



# DITH AUSTRALIA PTY LTD

**MODERN SLAVERY STATEMENT 2024**

This Modern Slavery Statement describes the steps taken by DITH Australia Pty Ltd. (ACN 620 953 166) (**DITH Australia**) during its financial year ending 30 September 2024 to address modern slavery risks in its business and supply chains.

DITH Australia Pty Ltd makes this statement in accordance with the Modern Slavery Act 2018 (Cth).

## **Our Company**

In this statement the “DITH Group” refers to Duferco International Trading Holding S.A. (“DITH”) and its subsidiaries. DITH is a Limited company with registered office at 6, Rue Guillaume Schneider, L-2522 Luxembourg.

DITH Australia is wholly owned by Duferco International Trading Holding S.A., a global leader in the trading and distribution of steel and steel-related raw materials. DITH has over 3000 employees operating in more than 115 countries worldwide and currently trading approximately 17 million tonnes of products every year. The trading headquarter for the worldwide activities of DITH is based in Switzerland.

## **Our business in Australia**

DITH Australia currently has 31 employees and supplies approximately \$ 250 million worth of steel to over 150 customers located in the Australian territory. DITH Australia primarily provides supply of steel products sourced from international producers to consumers in Australia and NZ. DITH Australia manages the supply chain risk, foreign exchange, international and domestic transport, customs clearance, duties, and provides working capital support through open account payment terms.

## **Our Supply Chain**

DITH Australia sources steel products from international producers based on multiple locations. Our supply chain related counter parties include steel mills, freight forwarders, international freight providers, domestic transport providers, warehouse operators, trade finance banks, credit insurers, and Australian steel consumers.

## **Our Actions**

DITH Australia has completed a comprehensive risk assessment of our suppliers, with the support of third-party specialists. This assessment identified and categorized potential risks of modern slavery practices throughout our supply chain. Based on these findings, due diligence for regions and suppliers within the high-risk category have been prioritized. The risk assessment engine considers various factors such as, geographical risk, industry risk, existing legislation in the region and exposure through spend.

The DITH Group issued its Sustainability Report for FY 2023, with focus on ensuring all subsidiaries adhere to the Human Rights Policy. DITH Australia continues to provide in house training on modern slavery to all employees.

## **Consultation**

The activities and efforts of the DITH Group are focused to implement measures that can reduce the risks of entering in business “connection” with counterparties not complying with applicable laws on modern slavery despite the complex and fragmented supply chain of trading and related activities.

The DITH Group continues its dedicated corporate functions (including risk management, compliance and legal) to which employees can refer to and address any issues relating to the compliance of the DITH Group with applicable laws. We continue to operate our dedicated and protected phone line through an independent professional. This line is available to all group companies, any potential risk of violation raised can be assessed by the independent professional.

In addition, thanks to DITH’s global presence in over 70 locations, and a reliable worldwide network of representatives. The DITH Group can ensure its efforts to continuously monitor the supply chain for any risks linked to modern slavery violations.

## **Assessing Effectiveness**

DITH Australia continues to review operations to minimize the risk of modern slavery throughout the supply chain. DITH Australia periodically assesses in house training, updating material in line with best practices. The supplier risk assessment has been thoroughly reviewed to identify key areas of focus for FY 24.

DITH Australia will measure effectiveness by undertaking biannual meetings with key stakeholders to address any concerns raised by suppliers, customers and/or employees in relation to DITH Australia Pty Ltd.'s approach to modern slavery.

No instances of modern slavery have been reported or alleged in FY 24.

### **Future Actions**

DITH Australia will engage with a handful of suppliers to reaffirm commitment to human rights and ethical practices. Suppliers have been reminded of our "Supplier Code of Conduct" which includes specific clauses on modern slavery and forced labour. To gain further insight into our supplier's operations and approaches to modern slavery, DITH Australia will issue tailored questionnaires to a range of suppliers in various regions, covering labour practices, supply chain transparency and actions taken to prevent modern slavery. These results will be reviewed and analysed to understand the broader risk landscape and aid the development of our mitigation strategies.

DITH Australia also plans to:

- Refine our modern slavery risk assessment process by incorporating additional risk indicators and data sources to ensure a more comprehensive analysis.
- Implement a structured follow up process for suppliers which continue to be identified as high risk after response. Ensuring they take measurable steps to mitigate modern slavery risk.
- Broaden our training to cover additional topics related to modern slavery and ethical sourcing.

This statement was approved by the board of DITH Australia on 1st April 2025.

**16th Apr 2025**



**Paul Whitehead**

Managing Director of DITH Australia Pty Ltd