



Modern Slavery Statement for

**MACSTEEL INTERNATIONAL
AUSTRALIA PTY LIMITED**

Financial Year ending 31 December 2025

As required under the Commonwealth Modern Slavery Act 2018 (Cth)



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Identify the reporting entity

This Modern Slavery Statement covers the activities of Macsteel International Australia Pty Ltd (“MIAUS”), ABN 94 000 904 978, as required under the Commonwealth Modern Slavery Act 2018, for the period 1 January 2025 to 31 December 2025 (FY25).

Describe the reporting entity's structure, operations and supply chains

Our Structure

Macsteel International Australia Pty Ltd is a company incorporated in Australia. Its registered office is Suite 2.01, 1 Gordon Street, Cremorne VIC 3121, Australia, and it currently employs approximately 48 people in Australia.

The Company's immediate parent entity is Macsteel International Trading Holdings Ltd. (MITH Ltd.), incorporated in the UK. The Company's ultimate parent entity, which exercises control over the Company, is Jordana Holdings Ltd., incorporated in the British Virgin Islands.



MIAUS forms part of the broader Macsteel group of companies, which operates internationally across steel trading, distribution and related services.

As part of the broader Macsteel Group, MIAUS also benefits from group-wide governance, supplier engagement and modern slavery initiatives where applicable. This includes leveraging established supplier relationships, group procurement knowledge and risk assessment methodologies developed across the wider Macsteel Group.

Operations

MIAUS operations include:

- Sourcing of steel products
- Marketing and selling of steel products
- Logistics management
- Distribution of steel products
- Quality management
- Claims handling



Our Supply Chain

MIAUS supplied a wide range of steel products to customers in Australia and New Zealand. A comprehensive list can be found on our website at <https://www.mitgr.com/>. Steel products are sourced from businesses operating in various countries. The significant regions that we source our steel from are Asia, the Middle East and Europe.

Logistics service providers are sourced from businesses domiciled in Australia, Singapore and Norway. Distribution service providers are sourced from businesses domiciled in Australia.

MIAUS employs individuals in Australia and contracts with agents in various other countries.

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

We recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

Risk Assessment Methodology

Based on MIAUS's most recent assessment, completed prior to FY2025, the overall modern slavery risk associated with its direct operations was assessed as low. MIAUS recognises, however, that potentially higher modern slavery risks may arise within parts of its international supply chain due to geographic, sector, product and supplier-specific factors. This assessment was not reviewed or refreshed during FY2025 (see 'Risk Assessment' below); MIAUS intends to review and update this assessment in FY2026.

MIAUS applies a risk assessment methodology which considers a range of indicators relevant to modern slavery risk, including the nature of our operations, products and services, industry sector, geographic location and supplier-specific risks. MIAUS's risk profile is summarised below.

MIAUS also has regard to risk assessment methodologies developed across the broader Macsteel Group. These methodologies consider factors such as sector risk, geographic risk and supplier-specific risk to assist in identifying higher-risk suppliers, freight providers and jurisdictions. Where appropriate, MIAUS leverages these Group-developed methodologies to support its own risk assessments.

Risk	Description of Risk
Sector/Industry	There is a risk of the potential for modern slavery practices in the supply chain of the steel manufacturing sector because of its characteristics, products and processes, such as the widespread reliance on unskilled workers as an industry practice and relaxed labour and safety regulations.
Product/Service	There is a risk of the potential for modern slavery practices in the supply chain of steel production because of the way that the product is produced, provided or used, such as competitive markets subject to price pressure, cyclical production and high-risk raw materials used as inputs.
Geographic	There is a risk of the potential for modern slavery practices in the supply chain in certain international geographic locations in which MIAUS operates that may have a higher prevalence of modern slavery due to factors such as poor governance, compromised rule of law, conflict zones, high migration inflows and socio-economic weaknesses such as poverty. MIAUS also has regard to geographic risk assessments and country risk information developed by the broader Macsteel Group when assessing suppliers and freight providers operating in higher-risk jurisdictions.
Specific Entity Risk	Certain companies or businesses may pose a risk of modern slavery due to a known poor human rights and/or labour practices record, poor governance structures and a lack of robust policies and/or responsible purchasing practices. No supplier questionnaires were



	issued by MIAUS during FY2025. However, MIAUS continued to rely on existing supplier knowledge, commercial due diligence, site visits, sanctions screening and, where applicable, Group-level supplier assessments and established supplier relationships when assessing counterparties. Based on available information, no suppliers were identified as presenting an elevated modern slavery risk during the reporting period.
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Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes

Risk Assessment

During FY2025, MIAUS experienced a period of significant leadership transition, including changes in the Managing Director and Chief Financial Officer roles. As a result, further risk assessment and supplier due diligence activity did not progress during the year beyond the methodology and initial assessment described in prior statements. MIAUS recognises this as a gap. With a newly appointed Managing Director and a Chief Financial Officer now in place, MIAUS is re-establishing its risk assessment and supplier due diligence cycle in FY2026 (see 'FY2026 focus' below).

As part of its supplier due diligence, MIAUS also benefits from the broader Macsteel Group's established commercial relationships with a number of international steel mills and suppliers. In many instances, suppliers engaged by MIAUS have existing relationships with other Group entities and have previously been subject to Group-level supplier assessments, commercial due diligence, site visits or ongoing supplier engagement.

Supplier Questionnaire

No new supplier questionnaires were issued during FY2025. MIAUS recognises the practical challenges associated with obtaining questionnaire responses from certain international suppliers and steel mills. During FY2026, MIAUS will continue to review opportunities to strengthen supplier due diligence processes, including consideration of appropriate supplier engagement mechanisms where practical.

Governance and Accountability Framework

MIAUS expects all suppliers in our supply chain to have no tolerance for modern slavery. The prevention, detection and reporting of modern slavery in any part of MIAUS's business or supply chain is the responsibility of all those working for us. Overall oversight of MIAUS's modern slavery framework rests with the Board of Directors and senior management. MIAUS's Board of Directors oversees the Company's modern slavery governance framework, including approval of the annual Modern Slavery Statement and oversight of compliance with the disclosure obligations under the Modern Slavery Act 2018 (Cth).

Following the leadership changes described above, MIAUS has confirmed day-to-day ownership of modern slavery risk assessment and reporting sits with the Risk Manager, in conjunction with the Chief Financial Officer, to ensure continuity of this process is maintained going forward independent of any future leadership changes.

MIAUS also works collaboratively with the broader Macsteel Group in reviewing and strengthening its modern slavery framework and considers Group-developed policies, guidance material and risk assessments where relevant to its Australian operations.



Remediation and Response

Where a suspected modern slavery issue is identified, MIAUS would assess and escalate the matter through appropriate management channels and determine an appropriate response having regard to the nature and severity of the issue. Actions may include further investigation, engagement with the relevant supplier or other party, corrective action and, where appropriate, disciplinary action or termination of the relevant employment or supplier relationship. Where MIAUS identifies that it has caused or contributed to modern slavery, it would seek to provide for, or cooperate in, appropriate remediation for affected persons. Where MIAUS is directly linked to modern slavery through its business relationships, it would seek to use its influence with the relevant party to support appropriate remediation and prevent recurrence.

Policies and Procedures

MIAUS maintains key internal policies and procedures that support its framework for identifying, assessing and addressing modern slavery risks.

In addition to its local policies, MIAUS also considers relevant internal Group-level policies, guidance, supplier screening methodologies and supporting documentation developed by other entities within the Macsteel Group where applicable to its operations.

Policy	Description
Modern Slavery Policy	Establishes MIAUS's commitment to preventing modern slavery and outlines its approach to identifying, assessing and addressing modern slavery risks across its operations and supply chain.
Whistleblower Policy	Provides confidential reporting channels and protects employees and other stakeholders who raise concerns about suspected misconduct or unethical practices.
Equal Employment Opportunity, Anti-Discrimination, Harassment & Bullying Policy	Promotes a workplace free from discrimination, harassment and bullying, supporting fair and respectful treatment of all workers.
Respectful Workplace Policy	Promotes a respectful, inclusive and safe workplace by setting expected standards of behaviour and providing mechanisms for reporting inappropriate conduct.
Workplace Grievance Handling Policy	Provides employees with a confidential and structured process to raise and resolve workplace concerns in a timely and fair manner.
Code of Ethics	Sets out the ethical standards and principles expected of employees, including integrity, respect, equality, human rights and responsible business conduct.
Anti-Corruption & Bribery Policy	Supports ethical business practices by prohibiting bribery and corruption, requiring due diligence and encouraging the reporting of misconduct.
Enterprise Risk Management Policy	Supports the Company's overall governance and risk management framework by identifying, assessing and managing enterprise-wide risks, including supplier, compliance and human capital risks.

Supplier Site Visits

During FY2025, MIAUS personnel continued to undertake supplier site visits as part of maintaining relationships with key suppliers, reviewing operations and discussing quality, production and commercial matters. While these visits are not conducted as dedicated modern slavery audits, they provide opportunities to observe supplier operations, engage directly with suppliers and reinforce MIAUS's expectations regarding responsible business practices. MIAUS will continue to consider opportunities to further incorporate modern slavery considerations into supplier engagement activities.



Where appropriate, MIAUS also draws upon Group-developed guidance to assist personnel in recognising potential indicators of modern slavery and labour exploitation during supplier visits and supplier engagement activities.

Staff Training

During FY2025, MIAUS delivered mandatory online Modern Slavery awareness training through the SafeTrac platform. MIAUS achieved a 100% completion rate for the FY2025 Modern Slavery training. The training covered modern slavery concepts, risk factors and penalties, supply chain transparency, relevant international legislation and Australia's modern slavery legislation.

MIAUS also delivered supporting compliance training through SafeTrac during the period, including Whistleblower Protection, Anti-Bribery and Corruption, and Anti-Bullying and Harassment.

MIAUS also has access to modern slavery awareness and procurement guidance developed by the broader Macsteel Group to support employees involved in procurement, supplier engagement and supply chain risk management.

Ongoing Commitment

MIAUS remains committed to strengthening its approach to identifying and addressing modern slavery risks. During FY2025, MIAUS continued mandatory staff awareness training through the SafeTrac platform, maintained its Modern Slavery Policy and supporting governance framework, and continued to respond to customer due diligence requests regarding modern slavery. MIAUS will continue to work with the broader Macsteel Group to strengthen supplier due diligence, governance and reporting practices where appropriate.

MIAUS recognises the importance of responsible purchasing practices and constructive supplier relationships in managing modern slavery risk. MIAUS seeks to maintain long-term relationships with established suppliers, communicate openly regarding commercial and operational requirements, and engage with suppliers on realistic production and delivery expectations.

Describe how the reporting entity assesses the effectiveness of such actions

The effectiveness of MIAUS's modern slavery framework is reviewed periodically by senior management through consideration of modern slavery risks, employee training, supplier engagement activities, any reported concerns or incidents, and feedback received through customer and stakeholder due diligence processes.

During FY2025, 100% of employees required to undertake Modern Slavery awareness training completed the course. MIAUS did not identify any confirmed instances of modern slavery through its reporting, supplier engagement or due diligence processes during the reporting period.

Relevant modern slavery matters are also reported through the Group's governance framework, including to the MITH Ltd Audit and Risk Committee.

As the framework continues to mature, MIAUS intends to further develop measurable indicators to better assess the effectiveness of these activities.

Describe the process of consultation with any entities that the reporting entity owns or controls

MIAUS does not own or control any other entities for the purposes of section 16(1)(f) of the Modern Slavery Act 2018. Accordingly, consultation with owned or controlled entities was not required in preparing this Statement.



Any other information that the reporting entity, or the entity giving the statement, considers relevant

FY2025 Outcomes

During FY2025, MIAUS continued to maintain its Modern Slavery Policy and governance framework, delivered mandatory employee training and leveraged Group-developed modern slavery policies, supplier screening methodologies, procurement guidance and risk assessment tools where applicable.

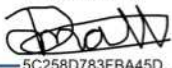
FY2026 Focus

In FY2026 MIAUS is committed to:

- reviewing and updating its Modern Slavery Policy and supporting governance documents where appropriate.
- strengthening supplier due diligence processes and documenting modern slavery considerations within supplier engagement activities.
- continuing mandatory employee modern slavery awareness training.
- continuing to collaborate with the broader Macsteel Group to adopt and implement appropriate Group-developed modern slavery initiatives, including supplier screening methodologies, procurement guidance, site visit guidance and risk assessment tools where applicable to MIAUS operations.
- enhancing the monitoring and reporting of modern slavery-related activities to support continuous improvement.
- addressing the lodgement timing of this statement and strengthening internal ownership of the annual reporting process.

Approval by the Principal Governing Body for the Reporting Entity

This Modern Slavery Statement has been approved by the Board of Directors of Macsteel International Australia Pty Ltd as its principle governing body on 26 August 2026.

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Dario Matteucci

Director of Macsteel International Australia Pty Limited