

UACJ AUSTRALIA PTY LTD

Incorporated in Victoria.
A.B.N 82 005 579 840

C/- Marubeni Aluminium Australia Limited
Suite 1703, Level 17, 120 Collins Street
Melbourne Vic 3000
Telephone (03) 9618 8188
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FY 2020 Modern Slavery Statement

1. Introduction

This is the Modern Slavery Statement made by UACJ Australia Pty. Ltd. (“UAAU”) for the financial year ending 31 December 2020 (the “Statement”), prepared and published in accordance with the *Modern Slavery Act 2018* (Cth) (the “Act”). This Statement sets out the actions UAAU has taken to identify and address the risks of modern slavery in its business operations and supply chains during the financial year stated above.

2. Company overview, structure, business operations and supply chains

Reporting Entity’s Background

The reporting entity, as defined under section 5 of the Act, for this Statement is UAAU, an Australian proprietary limited company (ACN: 005 579 840) located in the State of Victoria. UAAU is a wholly owned subsidiary of UACJ Corporation (“UACJ”), a company registered in Tokyo, Japan. UAAU was established on 31 July 1979.

Business Operations

UAAU’s business operations include: (i) the purchase of alumina; (ii) outsourcing the smelting of alumina into aluminium metal; and (iii) sale of aluminium metal to UACJ. Aspects of UAAU’s business operations are contracted to third party contractors, to be described in detail below.

UAAU holds 9.1% of shares in Boyne Smelters Limited (“BSL”), but does not own or control any entities inside or outside of Australia, and therefore does not have a consultation process with such subsidiaries.

Supply Chains

UAAU’s supply chain and contractors consists mainly of:

- (i) a company that supplies alumina to UAAU;
- (ii) a company that provides toll processing arrangements whereby UAAU supplies alumina to the company, which they smelter into aluminium metal;
- (iii) a Japanese company that provides export services from UAAU to the purchaser of the aluminium metal;
- (iv) an Australian company that provides local operational services to UAAU, including

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accounting, taxation and general office administration, including the provision of the office facility; and

- (v) a freight company that provides shipping services to UAAU.

Other than the above, UAAU's supply chain also includes support services for our organisation, such as financial, legal, accounting and consulting services.

3. Risk assessment

While UAAU does not directly conduct or contribute to modern slavery practices, UAAU recognizes that there are areas in the supply chain and contractors which may carry the risk of modern slavery. These include risks associated with the employment or engagement of staff who:

- refine alumina;
- provide logistics, shipping or export services;
- are engaged in smelter operations; and
- provide office facilities that include maintenance services, particularly cleaning services.

Over the next few years, as we develop our understanding of our supply chain across these key risk areas, we will increase our knowledge of the risks that lie in the supply chains of our suppliers. This will enable us to engage further, and work to mitigate identified risks.

4. Policies

The policies of UACJ are group-wide policies and apply to UAAU's operations.

UACJ has a strong code of conduct called the "UACJ Way", which sets "Safety and Compliance" as the fundamental principle.

The UACJ Group also published the "UACJ Group Code of Conduct" ("**Code of Conduct**") on the UACJ intranet in June 2014. The Code of Conduct states that all officers and employees of the UACJ Group shall comply with the international standard of human rights set out in the United Nations International Bill of Human Rights, as well as the laws and regulations of the relevant country and region. Further, the Code of Conduct states that the UACJ Group shall make its best efforts to respect human rights throughout its business operations generally, and states that the UACJ strictly disallows any form of forced labor, human trafficking or child

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labor.

UAAU acts in accordance with UACJ's three corporate values, which are "respect and understand your associates", "embrace honesty and foresight" and "be curious and challenging"¹ – all of which go against any form of modern slavery.

UACJ makes its "CSR Deployment Guideline for Suppliers"² available to the public, including to its suppliers, on its website. The "CSR Deployment Guideline for Suppliers" includes, among other matters, provisions regarding human rights, forced labor, inhumane treatments, child labor, appropriate wages, regulation on working hours, rights of freedom of association for employees, and workplace hygiene, health and safety.

5. Due diligence

UAAU obtains the public statements made by its suppliers and confirms that they are similarly conscious about the risks of modern slavery. During the next reporting period, UAAU is considering ways to contacting its suppliers who have not made appropriate public commitments to identify, assess and address risks of modern slavery and will to encourage them to do so.

During the next reporting period, UAAU is also considering to engage with its contractors and third party providers to obtain information about their supply chains.

6. Awareness-raising and training

Within the UACJ Group, the officers and employees undergo education on the Code of Conduct from October to December every year, confirming their understanding and reiterating the group's approach to human rights protection. Further, UACJ Group had entities subject to the United Kingdom's modern slavery annual statement requirement under the *Modern Slavery Act 2015* c. 30, which raised the UACJ Group's general awareness of modern slavery.

7. Assessment of response

¹ <https://www.uacj.co.jp/english/company/management/uacjway.htm>

² https://www.uacj.co.jp/english/csr/social/pdf/UACJ_CSR_Guidelines.pdf

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Due to its operation and corporate structure, UAAU relies mostly on UACJ's policies and guidelines. The guidelines are thorough and generally cover the concept of modern slavery as defined under the Act. However, UAAU also acknowledges that because these guidelines are meant for the UACJ Group across the globe, they do not address the Act or Australia's modern slavery concerns specifically. Consequently, UAAU does not have a mechanism to directly review and assess the effectiveness of the guidelines on its supply chain and also does not have an effective remediation process in place. UAAU would like to consider ways to work more closely with the members of its supply chain, including confirming any public releases and reports published by the members of the supply chain in relation to their approach to minimizing the risk of modern slavery. UAAU would also like to consider ways in which UACJ's corporate philosophy and fundamental principle of safety and compliance can be protected and upheld against the risk of modern slavery.

8. Approval by Board of Directors

This Statement has been approved by UAAU's board of directors on 17th June, 2021.



Shinji Tanaka, President.