



Modern Slavery Statement

Marubeni Aluminium Australia Pty Ltd
FY2021

This statement covers the activities of Marubeni Aluminium Australia Pty Ltd (ABN: 60 056 598 871) (**MAA**) and its owned and controlled entities during the year ended 31 December 2021.

This modern slavery statement is made 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.

Throughout 2021, we have continued to build on our approach to addressing modern slavery and have prioritised the awareness and understanding of modern slavery risks by training including compliance with modern slavery legislation and MAA's policies and procedures on human rights initiatives including the prevention of modern slavery.

This statement has been approved by the Board of MAA on 3rd June 2022.

About us

At 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. We take appropriate corrective measures if there is evidence that our business activities or our related investments have contributed to modern slavery. MAA seeks to create sustainable value by conducting business activities that respect human rights.

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 through its global network of 132 locations in 67 countries and regions.

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 an 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 utilise 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.

Using this methodology, we undertook risk assessments of modern slavery risks in our operations and investment project over their supply chains throughout the reporting period to consider the extent to which we cause, contribute to, or are directly linked to modern slavery practices. These risk assessments have confirmed that our operations and investment project supply chains continue to 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

We understand the importance of working collaboratively with our employees, suppliers and the broader industry to combat modern slavery.

In this reporting period, we continuously maintained the steps set out in further detail below to assess and address modern slavery in our operations and supply chains

Noting that our joint ventures are not operated by MAA and we are not directly involved in the day-to-day operations, during FY2021 we continuously maintained the steps set out in further detail below to assess and address modern slavery in our operations and investment project.

Due diligence

As noted above, MAA does not operate our joint venture investment and 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.

Regardless, we undertook desk-top assessment with investment project operators on the risks of modern slavery. We received responses from each of the investment project operators which indicated that they do not present a risk of modern slavery or unethical procedures in their respective operations and supplier chains.

Governance and accountability framework

The directors and Managers of MAA are responsible for considering any risks of modern slavery within MAA's ordinary course of business.

The directors and Managers consult with the Managing Director who is responsible for monitoring compliance and the preparation of this statement.

During FY2021, there was consistent consultation and collaboration between the Board of MAA and the project management section within Marubeni Corporation.

Policies and procedures

Our policies and procedures ensure we have strong frameworks to enable us to assess and address modern slavery risks. These policies include:

- Modern Slavery Policy for our business that establishes our commitment to addressing modern slavery risks in our business and driving 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.

We also continuously check and work closely with investment project operators on the modern slavery monitoring, identification, and rectification, if any, of modern slavery behaviours within their operations or supply chains.

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. Senior management annually considers whether we are appropriately identifying and evaluating our modern slavery risks. When commencing a new operation or engaging a new supplier, we would also assess whether our existing risk management processes remain appropriate.

We utilise a number of key performance indicators to measure the effectiveness of our actions, including:

- the number of suspected modern slavery incidents in a reporting period (In FY2021, MAA did not identify any); and
- the number of secondees that have undertaken training in a reporting period (In FY2021 all secondees undertook Modern Slavery Legislation e-training as well as training on the Marubeni Group Basic Supply Chain Sustainability Policy).

Externally, MAA will check with invested joint ventures on their assessment of modern slavery risks. Internally, MAA will encourage adherence to the MAA Compliance Manual which stipulates policies, procedures, and a broader governance framework on Modern Slavery.

Training

To maintain a high level of understanding and awareness of the risks of modern slavery in our operations and investment joint venture supply chains, MAA secondees has attended modern slavery training conducted by MAL.


A key focus going forward will be the implementation of more targeted training for all secondees to refresh and enhance their understanding of modern slavery and MAA's responsibilities for respecting human rights in FY2022.

Consultation and approval

MAA does not have any owned or controlled entities and therefore this criteria is not applicable. MAA checked and consulted with all joint venture investment operators in the preparation of this statement.

This statement was approved by the Board of Marubeni Aluminium Australia Pty Ltd in their capacity as the principal governing body for Marubeni Aluminium Australia Pty Ltd on 3rd June 2022.

This statement is signed by Takeshi Kondo in his role as the Managing Director and Chairman of Marubeni Aluminium Australia Pty Ltd.



Takeshi Kondo
Managing Director