

# Modern Slavery Statement FY2023

ABN 85 008 902 841

**Iwatani**  
Iwatani Australia

**Doral**

# Message from the Managing Director

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This Statement outlines our continuous and ongoing efforts to respecting and protecting human rights, and our commitment and actions taken to identify, manage and respond to human rights and modern slavery risks in our operations and supply chain.

We recognise that modern slavery presents one of the most complex challenges across the globe, resulting in serious human exploitation. We are committed to continuing to work within our supply chain to increase our understanding of modern slavery risks and will continue to make all efforts to improve our human rights approach and strengthen our governance framework. This also includes championing an inclusive culture within our organisation and within the communities where we operate.

Respect for human rights is embedded in our Human Rights Policy, People and Employment Policy, Sustainable Procurement Policy, Anti-Bribery & Corruption Policy, Employee Code of Conduct and Supplier Code of Conduct.

This Statement outlines our actions towards mitigating modern slavery and supporting human rights. We remain committed to the journey of continuous improvement and outline the steps taken in 2023 to address our operations and supply chain management for modern slavery risks. Based on discussions and previous completed questionnaires provided, we did not find any evidence of modern slavery in our supply chain. We will continue to work with identified 'at risk' suppliers, to further strengthen our controls to manage this risk and seek input from an external consultant to assist improvement in this area.

The Iwatani Australia Pty Ltd Board of Directors is committed to fostering a culture of compliance, ethical behaviour and good corporate governance. This Statement has been developed with contributions from core business functions, assisted by its Executive Team, to fulfil the oversight of Iwatani Australia's management of modern slavery risks. This Statement was approved by Iwatani's Board of Directors on 4 June 2024 on behalf of all reporting entities.

## Feedback

We value all feedback on the content of this Statement, please visit the Doral website, [www.doral.com.au](http://www.doral.com.au) Contacts Page to provide feedback or request additional information.

**Kan Ueda**

**Managing Director  
Iwatani Australia Pty Ltd**

## Mandatory Criteria

Report Section	Mandatory Criteria	Page No
Reporting Entity	(a) Identify the reporting entity	4
Structure, Operations and Supply Chain	(b) Describe the reporting entity's structure, operations and supply chains	5,6,7,8
Identifying Risks in Our Operations and Supply Chain	(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	9
Actions to Assess and Address Risks	(d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	10,11
Effectiveness of Actions to Address Modern Slavery Risks	(e) Describe how the reporting entity assesses the effectiveness of these actions	12
Consultation	(f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	13
Message from the Managing Director	(g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	2

### Acknowledgment of Country

Doral Mineral Sands acknowledges the Traditional Owners of Country throughout Australia in which we operate in as important stakeholders and pay our respect to Elders both past and present. We recognise Aboriginal and Torres Strait Islander Peoples unique ability to care for Country and the deep spiritual connection with Country.

## Reporting Entity

This is Iwatani Australia Pty Ltd’s (IWA) Modern Slavery Statement (Statement) for FY2023. This Statement has been prepared in accordance with Australia’s Modern Slavery Act 2018 (Cth) (Modern Slavery Act) and relates to Iwatani Australia’s financial year ending 31 December 2023 (FY2023, the ‘reporting period’).

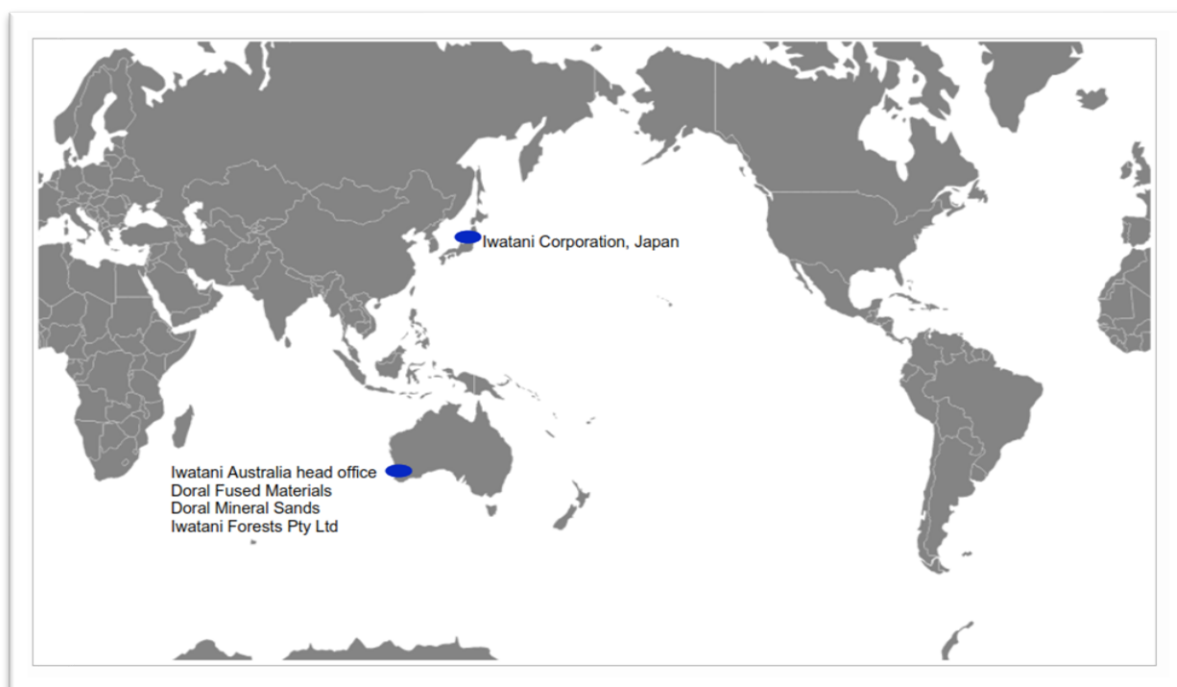
IWA is wholly owned by Iwatani Corporation of Japan (Tokyo stock exchange listing 8088) with full operational control of its subsidiaries being: Doral Fused Materials Pty Ltd (ABN 62 009 415 025), Doral Mineral Sands Pty Ltd (ABN 18 096 342 451), Keysbrook Leucoxene Pty Ltd (ABN 49 137 091 297) and Iwatani Forests Pty Ltd (ABN 39 663 138 047). All references to our, we, us, the Group, the Company, Doral, Iwatani Australia, refers to Iwatani Australia Pty Ltd (ABN 85 008 902 841)

This Statement is submitted on behalf of Iwatani Australia (IWA) and its subsidiary entities, employing 143 direct employees and contractors with its head office located in East Rockingham, Western Australia.

IWA and its subsidiary entities are not publicly listed in Australia and operate in accordance with being privately owned companies. The Company’s mining operations and timber plantation are solely located in Western Australia.

This Statement was prepared in consultation with key personnel from the entities whom IWA has operational control, being general managers, marketing, corporate affairs and company and secretariat functions.

### Asset Map – Australia and Japan

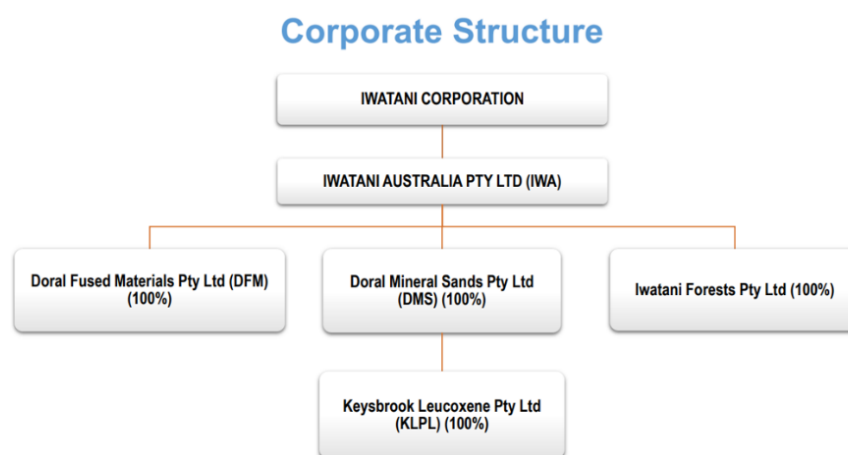


# Structure, Operations and Supply Chain

## Our Structure

IWA is wholly owned by Iwatani Corporation of Japan and operates in Australia through its wholly owned subsidiary companies – Doral Fused Materials Pty Ltd, Doral Mineral Sands Pty Ltd, Keysbrook Leucoxene Pty Ltd and Iwatani Forests Pty Ltd.

IWA’s registered head office is located in East Rockingham, Western Australia.



## Our Operations and People

IWA has mining and processing assets located in Western Australia and has been operating since 1990 with a total work force of 143 direct employees and contractors. Across our operations, approximately 20% of our direct workforce are women. Our direct workforce includes qualified personnel, being metallurgists, engineers, geologists and operational staff and support personnel.

The Company offers a Traineeship Program and in-house student work placement as part of our education and training initiatives. We prioritise direct employment with personnel who reside locally to reduce extensive travel time to and from work.

Contractors make up a large part of our business and provide roles in earthmoving operations, heavy mineral product transport and specialised services such as maintenance shut-downs.

IWA’s subsidiaries, located in Western Australia, are as follows:

- Doral Fused Materials (DFM), operating a fused zirconia plant in East Rockingham, (Perth metro);
- Keysbrook Leucoxene Pty Ltd (KLPL), operating the Keysbrook mine near Keysbrook (Peel region);
- Doral Mineral Sands (DMS), operating a mineral separation plant in Picton (South-West region) and the Yalyalup mine near Busselton (South-West region); and
- Iwatani Forests Pty Ltd (IWF), a 60 ha pine plantation located near Nannup (South West region).

## Asset Map – Western Australia



DFM's East Rockingham operation manufactures fused zirconia minerals which are generated in electric arc furnaces by heating high purity raw materials to their fusion point. After cooling the fused products are crushed, milled, sized and packaged according to customer requirements. Silica fume is produced as a co-product. DFM's products are utilised in the production of ceramic colours and glazes, refractory parts and linings, zirconium sponge for nuclear reactors and motor vehicle brake linings.

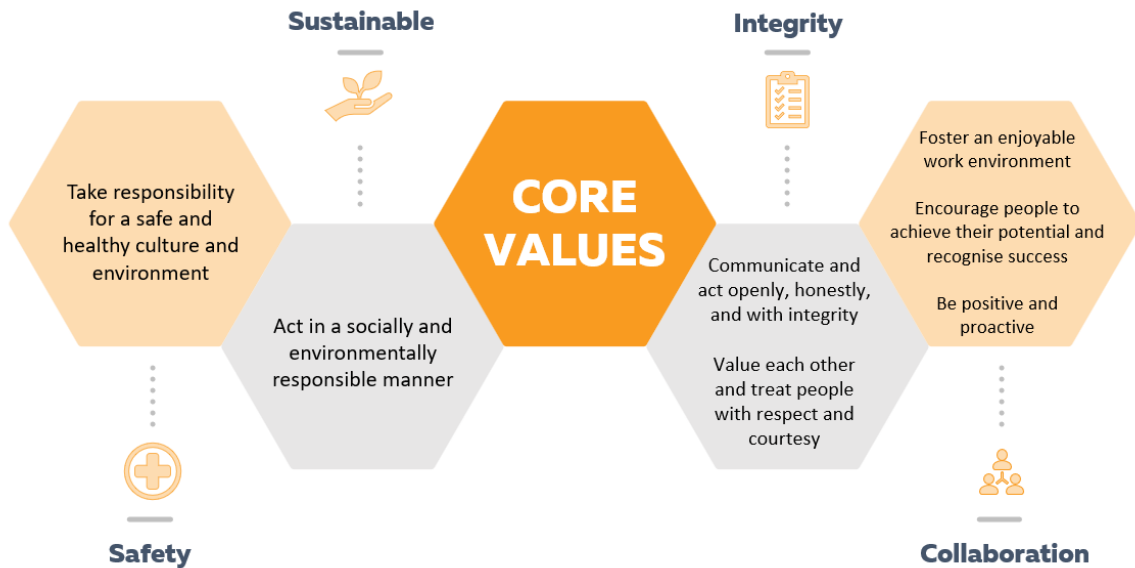
DMS produces titanium minerals and zircon sand products at its mineral sands' operations in Western Australia's South-West and Peel regions. Heavy mineral concentrate (HMC) produced from DMS's mines are transported via road to its Mineral Separation Plant (MSP) located in Picton, for processing into final product and exported through the Bunbury or Fremantle Ports. The final product is used in the manufacture of paint, titanium metal, welding rods, ceramics, refractory and foundry applications.

DMS's operations include the Yalyalup mine located 20km south-east of Busselton and the Keysbrook mine located 70kms south of Perth.

Its exploration activities cover the South-West and Peel region of Western Australia.

IWA's workforce is directly employed through Employment Agreements or a permanent contract arrangement. Casual labour is managed through a reputable local recruitment / labour firm based on a longstanding commercial partnership.

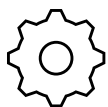
Doral's values define how we work together and inform every decision we make. We ensure that our core values are reinforced in our day-to-day operations and highlighted at daily safety meetings and quarterly Safety Week presentations across all sites.



## Our Supply Chain

Iwatani Australia values the mutually beneficial relationship between the Company and its suppliers and aims to create economic opportunities in the areas where we operate through our commitment to local supply, evidenced by the high number of suppliers predominantly based in Western Australia and within close proximity to our operations.

Our supply chain extends from the early exploration phase through to mine closure. Our supply chain activities across all business divisions include the following:



**Exploration**  
drilling and laboratory services



**Mining and Processing**  
earth moving contractors, processing feed and consumables, equipment purchase, labour hire for shut-downs and equipment hire



**Transport**  
mine to processing plant via road, port to customers via port services and shipping



### Administrative Support

labour, PPE equipment and clothing, agent fees, training providers, power, information technology, administration, new projects



### Purchase of Equipment / Materials

parts, mining equipment, vehicles, electrical, electronics

**For FY2023, 98% of suppliers were located in Australia and located predominantly in Western Australia. Iwatani engaged ±986 suppliers (being all suppliers, and not limited to High Value suppliers), of which 21 were located overseas.**

None of the 2% overseas based suppliers were identified as potentially at risk based on High Value supplier spend and location. 13 suppliers were identified to request further information based on supply chain risk, regardless of country of origin.



# Identifying Risks in our Operations and Supply Chain

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## Operations

Our operations are based in the Perth metro, Peel and South West regions of Western Australia, with the majority of spend within Western Australia, which has a low prevalence of modern slavery according to the Minderoo Foundation's 2023 Global Slavery Index <sup>1</sup>.

IWA is committed to respecting the human rights of all our stakeholders and the communities in which we live and operate, with the aim of continuing our social licence to operate with respectful and transparent engagement. Our commitment to human rights is embedded in our policies and procedures, which can be found on the company's website, [www.doral.com.au](http://www.doral.com.au).

## Supply Chain Assessment

During 2023, we continued to assess modern slavery risks through ongoing review of internal systems and processes with the focus remaining on High Value and Medium Value suppliers and those identified as higher risk based on country of origin or product sector. This internal assessment remains ongoing, with further review to be undertaken to ensure our Supplier Code of Conduct sets clear expectations in regard to minimum standards, and to build a better understanding of suppliers' exposure to modern slavery.

The FY2023 review did not identify any suppliers considered at risk based on their country location, however, 13 were considered at risk with regards to the nature of supply which may cause, contribute or be directly linked to modern slavery.

As a medium sized corporation, IWA's management team had direct contact with those 13 suppliers deemed most 'at risk' and will be prioritised for specific communications around the completion of a Supplier Self-Assessment Questionnaire (attached with Supplier Code of Conduct), and personalised letter explaining the Company's requirement to assess and comply with the Modern Slavery Act.

The focus for 2024 will be on port and shipping services and the procurement of bulk product bags.

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<sup>1</sup><https://www.walkfree.org/global-slavery-index/>

## Actions to Assess and Address Risks

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Iwatani seeks to identify any potential human rights risk associated with the procurement of goods and services which is outlined in its Supplier Code of Conduct. We will continue to work with those suppliers, to better understand their risks associated with modern slavery and our role to support and educate on the legislative requirements where required.

Letters were previously sent in 2022 to all identified suppliers, identified as 'at risk' with an attached **Supplier Self-Assessment Questionnaire (SAQ)** and updated **Supplier Code of Conduct** requesting an assessment of their supply chains to determine any potential modern slavery risks and if so, how would they be addressed.

All Supplier Questionnaires were completed and returned stating **no evidence of Modern Slavery was evident in their supply chain**. Given the same suppliers were identified for 2023, an updated Self-Assessment Questionnaire and letter will be sent in 2024, incorporating additional controls recommended from an external consultant in this area.

We have updated our New Supplier Form which now includes a requirement to review and acknowledge the Company's Human Rights Policy and Supplier Code of Conduct in addition to other key policies.

Our focus for FY2024 will be to conduct further due diligence of those suppliers (and for new suppliers in 2024) and report the outcomes in the next Statement, with input from an external consultant which the Company appointed in 2023 to assist with its inaugural Sustainability Report. Part of this Scope will be to seek feedback on the Company's Modern Slavery Statements to date and also an audit on supply chain management processes and auditing of higher risk suppliers.

To support the Company's corporate governance framework, all entities within the Iwatani group are governed by the following policies and procedures:

- ✓ Supplier contract, updated Terms and Conditions to include Modern Slavery
- ✓ Human Rights Policy
- ✓ Sustainable Procurement Policy
- ✓ Supplier Code of Conduct
- ✓ Whistleblower Policy
- ✓ Employee Code of Conduct
- ✓ Anti-Bribery and Corruption Policy
- ✓ People and Employment Policy

We acknowledge there remains work to be undertaken to ensure that our systems and processes remain sufficient to identify and address evidence of modern slavery risks and we will review our current grievance and whistleblower mechanisms and implement improvements where required.

In addition, Iwatani Australia through the Doral Mineral Sands and Doral Fused Materials operations participated in the **Ecovadis Corporate Social Responsibility (CSR)** survey for 2023, requested on behalf of the Company's major customers. This survey addresses Labor & Human Rights policies and actions within the business which comprises Modern Slavery Risks. IWA received a Silver Medal for both operations, being in the top 25% of businesses surveyed in the Manufacturer of Basic Precious and Other Non-ferrous Metals.

IWA also participates in the Zircon Industry Association's (ZIA), annual Environmental and Social Governance (ESG) Reporting and Key Performance Indicators (KPIs) Benchmarking, which in 2023 launched a new online portal for data uploading, analysis and reporting.

Given the medium sized nature of the IWA organisation and without the dedicated resources to manage as a stand-alone role, we have sought additional expertise in this field to guide us for improved reporting and modern slavery prevention controls.



*Yalyalup mining operations*

# Effectiveness of Actions to address Modern Slavery Risks

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FY2023 represents the third year of reporting on the Modern Slavery Act for Iwatani Australia, 2020 being a voluntary statement.

We recognise the value of continuous improvement and the importance of assessing the effectiveness of our actions taken to address our modern slavery risks. We have committed to seeking the expertise of an external consultant to audit our assessments and provide further guidance on improving our processes and procedures in line with our established policies.

We will continue to engage with our most at-risk suppliers and explore benchmarking our performance against similar sized organisations. In addition, we will seek feedback from both internal and external stakeholders to incorporate their knowledge and explore opportunities to improve upon our established systems. This will include reviewing our new supplier and procurement procedures.

No concerns were raised or communications received for the FY2023 via the Company's whistleblower contact of any incident of modern slavery within our supply chain.

The Company aims to build upon its key actions for 2023 to further strengthen and develop our processes, in consultation with all subsidiaries, to continually improve our modern slavery management practices and mitigate any human rights risks.



**No instances of modern slavery identified within the supply chain during FY2023**



**ESG Framework developed and Inaugural Sustainability Report for 2023 in progress**



**No grievances of modern slavery reported during FY2023**



**2023 Ecovadis Silver Medal**



**New Supplier Form (subject to final review) developed which incorporates link to the Human Rights Policy and Supplier Code of Conduct**

## Consultation

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During the reporting period of 2023, Iwatani actively consulted with its subsidiaries in the development of this Statement. Details of the Modern Slavery Act Statement and its requirements were presented to the Group's Executive Team, with input from management from each business entity in regard to those suppliers at risk. It was agreed that this is an ongoing process requiring continual improvement to further strengthen our supply chain practices. Given the major suppliers have not changed since they responded to our letters and questionnaires sent in 2022, additional requests for information and questionnaires will be sent in 2024.

Given the small nature of the organisation and established relationships, this communication will be managed by each business manager responsible for that commercial relationship. It was also agreed that an external sustainability consultant be engaged to review our performance to date and seek recommendations of improvement for 2024. This will be in addition to the Company's inaugural Sustainability report in progress for 2023/2024.

# Looking Ahead for 2024

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IWA is committed to the continuous development of its management activities and acknowledge this will take consistent action to continue to identify and address modern slavery risks.

## Key actions for FY2024 Modern Slavery Plan

- ✓ Continue to review existing Policies to ensure Modern Slavery risks are appropriately captured across all areas of the business
- ✓ Re-evaluate current controls for modern slavery risk and management through newly appointed sustainability consultant including modern slavery as a material topic
- ✓ Seek feedback and recommendations from external consultant to review current Modern Slavery Statement and supply chain management practices
- ✓ Identify key personnel for online training utilising Ecovadis and Tfs Academy Modern Slavery training modules
- ✓ Continued participation in the Ecovadis ESG Survey and Zircon Industry Association (ZIA) annual ESG survey
- ✓ Broaden the Grievance Mechanism / Whistleblower Policy
- ✓ Finalise the new Supplier Form which includes links to the Supplier Code of Conduct and Modern Slavery Policy and link to the website

## Contact

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