



Process optimization services and products  
for abrasive and impact applications.

# Australia Modern Slavery Statement

—

FYE 2024





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# 1

## About the Reporting Entity

### Welcome To Country

We acknowledge the Traditional Custodians of the lands across Australia. We honor the long history and celebrate the strength and resilience of Aboriginal and Torres Strait Islander peoples and communities past and present. This proud heritage inspires our ambition to foster a shared sense of belonging for all Australians. We recognize and respect Aboriginal and Torres Strait Islander peoples' historical and ongoing connection to land and waters and pay our respect to Elders past and present

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# A word from our Director

On behalf of the  
Board of Directors of  
Magotteaux Australia,  
I am pleased to present  
our 2024 Modern  
Slavery Statement

At Magotteaux Australia, our commitment to ethical conduct, transparency, and human rights underpins every aspect of our operations and supply chains. We are proud to present our fourth Modern Slavery Statement, reaffirming our unwavering commitment to combating modern slavery and human trafficking within our operations and supply chains.

This statement reflects a comprehensive approach to understanding the complexities of modern slavery and our dedication to mitigating these risks. It serves as another important step in our ongoing journey towards robust corporate sustainability and adherence to evolving reporting standards, including our broader Corporate Sustainability Reporting Directive (CSRD) compliance initiatives. This report aims to enhance our ability to better serve our customers and anticipate our future needs by providing clear insights into our efforts.

In this exercise of transparency and accountability to our valued stakeholders – including our employees, customers, suppliers, and the communities in which we operate – we detail the actions and initiatives undertaken during 2024 to identify, assess, and address modern slavery risks within our operations and extended supply chains.

Our statement provides an overview of our organizational structure, business operations, and supply chains, highlighting our key initiatives and strategies implemented over the past year.

Modern slavery remains a complex and global issue with lasting impacts. At Magotteaux, we are dedicated to eliminating any potential for such abhorrent practices in our operations and supply chain, recognizing the immense significance of this undertaking. Recognizing the complex and dynamic nature of global supply chains, Magotteaux Australia’s performance in combating modern slavery is intrinsically linked to our resilience and proactive engagement.

During 2024, as we navigated ongoing global economic challenges, inflationary pressures, and geopolitical uncertainties, our dedication to upholding human rights remained unwavering. The unexpected events, such as those faced by our global Magotteaux family, underscored the critical importance of strong governance and collaborative efforts in managing risks across our entire value chain. I am deeply grateful for and proud of the dedication of our teams in upholding our values even in the face of adversity.

In 2023, we focused on finding better ways to integrate our modern slavery commitments across the business, helping us identify modern slavery risks, improve transparency, and take the right steps to mitigate issues or prevent harm from occurring in the first place. This included re-evaluating our risk assessment processes, improving our engagement with suppliers, and integrating modern slavery considerations into our broader sustainability and ethical business practices.

This statement also details the training and awareness programs provided to our employees and partners to ensure a robust understanding of human rights and modern slavery issues. As we continue to progress in our sustainability strategy, this is increasingly relevant across our emerging renewable energy interests, where ethical sourcing is paramount. We developed a set of core human rights controls to support improved identification and mitigation of these critical risks, including modern slavery.

Looking ahead in 2025, we are committed to strengthening our capabilities further. Our strategic goals for 2024-2028, built on Magotteaux’s foundation as a premium supplier, are not only focused on innovative products and operational excellence but also on reinforcing our responsible business practices. As we continue with our journey, we remain fully committed to delivering on these plans, with a steadfast focus on continuous improvement in our approach to human rights due diligence. We will train our leaders in integrating human rights requirements into business decision-making and supporting their teams to identify, prevent, and mitigate human rights risks, including modern slavery.

Our focus will be to increase the quality and quantity of human rights risk assessments completed at our assets, delivering on our Ethical Sourcing Plan and meeting our targets. It is also our priority to continue to strengthen our workplace culture by improving physical and psychological safety in our business so our employees feel safe, supported, and confident to raise concerns if something doesn’t feel right. This is fundamental to identifying, investigating, and responding to potential modern slavery concerns across our entire value chain.

Our commitment to continuous improvement is evident in the actions and future plans outlined in this statement. We recognize the importance of ongoing vigilance and proactive measures to safeguard human rights and maintain ethical standards in all our operations. This document serves as a testament to our dedication to creating a business environment that upholds the highest principles of respect, equality, and sustainability

We are committed to continuous learning, adapting, and leading by example. This is our promise to our people, our partners, our customers, and our communities. Whether this is in the way we conduct ourselves, the impact we have on rights-holders, or the way we screen our clients and suppliers, we should always strive to do better

We extend our sincere thanks to our members of our Board of Directors, and all Magotteaux employees for their unwavering commitment. We also appreciate the confidence placed in us by all our stakeholders. It is through these enduring relationships and our collective vigilance that we are able to cultivate long-term strategic partnerships and ensure that our business contributes positively to a world free from modern slavery.



Philippe De Bosscher  
General Manager & Director  
Magotteaux Australia



# Mission and Vision

Charting our course: our purpose and goals.

## Our purpose

### Balancing development and associated impacts.

As human development progresses, it’s essential to consider the environmental consequences of our actions toward a sustainable way of living.

Infrastructure development, including the mandatory use of metals and minerals, is necessary for global economic development and improved living standards.

- At Magotteaux we actively participate to this development, striking a delicate balance between:
- Resource efficiency: optimal use of non-renewable resources, minimizing waste and actively promoting recycling.
  - Environmental consciousness: ensuring that development doesn't harm the planet irreversibly.
  - Sustainable practices: encouraging businesses and individuals to adopt sustainable practices.

Since its inception, Magotteaux has always been there and has striven for an improved life cycle of its product directly improving client efficiency and thus reducing its overall impact on the planet.

At Magotteaux, sustainability is not a separate priority – it is the natural outcome of how we do business. By balancing economic performance, environmental responsibility, and social well-being, we create long-term value for all stakeholders.

## Our goals

**For many years, Magotteaux has been recognized as a leader in the industry—an achievement we strive to uphold every day by embracing Industry 4.0, driving innovation, and acting sustainably. We leverage our core competencies in abrasion and impact, along with our understanding of customer processes, to retain, develop, and consolidate our leadership.**

Our goal is to consolidate our position as the global leader in process optimization products and services for abrasive and impact applications.

At Magotteaux, our customers are at the heart of everything we do. We are committed to delivering long-term satisfaction by combining customer focus with sustainable practices. By balancing client needs, employee well-being, and environmental responsibility, we aim to build lasting success and maintain our industry leadership.



These objectives are part of our strategic vision.



To be a global leader in process optimization products & services for abrasive and impact applications



Satisfied customers



Sustainable profit

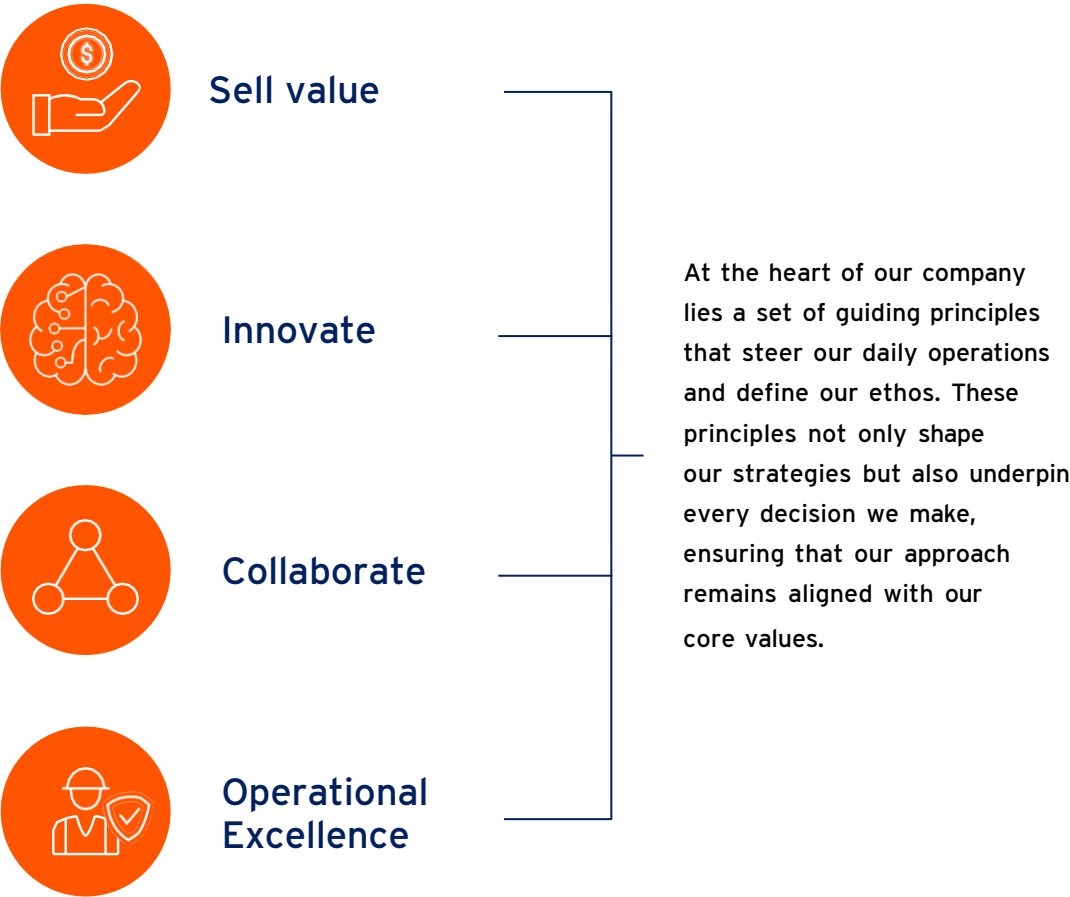


# Corporate Values

Our values and working principles help our people take the best decisions to serve the group objectives and ambitions.

People dominantly drive how we do things at Magotteaux. Our teams and working principles are what we capitalize on to make a difference, more than technology or equipment that are mere enablers.

The four main values and behaviors we promote above all are:



## Living our core working principles Together

### Our working principles

CUSTOMER	The customer drives everything we do.
RESPONSIBLE	Integrity and strong values guide our actions
INNOVATIVE	Our innovation today defines our success tomorrow
COLLABORATIVE	Collaborating, communicating and taking responsibility make work more efficient
PEOPLE	Always believing in our People, understanding what they do and how they do it while making sure they use their talents at their best.





# The Company

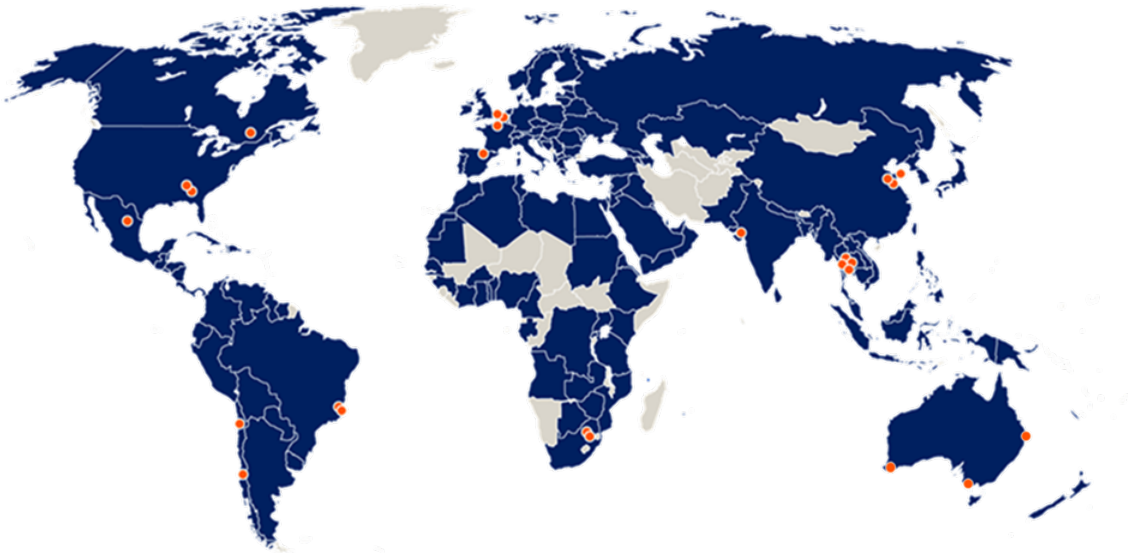
Magotteaux is the world leader in process optimization solutions for abrasive and impact applications.

Magotteaux is a global manufacturer of grinding media, castings, and other wear-resistant parts for the mining, cement, and quarrying industries. The company is a member of the Sigdo Koppers Group, a diversified industrial conglomerate listed on the Santiago Stock Exchange in Chile

Our business operations involve providing clients with integrated solutions that include advanced products, equipment, and systems. This is supported by comprehensive services and expert advice delivered by our team of over 200 technical and sales specialists, who work collaboratively with customers at their operational sites.

Our organisational structure balances regional autonomy with centralised oversight from a senior leadership team. This model ensures that group-wide policies and standards for ethical conduct, labour rights, and working conditions are implemented consistently across all our global operations.

These global operations are supported by extensive and complex supply chains. We describe these supply chains in the following section as the basis for our modern slavery risk assessment.



## Magotteaux at a glance







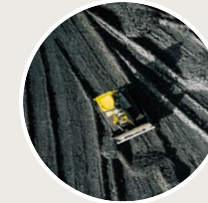




# Magotteaux Australia Structure

Magotteaux Australia Pty Ltd (ACN: 005 713 301) is an Australian registered company and is a wholly owned subsidiary of Magotteaux International S.A. and forms part of the Magotteaux global group.

Magotteaux Australia serves as the dedicated sales and distribution arm within the global Magotteaux group, providing high-performance products manufactured in our worldwide production facilities

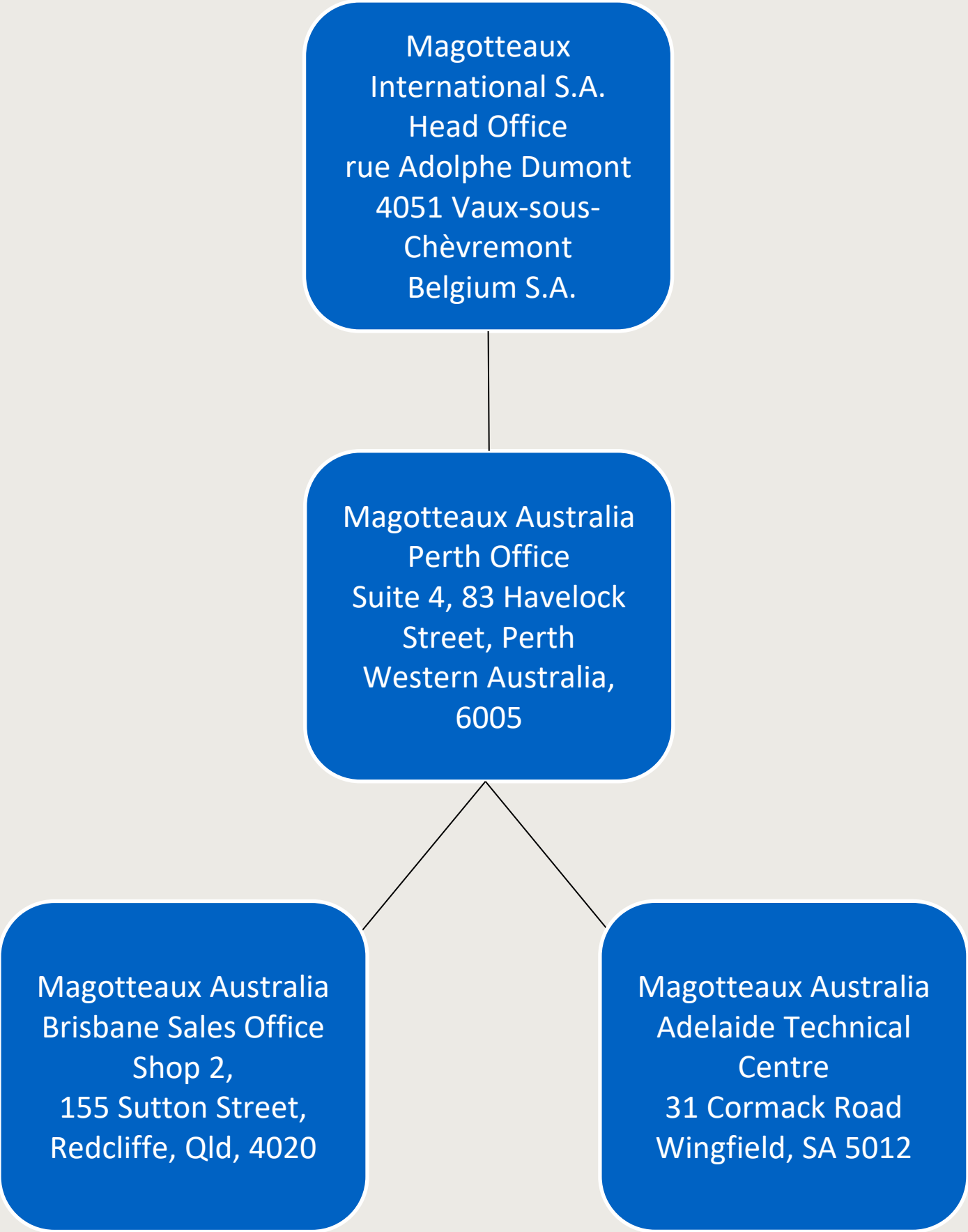
Operating within the Wholesalers Industry, our core function is to deliver comprehensive optimization solutions for abrasive and impact applications across a diverse range of sectors.

MINING	CEMENT	UTILITIES	AGGREGATES	RECYCLING
				

Our primary business streams include:

- Mining  
Supplying advanced grinding products crafted from various alloys and materials, alongside specialized technical services aimed at enhancing milling efficiency.
- Cement:  
Providing essential grinding products and expert technical services crucial for optimizing milling processes within the cement industry.

- Aggregates  
Offering robust crushing wear parts and deep process expertise tailored for the demanding, high-wear, and high-impact aggregates industry.
- Recycling  
Delivering innovative designs and manufacturing of specialized equipment parts and services that support the evolving needs of the recycling sector.
- Power Stations  
Supplying precision-engineered grinding products from diverse alloys and materials, complemented by technical services focused on maximizing milling efficiency for power generation.





# Corporate Governance Practice

At Magotteaux, we recognize the critical importance of effective corporate governance in ensuring transparency, accountability and sustainable growth.

As a leading provider of innovative solutions in the aggregates, cement, mining and power station industries, Magotteaux is committed to upholding the highest standards of corporate governance practices.

Through transparent communication and a culture of ethical conduct, Magotteaux strives to establish high corporate governance standards.

## Managing our Risks

In the dynamic and often unpredictable global landscape where we operate, effective risk management is paramount to achieve business success. To this end, we have set up a Risk Management Framework rooted in internationally recognized standards such as COSO Enterprise Risk Management, enabling us to navigate the spectrum of potential risks and opportunities arising from uncertainty.

### Risk Management Process

Our Risk Management Process is an iterative process performed on a quarterly basis and consisting of:

- Risk Identification
  - \ Risk Assessment
  - \ Risk Response
  - \ Risk Communication,
  - \ Monitoring and Reporting

We undertake risk Identification through a blend of top-down and bottom-up approaches to capture both strategic and emergent risks. This involves engaging top management for strategic risks and middle management for operational risks.

Subsequently, identified risks undergo thorough assessment, analyzing key risk drivers and evaluating existing controls to mitigate potential impacts on our exposure or vulnerabilities.

Our response to risks is guided by our risk appetite, with action plans formulated for risks exceeding predefined thresholds.

We employ a tailored communication and monitoring strategy, integrating Key Risk Indicators and escalation processes to facilitate well-informed decision-making.



### Governance

Magotteaux follows an integrated risk management governance model structured into three layers, enhancing decision-making communication flow, and reinforcing alignment among strategy, performance and risk management.

The first layer is responsible for promptly addressing the risks our organization faces and is overseen by designated risk owners vested with heightened responsibility.

The second layer comprises risk oversight leads tasked with ensuring that risk exposure remains within acceptable tolerance levels and aligns with our risk appetite.

The third layer, Internal Audit, conducts independent evaluations of internal controls and risk management practices within the Group.

These layers are overseen by the Risk Committee and by the Audit Committee.

Our governance model promotes a culture of employee and

managerial responsibility and accountability, fostering operational efficiency and enhancing resilience to changes in our risk exposure. While all members of our organization play a role in our Risk Management Framework, the Board of Directors ultimately bears accountability for overseeing the risk management strategy.

## Ethical Behavior And Organization

The Magotteaux Code of Ethics offers a comprehensive framework for ethical conduct across all levels of the organization, from top executives to frontline workers. It emphasizes the responsibility of every member to grasp and abide by its principles.

Moreover, the Magotteaux Corporate Ethics Committee assumes a crucial role in maintaining ethical standards. This committee is committed to promptly addressing any issues or conflicts of interest, thus ensuring the organization's commitment to the ethical guidelines outlined in the code.



## Supplier Code of Conduct

At Magotteaux, we strive to set an example of sustainable supply chains and enable development of communities that create value for future generations. It is crucial for us to build relationships with our suppliers that are reciprocal to all parties based on shared values, ethics and social responsibilities.

This Supplier Code of Conduct is an extension of Magotteaux's Code of Ethics and also the Supplier Code of Ethics and Conduct of our holding company, Sigdo Koppers SA. It provides general guidance over health and safety, ethical business practices, labor standards, environment, sustainable products and services development and community involvement,

All of our suppliers (including contractors, distributors, subcontractors, consultants and agents) are required to adhere to this Code of Conduct.

Our expectations resonate with the UN SDGs, emphasizing on SDG 3 (Health and Well-Being), SDG 4 (Quality Education), SDG 5 (Gender Equality), SDG 8 (Decent Work), SDG 12 (Responsible Consumption) and SDG 13 (Climate Action).

Our Supplier Code of Conduct is available on [our website](#).

## Whistle Blowing Channel

Magotteaux has established a reporting channel to address any potential irregularities or illegal activities. Employees of the company, shareholders, suppliers, customers and third parties have access to this complaint filing procedure.

Complaints can be lodged on the company's website: [www.magotteaux.com](http://www.magotteaux.com).

Moreover, the ethics committee plays a role in this process, taking responsibility for ethical matters, analyzing complaints and determining suitable solutions.

*The Magotteaux Code of Ethics offers a comprehensive framework for ethical conduct across all levels of the organization.*

## Magotteaux's Commitment to Fair Competition

At Magotteaux, we believe in fair competition, which drives innovation and efficiency for everyone involved. Last year, we had no legal issues related to unfair competition, demonstrating our dedication to honest business practices and fair play in the industry.

## Magotteaux Board Of Directors

The Magotteaux Group's Board of Directors consists of five non-executive members and the CEO, convening monthly. Similarly, the Board of Directors of Magotteaux International, comprising five executive members representing the group management, meets weekly.

Furthermore, there are 28 subsidiary companies worldwide, each holding Board of Directors and General Meetings annually or as mandated by legal requirements.

Each Board member brings significant expertise in pertinent industries, enabling them to proficiently supervise the company's operations.



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## Risk Assessment and Mitigation





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# Supply Chain Structure Highlights

Effective management of modern slavery risks begins with a thorough understanding of our supply chain.

## Primarily Vertically Integrated

Our supply chain is fundamentally structured around the global Magotteaux network. Over 83% of our capital expenditure is dedicated to intercompany procurement, with core products for the Australian market being supplied directly by Magotteaux's international manufacturing plants.

## Emphasis on Long-Term Partnerships

We prioritize building long-term, strategic relationships with our suppliers. This collaborative approach fosters the deep engagement and transparency necessary to jointly address sustainability and ethical challenges, including the risks of modern slavery.

## Strategic External Network

We supplement our intercompany supply with a carefully managed network of external partners. In the last reporting period, we assessed 298 key suppliers across 13 countries and 19 distinct procurement categories that support our local operations.







# Our Supply Chain

## Sourcing with Integrity: Leveraging Our Magotteaux Group Network

With over 83% of capital expenditure dedicated to intercompany procurement, Magotteaux maintains strong oversight of its sourcing practices, reinforcing its commitment to responsible supply chain management and sustainability.

Magotteaux Australia operates within a globally integrated supply chain reflective of the broader Magotteaux Group. Our sourcing model combines internal group entities with external suppliers across diverse geographies.

The majority of our products are sourced from Magotteaux manufacturing plants and joint ventures in Thailand, China, Spain, and Belgium, which produce specialized components critical to our operations. In 2024, 83.82% of our capital expenditure was allocated to intercompany purchases, allowing us to maintain high standards of quality, ethical sourcing, and compliance with group policies.

Logistics represent 8.46% of our total spend, supporting the transport of goods to Australia, Papua New Guinea, and New Zealand. The remaining under 8% is directed toward domestic operational support, largely from local Australian suppliers.

This globally distributed supply chain includes Tier 1 to Tier 3 supplier relationships, reinforcing the need for robust risk assessment and governance to address modern slavery risks at every level

## Ethical Sourcing

We ensure ethical sourcing by leveraging a globally integrated supply chain anchored in Magotteaux-owned manufacturing and controlled procurement practices.

### Manufacturing

Magotteaux Australia sources the majority of its products directly from Magotteaux-owned and joint venture plants across Thailand, China, Spain, and Belgium. This model ensures that manufacturing is carried out under consistent global standards for quality, ethics, and safety.

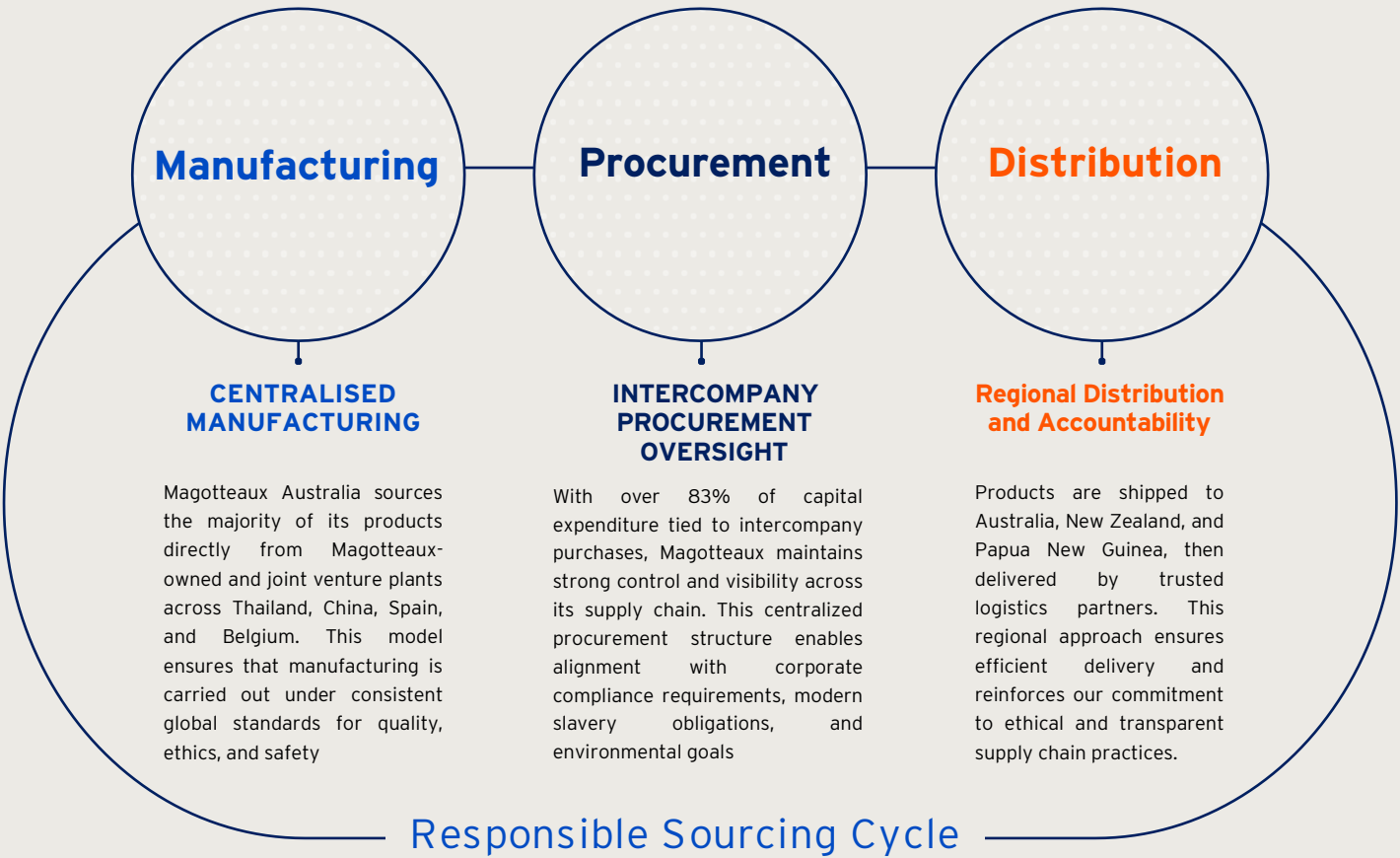
### Procurement

With over 83% of capital expenditure tied to intercompany purchases,

Magotteaux maintains strong control and visibility across its supply chain. This centralized procurement structure enables alignment with corporate compliance requirements, modern slavery obligations, and environmental goals.

### Distribution

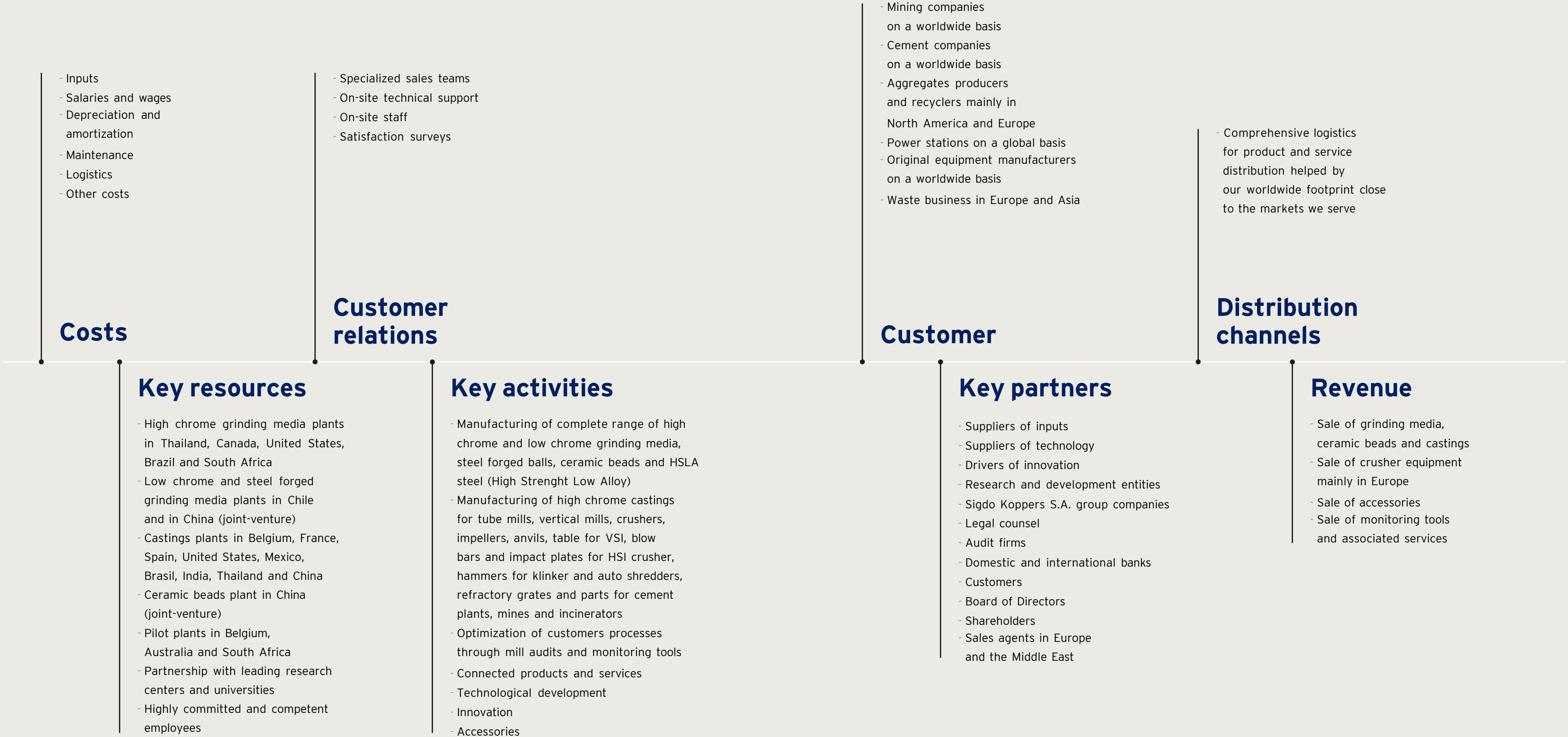
Finished goods are shipped to Australia, New Zealand, and Papua New Guinea, where they are distributed by trusted logistics partners. By operating close to our customer base and maintaining clear accountability at every step, Magotteaux ensures timely delivery while reinforcing its commitment to ethical sourcing and responsible business conduct.







# Global Business Model







# Risk Assessment Framework

## Managing modern slavery risk is a crucial aspect of our broader human rights strategy

Magotteaux Australia has adopted a structured and evolving framework to identify, assess, and respond to the risks of modern slavery within our operations and across our global supply chains. This framework is designed to meet the expectations set out in the Modern Slavery Act 2018 (Cth) and to reflect our ongoing commitment to human rights and ethical business conduct..

### Framework Design and Objectives

Our risk assessment framework is built around the core principles of transparency, evidence-based decision-making, and continuous improvement. It aims to:

- Identify areas in our operations and supply chain where there is a heightened risk of modern slavery or labour exploitation.
- Evaluate our actual and potential exposure to these risks using credible data sources.
- Prioritize risk mitigation actions based on severity, likelihood, and our ability to influence outcomes.
- Embed risk assessment into business practices, procurement processes, and supplier engagement strategies

### Assessment Tools and Methodologies

To ensure consistency and robustness, we employ a combination of external and internal assessment tools, including:

- Sedex Radar Trade Audit tools, which provide country-specific and sector-based risk profiling across multiple modern slavery indicators.
- The EcoVadis Sustainability Scorecard, which assesses environmental, labour, ethics, and human rights performance, enabling benchmarking across suppliers and regions.
- Internal data from procurement, audit, and compliance teams, including supplier self-assessment questionnaires and responses to modern slavery-specific inquiries.
- Engagement with internal stakeholders across departments (e.g. procurement, legal, ESG, HR) to provide qualitative context and feedback to supplement data analysis.

These tools allow us to assess risk across multiple dimensions—including geography, sector, commodity type, supplier practices, and worker vulnerability—providing a nuanced understanding of potential modern slavery exposures

### Scope of Risk Assessment

We conduct risk assessments at multiple levels:

#### Operational Risks:

Our own business operations are reviewed for potential indicators of modern slavery, including employment practices, recruitment methods, and workforce conditions.

#### Tiered Supply Chain Risks:

We assess Tier 1 suppliers directly and Tier 2 and Tier 3 suppliers where there is known subcontracting, particularly in high-risk regions or categories.

#### Product and Service Risks:

Risk is also evaluated based on the nature of the goods and services supplied, including whether they involve manual, low-skilled, or seasonal labour, which may carry a higher risk of exploitation

### Review and Continuous Improvement

Risk assessments are conducted annually and reviewed throughout the year to respond to:

- Shifts in our supplier base or sourcing regions;
- Emerging risks due to political, social, or economic developments;
- Feedback from audits, grievance mechanisms, and external stakeholder engagement.

This ensures our risk profile remains current and that our mitigation efforts evolve in step with changing global conditions.

### Governance and Oversight

Findings from our risk assessments are reported to our Australian Leadership Team, the Magotteaux Australia Board of Directors, and relevant global governance forums. This supports accountability, transparency, and strategic alignment, ensuring that risk mitigation is integrated into the fabric of our decision-making processes.

Our framework enables us to act early, engage meaningfully, and respond effectively to the risks of modern slavery—ensuring that our commitments are not only stated but also operationalized across our business







# Operational Risk Areas

Applying our Risk Assessment Framework described previously, we have conducted a comprehensive analysis of our operations and supply chains. Our methodology, which leverages tools such as Sedex Radar and EcoVadis, alongside internal data and supplier engagement, has enabled us to identify and prioritize key areas of modern slavery risk. The findings below are categorized according to the scope defined in our framework: Operational, Supply Chain, and Product and Service risks

## Operational Risks

Our operational risks relate to the employment practices and workforce conditions within Magotteaux Australia's direct control. As a company operating entirely within Australia, we are governed by robust national and state labour laws. Our primary focus in this area is on ensuring full compliance and ethical conduct, particularly in:

Identify areas in our operations and supply chain where there is a heightened risk of modern slavery or labour exploitation.

### Direct Employment

Ensuring all staff are employed under fair and lawful conditions, with clear contracts and entitlement protections.

### Recruitment and Hiring

Reviewing the practices of any third-party recruitment agencies to ensure they adhere to ethical standards and do not engage in deceptive or coercive practices.



## Our Direct Operations

For the 2024 reporting period, Magotteaux Australia conducted a thorough modern slavery risk assessment and due diligence process within our own direct operations. We are pleased to report that no actual instances or allegations of modern slavery were identified within Magotteaux.

The risk assessment determined that the level of modern slavery risk in our direct operations remains low. This conclusion is based on several key protective factors that are embedded in our management and hiring systems:

- \ **Robust Employment Standards:** Magotteaux as a group provides minimum employment standards that serve as strong safeguards against modern slavery practices, ensuring comprehensive protection for all our workers.
- \ **Stringent Hiring Practices:** Most of our employees are directly hired for skilled positions that require prior experience. We conduct extensive background checks during the hiring process to ensure the integrity of our workforce.
- \ **Ethical Code of Conduct:** Our Code of Ethics outlines expected workplace behaviors and serves as a guide for our employees. Additionally, our company values are an integral part of our MagAcademy training module, reinforcing our commitment to ethical conduct.
- \ **Compliance with Eligibility Criteria:** Our recruitment process includes thorough checks to verify both age and eligibility to work, ensuring compliance with all necessary employment requirements in Australia.





# Our Key Identified Risk Areas

## Supply Chain Risks

Our analysis confirms that our most significant modern slavery risks are embedded within our global supply chain. We have assessed these risks by segmenting our supply chain into its intercompany and external components.

### Intercompany Supply Chain Risks (Manufacturing)

Our reliance on finished products from Magotteaux's global manufacturing plants means we focus on the upstream risks associated with their specific locations. The risk assessment scores for the manufacturing sector highlight a variance across our key sourcing countries:

#### Higher-Risk Sourcing Locations

Our manufacturing risk assessment indicates a comparatively higher risk in China (Overall risk: 6.0, Labour Standards risk: 6.6) and Thailand (Overall risk: 5.8, Labour Standards risk: 5.8) .

The elevated Labour Standards risk scores in these countries guide our enhanced due diligence efforts concerning the raw materials and labour practices in these specific supply chains.

#### Moderate-Risk Sourcing Locations

Manufacturing in European locations such as Belgium (Labour Standards risk: 4.0) and Spain (Labour Standards risk: 4.3) presents a comparatively lower, though still monitored, risk level.

### External Supply Chain Risks (Australian Operations)

For our external suppliers, we have assessed risks based on the specific sectors they operate in, primarily within Australia.

#### Logistics and Warehousing

The logistics sector is a key area of focus. In Australia, this sector has an overall risk score of 3.3 and a Labour Standards risk score of 3.2. We use this data to engage with our domestic freight and warehousing partners.

#### Professional and Technical Services

For suppliers in the Professional, Scientific, and Technical activities sector in Australia, the assessment indicates an overall risk of 2.8 and a Labour Standards risk of 2.6.

#### Information and Communication

Suppliers of IT equipment and services fall into this category. In Australia, it has an overall risk score of 2.9 and a Labour Standards risk score of 2.8.

#### Finance and Insurance

Our partners in the Finance and Insurance sector in Australia operate in a category with a lower assessed risk, showing a Labour Standards score of 1.6.

### Overall Supplier Risk Profile

A total of 197 suppliers were assessed as part of our risk-based approach and found that 65% were low risk, 34% medium risk, and 1% high risk.

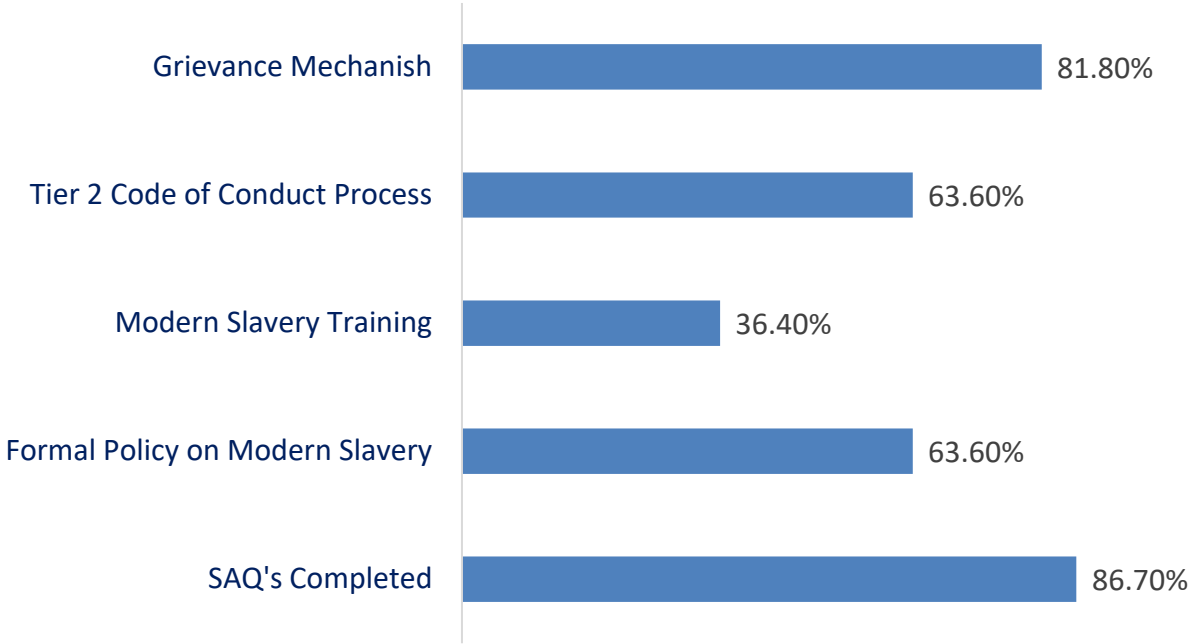
This indicates that the majority of our supply base presents a low risk, while also identifying areas where closer monitoring and due diligence are required. We remain committed to regularly reviewing and addressing supplier risks to help prevent modern slavery in our operations.

### Conclusion of SAQ Results

The results from the Supplier Self-Assessment Questionnaire (SAQ) indicate a strong level of supplier engagement, with the majority completing the questionnaire.

Most respondents reported having grievance mechanisms and basic modern slavery controls in place. However, fewer suppliers confirmed the existence of formal modern slavery policies or the provision of related staff training. These findings highlight a solid foundation but also reveal opportunities to strengthen awareness, policy implementation, and upstream accountability across our supply chain.

## Key Findings from Supplier SAQ Responses





# Actions Taken to Address and Mitigate Risks

Proactively mitigate risks through due diligence, supplier engagement, and targeted assessments.

## Supplier Due Diligence & Onboarding

Magotteaux Australia integrates modern slavery due diligence into all stages of supplier onboarding. This serves as a critical preventive mechanism designed to identify and reduce the risk of exploitative labour practices before entering into a commercial relationship. Our onboarding process is a multi-stage system of screening, assessment, and verification.

### Initial Risk Filtering

Before formal engagement, all prospective suppliers undergo a preliminary risk screening. This initial filter assesses the supplier's inherent risk profile based on their country of operation, referencing global benchmarks such as the Global Slavery Index and Sedex Radar country scores. We apply enhanced scrutiny to sector-specific vulnerabilities, particularly in industries with a known high risk, and evaluate the supplier's company structure and operations, paying close attention to their use of subcontractors.

### Modern Slavery Screening Questionnaire

Suppliers that progress through the initial screen are required to complete our Modern Slavery Pre-Qualification Questionnaire. This detailed assessment allows us to gather specific evidence on their internal controls, human rights policies, due diligence practices, and worker grievance mechanisms. The responses are scored against a risk matrix that categorizes suppliers as Low, Medium, or High Risk, determining the path for engagement

### Documentation, Verification, and Escalation

Prior to final approval, suppliers must provide supporting documentation to verify their claims, which may include a signed copy of our Supplier Code of Conduct, audit results from platforms like Sedex and other relevant policies.

Where a supplier is categorized as Medium Risk, engagement is conditional upon the submission of a formal corrective action plan. Suppliers assessed as presenting a severe or unmitigated risk are escalated for review and may be declined engagement or restricted to low-exposure contracts until their risk controls can be independently verified.

### Supplier Code of Conduct

A cornerstone of our supplier engagement strategy is the Magotteaux Supplier Code of Conduct.

This document formally communicates our ethical standards and establishes clear expectations for all partners within our supply chain.

It is an extension of Magotteaux's own Code of Ethics as we strive to set an example of sustainable supply chains and build reciprocal relationships with our suppliers based on shared values, ethics, and social responsibilities.

The Supplier Code of Conduct outlines the requirement for suppliers to ensure their own operations and supply chains meet our standards for human rights and labour practices. It provides general guidance covering health and safety, ethical business practices, labor standards, and community involvement. Our expectations resonate with the UN Sustainable Development Goals, with an emphasis on SDG 3 (Health and Well-Being), SDG 4 (Quality Education), SDG 5 (Gender Equality), SDG 8 (Decent Work), SDG 12 (Responsible Consumption), and SDG 13 (Climate Action).

All of our suppliers, including contractors, distributors, subcontractors, consultants, and agents, are required to adhere to this Code of Conduct. To reinforce these standards, standard Magotteaux agreements for goods and services commit our suppliers to take reasonable steps to identify, assess, and address the risks of modern slavery practices within their own operations and supply chains.





# 3

## Collaboration Consultation & Additional Information





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# Assessing the Effectiveness of Our Actions

Magotteaux Australia is committed to not only implementing robust processes but also to measuring their effectiveness to ensure they are leading to meaningful outcomes. Building upon the foundation established in previous years, we have developed a comprehensive reporting framework that includes specific Key Performance Indicators (KPIs) to measure the effectiveness of our modern slavery initiatives





Magotteaux is committed to measuring the effectiveness of our actions to ensure they contribute to meaningful outcomes and support our broader commitment to sustainability. Our approach aligns with the United Nations Sustainable Development Goals, with a particular focus on five key goals which guide our strategy

Our Key Performance Indicators (KPIs) are designed not only to measure our modern slavery due diligence but also to track our contribution towards these goals of our sustainability strategy.

Our KPIs and Alignment with UN SDGs

We use a combination of qualitative feedback and quantitative data to assess our progress. Key indicators are directly linked to the principles of the SDGs

SDG #8  
Decent Work and Economic Growth:

The majority of our modern slavery KPIs directly support our commitment to promoting inclusive and sustainable economic growth and providing decent work for all. This includes:

- \ Suppliers Adhering to Anti-Modern Slavery Policies: This KPI tracks our progress in ensuring our business partners uphold our standards for decent work.
- \ Modern Slavery Grievances Reported: This measures the effectiveness of mechanisms that protect worker rights.
- \ Employees Trained on Modern Slavery: This reflects our investment in building awareness and capacity to uphold decent work principles.

SDG #3  
Good Health and Well-being:

A core component of our due diligence involves assessing the health and safety of workers in our supply chain. We are committed to preventing safety accidents and ensuring our suppliers provide safe working conditions, which is a fundamental safeguard against exploitation.

SDG #12  
Responsible Consumption and Production:

Our efforts to create sustainable supply chains are central to this goal. By monitoring supplier compliance and conducting audits, we work to ensure our products and supply chains are free from exploitation, contributing to more responsible production cycles.

SDG #5  
Gender Equality:

While assessing risk, we consider specific vulnerabilities that can disproportionately affect women. Internally, our commitment to "ensure equal opportunities for all potential and current employees" and "ensure equitable pay structures" forms a key part of our control environment against exploitation.





# Key Performance Indicators

Magotteaux Australia is committed to not only implementing robust processes but also to measuring their effectiveness to ensure they are leading to meaningful outcomes. Our approach to assessing effectiveness is integrated into our continuous improvement cycle, where we use both qualitative feedback and quantitative data to understand our impact

Our Key Performance Indicators (KPIs) form the core of this data-driven approach. They are designed to provide clear, measurable insights into the performance of our modern slavery risk management program.

## Supplier Risk Profile

- \ **Metric:** Percentage of suppliers categorized as high-risk within our supply chain.
- \ **Purpose:** This KPI helps us monitor the effectiveness of our due diligence in identifying risks and our success in mitigating them over time, with a goal of reducing our overall risk exposure.

## Supplier Engagement and Compliance

- \ **Metric:** Percentage of suppliers categorized as high-risk within our supply chain.
- \ **Purpose:** This KPI helps us monitor the effectiveness of our due diligence in identifying risks and our success in mitigating them over time, with a goal of reducing our overall risk exposure.

## Internal Awareness and Capacity

- \ **Metric:** Percentage of suppliers categorized as high-risk within our supply chain.
- \ **Purpose:** This KPI helps us monitor the effectiveness of our due diligence in identifying risks and our success in mitigating them over time, with a goal of reducing our overall risk exposure.

## Grievance and Remediation

- \ **Metric:** The number of modern slavery-related grievances reported, investigated, and the average time to resolution.
- \ **Purpose:** This helps us assess the accessibility and effectiveness of our reporting and remediation mechanisms, ensuring issues are addressed in a timely manner.

Regular internal monitoring and reporting of these KPIs to the Australian Leadership Team and Board of Directors will ensure transparency and accountability. This allows us to identify areas for improvement, allocate resources effectively, and measure the tangible impact of our efforts to combat modern slavery







# Collaboration and Stakeholder Engagement

At Magotteaux, we believe that collaboration is essential to making meaningful progress in the fight against modern slavery. We actively engage with both internal and external stakeholders to strengthen our approach

This includes hosting regular Sustainable Procurement Forum sessions with our Global Procurement, ESG, and Legal departments to ensure alignment and share best practices.

We also continue to engage with our customers on advancing respect for human rights and remain responsive to their inquiries regarding our modern slavery risk management to foster transparency and trust. Furthermore, we utilize feedback from employees, suppliers, and other stakeholders to ensure our efforts are aligned with their needs and expectations

## Process of Consultation

In compiling and finalizing this statement, we have engaged closely with:

- \ Our Australian Leadership Team as a wholly-owned subsidiary of Magotteaux International S.A.
- \ Members of our global Sustainability, Sales and marketing, Finance and Legal departments.
- \ Members of the Board of Directors.

Magotteaux Australia will continue to consult on a Global scale to identify modern slavery risks.





Conclusion

In conclusion, Magotteaux Australia reaffirms its unwavering commitment to eradicating modern slavery and upholding human rights within our operations and across our extensive global supply chains.

Throughout 2024, we have made significant strides in understanding, assessing, and mitigating the risks of modern slavery. We have strengthened our due diligence processes, enhanced supplier engagement, and fostered a culture of transparency and accountability.

While we are proud of the progress made, we acknowledge that the fight against modern slavery is an ongoing journey. We remain vigilant and proactive in our efforts, continuously refining our strategies and collaborating with stakeholders to drive positive change.

Our commitment to continuous improvement is evident in our 2024 Sustainability Plan, which includes a focus on enhancing Environmental, Health, and Safety (EHS) practices across our manufacturing sites.

Magotteaux remains dedicated to maintaining the highest standards of ethical business conduct and social responsibility.

We believe that by working together with our employees, suppliers, customers, and communities, we can create a future where modern slavery is eradicated, and human rights are respected and protected.

This Modern Slavery Statement is a testament to our ongoing commitment to this important cause

Principle Governing Body Approval

This statement has been approved by the Magotteaux Board of Directors on June 27, 2025, and has been signed on its behalf by the Magotteaux Board of Directors as the principle governing body of Magotteaux Australia Pty Ltd.



Philippe De Bosscher  
Director Australia



Michael Adams  
Director Australia







## Mandatory Criteria

MODERN SLAVERY ACT REQUIREMENT	Magotteaux Statement
Identify the reporting entity	Page 8
Describe the structure, operations and supply chains of the reporting entity	Pages 7 – 8, 13 - 14
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Pages 16 - 18
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to address those risks, including due diligence and remediation processes	Page 19
Describe how the reporting entity assess the effectiveness of such actions	Pages 22 - 24
Describe the process of consultation with other entities in the Magotteaux Global Group. <b>Magotteaux Australia does not own or control any other entities</b>	Page 25
Provide any other information that the reporting entity or the entity giving the statement considers relevant	Pages 1 – 4, 23



