

ITOCHU Australia

Modern Slavery and Human Trafficking Statement 2020

This is a modern slavery statement, issued pursuant to the *Australian Modern Slavery Act 2018* (Cth), by ITOCHU Australia Ltd ABN 63 000 192 790 (**IAL**), ITOCHU Minerals & Energy of Australia Pty Ltd ABN 44 009 256 259 (**IMEA**), ICRA OC Pty Ltd ABN 41 106 260 593 (**ICRA OC**), ICRA Cumnock Pty Ltd ABN 82 129 006 819 (**ICRA Cumnock**), ICRA MC Pty Ltd ABN 77 147 657 074 (**ICRA MC**), IM Iron Holding Pty Ltd ABN 35 168 776 421 (**IMIH**) and ITOCHU Iron Ore Australia Pty Ltd ABN 49 134 669 408 (**IIOA**) for the Financial Year ending 31 March 2020. IAL, IMEA, ICRA OC, ICRA Cumnock, ICRA MC, IMIH and IIOA (collectively **ITOCHU Australia**) are each reporting entities and this statement includes the supply chains of the entities owned or controlled by ITOCHU Australia.

ITOCHU Australia's structure, operations and supply chain

IAL is a 100%-owned subsidiary of ITOCHU Corporation (**ITC**) in Japan, which is one of the leading general trading companies, or so-called "sogo shosha". IAL operates as a trader of general commodities and holds some minority investments. The company is involved in the trading of primary and natural commodities and divides its operations into divisions which include coal, metals & mineral resources, machinery, general merchandise, chemicals and foods. As part of its trading operations IAL procures goods in these sectors from Australia and Asia, primarily through the ITC group.

IMEA is owned by ITC and IAL and owns a number of subsidiaries including ICRA OC, ICRA Cumnock, ICRA MC, IMIH and IIOA. IMEA is a minority owner of major iron ore joint ventures in the Pilbara region and also has minority coal joint venture interests in New South Wales, Queensland and Indonesia. IMEA is in joint ventures with major international mining entities, including BHP and Glencore. These major mining entities have sophisticated procurement policies, including to address modern slavery risks.

Other entities owned and controlled by ITC have operations in Australia but are not owned or controlled by ITOCHU Australia and are not included in this statement.

In addition to ITOCHU Australia's investment and trading activities, ITOCHU Australia has offices in Sydney, Brisbane and Perth and procures office space and associated services, IT hardware and software and consumables.

Risks of modern slavery practices, actions taken and assessment of effectiveness

As set out above, ITOCHU Australia's operations primarily involve non-managed joint venture interests, and ITOCHU Australia is not in a position to control or change the supply chains for those investments.

ITOCHU Australia's trading arrangements are primarily with ITC entities, who are in compliance with ITC group policies on human rights, modern slavery and human trafficking, as set out below.

ITOCHU Australia's trading arrangements include agricultural products from Australia and fish products from Asia. Fish products from Asia have a potential for modern slavery risk, and ITOCHU Australia manages this risk in part through its selection of international global groups that it requests

to comply with ITC policies (including in relation to modern slavery). ITC's policies, and ITOCHU Australia's actions, are described below.

ITOCHU Australia regularly requests its employees to visit the premises of major suppliers and customers. During these visits employees are asked to physically identify and report any evidence which might identify modern slavery in a suppliers or customers supply chain.

Our Policy on Modern Slavery and Human Trafficking

ITOCHU Australia is committed to limiting the risk of modern slavery occurring within its own business and its supply chains. ITC participates in the United Nations Global Compact and applies the concepts of the United Nations Guiding Principles on Business and Human Rights and such concepts flow down to ITOCHU Australia. ITOCHU Australia's existing policies contain provisions have the goal of seeking to ensure that there is no slavery or human trafficking in any part of its business or supply chain. ITOCHU Australia incorporate policies from ITC.

Such policies include:

- ITOCHU group's Corporate Philosophy and Code of Conduct (<https://www.itochu.co.jp/en/about/mission/>)
- Human Rights Policy of the ITOCHU Group (https://www.itochu.co.jp/en/csr/society/human_rights/)
- Individual Policy related to Human Rights (https://www.itochu.co.jp/en/csr/society/human_rights/#h2_03)
- Human Rights Due Diligence (https://www.itochu.co.jp/en/csr/society/human_rights/#h2_04)
- The United Nations Global Compact (https://www.itochu.co.jp/en/csr/itochu/activity/global_compact/index.html)
- Sustainability Action Guidelines for Supply Chains (https://www.itochu.co.jp/en/csr/society/value_chain/policy/#h2_01)
- Internal Information Reporting System (Hotlines) (https://www.itochu.co.jp/en/about/governance_compliance/compliance/)

ITOCHU Australia recognises these policies and engages in business in accordance with the principles under these policies.

Development of the Policy and Guideline

In Financial Year 2020, ITOCHU Australia has included an anti-slavery policy within its own compliance manual, stating its commitment to limit the risk of modern slavery occurring within its own business.

ITOCHU Australia expects all who have, or seek to have, a business relationships with the company to familiarise themselves with ITOCHU Australia's anti-slavery policy and to act in a way that is consistent with its values.

ITOCHU Australia will conduct further risk assessments to determine which parts of the business and which supply chains are most at risk from modern slavery so efforts can be focused on the areas that are most 'at risk'.

ITOCHU Australia will only do business with organisations who fully comply with its anti-slavery policy, or those who are taking verifiable steps towards compliance.

Training

ITOCHU Australia works to spread understanding of the relationship between activities and human rights through in-house training programs for organisational heads, individuals assigned overseas, and all employees based in Australia.

ITOCHU Australia also continues to provide training to raise awareness and educate its employees in addressing the risk of modern slavery and human trafficking of any form.

Further Steps

ITOCHU Australia intend to take the following steps:

- To continue to develop in-house training programs for all employees to educate and raise awareness.
- To continue to improve reporting mechanism systems to aid people in noticing red flags or concerns about any sort of action or behaviours that reflect modern slavery and human trafficking.
- Having provisions for contracted suppliers to hold their own suppliers to the same standards.
- Reserve the right to terminate any contractual arrangement if there is breach of this policy.

ITOCHU Australia has consulted with each of its subsidiaries about this policy.

This statement is approved by the Boards of ITOCHU Australia, and signed by an authorised director.

24th December, 2020



Daisuke Inoue
Managing Director and CEO