

BUILDING A BETTER FUTURE TOGETHER

POSCO Australia Modern Slavery Report 2023

This Modern Slavery Statement, made by POSCO Australia Pty Ltd, is made in compliance with the Modern Slavery Act 2018 (Cth) (the "Act") and has been prepared in respect to the financial year ending 31 December 2023.



About This Report

POSCO Australia Pty Ltd (ABN 54 002 062 160) has published this 2023 Modern Slavery Report to disclose POSCO's Human Rights policies and guidelines to protect Human Rights across POSCO Australia's business activities in Australia. This report outlines POSCO Group's Corporate Citizenship management philosophy for achieving sustainable management for Human Rights.

At POSCO, we uphold and endorse the principles of internationally recognised human rights, such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the OECD Guidelines for Multinational Enterprises, and the ILO Conventions. All human beings have the right to be treated with dignity. This includes the rights to life, safety, freedom of thought, speech, religion and association, work-life balance, privacy, food and water security, freedom from torture, slavery and forced labour, the right to fair and dignified working conditions, and non-discrimination.

Reporting Principles

This report adheres to the Commonwealth *Modern Slavery Act 2018* (the Act). POSCO Australia identified and addressed key risk areas of modern slavery in its business operations and supply chains in Australia and details how POSCO Australia managed to eradicate the modern slavery risks through Human Rights policies, guidelines, governance and management frameworks. POSCO Australia remains committed to transparently disclosing and managing its medium-to-long-term strategies, goals, and management status for Human Rights through the Modern Slavery Report.

In this report, the terms "POSCO Australia", "we", "us", "our" and "the company", are used where reference is made, in general, to the reporting entity.

Reporting Period

This report provides a comprehensive overview of key activities in managing modern slavery risks from 1 January 2023 to 31 December 2023 within POSCO Australia's business operations and supply chains. Some of the information, such as POSCO Charter of Corporate Citizenship, Company-Wide Risk Management and Ethical Frameworks for Human Rights will provide POSCO Group's ESG strategies and vision with the goal to take part in addressing social issues and contribute to fostering a more prosperous world and better tomorrow for humanity.

POSCO Charter of Corporate Citizenship

POSCO, guided by its management philosophy of 'Corporate Citizenship: Building a Better Future Together,' aims to engage and communicate on a continuing basis with all relevant stakeholders, including customers, employees, and shareholders, as well as bring on changes and drive innovation in pursuit of maintaining sustainability and ultimately creating greater value for the company.

Corporate Citizenship goes above and beyond the principles recommended in ESG management; our vision embraces coexistence and joint advancement with all stakeholders, as a means to generate greater corporate value, seek continuous growth and contribute to sustainable development. Accordingly, POSCO that embraces the values of Corporate Citizenship is a company that complies with the following principles when conducting business.

One

We nurture a robust business ecosystem with our business partners.

Two

We are leading the efforts to address pressing social issues and make society better.

Three

We foster a happy and fulfilling workplace by creating a corporate culture based on trust and creativity.

Modern Slavery Report

We understand that modern slavery can take many forms but fundamentally is a range of exploitive practices including human trafficking, forced labour, servitude, deceptive recruiting and child labour. We do not tolerate modern slavery and will not knowingly engage with any consultants, suppliers or contractors that engage in modern slavery.

As part our commitment to minimising the risk of modern slavery, POSCO Australia has continued to discuss details of the *Modern Slavery Act 2018's* reporting requirements with other members of the global POSCO Group. Further, we have undertaken proactive actions to address these requirements and worked with the POSCO Group in updating this report. As we have a responsibility to take steps to identify and minimise the risks of modern slavery within our operations and supply chains, we continued to refine the way we manage these risks and have expanded our set of due diligence processes across POSCO Group.

Our Commitment

POSCO Australia is committed to continue in having a robust framework and strategies in place to minimise the risk of modern slavery within its business operations and supply chains in Australia.

POSCO Australia is committed to transparency in identifying and addressing any modern slavery risks through our risk management frameworks and preventing and mitigating any modern slavery instances whether they are linked directly or indirectly to our business activities even where it has not contributed to these any modern slavery instances itself by conducting our human rights due diligence.

During this reporting period, we focused on refining and enhancing our approach to have better control for the modern slavery risks associated with our operations and supply chains. Key activities undertaken are summarised as below:

- Implemented a comprehensive ESG risk management process spanning supplier registration, contract performance evaluation, and post-contract management.
- Enhanced the professional handling of human rights risk management by creating a dedicated human rights centre for consultation and investigation of potential rights violations.
- Held annual 'Respect for Humanity' surveys across all domestic and international business sites, as well as contractors, to identify potential human rights violations.

We consulted with POSCO Group and continued to adopt global standards of Human Rights governance and strategies to identify, assess, and respond to any inherent and potential modern slavery risks and how any risks may be present in our business operations and supply chains through our risk management framework. Furthermore, we are dedicated to improving our comprehensive ESG management system, encompassing ESG performance management, risk assessment, and reporting. We aim to apply this advanced system to our business operations and supply chains, with the goal of becoming a leader in global ESG practices.

Company-Wide Risk Management

POSCO is committed to a corporate-wide effort in proactive risk detection and management. Our aim is to immediately respond to the dynamic business environment, mitigate potential risks in advance, and secure a foundation for sustainable growth.

The findings from our risk monitoring efforts, along with the corresponding action plans, are reported to the Board of Directors and its specialised committees.

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Our Structure

POSCO Australia Pty Ltd, based in Sydney, is a wholly owned subsidiary of the POSCO Korea (“POSCO Group”) headquartered in South Korea, and has been operating in Australia as an Australian in-bound investment company since 1981. The registered address and head office of POSCO Australia is located at Level 49, Governor Phillip Tower, 1 Farrer Place, Sydney NSW 2000.

POSCO Australia continued to focus in the mining sector as its key operating segment during the reporting period. The following diagram illustrates our group structure:



Operations and Supply Chains

POSCO Australia as an Australian subsidiary of POSCO Group has built a successful business, with investments in Australian commodities across iron ore, manganese, lithium and metallurgical coal.

POSCO Group is an integrated steel producer, specialising in the production of hot rolled, cold rolled, and stainless steel. It boasts ownership of Pohang and Gwangyang Steelworks, which are globally recognized as the largest producers of crude steel. In its global operations, POSCO manages 13 production subsidiaries (comprising 3 upstream processes and 10 single-stand rolling mills) and 26 processing centers spread across 13 countries abroad.

To date, the POSCO Group, through its Australian subsidiaries, has invested A\$4.7 billion in iron ore, manganese, lithium and metallurgical coal projects in NSW, Queensland and Western Australia Australian States. The POSCO Group purchases over A\$7 billion worth of Australian resources per annum, making it the largest, single, private customer of Australian exports.

Currently, POSCO Australia aims to adjust its investment portfolio to be in line with the low-carbon era, and is promoting investments in clean hydrogen & green, renewable energy.

During the reporting period we had 12 employees who were employed in various professional roles such as resources, finance, accounting and human resources. POSCO Australia’s employees are covered by industrial instruments including modern awards, Enterprise Agreements, and individual employment contracts.

Each of these mechanisms meets or exceeds the minimum entitlements prescribed under the National Employment Standards. The standards set out the 10 minimum employment entitlements that must be provided to all Australian employees.

In our supply chains, POSCO Australia is supplied with a range of goods and services to support its office operations, comprising the administrative and professional services and office-related suppliers. The services provided to us are predominately located in Australia.

Modern Slavery Risks

POSCO Australia is not aware of any modern slavery practices occurring in its operations and supply chains in this reporting period and our general exposure to modern slavery risks remains as low impact. We acknowledge the potential risk of modern slavery practices within our operations and supply chains. Thus, It is imperative that our practices and procedures are designed to identify and address any instances of modern slavery effectively.

During the reporting period, we were committed in identifying any possible modern slavery risks in our business operations and supply chains by considering the following factors in evaluating the risk of modern slavery which encompasses business risks including human rights and supply chain and non-business risks which involve factors such as investments in our operations. Each category of risk area is managed by corresponding departments, ensuring that substantive risk mitigation is our top priority.

- Industry risks
- Product and service risks
- Entity risks

Business operations

We have evaluated our direct workforce and determined that it presents a low risk of modern slavery. This is attributed to a largely office-based, professional workforce and a strong commitment to in establishing a workplace culture of respecting human dignity, underpinned by shared values within POSCO Group and a robust governance and strategies. However, we recognise that our internally and externally managed investments are critical to our efforts in identifying and addressing modern slavery.

POSCO Australia strives to minimise modern slavery risks associated with our investment projects under POSCO Group’s ESG risk management system. Prior to embarking on any investment project, we perform a preliminary assessment of potential risks in areas of human rights. This allows us to evaluate the social impacts of the investment projects. Based on our findings, we devise strategies to reduce these risks as we move forward with our investment ventures. Prior to the approval of these investment ventures, our in-house ESG specialists participate from the earliest stages of the process as reviewers.

POSCO Group developed over 70 ESG assessment metrics to ensure that the investments align with the ESG considerations. Through the ESG assessment metrics, POSCO Australia will assess potential human

rights risks and ensure that the corresponding mitigation strategies are incorporated into the overall investment plans. Furthermore, we will continue to integrate the metrics into our performance evaluation process for investment projects.

Supply chains

Our supply chains generally include goods and services supplied to our office operations. The assessment of our supply chains identified that it is predominantly assigned a risk rating of low to modern slavery risks.

The POSCO Group Supplier Code of Conduct stipulates the basic principles to be observed by all suppliers that provide products and/or services to POSCO or POSCO's suppliers (hereinafter referred to as "Suppliers"). Suppliers to POSCO must establish a safe working environment, ensure that workers are treated with respect and dignity, and engage in ethical and sustainable business operations. They must also develop a sustainable purchasing policy for their own suppliers. The Code is comprised of provisions pertaining to the Environmental, Social, and Governance dimensions. Here, the Social dimension includes respect for human rights, shared growth, social contribution, safety and health, trade secret and intellectual property protection, quality, while Governance elements include ethics and fair trade.

As part of our preventive measures, POSCO Australia developed internal policies and practices in place to minimise the human right risks across our business operations and supply chains by complying with national labour laws and international labour standards. To prevent human rights violations and fulfill the company's human rights management, POSCO Group enacted the POSCO Human Rights Protection Operational Guidelines. POSCO Australia also respects the UN Guiding Principles on Business and Human Rights (UN Guiding Principles) in our operations and supply chains in Australia. This continuum of conduct approach (see 'Ethical Framework' section) allows us to prevent, mitigate and, where appropriate, remedy modern slavery risks in our operations and supply chains in accordance with our global ESG guidelines and management.



Ethical Framework

In addressing and acknowledging modern slavery risks, we continue to have the following ethical frameworks in place.

Global Core Values

As members of the global POSCO Group, our core values are as follows:

- Safety
- Win-win
- Ethics
- Creativity

That's why these core values, in conjunction with a rigorous code of conduct, are the cornerstone for the business decisions that we make.

Human Rights Guidelines

POSCO enacted the POSCO Human Rights Protection Guidelines on April 1, 2014 in order to combat human rights abuses and fulfill its corporate commitment to human rights management. These guidelines adhere to the 'UN Guiding Principles on Business and Human Rights' and the POSCO Code of Ethics. They underwent a revision to become the 'POSCO Operational Guidelines for Human Rights Protection' on July 31, 2020. These updated guidelines were incorporated into the company's bylaws and now serve as the benchmark for all tasks related to human rights protection within the organisation.

POSCO observes and supports the globally recognised international human rights standards, such as the UDHR, the UN Guiding Principles on Business and Human Rights, the UN Global Compact Ten Principles, the OECD Guidelines for Multinational Enterprises, and the Fundamental Conventions of the International Labor Organization (ILO).

All humans have the right to be treated with dignity. This includes the right to life and physical safety, freedom of ideas/expression/religion, freedom of association, work and home life balance, guarantee of privacy, food and water safety and security, prohibition of torture/slavery or forced labor, the right to fair and decent working conditions, and the right not to be subject to unfair discrimination.

Since adopting the Code of Ethics that reflects its human rights policy in 2003, POSCO has made efforts to prevent human rights violations and to take adequate measures to prevent and address adverse human rights impacts that may occur in the course of its business management activities and business relations. Our commitment to human rights was further solidified in 2019 when we released our Charter of Corporate Citizenship.

Our Basic Position on Human Rights

The following statements describe our basic position on human rights. Our aim is to meet our stakeholders' expectations of our responsibility to respect human rights.

- We comply with internationally recognised principles of human rights and applicable local laws and regulations on human rights wherever we operate
- When national laws conflict with international standards, we seek ways to honour the principles of internationally recognised human rights
- We pay special attention to potentially serious harms to human rights

Establishing a Workplace Culture of Respecting Human Dignity

POSCO is deeply committed to embracing the values and requirements of our new era while diligently upholding the responsibility to respect human rights. In this regard, we adhere to the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Ten Principles of the UN Global Compact, and the OECD Guidelines for Multinational Enterprises. At POSCO, we firmly reject any form of discrimination based on race, nationality, gender, age, education, religion, region, disability, marital status, or sexual identity. We respect each individual's dignity and diversity. We are committed to preventing any violations of human rights across all our business operations, both at home and abroad, and we strive to mitigate and rectify any negative impact on human rights that might occur during our business activities.

Governance

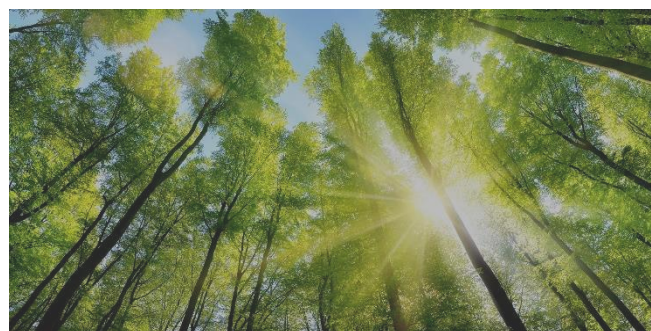
POSCO's Board of Directors ensures the assessment of ESG-related risks, including human rights, when making critical decisions such as investments. Furthermore, the Audit Committee under the Board receives biannual reports on the company's strategy for maintaining ethical standards among our employees. In January 2023, POSCO took a significant step by establishing a Human Rights Centre within the Legal Affairs Office, which reports directly to the CEO. The centre specialises in providing consultations and conducting investigations on instances of workplace sexual harassment, bullying, and other violations of human dignity. By allowing the participation of external professional bodies in consultations, investigations, and case handling, we have significantly elevated the level of professionalism in our approach to managing human rights risks.

Human Rights Policy

POSCO is an advocate for human rights and is in full support of relevant international standards, actively seeking to ensure the dignity of all stakeholders by promoting freedom, safety, and the improvement of the quality of life. We underscore the significance of protecting and respecting human rights in our Code of Ethics Practice Guidelines. Furthermore, we have made our human rights management guidelines readily accessible on our website, ensuring that all stakeholders can easily find and practice these important principles.

Sustainable Supply Chain Management

Under our philosophy of corporate citizenship management, POSCO is striving to construct a sustainable supply chain and foster a responsible supply chain management. This commitment stems from our purchasing vision of becoming 'a global leader in sustainable purchasing'. All our business transactions are conducted with fairness and transparency. To augment the global competitiveness of our supply chain, we leverage our eight major shared growth programs to assist suppliers in problem-solving and perpetuate win-win partnerships. We also advocate for comprehensive supply chain risk management, encompassing human rights and safety factors by enhancing our supply chain management system.



Supply Chain ESG Management

With the enhancement of ESG regulations for global supply chains, there is growing societal interest in various issues originating from corporate supply chains, such as those regarding the environment and human rights. This has escalated the demand for responsible corporate supply chain development and risk management. To build robust supply chains and address supply chain ESG risks, POSCO implements an ESG risk management process that spans from supplier registration to evaluation of contract performance and post-contract management.

Stage 1	Supplier Registration
Stage 2	Supplier Relationship Management (SRM)
Stage 3	Post-Contract Management
Stage 4	Ongoing Risk Manager

Under our Supplier Relationship Management (SRM), POSCO carries out a SRM assessment to evaluate the sustainability of its suppliers. All suppliers with transaction records with the company are evaluated, with the assessment categories encompassing credit, delivery, price, quality, and ESG. Starting in 2023, the ESG evaluation, currently a sub-component of our Supplier Performance Evaluation (SRM), is elevated to an on-site standalone supplier audit. This supplier ESG audit aims to identify and mitigate or improve potential or actual ESG risks within POSCO's supply chain, including human rights, and labour rights aspects.

Actions Taken to Assess and Address Modern Slavery Risks

During this reporting period, we progressed multiple initiatives to enhance our understanding of and responses to modern slavery risks. We are continually evolving and implementing Human Rights Guidelines to assess and address modern slavery risks.

POSCO Australia has made significant efforts to prevent violation of others' human rights and to take adequate measures to prevent and address adverse human rights impacts that may occur in the course of performing business activities. In 2023, a checklist consisting of 11 areas and 40 items was circulated for our self-evaluations in assessing the level of human rights management within our business operations and supply chains from POSCO Group. This checklist encompasses aspects such as the implementation of a human rights management system, non-discrimination in employment, upholding the freedom of assembly and to engage in collective bargaining, prohibiting forced and child labor, ensuring industrial safety, maintaining responsible supply chain management, safeguarding the human rights of local residents, guaranteeing environmental rights, protecting consumer rights, preventing sexual harassment and bullying, and promoting ethical practices. The results of these evaluations are shared within POSCO Group and aid the development of our internal training programs and facilitating improvement initiatives.

Furthermore, ethics sessions were conducted through surveys to assess the ethical standards of all managerial position holders. The survey incorporated human rights issues (such as ensuring industrial safety and preventing bullying and sexual harassment), and the outcomes were provided as feedback to senior managerial office holders. We also carried out post-evaluation management tasks, which included additional investigations and follow-up measures for any notable instances of human rights infringements. During this reporting period, we continued to focus on addressing and assessing modern slavery risks and we are committed in establishing a workplace culture of respecting human dignity. Below is a summary of our strategies and risk management systems:

Policies and procedures

Consistent application of policies and procedures across our operations and supply chains is also key in our approach to managing the risks of modern slavery. We continue to regularly review and update these policies and procedures under the guidance of POSCO Group.

POSCO Australia has a suite of Human Rights policies that form the foundations of how we manage the risks of modern slavery across our operations and supply chains. We provide our employees, partners and suppliers with recommendations and assistance to help them observe POSCO's internal policies and international principles on human rights. We respect the human rights of all our employees, partners and suppliers and strive to avoid human rights violation in any form.

The Code of Ethics establishes the ethical values and behavioural standards that must be preserved and developed by all POSCO Group employees. This code of ethics consists of the preamble, followed by the principles of ethics that reflect compliance and responsibilities of employees regarding the code of ethics, and uphold guidelines that set the standard for ethical decision-making. Furthermore, the following policies and codes set our clear expectations to respect human rights:

- Human Rights Policies and Guidelines
- Health & Safety Management and Policies
- Business Ethics
- Fair Trade
- Supplier Code of Conduct
- Human Rights Pledge and Training
- Human Rights Grievance Handling Process
- Human Rights Due Diligence Process

These policies and procedures applicable to our employees, partners, and suppliers, are set centrally to create a common baseline for expectations and consistency across POSCO Group in fulfilling the responsibility to respect human rights.

Actions Taken to Assess and Address Modern Slavery Risks

Human Rights Due Diligence Process

We continue to utilise checklists designed to diagnose the core elements of human rights management when conducting human rights due diligence.

POSCO Australia is committed to preventing and mitigating any negative impacts on human rights and is conducting human rights due diligence. Due diligence includes identification and assessment of the actual and potential impact on human rights, remedy for recognised problems, documentation of remedial activities and communication with stakeholders about our response to impact. Below we describe the key elements of our human rights due diligence process:

- If human rights-related risks are detected in our business operations, human rights due diligence is conducted to analyse and propose improvement measures.
- Human right due diligence is carried out using a checklist that assesses key elements related to human rights management.
- If necessary, substantive interviews are conducted with groups and relevant stakeholders who may be potentially impacted.
- During due diligence, both potential and actual impacts are identified. Potential impacts are shared company-wide, with preventive and mitigating measures implemented to address them, while actual impacts that have already occurred are remedied and resolved.
- As a principle, human rights due diligence is conducted by internal experts, but if necessary, it is conducted jointly with the support of external experts.

Human Rights Grievance Handling Process

We have a grievance mechanism to provide affected stakeholders with timely access to remedy.

POSCO Australia maintains a dedicated organisation that enables employees to seek guidance and report ethical issues. An unethical conduct reporting centre is also available on the company website, where reports can be made anonymously. POSCO takes appropriate action against cases that involve infringement upon human dignity. This is achieved through a systematic human rights grievance handling process. Notably, since January 2023, we have enhanced the professionalism and credibility of our grievance handling process by enabling our employees, partners and suppliers to seek advice and investigations from an external professional body (labour law firm designated by the company). The grievance mechanism serves the following important functions:

- Enable us to identify adverse human rights impacts with ease and provide a forum where the affected interested parties can directly raise issues;
- Prevent exacerbation of human rights violation by listening to the grievances and providing relief at early stage; and
- Enable us to understand and improve issues concerning human rights policy and procedure

Human Rights Pledge and Training

Our employees are constantly trained to ensure they adhere to appropriate ethical standards.

Each January, every employee at POSCO makes a pledge to adhere to the Code of Ethics, which includes human rights provisions, a commitment echoed by our partners. In November 2022, we implemented a pledge promoting the practice of gender equality and mutual respect and distributed specific behavioural guidelines for each position. Moreover, we operate both online and offline training programs for employees to prevent human rights abuses. Notably, all employees have completed an e-learning program focusing on sexual harassment prevention, as required by law.

POSCO Australia distributed educational materials on ethics and conducted trainings on human rights trainings and ethical management including the awareness of modern slavery risks.

- Employee one-on-one visits and email ethics training
- Ethics training for new employees
- Overseas ethics training for sojourning and locally recruited employees
- E-learning programs for modern slavery risks

Employee ethics training has been affirmed as part of POSCO's corporate culture.

Measuring Effectiveness

We continue to measure the effectiveness of our Human Rights Guidelines and Human Rights Risk Management in assessing and addressing the risks of modern slavery practices in our operations and supply chains to enhance our Human Rights management across POSCO Group.

POSCO Group conducts annual surveys focused on respect for human dignity, which are administered to employees across both domestic and international business sites, as well as our contractors. These surveys aim to boost employees' awareness about human dignity while also allowing us to continuously monitor potential risks related to the respect for human rights. We meticulously check for any human rights violations, and when required, we conduct direct investigations to manage such risks effectively.

In 2023, this survey was circulated to POSCO Australia, asking questions related to ethical practices and violations concerning human dignity. The results were then shared with the relevant departments, providing them with feedback and allowing them to undertake their own preventative measures and management actions. To improve the effectiveness of our Human Rights management, the headquarters will conduct direct investigations and share the results for ongoing monitoring when instances of human rights violations are detected. For this reporting period, we did not find any instances of modern slavery in our business operations and supply chains.

Policies and procedures

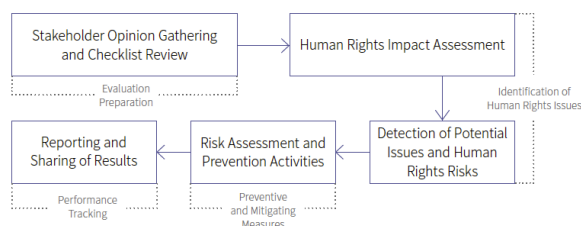
The set of Human Rights policies and Human Rights procedures are constantly monitored and reviewed by POSCO Australia in consultation with POSCO Group under POSCO Operational Guidelines for Human Rights Protection. In assessing the effectiveness of our policies and procedures for improvements, the following actions continue to be undertaken:

- Key documents (Policies and guidelines related to human rights) reviewed and updated. These documents are managed through an internal control documents library and where required, are endorsed and approved at executive or board level.
- As part of on boarding and contracting, POSCO Australia continues to perform due diligence on all new suppliers to determine their risk level and control procedures in relation to ethical sourcing and modern slavery as appropriate for our business.
- Evolving in the way we identify and assess risks by considering broader human rights to better understand and explore our potential operation and supply chain risks.
- Implementing a Modern Slavery policy where it states POSCO Australia must comply with Australian *Modern Slavery Act 2018* under the Modern Slavery Policy.
- Frequently monitoring registered suppliers in order to build a robust supply chain system.

Human Rights Due Diligence Process

POSCO Australia establishes a response system and carries out follow-up actions as guided by the findings from our due diligence in order to prevent and mitigate potential adverse impacts on human rights by taking the following action plans.

- Responses and follow-up measures to mitigate impact
- Stakeholder communication
- Embed human rights into our culture



Furthermore, we stimulate substantial enhancements in our human rights management through embedding the outcomes of human right due diligence within our organisational culture and facilitating activities for systematic improvement.

Measuring Effectiveness

Human Rights Grievance Handling Process

We have a grievance mechanism to provide affected stakeholders with timely access to remedy. Reports are received through existing platforms such as Ethics Helpline and Ethical Misconduct Hotline to ensure that they are swiftly addressed and remedied. The grievance mechanism serves the following important functions:

- Facilitate the identification of negative impacts and to give affected stakeholders access to a platform to raise their concerns
- Provide timely and direct interventions, e.g. grievance hearing, remediation, to prevent the risk of greater harm
- Identify problems with current human rights policies and procedures and make improvements

Across POSCO Group, the Human Rights Center, which is newly created in the Legal Affairs Office is responsible for preventive activities (education, campaigns), risk detection (surveys, consultations, receipt of reports), and responses (investigation of reports, protection of victims) to eliminate any modern slavery risks and human rights. Our in-house human rights centre specialising in the victim-centred process of consultation-reporting-investigation and in reinforcing measures to prevent secondary victimisation and protect victims.

For departments and individuals identified as needing improvement, we implemented recurrence prevention training, conducted individual investigations, and enforced immediate corrective measures such as personnel actions, when required.

Human Rights Pledge and Training

POSCO has implemented online and offline training programs for employees to prevent human rights violations. In particular, all employees have completed mandatory e-learning courses on ethics and modern slavery, in compliance with legal requirements which include:

- Mandatory training from POSCO Australia ensure that all employees receive adequate training on its Modern Slavery Statement and its Modern Slavery Policy and any supporting processes applicable to their role.
- Advising any new employees on the risks of modern slavery as part of our employee induction
- In addition, POSCO Australia conducted trainings about the complaint mechanism where the employees have an accessible and well-publicised reporting mechanism for concerns or disclosure in relation to modern slavery which allows for confidential and anonymous reporting and provides protection from reprisal.

Awareness raising, training and capacity building are important for both our employees and our supplier partners to be better equipped to identify and respond to modern slavery risks.

Future for Improving Human Rights

POSCO Group is currently re-evaluating the human rights policies of its overseas subsidiaries. The company will provide employees with training on human rights in local languages and share its human rights policies on its website. Also, through the POSCO Human Rights Due Diligence System developed in the first half of 2023, POSCO Group plans to conduct annual online audits for all overseas subsidiaries. If any issues are identified through these audits, in-house experts will be dispatched to provide necessary improvements. In addition, the company has implemented a procedure where resident staff in overseas subsidiaries promptly reports any potential labour and human rights issues to the relevant department at headquarters. Moving forward, the company aims to strengthen its collaborative system between headquarters and overseas subsidiaries to proactively prevent and resolve any arising issues.

Consultation

During the reporting period, POSCO Australia consulted with POSCO Group. We discussed details of the *Modern Slavery Act 2018*'s reporting requirements and provided information regarding the actions we intend to take to address these requirements. This statement was prepared in consultation with our Board of Directors under the guidance of the POSCO Human Rights Protection Operational Guidelines. This supports the delivery of our commitment to eliminate Modern Slavery risks from our entire operation and supply chains.

Approval

This Modern Slavery Statement 2023 has been authorised and approved by the Board of Directors of POSCO Australia Pty Ltd for the purposes of the Commonwealth *Modern Slavery Act 2018* and has been signed on behalf of the Board by Mr. Bo Sung Kim, Managing Director on 30 June 2024.



Bo Sung Kim
Managing Director of POSCO Australia Pty Ltd
30 June 2024



POSCO Management Philosophy

POSCO pursues 'Corporate Citizenship: Building a Better Future Together'. POSCO will become a valued member of society, grow alongside various stakeholders, such as employees, shareholders, customers, suppliers, vendors and local communities, and pursue the values of consideration, coexistence and symbiosis.

Annexure A

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018*, which includes seven mandatory reporting criteria:

Mandatory Reporting Criterion	Reference in this statement
a) Identify the reporting entity	About This Report
b) Describe the reporting entity's structure, operations and supply chains	Our Structure Operations and Supply Chains
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Modern Slavery Risks
d) Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Actions Taken To Assess and Address Modern Slavery Risks
e) Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Measuring Effectiveness
f) Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a joint statement, the entity giving the statement	Consultation Approval
g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Our Commitment Ethical Framework Future for Improving Human Rights