



## MITSUI IRON ORE DEVELOPMENT PTY LTD

### MODERN SLAVERY STATEMENT 2020

This Modern Slavery Statement describes the steps taken by Mitsui Iron Ore Development Pty Ltd (ACN 008 734 361) (**MIOD**) during its financial year ending 31 March 2020 to address modern slavery risks in its business and supply chains.

MIOD makes this statement in accordance with the *Modern Slavery Act 2018* (Cth).

#### **Our organisation**

MIOD is a wholly owned subsidiary of Mitsui & Co., Ltd. (**Mitsui Tokyo**), which is a true global conglomerate with multiple businesses operating across different industries under the one corporate group. With nearly 46,000 employees and 506 affiliated companies, Mitsui Tokyo does business in 65 countries from 133 offices around the world.

MIOD understands that we need to lead by example in the way we do business. We operate by a set of values which shapes the way we think, work and act to ensure we are helping people to achieve their ambitions – in the right way.

This also means we aim to act fairly, ethically and openly in everything we do. We are committed to combating the risk of modern slavery in our supply chains or in any part of our business.

#### **Our business in Australia**

MIOD is located in Western Australia and directly employs 12 staff. MIOD holds a 33% interest (20% direct and 13% indirect) in the Robe River Iron Associates unincorporated joint venture (RRIA) which operates mines and mining related infrastructure in Western Australia. RRIA is an iron ore mining operation in Western Australia's Pilbara region. It is ultimately owned by Rio Tinto Plc (Rio Tinto) (53%), Mitsui & Co Limited (Mitsui Japan) (33%) and Nippon Steel Corporation (NSC) (14%) through Australian partnerships who have direct interests in the joint venture. The joint venture is managed by Robe River Mining Company Pty Ltd (RRMC) (which is majority owned by Rio Tinto Ltd), and operates two sets of open pit mines in Western Australia, one being in the Robe Valley and one located in West Angelas. The joint venture also owns and operates Port Walcott (Cape Lambert), one of the three major iron ore exporting ports in the Pilbara region of Western Australia, and rail networks across the region.

#### **Assessing and managing risk**

Through its investment in RRIA, MIOD is exposed to large supply chains from a variety of suppliers across multiple continents. As majority shareholder and manager of the joint venture, Rio Tinto manages risks MIOD may be exposed to through the supply chain on behalf of participants. Their statement can be found:

<https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-policies/RT-Slavery-human-trafficking-statement-2019.pdf?rev=20aeda5623b6484dab11efda5bb7ba2c>

MIOD engages the services of Mitsui (both locally in Australia and in Japan) for shared services and has performed a risk assessment of human rights violations within those services, deeming them low risk. Mitsui itself is committed to upholding modern slavery legislation and has published its own statement in this regard. Many of our direct suppliers have their own extensive supply chains, connecting us with businesses worldwide. We have a robust process that aims to ensure we only work with appropriate suppliers who can meet the standards that we expect.

Mitsui Tokyo has assessed their global supply chain this year specifically for modern slavery risks using human rights risk mapping, together with advice from and consultation with independent experts. The assessment included MIOD as a wholly owned subsidiary, and was based on leading international human rights risk indicators and other tools such as the “[List of Goods Produced by Child Labor or Forced Labor](#)” of Bureau of International Labor Affairs (ILAB) and “[Global Map of Environmental and Social Risks in Agro-Commodity Production](#)” of International Finance Corporation (IFC), placing emphasis on the core labour standards identified by the International Labour Organization (ILO). Through this process, none of the existing suppliers of MIOD have been identified as high risk in the human rights risk mapping.

MIOD engages suppliers of banking and professional services (such as major banks, legal, accounting and engineering firms). MIOD has confirmed that these professional service providers have responsible supply chain policies and anti-modern slavery statements.

### **Actions Taken**

First of all, MIOD maintains its Business Conduct Guidelines, which oblige the company and its people to conduct our business in a manner that respects human rights and does not involve any modern slavery practices. The Guidelines also prohibit discrimination on the basis of any protected attribute under the law. The Guidelines are MIOD's principal code of conduct for our employees and contractors, who are required to understand and adhere to the Guidelines throughout their employment or engagement.

We also have a [Whistleblower Policy](#) in place with the reporting route available for both internal and external reports in case of any complaint or concern regarding our modern slavery obligations.

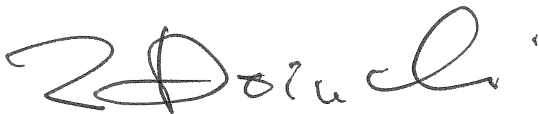
In addition, information on the mandatory reporting requirements has been conveyed to all staff. Our Annual Compliance Training and internal publications (for example, a "BCG Reminder"), which are provided to all employees and contractors, addressed the risk of modern slavery in our supply chains for the purpose of ensuring our workforce understands the law and our obligations in this area, and to raise awareness of modern slavery risks in the context of our business.

### **Looking ahead**

Moving ahead we are currently working to implement a framework in line with Mitsui Tokyo to assess and monitor the modern slavery risks in our supply chain.

We recognise that the risks of modern slavery are complex and evolving. We will continue to work to address these risks in our business and engage with a range of stakeholders to assess the effectiveness of our actions and enhance our approach.

I, Takahiro Doiuchi, hereby certify that this Modern Slavery Statement 2020, has been approved by the Board of Directors of Mitsui Iron Ore Development Pty Ltd on 17 December 2020.

A handwritten signature in black ink, appearing to read 'T. Doiuchi', written in a cursive style.

**TAKAHIRO DOUCIHI**  
President and Managing Director  
17 December 2020