



Modern Slavery Statement

Marubeni Aluminium Australia Pty Ltd
FY2020

This statement covers the activities of Marubeni Aluminium Australia Pty Ltd (ABN: 60 056 598 871) and its owned and controlled entities during the year ended 31 December 2020.

This is our first modern slavery statement under the *Modern Slavery Act 2018* (Cth) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This statement has been approved by the Board of Marubeni Aluminium Australia Pty Ltd on 26th March 2021.

About us

At Marubeni Aluminium Australia Pty Ltd (**MAA**), we recognise that respecting the human rights of those affected by our business activities is important as all businesses should proactively assess and respond to the risks of modern slavery in their operations and supply chains.

Our structure

MAA is a company incorporated in Australia and our registered office is located at Suite 1703, Level 17, 120 Collins Street, Melbourne, VIC 3000, Australia.

MAA is a subsidiary of Marubeni Corporation, headquartered in Japan. Marubeni Corporation and its subsidiaries conduct a diversified range of business activities across wide-ranging fields including lifestyle, ICT & real estate business, forest products, food, agri business, chemicals, energy, metals & mineral resources, power business, infrastructure project, aerospace & ship, finance & leasing business, construction, industrial machinery & mobility, and next generation business development. Additionally, the Marubeni Group offers a variety of services, makes internal and external investments, and is involved in resource development throughout all of the above industries.

MAA does not have any owned or controlled entities, however we do have minority interests in joint ventures as described below.

Our operations

We are a project investment company in aluminium smelting and the related power generation business. We sell all offtake aluminium metal from invested projects to Marubeni Corporation.

Our investments are located in Portland, Victoria, Australia and Gladstone, Queensland, Australia.

We do not engage any employees or contractors. All employees are seconded from a related entity, Marubeni Australia Ltd (MAL).

MAA holds directly or indirectly the following minority interests in Aluminium smelting assets and the related power generation assets:

- 52.95% of Southern Cross Aluminium Pty Ltd (with SC Metal Pty Ltd - a subsidiary of Sumitomo Corporation), which itself owns a minority share of 17% in pot line 3 of the Boyne Island Aluminium Smelter (via Boyne Smelter Ltd);

- SCA own 100% of Southern Cross GPS Pty Ltd (SCG), which itself owns 8.5% of Gladstone Power Station; and
- 22.5% of Portland Aluminium Smelter (**PSJV**) in Victoria, Australia.

Our supply chain

MAA does not involve and engage with suppliers for the operations of its invested projects. Boyne Smelter Limited is in incorporated joint venture, Gladstone Power Station is an unincorporated joint venture operated by NRG Energy Inc and the Portland Aluminium Smelter is an unincorporated joint venture operated by Alcoa of Australia.

Modern slavery risks

We recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

Risk assessment methodology

We developed a risk assessment methodology which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location and specific entity risk.

Our initial risk assessment has indicated that our operations and supply chain have a low potential for modern slavery risks. Our risk profile is summarised in the table below.

Risk profile

Risk	Description of risk
Sector /Industry	Our business is investment in the Australian aluminium sector and we do not operate our joint ventures directly. The Australian aluminium smelting sector is considered low risk as it relies on well trained specialist workers and is highly regulated and monitored by independent and governmental parties.
Product / Service	There are no goods and services that we directly procure in relation to our investments.
Geographic	All of our investments are in Australia, and we consider Australia as a low-risk jurisdiction.
Specific Entity	We have not identified any entity specified risks.

Actions to assess and address risk

Noting that our joint ventures are not operated by MAA and we are not directly involved in the day-to-day operations, during FY2020 we introduced a number of policies and procedures to ensure we have strong frameworks to enable us to better understand and address modern slavery risks in our investments, including the introduction of a:

- Modern Slavery Policy for our business that establishes our commitment to addressing modern slavery risks in our business and driving an accountability for ethical business practices across our organisation.
- Grievance Procedure that supports and encourages any employees or secondees to raise concerns without fear that their future employment prospects will be adversely affected. Considering there are currently no direct employees under MAA, this procedure is only applicable to secondees.

In future reporting periods, we will further consider the extent to which our investments may present risks of modern slavery and the extent to which we can influence decision making in the joint ventures to reduce any such risks.

Assessing our effectiveness

We are committed to reviewing the effectiveness of our actions by regularly reviewing our modern slavery processes and identify any potential risk of modern slavery, especially if a new supplier is engaged.

Externally, MAA will check with invested joint ventures on their assessment of modern slavery risks. Internally, MAA will encourage secondees to follow MAL Modern Slavery Training and guideline.

Consultation

As a subsidiary of the Marubeni Corporation, MAA's approach to modern slavery is largely comprised of overarching policies, systems and processes that are designed to be consistently applied across the Marubeni Group.

During FY2020, there was consistent consultation and collaboration between the Board of MAA and the project management section within Marubeni Corporation.

Prior to being put to the Board of MAA for review and approval, this statement was reviewed by Monami Tashiro, Director of MAA.

FY2021 focus

As this is our inaugural statement, we recognise there are further steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

In FY2021 we will focus on monitoring and reviewing Modern Slavery legislation compliances. We will also focus on further engaging with the operators of our joint venture investments to consider the extent to which our investments may present risks of modern slavery

This statement was approved by the Board of Marubeni Aluminium Australia Pty Ltd on 26th March 2021.



Shinji Shindo
Managing Director