



Mitsui-Itochu Iron Pty Ltd

MODERN SLAVERY STATEMENT 2024

1. Introduction – s 16(1)(a) of the Act

This Modern Slavery Statement describes the steps taken by Mitsui-Itochu Iron Pty Ltd (ACN 008 702 761) (**MII**) during its financial year ending 31 March 2024 to address modern slavery risks in its business operations and supply chains in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**). MII is a reporting entity under the Act.

2. Our organisation – s 16(1)(b) of the Act

Corporate Structure, Operation & Supply Chain

MII's ultimate parent entity is Mitsui & Co., Ltd (**Mitsui Tokyo**) and Itochu Corporation (ITOCHU). Mitsui Tokyo is a global conglomerate with multiple businesses operating across different industries under the one corporate group. Together with its many subsidiaries and affiliates, Mitsui Tokyo operates business through its offices in countries across the world.

MII does not directly employ any staff however obtains support through shared labour resources from its sister company, Mitsui Iron Ore Corporation Pty Ltd (**MIOC**). The shared labour resources are based in Perth Western Australia working together with BHP (the JV's operator) and ITOCHU in the world renowned Western Australian Iron Ore (**WAIO**) Joint Ventures (**JV**) in the production and sale of iron ore products to customers in China, Japan, South Korea, Australia and other countries. BHP operates & manages the operation and supply chain of WAIO JV.

Through our WAIO JV partnership with the JV operator BHP, MII has supported & encouraged sustainable and corporate social responsibility practices across our JV operation and supply chain. MII is a standalone entity and does not control or hold any other corporate entity. For more information on our organisation, please refer to our website below:

https://www.mitsui.com/au/en/group/1226100_9223.html

Further, in contributing to the sustainability of the Australian community, MII actively promotes social contribution in collaboration with our affiliated company Mitsui & Co. (Australia) Ltd (**MCA**).

For more information on our sustainability activities in collaboration with MCA, please refer to the website below:

Sustainability at Mitsui: [Sustainability - Mitsui & Co. \(Australia\) Ltd.](#)

We understand 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.

3. Assessing risk – s 16(1)(c) of the Act

Assessment

Partnering with BHP through our WAIO JV operations, MII's unique business portfolio and business structure features a supply base that is diverse, including small and medium-sized businesses as well as multinational corporations. Our direct & indirect suppliers have their own extensive supply chains, connecting us with business worldwide. We have a robust process that aims to ensure we only work with appropriate suppliers who meet the standards we expect of them.



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Human Rights Risk Mapping

Mitsui Tokyo has assessed our global supply chains in 2020 by assessing 3,128 transactions conducted by the head office and 7,820 transactions conducted by its overseas offices (which includes MII) from the human rights perspective broadly including modern slavery risks using human rights risk mapping, together with advice from and consultation with independent experts.

The assessment 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 MII have been identified in the high-risk combinations. MII also engages suppliers of banking and professional services (such as major banks, legal, accounting and consultancy firms). MII is satisfied that these service providers have responsible supply chain policies and where applicable, report their anti-modern slavery statements, and in relation to the service provided to MII, are unlikely to have high-risk combinations in those supply chains.

4. Managing risk – s 16(1)(d) of the Act

Policies and monitoring framework

First of all, MII maintains its Business Conduct Guidelines, which oblige the company and its people to conduct our business in a manner that respect 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 MII's principal code of conduct of our employees and contractors, who are required to understand and adhere to the Guidelines throughout their employment or engagement.

We also have in place reporting route available for both internal and external reporting in case of any complaints or concerns regarding our modern slavery obligations.

Actions taken

For the reporting period ending 31 March 2024:

- **Sustainable Procurement Policy** –this policy sets out our expectations for our suppliers (and sub-suppliers) to prevent and eliminate modern slavery, as well as our intentions to monitor and if necessary, terminate business transactions in case of continued non-compliance.
- **Supplier Check** – for monitoring purposes, MII, in consultations with Mitsui Tokyo and its affiliated company MCA has conduct modern slavery checks on suppliers transacted with during the reporting period. These check methods include reviewing the suppliers' most recent lodged modern slavery statement, and if necessary, inquiring directly and/or providing a questionnaire to the supplier. The check concludes no suppliers have reported any instances of modern slavery within their supply chains.
- **Business Conduct Guidelines** (with e-learning)– MII's Business Conduct Guidelines is enhanced by the e-learning course including a module dedicated to modern slavery where staffs can learn modern slavery risks in the context of our trading and investment business model. This e-learning course is compulsory for all our employees.



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5. Assessing effectiveness and looking ahead – s 16(1)(e) of the Act

We are assessing the effectiveness of actions by:

- monitoring the results of our supplier checks and continuously undertaking periodic reviews on the relevancy of these checks; and
- working together with Mitsui Tokyo and MCA to benefit from their reflections on their own human rights due diligence efforts.

In the financial year ending 31 March 2025, we intend to continue our efforts on our suppliers checks to assess for modern slavery risks, analyse the check results and engage with relevant stakeholders (e.g., Board of Directors, President & Managing Director, General Managers) to discuss what appropriate actions can be taken, if required.

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.

6. Consultation in preparing this statement – s 16(1)(f) of the Act

MII do not own or control any other entities and therefore there are no further consultation requirement.

7. Certification

I, Koichi Hirao, hereby certify that this Modern Slavery Statement 2024 has been approved by the Board of Directors of Mitsui-Itochu Iron Pty Ltd on 30th September 2024.

Hirao Koichi

KOICHI HIRAO

President & Managing Director
30th September 2024