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About this Statement

Introduction

This Modern Slavery Statement describes the steps taken by Mitsui-Itochu Iron Pty Ltd (ACN 008 702 761) (MII) during the financial year ending 31 March 2025 to address modern slavery risks in its operations and supply chains in accordance with the *Modern Slavery Act 2018* (Cth) (Act).

MII is a reporting entity under the Act.

This statement has been approved by MII's Board of Directors on 26 September 2025, and signed by the President & Managing Director, Koichi Hirao.

Our Organisation

Our Corporate Structure

MII's ultimate parent entities are Mitsui & Co., Ltd (Mitsui Tokyo) and Itochu Corporation (ITOCHU). Mitsui Tokyo is a global conglomerate with multiple businesses operating across different industries under the one corporate group. Together with its many subsidiaries and affiliates, Mitsui Tokyo operates business through its offices in countries across the world.

MII is an associate of Mitsui & Co. (Australia) Ltd. ACN 004 349 795 (MCA). In contributing to the sustainability of the Australian community, MII actively promotes social contribution in collaboration with MCA.

For more information on our sustainability activities in collaboration with MCA, please refer to the website below:

Sustainability at Mitsui: [Sustainability - Mitsui & Co. \(Australia\) Ltd.](#)

Our Operations and Supply Chain

MII does not directly employ any staff, however, obtains support through shared labour resources from its sister company, Mitsui Iron Ore Corporation Pty Ltd (MIOC). These shared labour resources will be referred to as employees/staff in this report. MII's staff are based in Perth Western Australia working together with BHP (the JV's operator) and ITOCHU in the world renowned Western Australian Iron Ore (WAIO) Joint Ventures (JV) in the production and sale of iron ore products to customers in China, Japan, South Korea, Australia and other countries. BHP operates & manages the operation and supply chain of WAIO JV.

Through our WAIO JV partnership with the JV operator BHP, MII has supported & encouraged sustainable and corporate social responsibility practices across our JV operation and supply chain. MII is a standalone entity and does not control or hold any



other corporate entity. For more information on our organisation, please refer to our website below:

https://www.mitsui.com/au/en/group/1226100_9223.html

We understand that we need to lead by example in the way we do business. We operate by a set of values which shapes the way we think, work and act to ensure we are helping people to achieve their ambitions – in the right way.

This also means we aim to act fairly, ethically and openly in everything we do. We are committed to combating the risk of modern slavery in our supply chains or in any part of our business.

Our Workplace

MII is committed to providing a safe, respectful, and equitable workplace. We maintain a comprehensive framework of policies, which promote dignity, courtesy, and respect, and help mitigate modern slavery risks in our operations.

Our Occupational Health & Safety Policy ensures compliance with workplace health and safety laws, the elimination or minimisation of hazards, and the promotion of both physical and psychological wellbeing.

Assessing risk

Assessment

Partnering with BHP through our WAIO JV operations, MII's unique business portfolio and business structure features a supply base that is diverse, including small and medium-sized businesses as well as multinational corporations. Our direct & indirect suppliers have their own extensive supply chains, connecting us with business worldwide. We have a robust process that aims to ensure we only work with appropriate suppliers who meet the standards we expect of them.

Risk Mapping

Mitsui Tokyo has assessed our global supply chains in 2020 by assessing 3,128 transactions conducted by the head office and 7,820 transactions conducted by its overseas offices (which includes MII) from the human rights perspective broadly including modern slavery risks using human rights risk mapping, together with advice from and consultation with independent experts.

The assessment was based on leading international human rights risk indicators and other tools such as the "[List of Goods Produced by Child Labor or Forced Labor](#)" of Bureau of International Labor Affairs (**ILAB**) and "[Global Map of Environmental and Social Risks in Agro-Commodity Production](#)" of International Finance Corporation



(IFC), placing emphasis on the core labour standards identified by the International Labour Organization (ILO).

Through this process, none of the existing suppliers of MII have been identified in the high-risk combinations.

MII also engages suppliers of banking and professional services (such as major banks, legal, accounting and engineering firms). MII is satisfied that these service providers have responsible supply chain policies and anti-modern slavery statements, and in relation to the services provided to MII, are unlikely to have high-risk combinations in those supply chains.

Managing risk

Policies and Monitoring Framework

MII maintains its Business Conduct Guidelines (Guidelines), which oblige the company and its people to conduct our business in a manner that respects human rights and does not involve any modern slavery practices. The Guidelines also prohibit discrimination on the basis of any protected attribute under the law.

The Guidelines are MII's principal code of conduct for our employees and contractors, who are required to understand and adhere to the Guidelines throughout their employment or engagement.

The Guidelines outline the reporting route available for both internal and external reports in case of any complaint or concern regarding our modern slavery obligations.

We implemented and published our Sustainable Procurement Policy in December 2020 on our publicly accessible website. The policy outlines our expectations for suppliers and sub-suppliers to prevent and eliminate modern slavery in their operations and supply chains. It also sets out our intention to monitor, and, if necessary, terminate business relationships in cases of continued non-compliance.

Actions taken

For the reporting period ending 31 March 2025:

- Supplier Check – for monitoring purposes, MII, in consultations with Mitsui Tokyo and its affiliated company MCA has conducted modern slavery checks on suppliers transacted with during the reporting period. These check methods include reviewing the suppliers' most recent lodged modern slavery statement, and if necessary, inquiring directly and/or providing a questionnaire to the supplier. The check concludes no MII suppliers have reported any instances of modern slavery within their supply chains.



- Business Conduct Guidelines (e-learning) – our e-learning course on Mitsui Business Conduct Guidelines – include a module dedicated to modern slavery where employees can learn modern slavery risks in the context of Mitsui's trading and investment business model. This annual e-learning course is compulsory for all of our employees.

Assessing Effectiveness

We are assessing the effectiveness of our actions through the following activities:

- Monitoring the results of our supplier checks and continuously undertaking periodic reviews on the relevancy of these checks; and
- Annual compliance surveys to assess our employees' awareness of human rights. Response rates are high and the latest survey showed that a large portion of employees reported being familiar with the Business Conduct Guidelines. Additionally, a majority of the employees are aware of internal reporting channels, and know about the EthicsPoint platform, supporting accessible and confidential reporting of human rights concerns; and
- Collaboration with Mitsui Tokyo and MCA to benefit from their reflections on their own due diligence efforts on human rights.

In the financial year ending 31 March 2026, we intend to continue our efforts on our suppliers checks to assess for modern slavery risks, analyse the check results and engage with relevant stakeholders (e.g., Board of Directors, President & Managing Director, General Managers) to discuss what appropriate actions can be taken, if required.

We recognise that the risks of modern slavery are complex and evolving. We will continue to work to address these risks in our business and engage with a range of stakeholders to assess the effectiveness of our actions and enhance our approach.

Consultation in preparing this statement

MII do not own or control any other entities and therefore there are no further consultation requirement.



MITSUI-ITOCHU IRON PTY LTD

MODERN SLAVERY STATEMENT 2025

Certification

I, Koichi Hirao, hereby certify that this Modern Slavery Statement 2025 has been approved by the Board of Directors of by Mitsui-Itochu Iron Pty Ltd on 26 September 2025.

Koichi Hirao

KOICHI HIRAO

President & Managing Director
26 September 2025