



# Materials for Tomorrow, Innovation for Excellence

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## **POSCO Australia Modern Slavery Report 2025**

This Modern Slavery Report, made by POSCO Australia Pty Ltd, is made in compliance with the *Modern Slavery Act 2018* (Cth) (the "Act") and has been prepared in respect to the financial year ending 31 December 2025.

## About This Report

POSCO Australia Pty Ltd (ABN 54 002 062 160) has published the Modern Slavery Report 2025 outlining our commitment, approach, and progress in promoting sustainable management and protecting human rights. Through this report, POSCO Australia provides transparent disclosure of POSCO Group's human rights management, including ESG strategies and objectives aimed at protecting human rights across its Australian business operations. POSCO supports internationally recognised human rights standards, including the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the OECD Guidelines for Multinational Enterprises, and the ILO Conventions.

### Reporting Principles

This report was prepared in accordance with the *Commonwealth Modern Slavery Act 2018* (the Act). As a member of the UN Global Compact, POSCO Group outlined its progress in compliance with the key principles defined for labour and human rights as well as our efforts to meet the UN Sustainable Development Goals (SDGs).

### Reporting Period

This report provides a comprehensive overview of key activities and improvements made in managing modern slavery risks from 1 January 2025 to 31 December 2025 within POSCO Australia's business operations and supply chains.

### Reporting Scope

This report addresses the mandatory reporting requirements under the Act and explains the modern slavery risk management framework adopted by the POSCO Group. It describes how POSCO Australia identifies, assesses, and responds to modern slavery risks within its Australian operations and supply chains, as well as the effectiveness of the Group's human rights governance, policies, and due diligence processes in mitigating these risks.

POSCO Australia remains committed to transparent modern slavery reporting by disclosing the POSCO Group's long-term ESG strategies, governance structures, and human rights objectives. Through these efforts, the Company seeks to meet stakeholder expectations while reinforcing its commitment to respecting and promoting human rights throughout its business activities.

For the purposes of this report, the terms "POSCO Australia", "we", "us", "our", and "the Company" refer to the reporting entity, unless otherwise specified. References to "POSCO" or "the Group" shall be construed to mean POSCO Group and its affiliated or related entities.

### Disclaimer

This report contains forward-looking statements reflecting POSCO Australia's current expectations and strategic approach to human rights management and performance. While these reports are based on assumptions considered reasonable at the time of publication, they are subject to various risks, uncertainties, and factors beyond the company's control that may cause actual outcomes to differ materially. These reports do not constitute guarantees of future performance, and POSCO Australia makes no representation as to their accuracy or completeness. The company disclaims any obligation to update or revise forward-looking reports, except as required by law.

### Our Commitment

POSCO Australia is committed to monitor and improve the human rights risk management under POSCO Group's ESG strategic framework to mitigate modern slavery risks across our business operations and supply chains in Australia.

POSCO Australia is committed to transparency in identifying and managing modern slavery risks through its Group-wide risk management framework. We aim to prevent and mitigate actual or potential modern slavery risks—directly or indirectly related to our operations—by conducting thorough and ongoing human rights due diligence. In collaboration with the POSCO Group, we align our practices with internationally recognised human rights standards, continually enhancing our due diligence and internal controls. The following key activities were undertaken as part of our ongoing risk management and governance framework:

- **Strengthening Human Rights Management** by joining global human-rights initiatives, embedding oversight within corporate governance structures, and conducting regular due-diligence reviews to identify and manage potential risks.
- **Enhancing Supply Chain and Partnership Oversight** through ongoing assessment and monitoring of partner companies' human-rights practices and compliance frameworks.
- **Building Internal Capability** by providing regular training and awareness programs to deepen organisational knowledge, engagement, and responsiveness in managing modern-slavery risks.

These initiatives reflect POSCO Australia Pty Ltd's ongoing commitment to responsible business conduct and the continued strengthening of ethical governance across its operations and supply chains. Throughout the reporting period, the Company focused on identifying, assessing, and addressing both existing and potential modern slavery risks through its established risk management framework. At the same time, POSCO Group continued to develop and refine its ESG management systems, including governance oversight, risk evaluation, performance monitoring, and reporting practices, demonstrating POSCO Australia's commitment to aligning with global standards in ESG and human rights governance.

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## POSCO Group Overview

The POSCO Group, established in 1968 as a steel manufacturing company, has grown into a global industrial group with operations across a range of sectors. In 2022, the Group adopted a holding company governance structure to strengthen core business capabilities, support future growth initiatives, and enhance strategic management across its operations. Under the leadership of POSCO Holdings, the Group continues to expand its activities across steel, rechargeable battery materials, infrastructure, and emerging industries.

While steel remains a core part of the Group's operations and long-term growth strategy, POSCO has also expanded into the rechargeable battery materials sector to support the transition towards a lower-carbon and environmentally sustainable economy. The Group continues to focus on innovation, operational efficiency, and the development of products and technologies aligned with evolving market and customer demands.

Globally, the POSCO Group operates steel mills, processing facilities, and raw material sourcing subsidiaries across multiple regions. The Group continues to pursue strategic investments and partnerships in key international markets, including Indonesia, India, the Americas, and Australia, with a focus on sustainable growth, local production capabilities, resource development, and environmentally responsible business practices.

### POSCO Australia

Established in 1981, POSCO Australia Pty Ltd is a wholly owned subsidiary of the POSCO Group headquartered in South Korea. Based in Sydney, the Company primarily operates as an inbound investment company focused on investments within the mining and energy sector, which remained its principal operating segment during the reporting period. The Company's registered and head office is located at Suite 32.02, Level 32, 1 Farrer Place, Sydney NSW 2000.

Aligned with the POSCO Group's corporate vision, POSCO Australia continues to reflect the Group's founding philosophy of "nation-building through steelmaking," which has evolved into a broader commitment towards creating "Materials for Tomorrow" and pursuing "Innovation for Excellence" through sustainable and forward-looking business practices.





# POSCO ESG Strategic Framework

Towards "Materials for Tomorrow, Innovation for Excellence"

Building on its longstanding history of innovation and operational excellence, POSCO Australia Pty Ltd and the broader POSCO Group continue to pursue the corporate vision of “Materials for Tomorrow, Innovation for Excellence.”

POSCO Group approaches ESG management through its commitment to environmental leadership, sustainable social value, and strong corporate governance. With GREEN serving as the central framework for future-oriented and environmentally sustainable business practices, the Group has developed five key ESG strategies designed to support and strengthen its Environmental, Social, and Governance objectives.

## GREEN Framework

|                         |                                                                                                                                                                                                                                                                                                  |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Green Competency        | POSCO Group seeks to respond to climate change by pursuing low-carbon operations, improving energy efficiency, and developing environmentally sustainable products and services. Through these efforts, the Group aims to minimise environmental impacts and contribute to a sustainable future. |
| Responsible Value Chain | The Group is committed to strengthening sustainability across its value chain by supporting business partners in areas including low-carbon initiatives, human rights, workplace safety, and responsible business practices.                                                                     |
| Employee Happiness      | POSCO Group aims to foster a safe, inclusive, and engaging workplace culture that values employee wellbeing, diversity, human rights, and the development of future talent.                                                                                                                      |
| Ethics & Integrity      | The Group continues to strengthen ethical management, compliance systems, and fair-trading practices to maintain integrity and accountability across all business activities and decision-making processes.                                                                                      |
| New Governance          | POSCO Group supports transparent and effective governance through an independent and diverse Board of Directors while continuing to prioritise shareholder value, accountability, and sound governance practices.                                                                                |

Aligned with the POSCO Group’s GREEN ESG strategy framework, POSCO Australia remains focused on creating sustainable value through responsible and ethical business operations. The Company continues to prioritise key ESG areas including carbon neutrality, workplace safety, supply chain oversight, and human rights management, while strengthening governance systems and maintaining transparent communication with stakeholders regarding its ESG initiatives and performance.

## Risk Management for Investments in Australia

POSCO Group maintains a structured governance and risk management framework to identify, assess, and monitor risks across its business operations. Significant risk matters and mitigation measures are regularly reviewed and reported to the Board of Directors to support effective oversight and decision-making. ESG-related risks are managed through a Group-wide ESG risk management system overseen by the ESG Team within the Corporate Compliance and Ethics division. Regular ESG risk assessments are conducted across operating entities, with material matters escalated to the Group ESG Council for review and response.

In relation to investment activities, proposed investments are subject to a formal review and approval process designed to manage financial, operational, and ESG-related risks. Initial assessments are conducted by the Investment Deliberation Committee, with final approvals reviewed by the Investment Committee and the Board of Directors. ESG considerations, including social and governance factors, are incorporated into the investment assessment process through the use of ESG evaluation checklists and ongoing monitoring procedures following investment approval.

| Check Items           | Details                                                                                                                                                                                                                                                                                                                         |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Safety                | Assessment of safety risks associated with construction and manufacturing processes, and confirmation that appropriate management plans are established to mitigate such risks.                                                                                                                                                 |
| Raw materials         | Review of ESG factors related to the sourcing, transportation, and utilisation of raw materials within the proposal.                                                                                                                                                                                                            |
| Local community       | Consideration of whether the proposal includes regular and open communication channels with stakeholders, such as public consultations, to facilitate ongoing engagement.                                                                                                                                                       |
| Human rights          | Advance assessment of potential risks concerning labour rights and diversity, including the prevention of child labour and forced labour.                                                                                                                                                                                       |
| Compliance/disclosure | Verification that the proposal complies with applicable global and local anti-corruption and ethical standards, as well as adherence to the Group’s ESG policies. For joint ventures, the proposal must clearly identify the entity responsible for consolidated ESG disclosures in accordance with the shareholding structure. |

## Our Structure and Operations

POSCO Australia Pty Ltd is a wholly owned Australian subsidiary of the POSCO Group and supports the Group's global investment and resource procurement strategy. The Company's primary activities involve managing and overseeing investments in the Australian mining and energy sectors, including equity interests in joint venture and resource development projects. Its operations are associated with key commodities such as iron ore, manganese, lithium, and metallurgical coal across major Australian mining regions including New South Wales, Queensland, and Western Australia. The following diagram illustrates our group structure:



POSCO Australia Pty Ltd operates from a corporate office environment in Sydney, supported by local employees and expatriate executives across functions including investment strategy, finance, accounting, taxation, human resources, and external affairs. Employment arrangements are governed by applicable Australian employment laws, modern awards, and individual employment agreements in accordance with Australia's National Employment Standards (NES). The Company does not undertake direct mining or extractive activities, with its operations instead focused on investment oversight, commercial management, financial administration, and coordination with joint venture partners and project operators across its Australian investments.

POSCO Australia Pty Ltd continues to monitor the performance and compliance of its investments while participating in governance and advisory activities where appropriate. As the Company expands and diversifies its investment portfolio, it is also exploring opportunities associated with the transition to a lower-carbon economy, including investments in clean hydrogen, renewable energy, and environmentally sustainable materials, in support of both the POSCO Group's sustainability objectives and POSCO Australia's broader energy transition initiatives.

## Our Supply Chains

POSCO Australia Pty Ltd is an investment and holding company within the POSCO Group with interests in various Australian mining, energy, and resource projects. Accordingly, the Company's supply chains include both the direct procurement of goods and services required to support its corporate operations and broader indirect supply chains associated with the projects in which it holds investment interests.

For its direct operations, POSCO Australia engages a range of Australian-based suppliers to support its day-to-day business activities and corporate functions in Sydney. These suppliers include providers of legal, accounting, administrative, and other professional services, as well as information technology and telecommunications support, corporate travel and accommodation services, office leasing and facilities management, and general office supplies and equipment. These goods and services are primarily sourced within Australia and are used to support the Company's office-based operations.

In addition, POSCO Australia is connected to broader indirect supply chains through its equity interests in mining and infrastructure joint ventures managed by third-party operators and business partners. These indirect supply chains may involve mining and exploration contractors, engineering and construction companies, machinery and equipment manufacturers, transport and logistics providers, utility services, and labour hire firms engaged by project operators. Depending on the nature and requirements of each project, goods and services—including raw materials, industrial components, specialised equipment, and construction materials—may be sourced from both domestic and international suppliers.



## Modern Slavery Risks

During this reporting period, POSCO Australia has not identified any modern slavery practices within its operations and supply chains, and our overall exposure to modern slavery risks remains low.

POSCO Australia Pty Ltd recognises that modern slavery can arise through various forms of exploitation, including forced labour, human trafficking, servitude, deceptive recruitment practices, and child labour. The level of risk may be influenced by factors such as the nature of business operations, workforce arrangements, supply chain structures, and the regulatory environments in which companies and suppliers operate. Additional risk indicators may include vulnerable worker populations, high-risk labour practices, certain product and service categories, and operations connected to higher-risk jurisdictions. Within the mining and energy sector, these risks may be heightened by complex supply chains, reliance on lower-tier suppliers, labour-intensive activities, and operational pressures associated with project delivery timelines.

During the reporting period, POSCO Australia continued to assess and monitor potential modern slavery risks across both its operations and supply chains. This process included consideration of operational and supply chain risks, as well as broader risks associated with the Company's investment activities. Responsibility for managing and mitigating identified risks is allocated to relevant internal functions to support ongoing oversight and implementation of appropriate risk management measures.

### Business operations

POSCO Australia Pty Ltd operates within a corporate, office-based environment and is primarily engaged in investment management activities rather than direct mining or project operations. As a result, the inherent risk of modern slavery within its direct operations and workforce is assessed as low. This assessment is supported by the Company's commitment to maintaining a workplace culture that respects human rights and dignity, together with the governance frameworks and ethical standards established across the broader POSCO Group.

Despite the relatively low risk within its direct operations, POSCO Australia acknowledges that modern slavery risks may arise indirectly through its investments in the mining and energy sectors, particularly within complex supply chains involving subcontracting arrangements, labour-intensive activities, or operations located in remote or higher-risk regions. In response, the Company remains committed to working collaboratively with business partners and project operators to promote responsible business practices and to undertake ongoing due diligence aimed at identifying, assessing, and mitigating modern slavery risks throughout the investment lifecycle.

### Supply chains

POSCO Australia Pty Ltd has assessed the risk of modern slavery within its direct supply chains, which primarily support its corporate office operations, as relatively low. However, as an investor in the mining and energy sectors, the Company recognises that indirect human rights risks may arise through the broader supply chains associated with joint venture projects and third-party operators. These risks may be linked to the complexity of industry supply chains, limited visibility over lower-tier suppliers, and the sourcing of machinery, equipment, and materials from higher-risk jurisdictions.

Potential areas of concern may also include the engagement of labour hire companies and outsourced service providers, such as cleaning, security, construction, and operational support personnel, particularly where subcontracting arrangements or vulnerable worker groups are involved. Although the overall level of risk within POSCO Australia's current operations remains low, the Company continues to undertake ongoing due diligence and maintain engagement with suppliers, operators, and business partners to support responsible and ethical supply chain practices.

### Risk Assessment

POSCO Australia Pty Ltd identifies and manages modern slavery risks through the POSCO Group's broader risk management and human rights governance framework, which is applied across the organisation. Group-wide human rights policies establish standards for workplace conduct and define responsibilities relating to the protection of human rights, with oversight provided by the Board of Directors and the Human Rights Centre within POSCO's Legal Affairs Office. Human rights due diligence processes are undertaken to identify, assess, and mitigate potential adverse impacts, while overseas subsidiaries such as POSCO Australia are also subject to periodic reviews and oversight from the Group headquarters.

In relation to suppliers and business partners, POSCO Australia applies the Group's Supplier Relationship Management (SRM) framework, which incorporates supplier screening, ESG assessments, ongoing performance reviews, and post-engagement monitoring processes. This framework supports the identification and management of risks relating to human rights, environmental sustainability, and broader ESG matters throughout the supply chain.

POSCO Australia remains committed to minimising modern slavery risks across its investment activities through compliance with the POSCO Group's ESG and human rights management standards, which are aligned with Australian regulatory requirements and international best practice principles. The Company maintains a zero-tolerance approach to modern slavery and seeks to engage only with suppliers, contractors, and business partners that operate in a lawful, ethical, and responsible manner.

## POSCO Human Rights Management

POSCO Australia is committed to upholding human dignity and protecting human rights throughout all aspects of its business conduct. In alignment with international human rights standards, POSCO Australia implements the POSCO Group's overarching human rights policies and governance framework, which reflects our strong commitment to the prevention of human rights violations across all business activities.

### Human Rights Governance

The POSCO Group is committed to respecting and protecting human rights in line with internationally recognised standards and principles. Human rights matters, including related risk assessments and improvement initiatives, are reported to the Audit Committee of the Board of Directors as part of the Group's internal governance and audit processes. Updates on human rights management activities, including supply chain due diligence and any relevant human rights issues or incidents, are also reviewed through the ESG Committee and Board-level ESG discussions involving both internal and external directors.

### Group Council on Respect for Human Rights

To further strengthen its governance framework, POSCO Group established the Group Council on Respect for Human Rights in 2023. The Council comprises the Chief of Corporate Audit at POSCO Holdings, the heads of the Corporate Audit Offices from 20 Group affiliates, and the heads of the Human Rights Centre and Audit Planning Group. The Council serves as a strategic platform for discussing key human rights issues, sharing monitoring results from overseas subsidiaries, and issuing guidance on human rights management practices. Significant outcomes from these discussions are incorporated into the internal audit department's work reports and formally presented to the Audit Committee of POSCO Holdings, which is composed solely of independent non-executive directors.

### Establishing the Human Rights Centre

In January 2023, POSCO established a dedicated Human Rights Centre within the Legal Affairs Office to strengthen its management of human rights-related risks across the Group, including workplace misconduct issues such as sexual harassment, bullying, and abuse of authority. The Human Rights Centre is overseen by the Legal Affairs Office and is responsible for providing employee education, conducting counselling and investigations into reported matters, and implementing human rights due diligence across both domestic and overseas operations. Human rights matters and related improvement measures are also incorporated into internal audit reporting and submitted biannually to the Audit Committee of the Board of Directors as part of the Group's governance framework.

To promote a culture of integrity, accountability, and mutual respect, all employees are required to annually acknowledge and comply with the POSCO Code of Ethics, which includes commitments relating to the protection of human rights and ethical workplace conduct. The Human Rights Centre further strengthens employee awareness and engagement through a combination of online and in-person education programs, internal awareness campaigns, and ongoing communication initiatives focused on human rights, workplace behaviour, diversity, and inclusion. These activities are designed to reinforce the Group's commitment to maintaining a safe, inclusive, and respectful working environment while encouraging employees to actively recognise, prevent, and report potential human rights concerns and inappropriate workplace conduct.

To promote a culture of integrity and mutual respect, all employees are required to annually acknowledge compliance with the POSCO Code of Ethics, which includes commitments relating to the protection of human rights. The Human Rights Centre further supports awareness and engagement through a range of online and in-person education programs, internal campaigns, and ongoing communication initiatives aimed at fostering a safe, inclusive, and respectful workplace environment.

### Human Rights Policy

The POSCO Group's Human Rights Policy reflects its commitment to internationally recognised human rights standards and principles, including the UN Guiding Principles on Business and Human Rights, the UN Global Compact (UNGC), the Universal Declaration of Human Rights, and the OECD Guidelines for Multinational Enterprises. The policy applies to all employees across the POSCO Group, as well as suppliers, contractors, and business partners throughout the value chain.

The policy outlines standards and implementation measures relating to non-discrimination, the prohibition of forced labour and child labour, workplace harassment prevention, freedom of association and collective bargaining, occupational health and safety, anti-corruption practices, responsible supply chain management, environmental rights, and the protection of local communities and consumers. It also incorporates grievance and reporting mechanisms designed to support the identification, management, and remediation of potential human rights concerns.

The Human Rights Policy is supported by related governance frameworks, including the POSCO Group's Supply Chain Policy and Stakeholder Engagement Policy, which establish procedures for stakeholder engagement, human rights monitoring, and supply chain oversight activities. Since 2014, the POSCO Group has also maintained internal guidelines and workplace conduct standards setting out responsibilities and procedures relating to human rights protection, grievance handling, and the prevention of workplace misconduct, including bullying and sexual harassment. To support transparency and accessibility, POSCO has publicly disclosed its Human Rights Management Guidelines and Human Rights Protection Guidelines through its official website, reinforcing the Group's commitment to responsible and ethical business conduct across its global operations.



# POSCO Supply Chain Management

In response to evolving global ESG standards and regulatory developments, including the EU’s proposed Corporate Sustainability Due Diligence Directive, the POSCO Group continues to strengthen sustainable supply chain management through responsible sourcing practices, enhanced ESG oversight, and the promotion of a resilient industrial ecosystem across its global value chains.

## Supply Chain Governance

Under the leadership of the Board of Directors of POSCO Holdings, the Group establishes overarching ESG policies and monitors ESG issues across its operating companies. ESG matters relating to supply chains are classified as key issues requiring Group-level oversight and are regularly reported to the ESG Committee of POSCO Holdings. This process enables high-level review of emerging risks and supports the formulation of strategic responses.

## Group Supply Chain Management Council

Since 2021, the POSCO Group has operated a Group Purchasing Executives Council led by POSCO’s Purchasing and Investment Division to oversee supply chain management and procurement-related activities across the Group. In response to increasing global regulatory scrutiny and heightened stakeholder expectations relating to supply chain human rights and environmental risks, the council was restructured and renamed the Group Supply Chain Management Council in 2023. The Council convenes biannually to promote collaboration, innovation, and the continued advancement of sustainable, ethical, and responsible supply chain management practices across the POSCO Group.

## Supply Chain Policy

To support the development of a responsible, sustainable, and high-performing supply chain based on mutual trust and accountability, the POSCO Group has established comprehensive ESG management guidelines. These guidelines are supported by the implementation of a Supplier Code of Conduct and related governance policies, which set out expectations relating to ethical business practices, human rights, environmental sustainability, workplace safety, and regulatory compliance across the supply chain.

| Policy              | Details                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Supply Chain Policy | This policy supports POSCO Holdings in promoting fair and transparent business practices founded on mutual trust with its suppliers and business partners, while strengthening a sustainable and responsible supply chain. Through this approach, POSCO Holdings aims to foster an inclusive business environment that enables long-term collaboration, shared growth, and sustainable value creation with its stakeholders. |

|                             |                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Responsible Minerals Policy | This policy outlines POSCO Holdings’ commitment to sourcing only responsibly produced minerals that are extracted in a manner which respects human rights, protects the environment, and does not contribute to armed conflict. The policy also establishes the standards of conduct and implementation measures required to support these objectives.                                                     |
| ESG Purchasing Policy       | POSCO adopts a sustainable procurement approach based on the principle of engaging with suppliers that maintain environmentally responsible operations and demonstrate strong social responsibility practices. Through its ESG purchasing framework, POSCO seeks to strengthen ESG management across its supply chain by working collaboratively with suppliers and business partners as key stakeholders. |
| Supplier Code of Conduct    | POSCO’s Supplier Code of Conduct further outlines the core standards and expectations applicable to suppliers in the course of their business activities, including requirements relating to workplace health and safety, respect for workers’ rights and dignity, ethical business conduct, and responsible management practices.                                                                         |

## Supply chain ESG management guidelines

The Supply Chain ESG Management Guidelines set out the processes implemented by the POSCO Group to identify, assess, manage, and monitor ESG risks across its supply chains to support long-term sustainability and responsible business practices. These guidelines are designed to address key ESG risks, including potential human rights issues, across critical areas of the supply chain. As part of this framework, the POSCO Group undertakes ongoing due diligence and risk assessment activities to strengthen supply chain oversight and governance.

## Sustainable Supply Chain Management

To support environmental sustainability, human rights protection, and broader ESG objectives across its supply chains, POSCO applies a structured ESG risk management process covering supplier registration, performance assessment, and ongoing supplier management activities.

|        |                           |                                                                                                                                                                                                                                              |
|--------|---------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Step 1 | New Supplier Registration | Prospective suppliers are required to comply with POSCO’s Supplier Code of Conduct and applicable ethics requirements as part of the supplier registration process.                                                                          |
| Step 2 | Performance Assessment    | POSCO conducts regular Supplier Relationship Management (SRM) assessments to evaluate supplier performance, including ESG-related due diligence processes aimed at identifying and managing potential supply chain risks.                    |
| Step 3 | Follow-up Management      | Assessment results are incorporated into regular supplier performance reports, with feedback provided to suppliers regarding identified strengths and areas for improvement to support ongoing enhancement of ESG and operational practices. |

# Actions Taken to Assess and Address Modern Slavery Risks

During the reporting period, POSCO Australia continued to strengthen its human-rights management, supply-chain oversight, and employee awareness programs in support of sustainable and ethical investments in Australia.

POSCO Australia Pty Ltd has undertaken a range of initiatives to prevent human rights violations and mitigate potential adverse impacts associated with its business activities. During the reporting period, the Company's efforts focused on three key areas:

- **Strengthening Human Rights Management** through participation in global human rights initiatives, governance oversight, and ongoing due diligence activities to identify and manage potential risks.
- **Enhancing Supply Chain and Partnership Oversight** through the continued assessment and monitoring of business partners' human rights and ESG practices.
- **Building Internal Capability** through regular training and awareness programs aimed at improving employee understanding and responsiveness to modern slavery risks.

Further details regarding the actions implemented during the reporting period are outlined in the following sections of this report.

## 1. Strengthening Human Rights Management

### Joining Human Rights Initiatives

As a member of the UN Global Compact (UNGC), the POSCO Group remains committed to upholding the UNGC's 10 principles relating to human rights, labour standards, environmental responsibility, and anti-corruption. The Group's human rights management and due diligence processes are aligned with these principles to support responsible and sustainable business practices across its operations and supply chains.

In 2025, the POSCO Group further strengthened its commitment by participating in the Business & Human Rights Accelerator programme, which supports companies in embedding human rights principles and responsible business practices throughout their operations and value chains.

### Monitoring Grievance Mechanism

The POSCO Group maintains a formal grievance mechanism to address human rights-related concerns arising from its business activities. This mechanism is available to stakeholders including employees, suppliers, local communities, and Indigenous peoples, who may raise concerns through various reporting channels such as email, telephone, post, or in person. Reported matters are reviewed by the Human Rights Team, which may undertake investigations and implement corrective actions where appropriate. The process is designed to maintain confidentiality, protect reporter anonymity, and prohibit retaliation against individuals raising concerns.

POSCO Australia Pty Ltd continues to work with the broader POSCO Group to regularly review and enhance grievance procedures, including whistleblower protections, investigation processes, and employee training initiatives. These efforts support the ongoing effectiveness of the grievance framework and its alignment with applicable legal requirements and internationally recognised human rights standards.

### Human Rights Assessment

Human rights due diligence within the POSCO Group is conducted by designated personnel to identify, assess, and mitigate potential or actual adverse human rights impacts across its operations. This process includes risk assessments, stakeholder engagement, and consultation with internal and external specialists where appropriate, with findings used to support prevention, mitigation, and remediation measures. Assessment outcomes are communicated across relevant areas of the organisation to support ongoing human rights management and governance.

As a subsidiary of the POSCO Group, POSCO Australia Pty Ltd is also subject to periodic human rights impact assessments covering areas such as workplace safety, anti-discrimination, child and forced labour prevention, data privacy, and freedom of association. Assessment results are used to identify improvement opportunities, including employee training and updates to internal policies and procedures.

## 2. Enhancing Supply Chain and Partnership Oversight

### SRM Assessment and Supply Chain Due Diligence

POSCO operates a comprehensive ESG risk management process through its Supplier Relationship Management (SRM) system to identify, assess, and manage environmental, human rights, and other key ESG risks across the supply chain. This process covers supplier registration, performance assessments during contract execution, and ongoing follow-up management activities. Assessment outcomes are incorporated into regular quarterly and annual reporting processes, with feedback provided to suppliers to encourage the continuous improvement of ESG and operational practices.

In response to evolving global ESG standards and regulatory developments, including the EU's Corporate Sustainability Due Diligence Directive and increasing ESG disclosure expectations, the POSCO Group established a formal supply chain ESG due diligence framework in 2023. This due diligence process continued to operate throughout the reporting period as part of the Group's broader ESG governance framework. POSCO Australia Pty Ltd supports these initiatives through ongoing collaboration with the broader POSCO Group to strengthen ESG management across its supply chains. The Group remains committed to promoting sustainable and responsible supply chain practices, strengthening stakeholder trust, and supporting the development of a resilient and sustainable industrial ecosystem.

## 3. Building Internal Capability

### Ethics Pledge

Since adopting its Code of Ethics in 2003, the POSCO Group has continued to uphold ethical management as a core value across its business activities, promoting a corporate culture aligned with global standards of integrity and responsibility. To support ongoing compliance, all employees are required to annually reaffirm their commitment by signing an Ethics Pledge each January, which includes provisions relating to human rights and ethical workplace conduct. This commitment is also extended to relevant business partners and stakeholders. The POSCO Group further reinforces these standards through regular ethics training and awareness initiatives across its global operations. In addition, specialised training sessions are conducted on key human rights and workplace conduct matters, including discrimination prevention, bullying, sexual harassment, workplace harassment, and abuse of authority. These initiatives support employee awareness of ethical responsibilities and help promote a safe, respectful, and inclusive workplace environment.

### Supplier Engagement and Support

POSCO conducts its business activities in compliance with applicable domestic and international laws, supported by internal policies, governance frameworks, and ethical standards. The Group expects suppliers and subcontractors to uphold these principles and operate in a responsible and ethical manner consistent with POSCO's corporate values. Through a commitment to mutual trust and collaboration, POSCO seeks to foster an inclusive business environment that supports sustainable growth and long-term partnerships across its supply chain. POSCO's Supplier Code of Conduct, consisting of 49 clauses across seven key areas, is aligned with the Responsible Business Alliance (RBA) standards and the Group's governance principles. The Code requires suppliers to maintain environmentally responsible and safe workplaces, respect workers' rights and dignity, and comply with ethical business practices. Since 2024, suppliers of raw materials, equipment, and industrial inputs have been required to formally acknowledge compliance with the Supplier Code of Conduct through POSCO's e-Procurement system.

Suppliers are expected to respect the rights of all workers, including temporary, migrant, trainee, and contract workers, in accordance with applicable labour laws and standards. During the reporting period, POSCO Australia Pty Ltd continued engaging with suppliers and business partners to support human rights awareness and the management of modern slavery risks across its supply chains.

### Human Rights Awareness and Training

As part of its commitment to ethical business conduct, POSCO Australia Pty Ltd provides ongoing training and awareness programs to support employee understanding of human rights and ethical responsibilities. This includes mandatory annual online training for all employees, together with the distribution of educational materials and targeted training relating to ethical management and modern slavery risk awareness.

POSCO Australia is also continuing to enhance its internal training and governance framework to further strengthen awareness, accountability, and the effectiveness of modern slavery risk management across the organisation.



## Effectiveness Assessment

POSCO Australia Pty Ltd recognises that effectively addressing modern slavery requires a structured and proactive approach. During the reporting period, the Company's efforts focused on three key areas:

- **Strengthening Human Rights Management** through ongoing due diligence, governance oversight, and alignment with international human rights initiatives.
  - **Enhancing Supply Chain and Partnership Oversight** through continued monitoring and assessment of human rights practices across supply chains and investment partnerships.
  - **Building Internal Capability** by training and awareness initiatives aimed at improving employee understanding and responsiveness to modern slavery risks.
- These efforts aim to cultivate a culture of accountability and continuous improvement in support of ethical and sustainable operations.

The following table outlines our approach to assessing the effectiveness of key risk management actions undertaken during the reporting period.

| Focus Area                       | Purpose                                                                                                                                                                                 | Scope of Application                                                                                                                                                                                                                           | Measuring Effectiveness                                                                                                                                                                                                                        |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Joining Human Rights Initiatives | To strengthen human rights management through participation in the Business & Human Rights Accelerator programme and support implementation of the UN Global Compact (UNGC) principles. | As a signatory to the UNGC, the POSCO Group remains committed to upholding the ten principles relating to human rights, labour, environment, and anti-corruption.                                                                              | The effectiveness of this initiative is assessed through the Group's continued alignment with international labour and human rights standards, as well as its contribution towards the UN Sustainable Development Goals (SDGs).                |
| Monitoring Grievance Mechanism   | To maintain a safe, accessible, and transparent grievance mechanism allowing employees, suppliers, and stakeholders to raise concerns confidentially or anonymously.                    | The grievance mechanism applies across POSCO Australia Pty Ltd's operations and investment activities and supports the identification, investigation, and management of potential human rights concerns, with protections against retaliation. | The grievance mechanism is regularly reviewed to assess its timeliness, responsiveness, and transparency, with effectiveness measured through reporting activity, response timeframes, and the implementation of appropriate remedial actions. |

#### Human Rights Assessment

To implement a structured human rights due diligence framework that identifies, assesses, and mitigates actual or potential human rights and labour-related risks across operational and investment activities, while supporting stakeholder engagement and appropriate risk response measures.

Human rights assessments developed and managed by POSCO headquarters apply across both domestic and overseas subsidiaries, including POSCO Australia Pty Ltd. These assessments utilise a structured questionnaire comprising approximately 30 indicators across key areas including human rights governance, stakeholder engagement, non-discrimination, forced labour prevention, occupational health and safety, freedom of association, child labour prevention, and data privacy.

POSCO Australia adheres to POSCO Group's internal risk governance and compliance framework, ensuring alignment with both Australian and international human rights standards. The effectiveness of assessments is measured through the completion and review of the questionnaire, the identification of risk areas, and the implementation of corresponding corrective or preventative actions to support sustainable business operations.

| Focus Area                                       | Purpose                                                                                                                                                                                                                                                                    | Scope of Application                                                                                                                                                                                                                                                                                                                                         | Measuring Effectiveness                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Enhancing Supply Chain and Partnership Oversight | To promote fair trade, mutual trust, and a sustainable supply chain environment by requiring suppliers and business partners to comply with POSCO's Supplier Code of Conduct and applicable ethics standards.                                                              | The Supplier Code of Conduct and Supplier Relationship Management (SRM) framework apply to POSCO Australia Pty Ltd, including supplier registration, ongoing performance assessments, and supply chain due diligence processes. Employees, suppliers, and business partners are expected to comply with these requirements or maintain equivalent standards. | Effectiveness is assessed through ongoing SRM evaluations, which incorporate requirements relating to the prohibition of child labour, forced labour, and human trafficking in alignment with international human rights and labour standards. This framework supports the management of potential indirect modern slavery risks associated with POSCO's investment activities in Australia. |
| Building Internal Capability                     | To strengthen employee awareness and capability in identifying and responding to modern slavery risks through the annual Ethics Pledge and ongoing human rights training and awareness programs, while promoting a culture of accountability and ethical business conduct. | This initiative applies to all officers and employees of POSCO Australia Pty Ltd. Participation in mandatory training programs and annual completion of the Ethics Pledge are actively monitored and encouraged across the organisation.                                                                                                                     | Effectiveness is also measured through training participation and completion rates, with POSCO Australia Pty Ltd monitoring compliance with mandatory employee training requirements across the organisation.                                                                                                                                                                                |



## Consultation

This report was prepared in consultation with relevant internal stakeholders, subject matter experts, and external advisors to support an accurate and comprehensive assessment of POSCO Australia Pty Ltd's approach to identifying, assessing, and managing modern slavery risks. Throughout the reporting period, POSCO Australia continued to engage with the broader POSCO Group regarding compliance with the Modern Slavery Act 2018 (Cth) and the implementation of related human rights and risk management initiatives.

The report was developed with reference to the most recent POSCO Group Sustainability Report available at the time of preparation to ensure consistency with Group-wide policies, governance frameworks, and human rights commitments. The report was reviewed and approved by POSCO Australia's Board of Directors, with oversight informed by the POSCO Human Rights Management Guidelines.

The POSCO Group's Council on Respect for Human Rights continues to oversee and monitor Group-wide human rights matters, including guidance relating to human rights risk management practices applicable to POSCO Australia. Additional support is provided through the Human Rights Centre within POSCO's Legal Affairs Office, which assists in strengthening the Group's capability to identify and manage human rights-related risks across its operations.

## Principal Governing Body Approval

This Modern Slavery Report was approved by the Board of POSCO Australia Pty Ltd in their capacity the principal governing body of

POSCO Australia Pty Ltd

as defined by the *Modern Slavery Act 2018* (Cth) ("the Act") on

30 June 2026

## Signature of Responsible Member

This Modern Slavery Report for POSCO Australia Pty Ltd is approved and signed by a responsible member of

Mr Ki Ho Han

in his role as the Managing Director of POSCO Australia Pty Ltd on behalf of the Board. as defined by the Act:



This Modern Slavery Report is signed on

30 June 2026



## Mandatory Criteria

This Modern Slavery Report is made pursuant to the *Modern Slavery Act 2018*, which includes seven mandatory reporting criteria in section 16 of the Act:

| Mandatory Reporting Criterion                                                                                                                                                                                       | Reference in This Report                                                                        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| a) Identify the reporting entity                                                                                                                                                                                    | About This Report                                                                               |
| b) Describe the reporting entity's structure, operations and supply chains                                                                                                                                          | Our Structure, Operations and Supply Chains                                                     |
| c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls                                                | Modern Slavery Risks                                                                            |
| d) Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes              | Actions Taken to Assess and Address Modern Slavery Risks                                        |
| e) Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks                                                                                   | Effectiveness Assessment                                                                        |
| f) Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a joint statement, the entity giving the statement | Consultation and Approval                                                                       |
| g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant                                                                                                  | POSCO ESG Strategic Framework<br>POSCO Human Rights Management<br>POSCO Supply Chain Management |



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