



New way, New value

MODERN SLAVERY STATEMENT

2023

Introduction

Sojitz Development Pty Ltd is committed to reducing the risk of modern slavery in our supply chains or in any part of our business and improving our practices to combat slavery. As a member of the Sojitz Group we are focused on sustainability and creating value and prosperity for society in conducting our business operations.

As part of the Sojitz Group's medium and long-term management plans and commitment to complying with the U.N. Guiding Principles on Business and Human Rights (2011), we will be involved in greater risk assessment and the expansion of a step-by-step approach to improving and promoting human rights due diligence.

Who We Are?

We are an Australian proprietary limited company and form part of the Sojitz Group with our ultimate parent company being Sojitz Corporation. Sojitz Corporation is headquartered in Japan. As a general trading company, the Sojitz Group is engaged in a wide range of businesses globally, including buying, selling, importing, and exporting goods, manufacturing, and selling products, providing services, and planning and coordinating projects, in Japan and overseas.

The Sojitz Group also invests in various sectors and conducts financing activities. The broad range of sectors in which the Sojitz Group operates includes those related to automobiles, plants, aerospace, medical infrastructure, energy, mineral resources, chemicals, foodstuff resources, agricultural and forestry resources, consumer goods, and industrial parks.

We are a holding company for various incorporated entities and unincorporated joint ventures operating in the coal mining industry in Australia. Specifically, we own or otherwise control various Australian proprietary companies which We have 495 employees across all our Australian operations, consisting of 34 employees in the Brisbane corporate office.

We have acted in consultation with the entities which we own or control in the preparation of this statement as they all operate under the ultimate direction and governance of the board of Sojitz Development Pty Ltd in Australia.

Our Structure

This Modern Slavery Statement is made pursuant to the Act by Sojitz Development Pty Ltd in respect of Sojitz and its related bodies corporate (the Group) and relates to the financial year 1 April 2023 to 31 March 2024. Related entity structure is shown below:

Name of Reporting Entity	Australian Company Number
Sojitz Development Pty Ltd	063 050 680
Sojitz Blue Pty Ltd Pty	099 442 556
Sojitz MDS Mining Pty Ltd	610 971 027
Sojitz Gregory Crinum Pty Ltd	626 424 048
Sojitz Plus Pty Ltd	108 510 309
Sojitz Green Pty Ltd	632 634 587
Sojitz Coal Sales Pty Ltd	110 316 599
Minerva Coal Pty Ltd	075 056 058
Sojitz Gregory Mining Pty Ltd	630 511 125

Supply Chain Areas

Our tier one suppliers make up the bulk of our supply chain and is limited to Australian based providers identified in Table 1. We use a combination of tier one suppliers as well as suppliers and services sourced locally.

The procurement and contracting at Sojitz Development are conducted through a centralized Supply Management team based in our head office In Brisbane. This team's primary function is to support the operating entities to ensure ethical and sustainable sourcing of goods and services.

The groups procurement expenditure is related to open cut and underground mining as well as rehabilitation services.

Table 1

1. Technology	<ul style="list-style-type: none"> • Software • Electronic Equipment – mobile phones, tablets, computers
2. Labour hire and consultant services	<ul style="list-style-type: none"> • Contract labour hire • Professional services – environmental, engineering, legal, finance, project management • Haulage Services • Waste Management • Cranage Services • Drilling Services • Equipment maintenance services
3. Bulk Materials	<ul style="list-style-type: none"> • Diesel & fuels • Tyres • Oils, Greases • Explosives • Magnetite • Stone dust, cement
4. Maintenance and replacement supplies, general consumables	<ul style="list-style-type: none"> • Mining equipment • Fixed Plant equipment • Conveyors • Pumps • Hydraulic equipment and components • Industrial supplies/Tools • Electrical Consumables and HVAC Systems • Steel • Personal Protective Equipment/Uniforms
5. Hospitality	<ul style="list-style-type: none"> • Accommodation services including catering • Facilities services – cleaning, cleaning chemicals and equipment • Air travel, Charter Flights • Transport
6. Energy & logistics	<ul style="list-style-type: none"> • Electricity from grid and renewable sources • Shipping activities of product & consumables • Rail & Port Services

How We Assess and Address Modern Slavery Risks

We have undertaken a risk assessment of our operations and supply chains, including a more detailed assessment of our major tier one suppliers (based on spend) for the financial year ending 31 March 2024 (“FY23”). Although we recognize that spending is not the sole factor in assessing modern slavery risk, we consider that it is a useful assessment tool which will assist us in working with our major suppliers to address the key modern slavery risks.

Key Modern Slavery Risks

Sojitz has identified potential key risks of modern slavery in our operations, including the operations of all entities on whose behalf this statement is made, as follows:

Labour Risks: Through engagement of labour particularly around temporary and short-term labour resources. There is potential risk that workers are exposed to modern slavery practices through non-compliance with relevant labour laws. The area considered to be the most risk in our business is employment of clerical staff, cleaners, and casual employees.

Procurement and Sourcing Risks: As a result of engagement of local and regional suppliers that source products from overseas, there is a risk that workers producing these products may have potential to be exposed to modern slavery practices. Procurement of rubber-based products such as tyres and conveyor belts along with the textile products such as work uniforms are considered to higher risk of modern slavery risks.

During this reporting period in FY23, we did not become aware of any instances in modern slavery on our supply chain or operations. Sojitz will continue to review key risks and be vigilant with any potential modern slavery risks within our network.

Our Policies on Slavery

We are committed to reducing the risk of modern slavery in our supply chains or in any part of our business. The Sojitz Group’s human rights policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to mitigate risks of slavery taking place in our supply chains.

The Sojitz Group strives to create value and prosperity by connecting the world with a spirit of integrity. We believe that respect for human rights is an integral foundation for creating what we call “Two Types of Value” —value for both our company and society, and for meeting the expectations of our stakeholders. In undertaking these business activities, we recognize our responsibility to avoid causing or contributing to adverse human rights impacts and of seeking to prevent or mitigate such adverse impacts. We commit to respecting human rights as set out in the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and to carry out our business in accordance with the United Nations Guiding Principles on Business and Human Rights.

The Sojitz Group’s Human Rights Policy can be found on our website at <https://www.sojitz.com/en/csr/humanrights/>.

Our commitment to reducing the risk of modern slavery in our supply chains is further supported by the Sojitz Group’s Code of Conduct and Ethics (a set of decision-making standards established to act as the foundation for all Sojitz Group business activities) and broader CSR policies, such as the:

- CSR Action Guidelines for Supply Chains (“Action Guidelines”).
- Environmental Policy.

- Anti-Corruption Rules; and
- Anti-Bribery Policy

The policies are available on our website at <https://www.sojitz.com/en/>. In complying with the Code and CSR policies, not only are we able to promote vital Sojitz Group CSR initiatives, but we are also able to gain greater visibility in our supply chains (and therefore any associated modern slavery risks in our supply chains).

Due Diligence Processes

As part of our initiative to identify human rights abuses (including modern slavery) and mitigate associated risks in our business and supply chains, we undertake assessments of the members of our supply chain to identify any risk areas, which take into consideration the reputation of and any historical human rights breaches of the supplier, the location of the supplier and (where possible) where the goods or services it is providing are sourced from, as well as the nature of the products the supplier provides or the particular industry the supplier is involved in. Additionally, we aim to engage only with suppliers that uphold our standards and values in relation to human rights and anti-modern slavery practices through their operations and supply chains.

Supplier Adherence to Our Values

The business activities of the Sojitz Group are possible due to the cooperation of various stakeholders including suppliers and other business partners. For the Group to meet our responsibility to respect human rights, their understanding and cooperation are indispensable.

The Sojitz Group is committed to working with and encouraging our business partners to uphold the principles in our Human Rights Policy. If we identify an alleged human rights abuse outside of the Sojitz Group but linked to our business activities, including in our suppliers and other business partners, upon confirming the situation the Group will ask relevant parties such as suppliers and other business partners to take measures to address the human rights issues.

For further information on our expectations of our suppliers and other business partners, including our policy concerning cases of material breach, please see our Action Guidelines. In the event of a material breach of the Action Guidelines, the Sojitz Group shall, upon verifying the facts, request that the supplier or other business partner improve the situation. If no improvement has been made after a specified period, we will take measures which may include a reconsideration of the contract with the supplier or partner. If necessary, the Sojitz Group shall, along with experts designated by the Group, visit the site concerned for investigation.

Training

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, the relevant information as learning material has been communicated to our staff as a part of training. In FY23, we provided more focused training to relevant employees in relation to human rights and specifically, modern slavery risks. We are looking to further update and develop our online training materials and resources in relation to human rights and modern slavery to ensure that we are providing the most up to date training on human rights and modern slavery risks and processes to a greater number of employees.

Supplier Engagement and Audit

In FY23, we increased the scope of our modern slavery risk assessment of our supply chain, including by undertaking an assessment of a greater number of suppliers. We are looking to continue improving our risk assessment and mitigation processes in relation to modern slavery for both new and existing suppliers in the upcoming reporting year, including by:

- developing more detailed due diligence processes for all our suppliers.
- pursuing contractual acknowledgement of and compliance with applicable laws and our policies and values in relation to human rights and modern slavery with all our suppliers; and
- seeking enhanced dialogue with suppliers (particularly those in higher risk modern slavery categories) for greater transparency and a more unified approach to further assessing and addressing any potential modern slavery risks in the supply chain.
- We have added a new role for a Strategic Sourcing Partner, further embedding sustainability into our procurement practices and strategies.
- All our key suppliers in FY23 had modern slavery policies which were reviewed. These policies accurately reflect the risk in their respected supply chains and operations.

In working towards these goals, we aim to build knowledge across our operations, have better visibility of our supply chains and potential modern slavery risks in such supply chains and meet our commitment to reducing the risk of modern slavery in our supply chains or in any part of our business.


Our Effectiveness in Combating Modern Slavery

To date we did not identify any modern slavery practices within our operations or within our supply chain during FY23. Sojitz continue to improve processes for assessing modern slavery risks and identifying and managing modern slavery risks in our supply chain. Sojitz is satisfied the controls implemented to date have been effective in mitigating though not eliminating potential modern slavery risks.

Remediation

We respect the human rights of people involved in our operations. This applies not only to our employees, but also to everyone affected by our operations throughout its supply chains. Should there be any instances of modern slavery, we will seek to rectify them.

This Statement was approved by our Board of Directors on 30 September 2024.



Daisei Yamamoto
Managing Director,
Sojitz Development Pty Ltd (ACN 063 050 680)

Date: 30 September 2024