

FY 2024 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 2024 (the “**2024 Statement**”), which marks UAAU’s fifth Modern Slavery Statement following its 2020, 2021, 2022, and 2023 statements. This 2024 Statement is submitted as a single statement in accordance with section 13 of *Modern Slavery Act 2018* (Cth) (the “**Act**”). This Statement sets out the actions UAAU has taken to identify, assess and address the risks of modern slavery in its business operations and supply chains during the financial year stated above (the “**Reporting Period**”).

UAAU again confirms its support to combat modern slavery, and has taken the actions detailed in this 2024 Statement to assess and address modern slavery during the Reporting Period.

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

(a) Reporting Entity’s Background

The reporting entity, as defined under section 5 of the Act, for this 2024 Statement is UAAU, an Australian proprietary limited company (ACN: 005 579 840) registered at Level 17, 120 Collins Street Melbourne VIC 3000 Australia. UAAU was established on 31 July 1979.

UAAU is a wholly owned subsidiary of UACJ Corporation (“UACJ”), a company registered in Tokyo, Japan. UACJ is not a reporting entity under the Act.

(b) Business Operations

Similarly to the past four reporting periods, during this Reporting Period, UAAU’s main business operations were (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, described in detail below. UAAU does not have any employees in Australia. There are three officers of UAAU, the President and two directors, who reside in Japan. The fourth officer is the Managing Director of Marubeni Aluminium Australia (“**Marubeni**”), and resides in Australia. UAAU does not have any direct employees.

UAAU continues to hold 9.29% of shares in Boyne Smelters Limited (“**BSL**”), but does not own or control any entities inside or outside of Australia. UAAU is therefore the sole entity covered by this 2024 Statement.

(c) Supply Chains

There are no significant changes to UAAU's supply chain since the reporting period of 2021. UAAU's first tier supply chain consists mainly of:

- (i) an Australian company that supplies alumina (which is produced in Australia) to UAAU;
- (ii) an Australian company that provides toll processing arrangements whereby UAAU supplies alumina to the company, which they smelter into aluminium metal in Australia and then ships to its purchasers;
- (iii) a Japanese company that provides export services from UAAU to the purchaser of the aluminium metal;
- (iv) Marubeni which provides local operational services to UAAU, including accounting, taxation and general office administration, including the provision of the office facility; and
- (v) a freight forwarding company that arranges export services for UAAU.

Other than the above, UAAU's supply chain also includes professional support services for our organisation, such as financial, legal, accounting and consulting services. The three officers of UAAU that reside in Japan work from the office of UAAU's parent company, UACJ. One of them is also an officer of UACJ and the other two are employees of UACJ. UAAU implements the policies and procedures of UACJ in respect of UAAU's operations and supply chains.

UAAU mostly outsources its general office administrative work to Marubeni. UAAU has reviewed Marubeni's modern slavery statement for the 2023 financial year.¹ UAAU has separately reached out to Marubeni to discuss how it identifies, assesses and addresses risks of modern slavery in its supply chain. This engagement occurred following the end of the Reporting Period. The risks and actions taken during the Reporting Period are detailed below in the following sections.

(d) Risk assessment

Although UAAU's business operations in Australia are considered low-risk and are outsourced to well-trained agent and workers, UAAU recognises that some parts of its supply chain and contractors which it deals with may pose modern slavery risks. These risks include the employment or engagement of personnel in roles that represent higher risks for modern slavery, for example personnel who:

- refine alumina;
- provide logistics, shipping or export services;

¹ <https://modernslaveryregister.gov.au/statements/17895/>

- are engaged in smelting operations; and
- provide office facilities that include maintenance services, particularly cleaning services.

In an effort to deepen its understanding of the supply chain across these key risk areas, as in 2023, UAAU has confirmed the status of modern slavery due diligence conducted by its direct suppliers by researching their compliance with certain applicable human rights, modern slavery due diligence and reporting laws. UAAU has identified that all except three companies in its supply chain (a logistics company, export company and purchaser of aluminium), have reported their modern slavery statement under the Act. Two of the three companies publicise their efforts to prevent modern slavery on their website and provide access to their modern slavery statement prepared in accordance with the United Kingdom's modern slavery laws. These materials have supported UAAU's understanding of the supply chain beyond its direct suppliers.

3. Actions to assess and address risks of modern slavery

(a) Policies

The policies of UACJ are group-wide policies and apply to UAAU's operations. UACJ has a strong code of conduct concept called the "UACJ Way", which sets "Safety and Compliance" as the fundamental principle. As part of the "UACJ Way", UAAU is required to value and contribute to engagement with the local community, sincerely respond to stakeholder expectations and stay ahead of emerging trends.

Based on the main premises of safety and compliance when officers and employees execute company work, the UACJ Group established the "UACJ Group Code of Conduct" ("**Code of Conduct**") in June 2014 as a standard for behaviour for conducting actions in accordance with the "UACJ Way" of respecting and understanding. The last update of the Code of Conduct was in December, 2023, and in 2023 UACJ published the Code of Conduct Guidebook, which explains the contents of the Code of Conduct in an easy-to-understand manner. 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 prohibits any form of forced labour, human trafficking or child labour. Each division or group company is further required to provide a signed annual statement that all personnel in that division or group company have learnt and agree to abide by the Code of Conduct. This is part of mandatory training on human rights issues, including modern slavery issues.

The UACJ Group further published the “UACJ’s Human Rights Policy” (“**Human Rights Policy**”) on the UACJ website available to the public as well UACJ group personnel and suppliers in March 2022. The Human Rights Policy applies to all directors, employees, and business partners of UACJ, including UAAU. The Human Rights Policy was formulated with reference to the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the Government of Japan’s Action Plan on Business and Human Rights. UACJ amended the Policy in 2024 and added the section on human resources development to the Policy. The UACJ Group believes that understanding the expectations of stakeholders and responding to their trust is vital for a business that contributes widely to society. The UACJ Group considers human rights, supply chain management, human resource diversity and development, the provision of safe and healthy work environments (occupational safety and health), and product safety and quality control as essential to its operation and accordingly set targets and actively implement initiatives in each category. The additional section represents a commitment by the UACJ Group to recognize that its employees are the most vital source of its ability to develop technologies that “bring out the innate power of Materials,” and the UACJ Group will continue providing an open and supportive work environment where employees together and individually embody the UACJ Way.

As explained earlier, UAAU mostly outsources its general office administrative work to Marubeni and UAAU does not have any direct employees. The president and two directors of UAAU undergo education on the Code of Conduct every year. 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”² – all of which go against any form of modern slavery.

In 2023, UACJ updated its procurement guidelines, replacing its “UACJ Group CSR Deployment Guideline for Suppliers” (“**CSR Deployment Guideline for Suppliers**”) with the new “UACJ Group Sustainable Procurement Guidelines”³ (**Sustainable Procurement Guidelines**). The new **Sustainable Procurement Guidelines** were published on December 2023 and have been available to the public, including to UACJ and UAAU’s suppliers, via the UACJ website since January 2024. The Sustainable Procurement Guidelines clarify the promotion of sustainability management based on UACJ Group Philosophy, and establish a grievance mechanism that is available for stakeholders, in order to prevent any improper conduct in the company and its supply

² <https://www.uacj.co.jp/english/company/management/uacjway.htm>

³ [UACJ Sustainable Guidelines.pdf](#)

chain. The grievance mechanism refers to the mechanism by which a person can make a report about an act which is or could be a breach of the Sustainable Procurement Guidelines. The person making the report can provide information about the grievance via e-mail and/or HP form⁴. UACJ also receives anonymous reports. In 2024, UACJ worked to establish a policy or procedure that clearly outlines the process for responding to a report to the grievance mechanism. Until a policy or procedure is established, UACJ will treat reports from suppliers in the same way as whistleblower reports. This new mechanism is scheduled to be operationalised in 2025. The Sustainable Procurement Guidelines communicate the expectations for UACJ's and UAAU's suppliers, including provisions regarding human rights, forced labour, inhumane treatments, child labour, appropriate wages, regulation on working hours, rights of freedom of association for employees, and workplace hygiene, health and safety.

(b) Supplier engagement

As described under the "Policies" heading above, in 2024 UACJ distributed the Sustainable Procurement Guidelines to suppliers and required suppliers who consented to the intent of the Guidelines to sign and return consent letters to UACJ. UACJ worked to contact 113 of its suppliers and expects to receive the consent letters by providing their signatures on UACJ Group Sustainable Procurement Guidelines by October 2025. For those suppliers who do not provide consent letters, UACJ will consider whether the content of their supplier code of conduct covers the content of the Sustainable Procurement Guidelines. If UACJ discovers that a supplier has a suspected modern slavery issue, UACJ may visit a supplier's plant or other sites as necessary. In lieu of this, UACJ may engage a recognized third party to conduct an objective assessment or evaluation of that supplier. As indicated above, the Guidelines set expectations for suppliers, including in relation to human rights and forced and child labour.

During the last four financial years, UAAU has been considering ways to contact its suppliers who have not made public commitments to identify, assess and address risks of modern slavery, and how they can encourage their supply chain to do so. In 2021, as a part of its due diligence effort, UAAU engaged with its major supplier and parent company, UACJ, to ensure that further engagement was undertaken with UACJ's suppliers to assess and address modern slavery risks in its supply chain. UACJ committed to actively distributing its CSR Deployment Guideline for Suppliers to its direct suppliers to obtain their signatures in agreement. UACJ commenced contacting its suppliers during 2021; further detail is provided in section 7 below. This was implemented as a new strategy in 2021 to actively raise awareness of modern slavery issues, and

⁴ <https://www.uacj.co.jp/english/inquiry/term.php?mode=other>

to emphasise the passion and commitment of the UACJ Group (including UAAU) to eliminate modern slavery in its supply chain, as opposed to simply providing the Guideline on its website.

As noted above, UACJ's distribution to suppliers of its CSR Deployment Guideline for Suppliers commenced during 2021. UACJ engaged directly with its and with UAAU's suppliers in 2022. This included engagement with Rio Tinto, whose representatives signed the recognition of and agreement to UACJ's CSR Deployment Guideline for Suppliers in April, 2023. Rio Tinto is the controlling shareholder of BSL, which is one of UAAU's most significant business partners, therefore Rio Tinto's recognition and agreement covers a significant portion of UAAU's supply chain.

(c) Whistleblower reporting system

UACJ has a whistleblower reporting system, which can be used when any potential risks or occurrences of modern slavery are identified. The whistleblowing system is administered by a third party which then escalates issues to UACJ's internal legal department. UAAU has confirmed with UACJ that UACJ has not received any whistleblower reports relating to modern slavery. In 2023, UACJ worked to widen the scope of its reporting system. As a result, a grievance mechanism was developed at the end of 2023 which will now allow not only employees but suppliers of UACJ Group to access its reporting system. As indicated above, in 2024, UACJ worked to establish a policy or procedure that clearly outlines the process for responding to a report to the grievance mechanism. Until a policy or procedure is established, UACJ will treat reports from suppliers in the same way as whistleblower reports. Full scale operation of this new mechanism is scheduled to commence in 2025.

(d) Human rights due diligence

The UACJ Group conducts human rights due diligence on its domestic and overseas workplaces in order to identify any negative human rights impacts or risks that may arise through its business operations. The UACJ Group assesses negative impacts and risks that have come to light as a result of human rights due diligence, and as well as providing employee education to help prevent and correct such impacts and risks, the UACJ Group has established guidelines such as the "UACJ Group Sustainable Procurement Guidelines." During the Reporting Period, UACJ assessed its human rights risks across its worldwide operations and conducted human rights due diligence of three of its processing, casting, forging and extrusion plants in Japan and Czech. As results of the due diligence, UACJ did not identify any problems requiring immediate correction with regard to modern slavery. The UACJ Group will continue conducting human rights due diligence on an ongoing basis with the aim of completing implementation throughout the Group by fiscal 2030,

and will work to identify, mitigate, and prevent the emergence of human rights risks associated with our business activities.

UACJ is still in the process of implementing its human rights due diligence mechanism across all group entities, and will work with UAAU to conduct human rights due diligence over UAAU's operations and supply chain.

(e) Awareness-raising and training

Within the UACJ Group, its officers and employees undergo education on the Code of Conduct from October to December every year, and the same training was conducted in this reporting period, confirming their understanding and reiterating the group's approach to human rights protection. As noted above, this training is mandatory and all personnel must evidence their completion to their relevant division.

4. Assessment of response

Due to its corporate structure, UAAU implements UACJ's policies and guidelines. The guidelines generally cover the concept of modern slavery as defined under the Act. However, these guidelines are directed to the UACJ Group across the globe, they do not expressly refer to the Act or Australia's modern slavery concerns specifically. UAAU will keep considering appropriate mechanisms that it could implement in the next reporting period to directly review and assess the effectiveness of its actions, including the guidelines, to assess and address risks of modern slavery in its supply chain and operations.

That is why during the previous reporting periods, UACJ, as UAAU's parent company, implemented a new measure to directly contact its suppliers and seek agreement of the guidelines, so that UACJ Group's corporate philosophy and fundamental principle of safety and compliance can be protected and upheld against the risk of modern slavery.

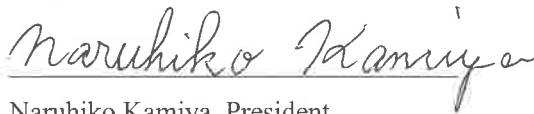
In seeking agreement from suppliers on the CSR Deployment Guideline for Suppliers, UAAU has been able to confirm that UACJ was able to engage in effective communications to seek agreement to the guideline which addresses issues of modern slavery. Throughout 2021 and 2023, UACJ contacted 56 of its suppliers, of which 48 (86%) responded by providing their signatures on the CSR Deployment Guidelines. From 2024, UACJ has commenced providing the newly issued "UACJ Group Sustainable Procurement Guidelines" to suppliers it engages with. In 2024, UACJ worked to contact 113 of its suppliers and expects to receive the consent letters by providing their signatures on UACJ Group Sustainable Procurement Guidelines. For those suppliers who do not provide consent letters, UACJ will consider whether the content of their supplier code of conduct covers the content of the Sustainable Procurement Guidelines. This included suppliers of UAAU

as well.

UAAU acknowledges the importance of assessing the effectiveness of the steps it is taking to identify risk of modern slavery in its supply chain, including steps to raise widespread understanding and awareness of modern slavery risks. UACJ has confirmed that it will further consider how to measure the effectiveness of its actions in the coming year.

5. Approval by Board of Directors

This Statement has been approved by UAAU's board of directors on 24 June, 2025.
UAAU is the sole reporting entity and does not own or control any other entities.

A handwritten signature in dark ink, reading "Naruhiko Kamiya". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

Naruhiko Kamiya, President

MSA Section	Reporting Criterion	Section of Statement
16(1)(a)	Identify the reporting entity	1, 2(a)
16(1)(b)	Describe the structure, operations and supply chains of the reporting entity	2(a), 2(b), 2(c)
16(1)(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	2(d)
16(1)(d)	Describe the actions taken by the reporting entity and any entities the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	3
16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions	4
16(1)(f)	Describe the process of consultation with any entities that the reporting entity owns or controls, and in the case of a reporting entity covered by a statement under section 14 – the entity giving the statement	N/A
16(1)(g)	Include any other information that the reporting entity considers relevant	N/A