



DITH AUSTRALIA PTY LTD

MODERN SLAVERY STATEMENT 2025

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 2025 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 3200 employees operating in more than 105 countries worldwide and currently trading approximately 14 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 30 employees and supplies approximately \$ 400 million worth of steel to over 200 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 2024, 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 provides training for all employees annually on Modern Slavery compliance and updates the material in line with current best practices.

DITH Australia will measure effectiveness by undertaking quarterly reviews of progress as part of the Integrated Management System 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 25.

Future Actions

DITH Australia will continue to audit suppliers based on expenditure with a target to ensure that 85% of our expenditure is directed towards companies that publish a Modern Slavery or Human Rights statement or are accredited to ISO 45001. Suppliers will be reminded of our "Supplier Code of Conduct" which includes specific clauses on modern slavery and forced labour and where possible required to acknowledge and accept compliance with those policies.

To gain further insight into our supplier's operations and approaches to modern slavery, DITH Australia will also 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.
- Maintain our training for all employees updating and expanding the curriculum where possible.

This statement was approved by the board of DITH Australia on 27th March 2026.



Paul Whitehead

Managing Director of DITH Australia Pty Ltd