide risk management system follows a holistic and integrated approach and goes far beyond the early identification of risks required by law. Forward-looking risk management therefore also serves the interests of our stakeholders. Our transparent and systematic risk management system with structured processes contributes to an efficient monitoring and steering of the group's overall risks. Our risk strategy is focused on securing the existence of the company long-term and sustainably increasing the value of the company. The precondition for us to be successful as a company is identifying and evaluating the risks and ensuring that our employees manage them optimally. Our "Governance, Risk and Compliance (GRC) Policy" and the "Risk and Internal Control (RIC) Group Regulation" define basic principles for corporate governance and risk management at thyssenkrupp. They also describe the group's universally applicable principles of risk policy framework for meeting the requirements of proper, consistent and proactive risk management. The principles are based on the thyssenkrupp mission statement and the strategic goals for the various business models; they serve as guidelines for professional and responsible risk management and thereby contribute to an appropriate reduction of risks. We continuously enhance thyssenkrupp's risk management system, align it with the internationally recognized Committee of Sponsoring Organizations of the Treadway Commission (COSO) model and integrate it with our internal control system and other management systems. The design of our various risk management tools ensures that the sub-processes are integrated in a continuous risk management loop and all risk managers are involved appropriately in the risk management process. Our methods and tools to identify, assess, control and report risks are implemented throughout the group and we continually develop them when new requirements arise. We have organized risk management at thyssenkrupp as a combined top-down/bottom-up process. Binding process and system standards are formulated centrally at group level and apply to all operating entities. Responsibility for measuring and controlling risks along the value chain lies at local level with the managers in the operating entities. Employees responsible for risk management receive training on a regular basis and as required. We also use our groupwide web-based IT risk management tool to provide targeted information and training material.

Detailed information on thyssenkrupp's risk management system is provided in the [Annual Report 2022/2023](#).

The topic of sustainability has become increasingly important in recent years. Regulatory requirements for non-financial risk management and reporting have changed and will continue

to become more comprehensive. Therefore, it is required to develop our risk management system constantly in order to keep pace with regulatory requirements. Thus, risks pursuant to the German CSR Directive Implementation Act that relate to environmental, employee and social issues, human rights, anti-corruption and bribery are included in our risk inventory as well. The so-called inside-out-perspective is included in our risk definition, focuses on sustainability topics and concentrates on possible negative non-financial impacts in the event of a possible occurrence of risks. In the thyssenkrupp risk catalogue human rights risks are embedded as part of multiple so-called risk causes, e.g. labor conditions and human rights, social conditions, occupational safety, human resources, qualification and diversity, subcontractor management, conflict minerals or suppliers. Risk effects, e.g. personal injuries or legal- and compliance-related cases, represent the inside-out-perspective – the assessment of our potential impact on society. Our training material for risk managers also covers a further extension of our risk management process with regards to above-mentioned non-financial risks and the assessment of thyssenkrupp's impact on these topics. Based on this risk analysis, no material non-financial risks that have to be reported according to the German CSR Directive Implementation Act have been identified. Hence, the risk of human rights violations in thyssenkrupp's own operations and supply chain is considered to be low. No risks have been identified that need to be prioritized and the identified violations were implemented in a structured corrective action plan and were, or are, addressed by the respective thyssenkrupp Group companies responsible for the supplier.

The risk of Modern Slavery in thyssenkrupp Materials Australia's own operations is extremely low. There is no known susceptibility to modern slavery in our activities as these sectors and the employment relationship are highly regulated in Australia through the application and implementation of Modern Awards and National Employment Standards. There is a low to moderate risk of Modern Slavery in terms of thyssenkrupp Materials Australia's suppliers. Most of our suppliers are visited by local management on a regular basis per year, this includes visits to their production facilities. Any obvious issues with working conditions would be brought up with our partner immediately. Based on these visits we are not aware of any issues relating to working conditions or pertaining to Modern Slavery.

For more details please see:

["Further measures implemented by thyssenkrupp Materials Australia."](#)

## Focus on our own operations

At thyssenkrupp our claim “engineering.tomorrow.together.” unites us all. We are all committed to the engineering of sustainable solutions, and we are convinced that we can produce the best results by working together. A corporate culture with shared values like team spirit, communication, commitment, a success mindset, and respect for colleagues, customers, investors as well as competitors is one of our key success factors. We live this culture every day and thyssenkrupp has implemented these values in several group policies and regulations:

### Our corporate culture and our mission statement

At thyssenkrupp, we are around 100.000 people with thousands of different lifestyles and cultures but one thing unites us all: We are a team. We work together, learn from each other, and grow together. We are fair. We respect each other and communicate openly. We do what we say and say what we do. This value structure unites us and makes us successful. Our mission statement is our basic law. We developed it together to describe how we engage with customers, colleagues, investors, and society in general. We are proud that this is reflected in our commitment. We always openly encourage our employees to come to us if there are problems. That is important so that we can continuously improve. We believe in openness, mutual appreciation, and respect.

### Code of Conduct

While the group mission statement describes our goals and standards, the concrete principles and ground rules for our work and our behavior towards each other, business partners and the public are summarized in the thyssenkrupp Code of Conduct. Our Code of Conduct is the highest frame of reference for employees, managers and board members alike and includes all basic principles and rules with respect to responsible and ethical conduct towards persons inside and outside of the group. It provides guidelines on subjects such as the requirements for compliance, equality and non-discrimination, cooperation with the employee representatives, occupational safety and health, environmental and climate protection, as well as data protection and information security. Concrete rules and regulations for individual situations and circumstances in the work environment are clearly formulated in the Code of Conduct and corresponding group policies, directives and agreements. These policies, directives and agreements are unconditionally valid and binding for all employees of the thyssenkrupp Group. In addition, thyssenkrupp has signed the United Nations Global Compact, the Association for Supply Chain Management, Procurement and Logistics (BME) Code of Conduct and the Diversity Charta.

### International Framework Agreement (IFA)

thyssenkrupp has always embraced its responsibility as a fair employer. We are a socially responsible corporate citizen, stand up for good working conditions worldwide. We also expect certain principles and standards from suppliers and business partners. For this, minimum standards are needed. That is why in 2015 thyssenkrupp AG, the Group works council, the metalworkers' union IG Metall, and the global union federation

“IndustriALL Global Union” entered into an International Framework Agreement on global minimum labor standards in the Group. As well as recognizing labor standards and human rights, the IFA includes principles on occupational safety and health, opportunities for career and personal development, the right to fair pay, and the prohibition of child and forced labor and all forms of discrimination. We want these standards and principles to be implemented everywhere throughout the thyssenkrupp Group and expect our suppliers to comply with these standards as well. The responsibility for the implementation of the above-mentioned IFA lies with the management boards of the businesses.

The awareness of responsible persons, such as managers and all employees, shall be raised and employees' representatives shall be involved in this process. In case of justified complaints responsible directors or management boards, if necessary involving the responsible person in regional headquarters, will take necessary steps to remedy. Here, they as well as employees and employee representatives shall make full use of all possibilities to solve the conflict locally. As part of the IFA we have established an International Committee with the purpose of additional control and for regular exchange on adherence to and implementation of this agreement. The Committee is composed of representatives from the Group Works Council, the European Works Council, IG Metall and the IndustriALL Global Union. If required further participants can be called in. The CHRO reports to the International Committee on the status of implementation and adherence to the framework agreement at least once a year. The International Committee can propose appropriate measures to be taken to remedy violations, if local or national mediation possibilities have been used without success. It can also make proposals for further measures with the objective to prevent future violations. Additionally, the representatives of the International Committee visit at least one production site of a company or multiple companies of the Group. The region or country is selected annually by the International Committee after consultation with the CHRO. The results of these regular on-site audits are discussed with the CHRO and additional measures are implemented if necessary.

### Principles of compliance with human rights and environmental due diligence requirements

Responsibility for and implementation of due diligence obligations for the protection of human rights and the environment in accordance with the German Act on Corporate Due Diligence Obligations in Supply Chains is an integral part of the overarching sustainability strategy and goals of thyssenkrupp. Our understanding of these due diligence obligations are anchored in our [principles of compliance](#).

### Occupational Safety & Health standards

The thyssenkrupp Occupational Safety & Health (OSH) standards are implemented in various group policies and regulations. Most importantly in the Group Mission Statement, the Group OSH Policy and in detail in the Group Regulation “Occupational Safety and Health” in combination with the OSH Management Manual

which is in accordance to the international standard ISO 45001. Topics covered do not only include physical aspects of safety at work but also mental health. The aim of our Occupational Safety & Health standards is to create a consistent groupwide understanding of occupational safety and health management, to define responsibilities, duties, and minimum standards in occupational safety and health management (to supplement the existing statutory regulations), to create an appropriate organizational body for occupational safety and health management for avoiding incidents and work-related illnesses as well as building awareness, motivation, and abilities to promote individual health, and enabling the inclusion of employees with restricted capabilities as much as possible at thyssenkrupp. This applies for our own employees as well as for contractors.

### Diversity & Inclusion

Diversity & Inclusiveness Management is a fixed part of our responsible employer policy. This is also demonstrated in our management principles and with our signing of the “Diversity Charta” (Charta der Vielfalt) as well as with our commitment to the “Free & Equal Initiative of the UN Human Rights Office” which we signed as one of the first 100 companies, tackling discrimination against LGBTI people. The working environment at thyssenkrupp is characterized by diversity, which also includes different flexible models for working hours (e.g. part-time, part-time apprenticeships, job sharing). We have increasingly switched to hybrid working wherever this is possible from an operational perspective: working remotely or in the office is a standard element of flexible models for employment and working hours. In addition, thyssenkrupp supports its employees with childcare, company owned kindergartens, support with homework. Internally we use gender-neutral language and support employee networks (the women’s network wow!, pride@tk network, tk turkish community). We want everyone who works for us to be able to reach their full potential – irrespective of origin, gender, skin color, religious beliefs, political or other convictions, disabilities, age, sexual orientation and identity and other factors. Important targets of our diversity management are bringing more women in leading

positions and enabling compatibility of family and work also for men. Already in 2015, thyssenkrupp also issued a statement expressing its commitment to inclusion. Inclusion is aimed at equal participation and involvement by all people in public life. In the joint statement by the Executive Board and employee representatives, we commit to recruiting and supporting people with disabilities and to reporting regularly on progress with inclusion. Nobody should be excluded from leading a self-determined life because of disability, and this includes the right to an education and the right to work. thyssenkrupp regards workplace inclusion, i.e. self-determined and equal participation by people with disabilities in working life, as a special corporate responsibility.

### Employee Pulse Check

Among our fundamental values is a corporate culture that is defined by openness, honesty and mutual respect; it is a vital prerequisite for successful changes. In fiscal year 2022/2023 the third groupwide Employee Pulse Check was conducted at thyssenkrupp. The Employee Pulse Check is a short survey on employee satisfaction and on success factors for change, such as leadership, culture and communication. The survey is repeated at regular, annual intervals to continuously provide employees with an opportunity for feedback and to observe trends and improvements over time. The survey is open to all employees of thyssenkrupp, who work in a company that participates in the survey. This fiscal year, the Employee Pulse Check was offered to 97% of the employees at thyssenkrupp worldwide – so around 91,700 employees had an opportunity to share their feedback. As in the previous fiscal year, the Employee Pulse Checks results showed overall improvement. Following the survey, the results were distributed to the participating thyssenkrupp companies as basis for dialogs with employees and managers and to derive measures for improvement.

More information can be found in the [Corporate Culture](#), [Compliance](#), [International Framework Agreement](#) and [Responsible Employer](#) sections on our website.

## Focus on the supply chain

As we are committed to treating employees, customers, suppliers and local residents responsibly and fully respect human rights in our internal operations, we expect our business partners, and particularly our suppliers and subcontractors, to share this commitment with us. At thyssenkrupp, acting responsibly is therefore firmly integrated into our procurement processes. The service line Procurement & Supply Management at thyssenkrupp Services provides groupwide harmonized instruments and approaches for sustainability in the supply chain, which are applied and reported by the businesses. Adhering to high ethical standards also plays a vital role in our supply chain management. Since 2011, thyssenkrupp has continuously developed and implemented instruments to ensure sustainability in the supply chain. When awarding contracts, our decisions are not only

based on economic criteria: In our procurement activities, we not only observe legal, commercial, technical and process-related criteria, but also consider social and ecological aspects such as human rights, working conditions, anti-corruption, as well as environmental and climate protection. thyssenkrupp’s sustainability approach in supply chain management is based on three pillars: our Supplier Code of Conduct, risk analysis and supplier development.

### Supplier Code of Conduct

For thyssenkrupp AG and its affiliated companies (collectively referred to as “thyssenkrupp”), sustainability is an essential element in the thyssenkrupp mission statement and an integral component of our business strategy. thyssenkrupp is an

international corporation that develops technologies and solutions for future market and customer needs. To secure the customers' lasting success with innovative product and service solutions, we purchase our raw materials, goods and services from around the world. To ensure responsible corporate governance aligned to long-term value creation, we include our suppliers directly into our sustainability strategy. As a central element, the thyssenkrupp Supplier Code of Conduct addresses our expectations of suppliers and their subcontractors on the basis of legal requirements, comparable regulations in other countries, international agreements and principles and our own sustainability standards. We expect all our suppliers to acknowledge the Supplier Code of Conduct and to meet the expectations it specifies. The Supplier Code of Conduct addresses possible risks and negative impacts along the supply chain and requires our suppliers in particular to safeguard human rights, ensure fair working conditions, actively protect the environment and avoid human right violations caused by environmental harm, combat corruption, and create transparency on the origin of conflict minerals.

### Supplier risk analysis and development

Risk management is a very dynamic process, thus for thyssenkrupp risk analysis is a continuous development and requires sensitivity for changing circumstances. In order to continuously advance our approach, especially with regard to changing legal requirements such as the German Act on Corporate Due Diligence Obligations in Supply Chains, we have implemented a digital risk analysis solution with a stronger focus on protection of human rights. Using the supply chain act (SCA) risks as a basis, we subject our immediate suppliers to a basic risk analysis and identify their risk potential. We weight the individual SCA risks and take factors such as external risk indices, the supplier's location and industry, the scope of business activities (purchasing volume), the type of goods supplied and the severity and reversibility of potential events into account in our ongoing risk analysis. Based on the results of the risk analysis, a risk category is determined for each supplier. Our group companies refer to this risk category to take appropriate prevention measures in order to mitigate the risk posed by suppliers. At the same time, prioritization takes place on the basis of the established risk, our contribution to the cause, the degree of our influence, and taking into account the characteristics of the business in question.

thyssenkrupp has drafted an appropriate catalog of measures on the basis of the SCA risk areas and individual risks of the risk analysis. These measures allow us to mitigate the risk of potential violations of human rights and environmental rights and legal interests at our suppliers. Our prevention measures include, for example, the acknowledgment of the thyssenkrupp Supplier Code of Conduct and the implementation of supplier training courses. We expect all our suppliers to acknowledge the Supplier Code of Conduct and to meet the expectations it specifies. We expect suppliers that have been identified as having a heightened risk potential to provide contractual assurances that our human rights and environmental expectations are complied with and agree individual prevention and remedial measures, such as supplier audits.

If any violations of a human rights or environmental requirements at a direct or indirect supplier become known, thyssenkrupp will initiate immediate and appropriate measures aimed at ending these violations. If the violation committed by a supplier is of an especially grave nature, this may result in the temporary suspension or, in extreme cases, the immediate termination of the business relationship.

### Conflict minerals and high-risk raw materials

The mining of certain minerals partially contributes to significant human rights abuses and to the financing of violent conflicts in the originating regions. Due to the higher risk, the US Conflict Minerals Regulation (Dodd-Frank Act) and the EU Conflict Minerals Regulation set minimum legal due diligence and reporting requirements for the sourcing of these minerals. These regulations also put emphasis on certain regions, e.g. the Democratic Republic of Congo (DRC) and the adjoining countries, where there is a particularly higher risk. Conflict minerals contain tantalum, tin, tungsten (and the ores from which they originate) and gold, regardless of where they are sourced, processed or sold.

thyssenkrupp expects its suppliers to duly exercise their duty of care to promote responsible raw material supply chains and to comply with all applicable statutory rules pertaining to conflict materials – this is also embedded in our Supplier Code of Conduct. We expect conflict minerals to be procured from conflict-free sources. In cases where a product contains one or several conflict minerals or high-risk raw materials, thyssenkrupp expects its suppliers to assure and provide, on request, transparency of their supply chain all the way to the smelter and origin of the material. The aim is to exclude smelters without an adequate or certified due diligence process. Our businesses bear the responsibility to manage conflict minerals within their company. Additionally the companies report their annual import volume of conflict minerals to the service line Procurement & Supply Management, to ensure transparency of processes and internal regulations. The goal of the conflict minerals subject matter experts within our groupwide Procurement & Supply Management is to continuously exchange knowledge and better practices to ensure that the sourcing of conflict minerals does not contribute to significant human rights abuses and to the financing of violent conflicts in the originating regions.

thyssenkrupp AG (including all its subsidiary companies) does not file reports with the SEC and therefore has no legislative obligations to comply with the conflict minerals requirements covered in Section 1502 of the Dodd-Frank Act. At the same time we recognize the SEC final rule for Section 1502 mandates our direct and indirect customers to undertake due diligence across their global supply chains and thus, go beyond legal requirements.

More information can be found in the [Responsible Procurement](#) section on our website.



## Training and communication

Human rights are communicated by the various departments multiple times per year and all our policies and guidelines can be accessed via the intranet 24/7. To ensure that all employees in our production sites have access to our communication, wallpapers inform about the values and standards of the IFA. They furthermore explain the grievance mechanism including how potential violations can be reported and where further support can be found. To introduce the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains and to create awareness for the topics covered under the act globally, thyssenkrupp has set up regional as well as function specific leadership calls, newsletters and videos. In the 2022/2023 financial year, we trained around 1,400 participants worldwide on human rights in face-to-face/remote training sessions.

We use our training formats to raise our employees' awareness of our human rights and environmental due diligence obligations. The training courses explain our due diligence obligations, explain why these due diligence obligations are of importance and how we want to achieve compliance with the due diligence obligations in the thyssenkrupp Group. The training courses also outline the various channels of our complaints procedure. Employees learn how they can play their part in complying with due diligence obligations – whether in relation to our own business area or in cooperation with our suppliers – and who they can contact if they become aware of potential breaches of duty. Proof of the effectiveness of the e-learning, the rollout of which began on September 30, 2023, is provided in the form of a certificate, which is issued following successful completion of the final test. At the end of the reporting period, almost 3,000 employees had already received direct training on the SCA.

Communication and information are essential elements for developing a safety and health culture at thyssenkrupp. For many years now, our global programs to promote a culture of safety and health have been running under the motto “we care”. One highlight are our “we care” Days, which take place every year around April 28 to mark the World Health and Safety Day. Communication campaigns, workshop formats and tools for everyday work help to make occupational safety and health issues an intensive topic of discussion directly at our sites.

## Grievance mechanisms

Speaking up and holding others accountable are values that are important for thyssenkrupp. It is essential for us to counteract violations at an early stage and review concerns relating to serious misconduct – with or without revealing their identity. Bona fide reports help reveal suspected wrongdoing at an early stage and limit the damage for our company, our employees, and our business partners. We have set up several channels to contact us and to report possible infringements, including any matters concerning misconduct in the area of human rights

Occupational safety and health are topics of everyday work. For this very reason, the “we care”-Days are used to focus on various topics in greater depth. For this purpose, concepts, workshop formats and tools are developed that can be used independently in our companies. The main topics were, for example, raising awareness of major accident risks, dealing with unsafe conditions and behavior, and discussing strategies for resilience and stress management. With our OSH standards and our global cultural program “we care”, we promote preventive measures and actions so that everyone who works for thyssenkrupp returns home safe and sound.

### Further measures implemented by thyssenkrupp Materials Australia

thyssenkrupp Materials Australia regularly engages with an Industry Association Group to ensure all obligations of the Australian Modern Awards and National Employment Standards are consistently met and provide entitlements well above the minimum legal entitlements outlined by Australian law. Our employee induction process includes employment checks managed by our internal Human Resources department in Australia. This also includes checking that all new employees have the requisite visa status. We are providing all new employees with a FairWork information statement and advising them of the appropriate award coverage and where to access their award. thyssenkrupp Materials Australia publishes all modern slavery statements internally and actively communicates these to the employees. Furthermore, the Modern Slavery Statement is discussed in management meetings to ensure a comprehensive understanding of what human rights, and in particular modern slavery, are and what potential risks can arise. thyssenkrupp Materials Australia will implement further formal training on modern slavery to increase awareness and understanding amongst the workforce in 2024. Additionally, the company plans to continue to develop local risk assessments. An open Speak-up culture is something which we promote internally, where we champion our employees to speak out and allow everyone's opinions and grievances to be heard and ensure no adverse action will come to anyone who speaks up on things they believe are not right.

violations, not only at thyssenkrupp, but also regarding possible violations at our suppliers. The system for reporting information is open to all thyssenkrupp employees as well as third parties such as customers, suppliers and others.

### Compliance Whistleblowing System

We encourage all our employees to address suspected compliance violations through the grievance or dispute resolution channels. Since an open communication culture is a

key component of a functioning compliance program, ideally, our employees are able to talk openly to their supervisor. Alternatively, contacting our Compliance department is possible and encouraged. Employees of thyssenkrupp can also contact their compliance officer or the compliance manager responsible for their company directly. A detailed list of contacts is available on the intranet. Non-employees should contact their business partner. Additionally, the thyssenkrupp Compliance Whistleblowing System is available to report possible compliance violations of laws or guidelines within the Group – anonymously if required. Possible violations of human rights at suppliers as well as possible environmental issues can also be reported via the thyssenkrupp Compliance Whistleblowing System and will be handled by the responsible departments.

Our [electronic Compliance Whistleblowing System](#) on the internet is available in 34 languages, and is open to all thyssenkrupp employees, customers, suppliers, and other third parties to report cases where compliance standards and principles are not being followed. Reports can also be submitted at any time via a telephone hotline or directly to a supervisor or the Compliance Organization. All reports will be reviewed and handled by the Compliance Officers of thyssenkrupp Group. Any necessary follow-up communication between the Compliance Officer and the whistleblower is possible through a secure mailbox and is anonymously if desired.

thyssenkrupp takes the interests of the whistleblower very seriously and will do everything possible to safeguard informants acting in all conscience against potential difficulties resulting from reporting misconduct. This is done not only through the secure Compliance Whistleblowing System, but also by providing assurance that all information received by group function Legal & Compliance at thyssenkrupp AG will be treated as confidential. Therefore, Compliance Organization at thyssenkrupp comprises its own Investigations Department that – in close collaboration with internal auditing – systematically tracks, investigates and responds to allegations or incidents, explicitly including

those reported through our various compliance whistleblowing channels. To ensure independent investigation at all times, our Investigation Department is strictly separated from the preventive part of our Compliance Organization in charge inter alia for Compliance advice. During its investigations, thyssenkrupp will strive to protect the legitimate interests of other persons affected by a disclosure. Casting suspicion on another person can have serious consequences for that person. It is essential that the Compliance Whistleblowing System is used responsibly and that strict confidentiality and privacy is maintained throughout the entire process. Further information on the whistleblower system at thyssenkrupp can be found in the [whistleblowing rules of procedure](#).

#### **Additional measures for potential human and labor rights violations**

In addition to our general Compliance Whistleblowing System, thyssenkrupp offers a whistleblowing system especially focused on potential human labor rights violations that is implemented via the International Framework Agreement on global minimum labor standards in the thyssenkrupp Group. In case of a conflict, the persons concerned can address the responsible person on the site, e.g. supervisors, responsible employees' representatives or compliance managers. Information about possible violations of the provisions of the International Framework Agreement can also be reported via email through internal company communication channels or via an online reporting system that is available in 10 languages. Persons who report violations must not be subject to any disadvantages. All employees and third parties can use the system – with or without revealing their identity – to report cases where standards and principles are not being observed. An International Committee with representatives from the Group Works Council, the European Works Council and the union is authorized to intervene in the event of infringements or disputes that cannot be resolved locally. In accordance with the International Framework Agreement, incoming reports will be processed in consultation between the International Committee and thyssenkrupp.

## Partnerships and stakeholder engagement

For many years, thyssenkrupp has been participating in various working groups and best practice exchanges with regard to business and human rights, e.g. at econsense (German network of internationally operating companies with the goal of shaping the change to a more sustainable economy and society), the German Global Compact Network as well as several other associations and organizations. We highly appreciate that

many of our customers and suppliers come together in industry associations and discuss human rights and supply chain topics since this creates multiplier and leverage effects and can have a material positive impact. In addition, we also have a regular exchange with our customers and discuss their specific human rights requirements from thyssenkrupp as a supplier, the current thyssenkrupp approach as well as further points of action.

## Effectiveness of actions

To ensure that thyssenkrupp's actions to assess and address the risk of human rights in our own operations and supply chain are effective, different processes are implemented. The description of these processes is integrated in the chapters above:

- The annual update of the thyssenkrupp Modern Slavery Statement includes a feedback process between relevant group functions and service lines as well as with key functions from relevant group companies (so-called reporting

entities). Finally, the Modern Slavery Statement is approved by relevant group functions and service lines as well as our Executive Board. For more information please see chapters “Consultation”, “Governance” and “Approval of Executive Board”.

- Our risk assessment processes are updated at least annually. For more information please see chapter “Risk Management”.
- We regularly engage with industry groups and peers in order to ensure that all relevant and new requirements in terms of human rights are adequately assessed and implemented at thyssenkrupp. For more information please see chapters “Focus on our own operations” and “Partnerships and stakeholder engagement”.
- Our sustainability reporting that is fully integrated in our Annual Report is externally audited with the highest standard

of care – a reasonable assurance. This reporting includes setting targets, tracking our measures and sustainability linked remuneration. For more information please see chapter “Targets and Results”.

- Our due diligence and monitoring approaches for ensuring the effectiveness of activities in our own operations and the supply chain, e.g. exchange with works councils, industry associations or legal experts as well as supplier audits, working with suppliers on preventive and remedial measures or access to remedy, are described in the chapters “Focus on our own operations” and “Focus on the supply chain”.
- In the upcoming reporting year 2023/2024, thyssenkrupp will launch a new project that aims to further develop our sustainability strategy. For more information please see chapter “Next milestones and future points of action”.

## Targets and Results

Openness, equality of opportunity and mutual respect are central values of our corporate culture. In terms of the equal representation of women and men in management positions, in 2011 thyssenkrupp set itself a voluntary target to increase the proportion of women in management positions. The increase from 8% in 2011 to 14.6% as of September 30, 2023 shows a clear improvement at thyssenkrupp. Although significant challenges remain and structural changes lie ahead, thyssenkrupp is aiming to fill 17% of leadership positions with women and wants to achieve this target by the end of the 2025/2026 fiscal year. This ambitious goal reflects the proportion of women in the workforce as a whole and is one of the targets for the Long-Term Incentive plan. For many years thyssenkrupp has exceeded its own target of 10% for first aiders in the workforce. Currently 17.4% of employees are trained in first aid. We aim to maintain this high level. The development of accident statistics is the benchmark for occupational safety at thyssenkrupp. The accident situation in the company is regularly discussed at Executive Board meetings. The key indicator in this context is the accident frequency rate. This is reported monthly by all units worldwide. In the past fiscal year, it was 2.4, which was the target set by thyssenkrupp. Therefore, thyssenkrupp has already almost achieved the target of 2.3 set for fiscal year 2023/2024. As a result, the target has been reduced to 2.2. The reporting period was moreover the second consecutive year in which no thyssenkrupp employee died as a result of an accident in the workplace. Nevertheless, some unplanned events did happen and we are continuing our preventive measures, which also includes contracted companies.

As an indicator for employee satisfaction, we strive to continuously improve the employee Net Promoter Scores (eNPS) to a positive value by fiscal year 2025/2026. The thyssenkrupp

eNPS is part of the annual Employee Pulse Check survey, expressed by the willingness of employees to recommend thyssenkrupp as an employer and, with a value of -4 in the past fiscal year 2022/2023, shows that we are on the right track. All three targets, which reflect the proportion of women in the workforce as a whole, the accident frequency rate and the employee Net Promoter Score, are a criterion for Executive Board compensation and thus, parameters in the Long-Term Incentive Plan. For the current fiscal year, 2023/2024, long-term compensation includes the newly developed indicator High Risk Supplier Reduction (HSR), which measures the annual reduction in the proportion of suppliers classified as potentially risky in the initial risk analysis performed in accordance with the German Act on Corporate Due Diligence Obligations in Supply Chains relative to the total population of potentially risky suppliers. In this way, we aim to achieve a general reduction in the risk of violating the legal provisions of this legislation in respect of environmental protection, human rights, and occupational safety within our portfolio of suppliers. In the past ten years, more than 1,150 sustainability audits have been carried out to check compliance with the principles and continuous fulfillment of requirements that are written down in our Supplier Code of Conduct. More than 100 sustainability audits were carried out in fiscal year 2022/2023. Key topics for potential improvements highlighted by the audits were working hours and occupational safety. All established Indirect Financial Targets (IFTs) are being continued with the aim of continuous improvement and are constantly being adjusted and extended in parallel with our ongoing strategic development.

More information on thyssenkrupp’s Indirect Financial Targets can be found in the [Sustainability Strategy](#) section on our website and in the [Annual Report 2022/2023](#).

## Next milestones and future points of action

In the upcoming reporting year 2023/2024, thyssenkrupp will launch a new project that aims to further develop our sustainability strategy:

- “thyssenkrupp ESG Strategy” – an interdisciplinary sustainability project with the goal of developing an holistic ESG strategy. The project includes various sub-projects such as the identification of reporting requirements according to

Corporate Sustainability Reporting Directive (CSRD) and the classification of sustainable products and technologies according to the EU Taxonomy. Sub-projects are designed and realized in close consultation with the segments and businesses at thyssenkrupp that are responsible for their operational implementation.

# Approval of Executive Board

In compliance with the requirements of the Australian Modern Slavery Act (2018), this Statement has been approved by the thyssenkrupp Materials Australia Executive Board on March 28, 2024.



Frederik Bremsteller – CEO



Thomas Goerges – CFO

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