

MAG ONTEC

ACN 010 441 666

MAGONTEC LIMITED

Modern Slavery Statement

2023

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Image: Qinghai salt lake retention ponds (Qilai Shen)

About this statement

This is the first Modern Slavery Statement prepared by Magontec Limited (MGL) and its owned or controlled entities (Group) pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (the Act).

This Statement relates to the reporting period that commenced on 1 January 2023 and ended on 31 December 2023 (Reporting Period) and describes the risk of modern slavery in the operations and supply chains of the reporting entity and its owned or controlled entities and details the steps taken to assess and address this risk.

Modern Slavery Act 2018 Criteria

Sec. 16 (1)	This Modern Slavery Statement covers the following mandatory reporting criteria detailed in the act:	Section
(a)	identify the reporting entity	1
(b)	describe the structure, operations and supply chains of the reporting entity	2
(c)	describe the risk of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	3-5
(d)	describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes	4-5
(e)	describe how the reporting entity assesses the effectiveness of such actions	6
(f)	describe the process of consultation with: <ul style="list-style-type: none"> - 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 	7
(g)	include any other information that the reporting entity, or the entity giving the statement, considers relevant.	1-8

Magontec is aware that modern slavery can occur in any industry and any country and that modern slavery risks must be recognised so that business may not exploit individuals for profit.

Magontec is committed to ensuring that our people management practices, procurement practices and all dealings with the magnesium global community support and protect the rights of all workers within our operations and supply chain.

This statement has been reviewed and approved by the Board of Magontec Limited.



Nicholas Andrews
Executive Chairman

15 May 2024

1. The reporting entity

This joint Statement reports on the activities of Magontec Limited and its subsidiaries and has been reviewed and approved by the Directors of Magontec Limited (Parent Entity).

Formal Name of Entity	Description of Entity	Referred to as
Head Office Entities		
Magontec Limited	The ultimate parent/holding company of the Group.	MGL, the Company or the Parent Entity
Advanced Magnesium Technologies Pty Limited	Wholly owned subsidiary of Magontec Limited that acts as the administrative operating entity.	AMT
Varomet Holdings Limited	The wholly owned holding entity that owns the Group's operating businesses at Xi'an (PRC) and Suzhou (PRC).	VHL
Operating Entities		
Magontec GmbH	The wholly owned entity that owns the Group's operations in Bottrop, Germany.	MAB
Magontec SRL	The wholly owned entity that owns the Group's operations in Santana, Romania.	MAR
Magontec Xi'an Co. Ltd.	The wholly owned entity that owns the Group's operations in Xi'an, PRC.	MAX
Magontec Qinghai Co. Ltd.	The wholly owned entity that owns the Group's operations in Qinghai, PRC.	MAQ
Magontec US LLC	The wholly owned entity that acts as the Group's distributor located in the United States of America.	MAU
Magontec Suzhou Co. Ltd.	The wholly owned entity that owned the Group's operations in Suzhou, PRC. Production ceased at this facility in 2016.	MAS

2. About Magontec Limited

MAGONTEC has been providing innovative solutions in the field of magnesium products for nearly 70 years. It is a record to be proud of and one that can help to sustain our business in the years ahead.

To survive over this long period, a company must be flexible and able to adjust to changing business requirements so that it remains a viable entity, an attractive place to work and a strong counterparty for customers and suppliers.

Our values are contained in our strategic objective:

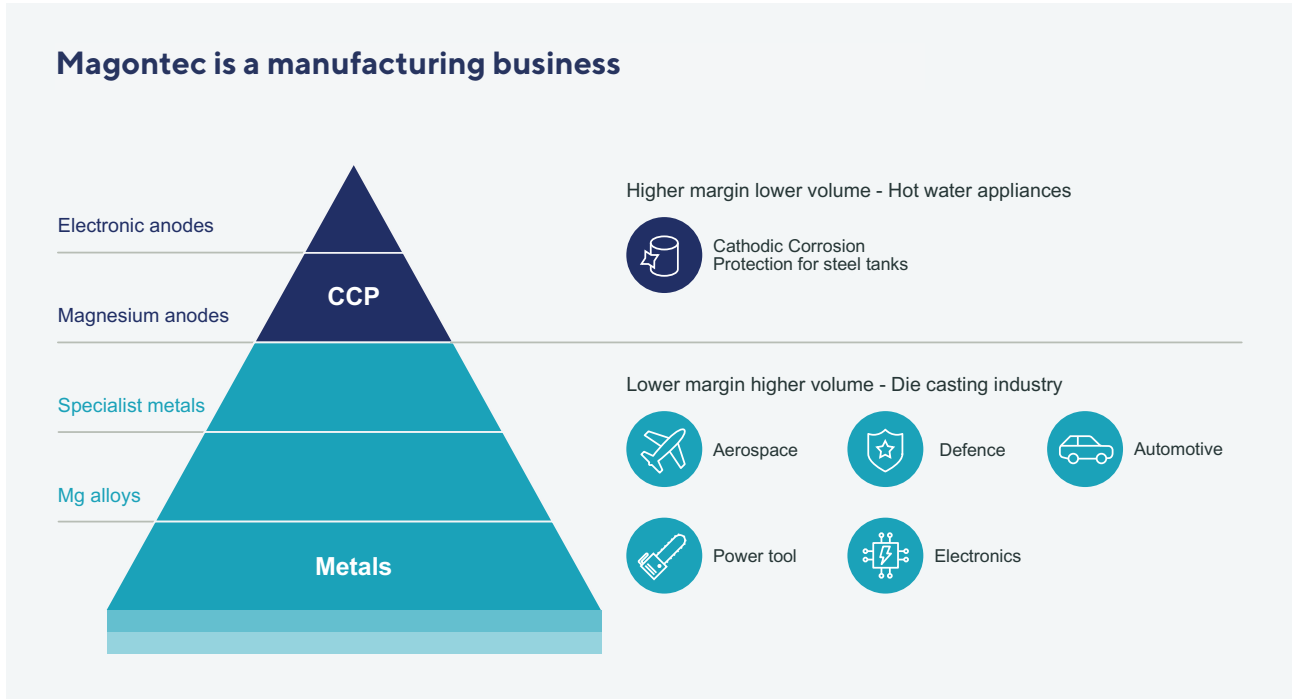
"Magontec seeks to entrench itself as a leading global manufacturer and recycler of magnesium alloys and magnesium alloy products, to be known as a fair and safe workplace, for its embrace of technology, high environmental standards, efficient execution of global logistics and high standards of corporate governance."

Which is further detailed with the following:

Objective	Explanatory Note
A leading global manufacturer and recycler of magnesium alloys and magnesium alloy products	Magnesium alloy is the central theme of Magontec's business. Except for electronic anodes (ICAS), all parts of our business are currently focused on Mg. The Magontec Qinghai cast house project, which is the exclusive Mg alloy commercialisation vehicle for the QSLM Qinghai electrolytic Mg project, is expected to position Magontec as a global leader in this product.
A fair and safe workplace	Our strategic objective acknowledges that Magontec has a responsibility to its employees to ensure that the workplace is safe and that employees are treated fairly at all company worksites companies.
Technology	For Mg alloy to become a more ubiquitous metal in the 21st century it needs to broaden its application, both within and outside of the automotive industry. Magontec brings critical early-stage technologies and a growing body of R&D that will help to propel Mg volumes in the decades ahead. We are committed to investigating new applications, new production methods and a deeper understanding of magnesium in partnership with Universities and research institutes. Technology is a key driver for Mg alloys and for Magontec.
High environmental standards	The Qinghai project establishes a new environmental benchmark for global Mg production. This provides Magontec and QSLM with a distinct advantage in global markets where increasingly stringent production and life cycle emission standards are adding costs to less advanced manufacturers. Magontec also operates low emission facilities in Europe that access a high proportion of renewal energy for Mg alloy recycling and Mg anode manufacturing.
Efficient execution of global logistics	Magontec has significant Mg alloy manufacturing and recycling operating abilities in Europe and Asia and distribution abilities to North American customers. The Company's ability to efficiently deliver material to customer sites all over the world is an important USP. In the years ahead, as Magontec grows its Mg manufacturing and recycling activities, efficient logistics will remain a core skill.
High standards of corporate governance	As an ASX listed company, Magontec is bound by Australian corporate law, ASX governance standards as well as environmental, employee, tax and other laws that dictate the way in which the company behaves in all the countries in which it operates. Magontec's strategic objectives also recognise a public image that directly impacts its financial value. The Company seeks to comply with the highest corporate governance standards in all its locations to maximize shareholder wealth.

2. About Magontec Limited continued

Our Products



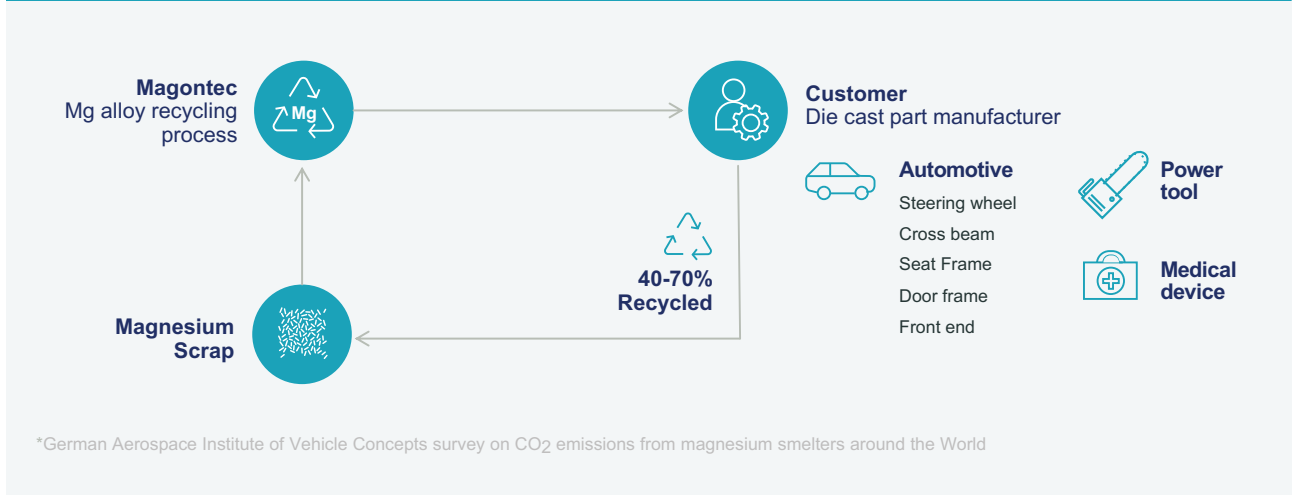
Magnesium Alloy

Magontec is a specialist manufacturer of primary Mg alloys and a recycler of Mg alloy returns.

Magontec’s recycling services make a significant contribution to the environment. Re-using materials is an important part of the production and procurement chain, reducing cost and waste and contributing to the circular economy.

Construction of new plants and maintenance of existing facilities requires the observance of strict environmental emissions controls. Magontec recycling facilities are certified by relevant environmental authorities and enjoy an enviable safety record.

Mg is 100% recyclable	Recycling adds just 0.59 kg CO ₂ equivalent/kg of Mg*	Installed capacity 24k mtpa	Europe's largest Mg recycler
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*German Aerospace Institute of Vehicle Concepts survey on CO₂ emissions from magnesium smelters around the World

2. About Magontec Limited continued

Our Products (continued)

Cathodic Corrosion Protection

Magontec is the world’s leading manufacturer of magnesium and electronic anodes for cathodic corrosion protection.

Alloy quality makes a critical difference; Magontec has made millions of HyTonic® anodes over many decades producing a safe product that also protects the health of the end-user. Magontec’s anodes feed into the supply chain of hot water appliance manufacturers all over the world.

Total control of the processes employed ensures that Magontec remains a leading producer of safe and high-performance products. Magontec has been investing for decades in technical know-how focussed on the electrochemical processes and industrial production procedures.

Magontec controls all production processes from sourcing the raw material to casting or extruding. The company has an intimate understanding of casting processes and techniques required to ensure that our products meet application-specific conditions. Further processing offers a variety of finished products appropriate to the specific requirements of the household environment including dimensions, functions and mounting types.

Cathodic Corrosion Protection (CCP)

Every water tank in every house requires corrosion protection



Industry drivers

Urbanisation (water heater installation)
80% replacement (5 to 10 year c)

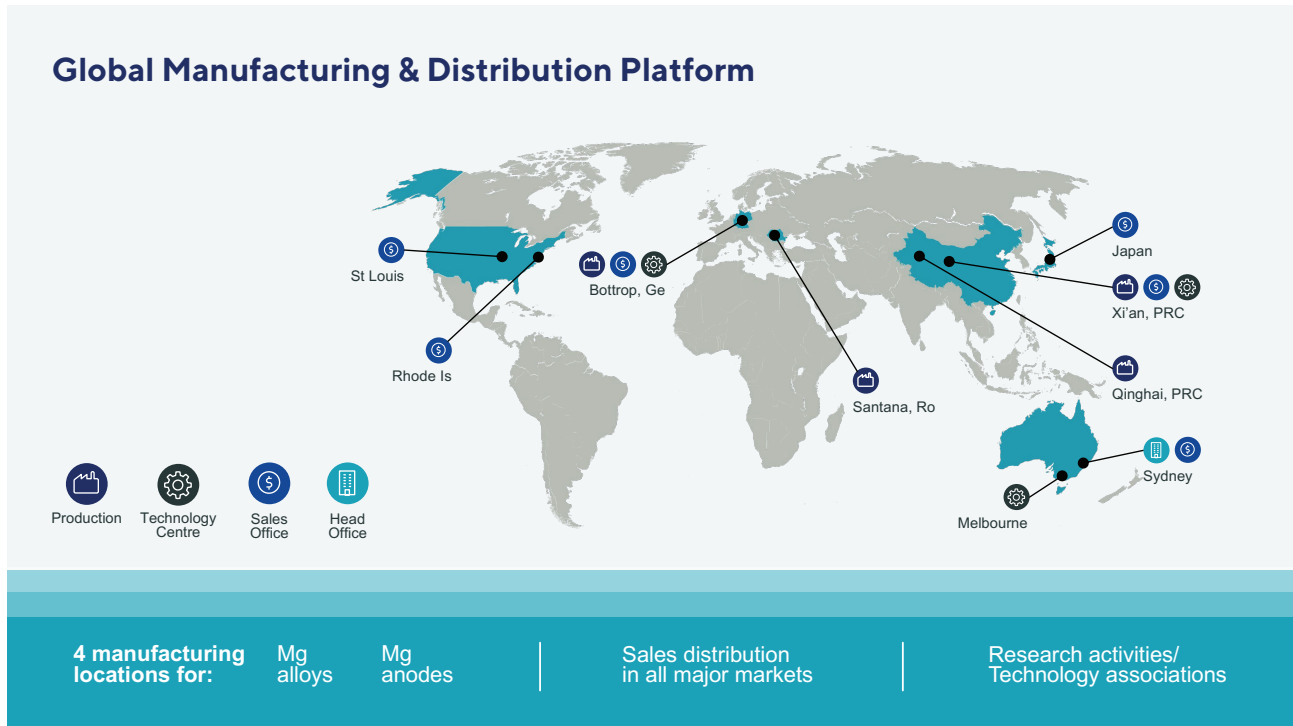


Climate change

Switch from oil/gas to electric heat pump
Accelerated replacement of installed appliances

2. About Magontec Limited continued

Our Operations



Headquartered in Australia, Magontec operates 4 manufacturing facilities across 3 countries.

Country	Location	Location Activity	Employees as at 31 December 2023
Australia	Sydney	Group Headquarters	4
Germany	Bottrop	Alloy	77
Romania	Santana	Anode	72
China	Xi'an /Qinghai	Anode, Alloy	158
USA	Rhode Island / St Louis	Sales	-
4 countries	5 Locations		311

* USA and Japan are third party sales agencies with no direct employees of Magontec.

2. About Magontec Limited continued

Our Supply Chain

Each location operates largely independently of each other, leveraging services where possible, and sourcing raw material locally and within the geographic region.

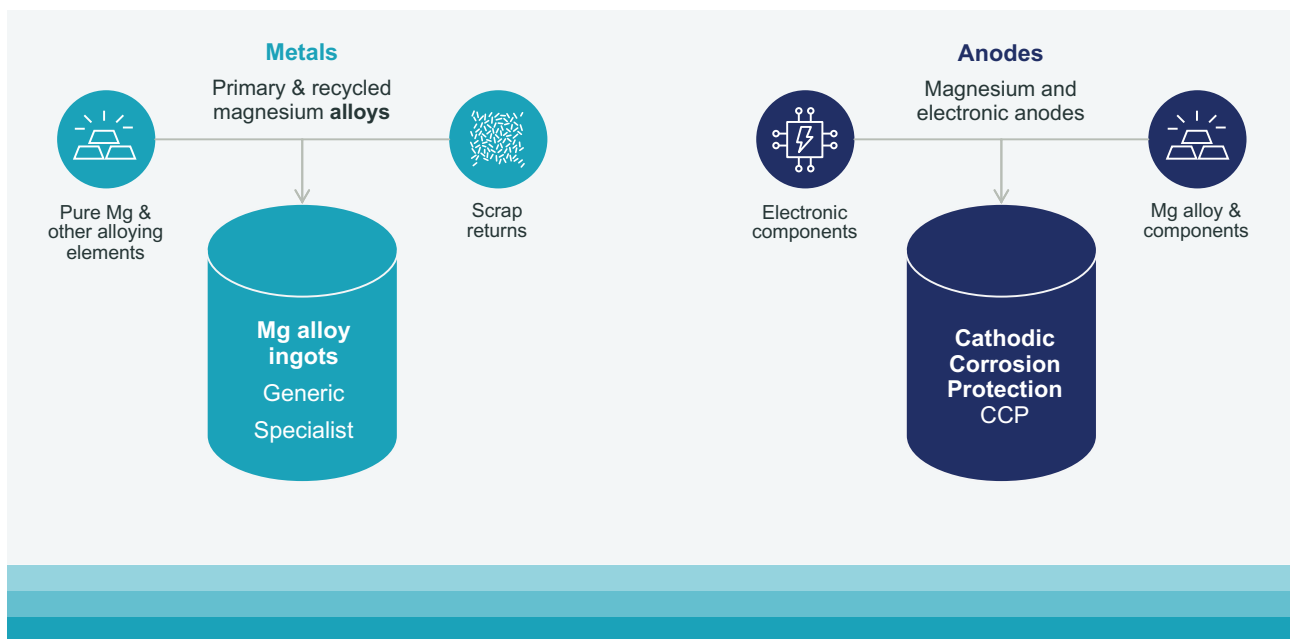
Our suppliers provide raw material in form of alloying elements, electronic and other parts as well as Mg alloy scrap returns. This represents around 75% of our 2023 annual spend. The remaining 25% is allocated to wages and “G&A” expenses.

Spend	Group (% of Spend)
Cost of Goods Sold	75%
Personnel (direct)	17%
General Expenses	8%
	100%

Source: Magontec Audited 2023 Annual Accounts

Note: Spend is defined as COGS and other P&L expenses excluding impairment, depreciation, interest and tax.

Customers are a key source for supply, providing their scrap back to our operations for recycling and return in the form of Mg alloy ingots. This recycling of magnesium scrap from customers, meets close to 60% of our overall Mg raw material requirements.



3. Our approach to managing Modern Slavery Risks

Magontec’s risks are becoming increasingly complex due to changes in global markets and our widespread geographical locations. Addressing these risks requires a practical and straightforward approach that is regularly reviewed, assessed, and where necessary, adjusted on a continuous improvement basis.

Magontec continually works to ensure that risk management practices are kept relevant to risks and embedded in processes and operations. This year we updated the Board approved risk management process to better align with the Company’s strategy, operational environment and ways-of-working.

Modern Slavery Defined:

Modern slavery refers to situations of exploitation in which a person cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power. Modern slavery is an umbrella term and includes practices that include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.

(source: Australian Government – Attorney-General’s Department)

Our overall Business Risk Profile

As a business that operates in the manufacturing and recycling of magnesium ingots across 4 countries and 2 continents, the Group covers a broad and diverse cultural and political environment.

This diversity brings challenges in coordination of management across this widely spread operating environment.

Whilst this introduces a certain operational risk, the group has been operating in this environment over many years and has focussed on implementing business practices that mitigate risks for non-compliance to group policies.

The overall global direction in relation to ESG, and specifically relating to the Attorney General’s statement on Modern Slavery, is creating a greater consistency in legislative fundamentals and has made the group’s geographical and political challenges somewhat easier. This global consistency has helped to mitigate the risk of non-compliance within our business.

Our Business Model Risks

Our business model assists in managing and mitigating risks:

Our **business size** is simple in its structure, without complexity, that assists with managing the organisation with effective oversight and governance.

As a **manufacturer** specialising in a single industry segment of magnesium, the Group does not have a wide product offering which requires a large number of direct and indirect suppliers. This relatively small supply chain depth makes it easier to manage and ensure compliance with our Supplier Code of Conduct.

Our **geographical segments** allow us to have specialised teams focused on ensuring local compliance, with oversight from head-office expertise assisting the teams with group policy and coordination.

As a result of this global business model and overlay of an effective whole-of-business risk management framework, our exposure to risks associated with for Modern Slavery in our business and supply chain are reduced. The following sections detail the residual operational and supply chain risks in the business.

Where we operate and prevalence of modern slavery:

Operations and major locations of Supply	Estimate of prevalence of modern slavery per 1,000 population
Australia	1.6
Germany	0.6
Romania	7.5
China	4.0
USA	3.3
Japan	1.1

Source: Global Slavery Index 2023 – Walk Free Org

3. Our approach to managing Modern Slavery Risks continued

The Global Slavery Index 2023 Report rates the prevalence of modern slavery in the countries in which we operate in. The prevalence of modern slavery occurrence is an estimated indicator in each country across multiple industries and supply chains.

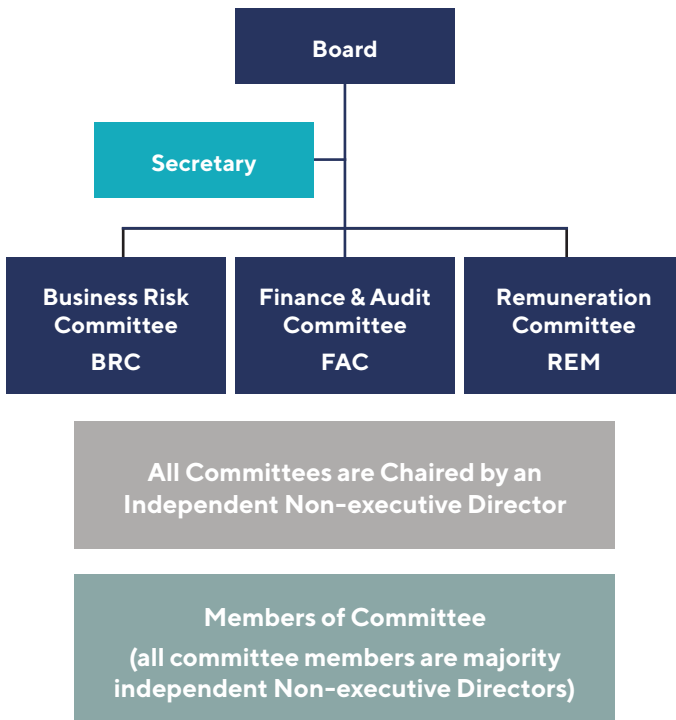
While Magontec feels these are not indicative of our business operations, this does not mean our operations are absent from risk nor that we are less rigorous with our due diligence processes in those regions.

Overview of our Governance

Magontec operates in volatile global markets and is exposed to constant changes in demand, pricing and costs.

Magontec and the global magnesium market are not alone in these challenging times. All businesses must adapt to the post COVID economic environment and, at the same time, seek to transition to cleaner energy sources and combat climate change. These two generational impacts are raising global risks associated with supply chains, the availability of clean energy, human resources and the impact of rising inflation on costs and corporate compliance complexity.

As a Publicly Listed entity, there is an expectation among our shareholders that the Company operate in an ethical and law-abiding manner. To this end Magontec has developed a strong and robust risk management process, incorporated within our Board and Committee structure and integrated within our operations.



Our Risk Management Improvements in 2023

During 2023, Magontec reviewed and enhanced its management processes to address and mitigate risks in line with the **ISO 31000:2018** standard. This includes identification of risks associated within our business and operates on an integrated whole-of-business approach.

ISO 31000:2018 provides more emphasis on the involvement of senior management and the integration of risk management into the organisation. Its overarching goal is to develop a risk management culture where employees and stakeholders are aware of the importance of monitoring and managing risk.

Identified risks are analysed and evaluated, with risk treatment processes determined to reduce risk exposure to the business. Regular reporting and reviews are undertaken throughout the year by operational management, the Risk Committee and the Board.

Risk management is a part of the organisation's structure, processes, objectives, strategy and reflects a people-centred discipline required to be effective.

4. Risk of Modern Slavery in our Operations

Our Business Operational Risks

The table below outlines material risks that relate to Modern Slavery in our operations. These risks are identified through the risk management framework, prepared by management with independent oversight from the Business Risk Committee and the Board.

Risk Category	Risk Indicator	Risk Management Mitigations & Actions	Mitigated Risk Assessment
Governance	Policies	<ul style="list-style-type: none"> - Employee Code of Conduct is provided to all employees and stipulates expected behaviours of employees. - Other associated policies and procedures supporting the Code of Conduct (whistleblower, etc) are in place. 	Low
	Risk assessment	<ul style="list-style-type: none"> - Group's Risk Management Framework aligns with ISO 31000:2018 and requires risk assessment for all identified risks. 	Low
	Grievance / Whistleblower	<ul style="list-style-type: none"> - Whistleblower Policy and training are in place for all locations. 	Low
	Segregation of duties	<ul style="list-style-type: none"> - All operations have established systems and process to manage recruitment and payroll reporting through to local finance teams and ultimately to group CFO as appropriate. 	Low
	Due Diligence	<ul style="list-style-type: none"> - As part of the annual independent audit process, employment and payroll processing is reviewed in detail and material breaches will be reported through to the Group CFO, Audit Committee and the Board. 	Low

4. Risk of Modern Slavery in our Operations continued

Risk Category	Risk Indicator	Risk Management Mitigations & Actions	Mitigated Risk Assessment
Employment	Contracts	<ul style="list-style-type: none"> - All employees and contractors have written contracts detailing the conditions, benefits and entitlements of the employee. - Conditions include wages paid, hours worked, overtime, paid leave benefits, other benefits and allowances. - No original personal ID documents are retained. 	Low
	Diversity & Discrimination	<ul style="list-style-type: none"> - The Group is a geographically dispersed organisation, with locations covering a multi-cultural and ethnicity diversity. - Employment is based on obtaining the most appropriate skilled individual for all roles being required. 	Low
	Wages / Living wage	<ul style="list-style-type: none"> - All employees are paid in accordance with their contract and no less than the minimum legislated wages for the country of operation. - Wage levels are reviewed annually and adjusted if required for any changes in legislated minimum wage rates. - No employment costs are deducted from the employee. 	Low
	Working hours / Overtime	<ul style="list-style-type: none"> - All employees work in accordance with their contracted hours, and the standard is no more than 40 hours per week. - Any additional work is paid in accordance with contract and local legislated rates. 	Low
	Leave	<ul style="list-style-type: none"> - All employees receive leave benefits in accordance with local legislation and include annual leave, sick leave, public holidays, etc. 	Low
	Child Labour	<ul style="list-style-type: none"> - No employees are below the working age of the local jurisdiction. - All workers ages are checked, and child labour prevented. 	Low
	Freedom of association	<ul style="list-style-type: none"> - All employees are free to join and be represented by a trade union or worker association. 	Low
	Other benefits	<ul style="list-style-type: none"> - All employees are paid superannuation or local equivalent in accordance with local legislation. 	Low
Health, Safety & Environment	Health & Safety	<ul style="list-style-type: none"> - HSE Committees exist in each location and report monthly through to the Risk Committee and Board on unsafe work practices and incidents. 	Low
	Environment	<ul style="list-style-type: none"> - All locations have compliance with local required legislative safety requirements and for EU include ISO 9001, ISO 50001 and ISO 14001 certification. 	Low

4. Risk of Modern Slavery in our Operations continued

Group Employee Code of Conduct

Key to our risk management and at the centre of our risk mitigation approach is our Employee Code of Conduct. Magontec's code is built on a strong ethical foundation. The code applies to all employees, contractors and directors.

Code of Conduct Principle	Company and Employee Expectations
Honesty & Integrity	<ul style="list-style-type: none"> - To deal fairly with all parties - Be respectful with others and treat them openly and honestly without prejudice or discrimination. - Not to behave in a manner that is fraudulent, corrupt or unlawful. - Refuse all payments and inducements from third parties that may compromise decisions and judgements.
Compliance with laws and regulations	<ul style="list-style-type: none"> - Comply with all laws, rules and regulations. - Abide by all applicable rules and standards of bodies. - Comply with all contractual obligations. - Abide by all protocols, policies and procedures.
Confidentiality & Privacy	<ul style="list-style-type: none"> - Maintain confidentiality of information that relates to Magontec, its employees, customers and suppliers.
Fair Dealing	<ul style="list-style-type: none"> - Fair, open, honest, dignified and non-discriminatory treatment. - Safe and healthy working environment. - Training and development to maximise individual potential. - Fair & equitable remuneration. - Opportunity to give and receive feedback.
Proper use of position:	<ul style="list-style-type: none"> - Act in good faith. - Act with due care and diligence. - Act for proper purpose. - Avoid conflict of interest or duty.

These principles permeate through the organisation, apply across all geographic regions and are supported by local operational procedures and manuals that are aligned with Group policies.

To support these principles, the Group has an enterprise-wide **Whistleblower Policy** which provide both the policy and process for all employees to communicate any breaches of our policies.

Employees and others working closely with Magontec Limited will often be the best source of information when things are not quite right. This Whistleblower Policy is an important element in detecting corrupt, illegal or other undesirable conduct at Magontec Limited.

A specific Modern Slavery Policy will be developed and issued in 2024.

5. Risk of Modern Slavery in our Supply Chain

As noted earlier in this report, Magontec’s supply chain is largely regionally based, concentrated in the procurement of raw materials with 60% sourced from customers in the form of scrap and recycled.

The automotive supply chain is highly focused on responsible supply chain practices resulting in the industry ensuring their businesses comply with the appropriate policies and practices to prevent modern slavery occurring.

Spend	Group (% of Spend)
AU	3%
EU	53%
PRC	44%
	100%

Spend	Group (% of Spend)
Cost of Goods Sold	75%
Personnel (direct)	17%
General Expenses	8%
	100%

The table below outlines material risks that relate to Modern Slavery in our Supply Chain. These risks are identified through the risk management framework, prepared by management with independent oversight from the Business Risk Committee and the Board.

Risk Category	Risk Indicator	Risk Management Mitigations & Actions	Mitigated Risk Assessment
Governance	Lack of Policies	- Supplier Code of Conduct is provided to all suppliers and stipulates expected behaviours of suppliers.	Low
	Lack of Due Diligence	- Visits are performed by local management to Tier 1 major suppliers on a regular basis.	Low - Medium
Supplier	Lack of Supplier Policies	- Tier 1 major suppliers Code of Conduct reviewed for alignment with MGL Suppliers Code of Conduct.	Low - Medium
	Poor Employment Practices	- Supplier employment policies are compliant in accordance with UN guiding principles on Business and Human Rights.	Low - Medium
	Poor Health & Safety	- Supplier safety policies are of a standard that meets or exceeds local laws and industry standards for safety and occupational health.	Low - Medium
	Dealing with Conflict Materials	- Reviews are undertaken on a bi-annual basis to update countries and suppliers in accordance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.	Low - Medium
	Dealing with Sanctioned Countries	- Reviews are undertaken on a bi-annual basis to update countries and suppliers that are sanctioned under the United Nations Security Council (UNSC) and Australian sanctions laws.	Low

5. Risk of Modern Slavery in our Supply Chain continued

Supplier Code of Conduct

Magontec strives to continuously optimise its corporate activity and products in the interests of sustainability and asks its suppliers to contribute to this in the interests of a holistic approach.

Contracting Partners agree on the validity of the following regulations for a joint Code of Conduct. The Contracting Partners undertake to comply with the principles and requirements of this Code of Conduct. Suppliers are encouraged to contractually require any subcontractors to comply with the standards and regulations outlined in our policy.

Any violation of this Code of Conduct may be grounds and cause for our Company to terminate the business relationship, including all related supply contracts.

Code of Conduct Principle (extract)	Supplier Expectations
Social Responsibility	<ul style="list-style-type: none"> - Exclusion of forced labour - Prohibition of child labour - Fair remuneration - Fair working time - Freedom of association - Prohibition of discrimination - Health protection, safety at work - Complaint mechanisms - Dealing with conflict materials
Ethical business conduct	<ul style="list-style-type: none"> - Fair competition - Confidentiality / data protection - Intellectual property - Integrity / bribery - Conflicts of interest

6. Effectiveness of Actions

This is the first Modern Slavery Statement prepared by Magontec Limited (MGL) and its owned or controlled entities (Group) pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (the Act).

Magontec is aware that modern slavery can occur in any industry and any country and that modern slavery risks must be recognised so that business may not exploit individuals for profit.

Magontec is committed to ensuring that our people management practices, procurement practices and all dealings with the magnesium global community, support and protect the rights of all workers within our operations and supply chain.

This commitment has been a foundation of the business and has ensured that the business has navigated through many global financial and economic challenges over the years.

Without its people and suppliers being treated with respect, safely and fairly, the business would not have survived the hurdles that it has faced.

This fact is testament to the effectiveness of our actions.

This ethos will be carried through into the next phase of the Group with a strengthening of its resolve to ensure modern slavery practices are not tolerated within our business or our supply chain.

We look forward to reporting our 2024 actions, and their effectiveness in reducing our modern slavery risk.

7. Our consultation process

With our subsidiaries

The reporting entities included in the report were consulted and provided information relevant to the compilation and commentary made in this statement.

Information was obtained through the Business Risk Committee and Board reports which contained regional risk, employment and safety reports.

With our suppliers

Regional Executives are in regular contact with both customers and suppliers, particularly where our customers are also our suppliers.

Information was obtained, where available, relating to our suppliers' Modern Slavery policies.

8. Action areas for next 12 months

Action Area	Action / Task
Modern Slavery Policies	<ul style="list-style-type: none"> - Modern Slavery Policy to be issued and references included in employee and suppliers code of conduct. - Continuous improvement of data capture for reporting and supplier prioritisation and categorisation. - Further supplier analysis.
Education	<ul style="list-style-type: none"> - Modern slavery training to be included in onboarding process for all new employees.
Collaboration	<ul style="list-style-type: none"> - Ongoing collaboration with the Group and suppliers and review of Modern Slavery contracts to and from suppliers.
Engagement with suppliers	<ul style="list-style-type: none"> - Rollout of Modern Slavery Supplier Questionnaire to key prioritised suppliers as a trial, in preparation for broader rollout in 2025. - Continued to have all new suppliers complete the Supplier Code of Conduct.
Governance	<ul style="list-style-type: none"> - Refinement of Internal ESG Committee roles and objectives. - Continue to improve data capture and quality. - Review of risk management process, identification of risks and remediation actions. - Continuous improvement of 2024 Modern Slavery Statement with focus supply chain mapping, spending data and effectiveness of actions.



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