

Modern Slavery Statement

Reporting period 1 July 2024 – 30 June 2025

Context

This statement outlines the identified risks and control strategies implemented to manage modern slavery risks in connection with Molycop Australia’s operations and supply chains.

This statement has been prepared and submitted pursuant to the requirements of [Modern Slavery Act 2018 \(Cth\) \(MS Act\)](#).

Molycop is dedicated to upholding internationally recognised human rights and ensures it and its supply chain partners:

- Uphold international human rights
- Promote non-discrimination and respect
- Prohibit child and forced labour
- Uphold a harassment-free workplace

Identify the reporting entity

In the 2024/2025 financial year, Molycop operated four wholly owned corporate entities operating or carrying on business in Australia; namely:

Entity Name:	Australian Company Number (ACN):
Grinding Media Pty Ltd (Grinding Media)	615 611 759
Commonwealth Steel Company Pty Ltd (CSC)	000 007 698
Donhad Pty Ltd (Donhad)	009 009 054
Molycop Technologies Pty Ltd (Molycop Technologies)	154 346 004

Grinding Media Pty Ltd operated as a holding company with CSC, Molycop Technologies and Donhad as subsidiary companies.

These entities function collectively for Molycop, predominantly under the ‘Molycop’ and ‘Comsteel’ brands. CSC and Molycop Technologies are the primary entities for transactional and operational matters.



All registered business names for Molycop in Australia were attached to CSC (ABN: 58 000 007 698) and Molycop Technologies (ABN: 85 154 346 004) and comprised the following:

- Molycop
- Molycop Australia / Australasia
- Comsteel
- Comsteel Grinding Media
- Process IQ
- PIQ

In the 2024/2025 financial year, Grinding Media Pty Ltd had a consolidated revenue – incorporating that generated from CSC, Donhad and Molycop Technologies that renders it a reporting entity under the Modern Slavery Act.



Molycop's operations

Molycop is an international organisation and market leading supplier of forged grinding media and associated services.

The Molycop group:

- Coordinates functions under a US registered & domiciled parent company, AIP MC Holdings LLC, and
- Has business operations in multiple regions including the Americas, Europe and Australasia.

Each region operates with a degree of autonomy but with shared resources (such as global support teams, policies and procedures) and common senior leadership structures to ensure consistency in functionality and coordination of activities.

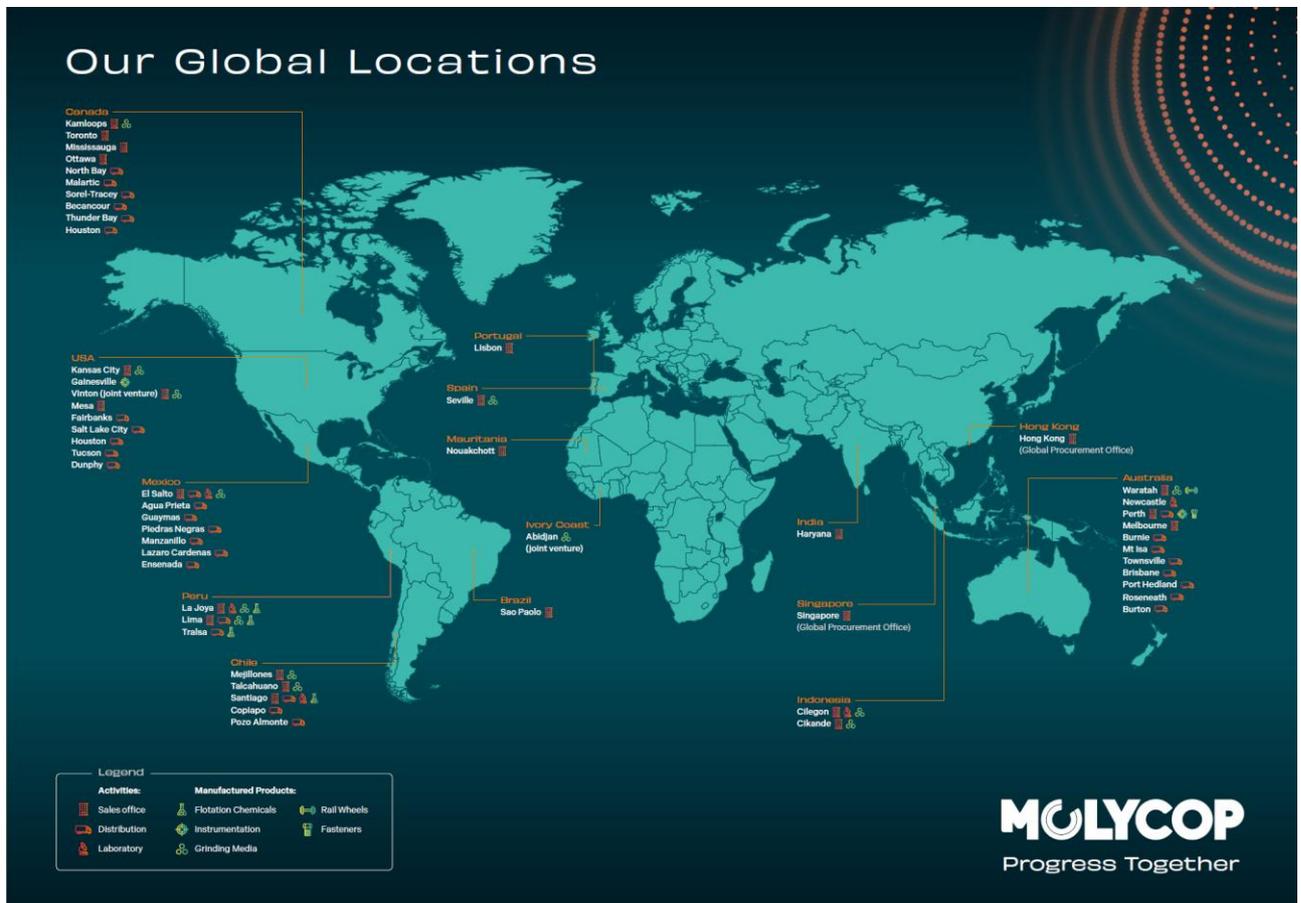


Figure 1: Overview of Molycop corporate group global operations and locations



Molycop Australia

The Australian Molycop entities are proprietary limited companies constituted under the [Corporations Act 2001 \(Cth\)](#) – Grinding Media, CSC, Donhad and Molycop Technologies (collectively, **Molycop Australia**). All operations are conducted by CSC and Molycop Technologies.

At present, Grinding Media and Donhad are both non-operating entities.

The directors of CSC and Molycop Technologies are senior executives within the broader Molycop corporate group.

Manufacturing and sale of steel products are the focus of CSC’s operations, having been established in Australia for over 100 years, with a product portfolio comprising of steel grinding media, railway wheels and other specialist steel goods.

Molycop Technologies is a digital services company providing instrumentation and software technologies to improve throughput, recovery and efficiency for mineral processing circuits.

As of 30 June 2025, Molycop Australia had 328 employees working in Australia.

Most employees are based at the Newcastle or Perth workplaces. Roles in these facilities typically include plant operators, trades, apprentices, and professional support staff including engineers, metallurgists, sales, procurement and functional support from finance, legal information technology, marketing and human resources.

Molycop Australia’s supply chain

In the 2024 / 2025 financial year, Molycop Australia procured goods and services as follows:

Breakdown of Molycop Australia spend by categories 2024 / 2025

External steel feed – supplier purchased steel bar / bloom	46.8%
Labour – all Australian staff	14.6%
Freight and logistics – including shipping, rail and road transport	8.7%
Finished goods – supplier purchased imported grinding media	8.4%
Maintenance, Repairs and Operations (MRO) – supplies, like machine parts, packaging and other operational consumables	3.9%
Services – including facilities, operational and contract labour	3.1%
Finished goods – Molycop manufactured imported grinding media	2.6%
Energy – electricity and gas	2.0%
Other – including raw materials (1.4%), communications (1.1%), travel, etc.	9.9%
Total	100%

Table 1 - breakdown of spend by contributing categories FY2024-25, Molycop Australia, notable is ~60% spend is related to the import of steel feed and finished grinding media – the three categories of focus in Molycop Australia’s Modern Slavery risk-based approach



Molycop Australia's modern slavery challenges and limitations, FY2024-25

Molycop Australia did not identify any instances of modern slavery within our Australian operations, or the broader global group, during FY2024-25.

Even so, we recognise that elements of our supply chain involve sourcing from regions and industries that present inherent modern slavery risks. Managing these risks is not a one-off exercise, rather it is an ongoing responsibility that demands better data, visibility and governance over time.

As part of our continuous improvement commitment Molycop has identified several areas where our current approach can be strengthened. We outline these as future goals not because our present systems are inadequate, but because we aim to build capability and maturity over the coming reporting cycles.

Current limitations / opportunities for improvement

a) Granularity of geographic risk assessment

Our current methodology applies country-level modern slavery prevalence rates when assessing location-based risks. We recognise that province- or state-level analysis would provide a more accurate view of our exposure. The primary challenge is the availability and reliability of sub-national data across relevant jurisdictions.

b) Visibility beyond tier-1 suppliers

Engagement with tier-2 and tier-3 suppliers remains limited. Improved downstream visibility is essential to understanding conditions in upstream processing and raw-material production. The main barrier is achieving sufficient cooperation and transparency from tier-1 suppliers to facilitate meaningful engagement further down the chain.

c) Enterprise-level governance and oversight

Board-level engagement and integration with Group-wide governance forums can be strengthened to ensure that modern slavery risks and responses are consistently understood, prioritised and managed across the organisation.

d) Internal and external benchmarking

We see clear value in benchmarking against other divisions within the Molycop Group and against peer companies in comparable sectors and jurisdictions. As with geographic risk assessment, a key constraint is the availability of consistent, high-quality data for meaningful comparison.

e) Quantitative performance indicators

Current reporting relies primarily on qualitative descriptions of actions. Developing quantitative indicators will allow clearer tracking of progress, greater accountability and more consistent evaluation of the effectiveness of our modern slavery program.



Governance

Molycop is committed to the highest ethical and legal standards in the way we conduct our business.

In FY2023-24 Molycop appointed a Global Head of Compliance whose portfolio encompasses “ethical sourcing” at a global level. This role reports directly to Molycop’s Chief Legal Officer. Under the leadership of our Global Head of Compliance Molycop employs a range of governance mechanisms to ensure that its business is conducted to the highest ethical and legal standards. Several of these governance mechanisms (noted below) directly assess and address the potential risk of modern slavery within Molycop’s operations and its supply chain.

In FY2025-26 Molycop Australia will update its Australian purchasing terms and conditions to ensure suppliers provide more specific guarantees & assurances regarding their modern slavery management activities.

Action / Mechanism	Relevance to Modern Slavery	Implementation
Molycop Code of Conduct	<p>Molycop’s <i>Code of Conduct</i> sets the expected standards for any work performed in connection with the operations of the Molycop group.</p> <p>Of note, it expressly references that modern slavery presents significant legal and ethical issues and that such practices will not be tolerated by Molycop.</p>	<p>Molycop’s Code of Conduct is publicly available, and 91% of global employees have been duly trained during FY2024-25 on its requirements.</p> <p>Every new hire is inducted upon joining. Any alleged non-compliance is subject to formal investigation, and confirmed violations result in proportionate discipline.</p> <p>Terminations related to code of conduct breaches are reported quarterly to the Governance and Compensation Board Committee.</p>
Supplier Code of Conduct	<p>Molycop’s <i>Suppliers Code of Conduct</i> (released in December 2024) sets out requirements that all parties who are doing business with Molycop are expected to fulfil. Specifically covered are human rights and labour practices, where suppliers agree to:</p> <ul style="list-style-type: none"> • Uphold international human rights • Prohibit child and forced labour • Non-discrimination and respect in employment • Uphold a harassment-free workplace 	<p>Molycop’s Supplier Code of Conduct is publicly available. It is also embedded in our Third-Party Due Diligence process as a mitigation measure, with specific focus on modern slavery, human trafficking, child labor, and other human-rights and compliance risks.</p> <p>If a supplier fails to meet these requirements, Molycop will work to develop and implement remediations; however, Molycop reserves the right to terminate the relationship with immediate effect where appropriate.</p>
Work Health, Wellbeing and Safety Policy	<p>Molycop is committed to fostering a safe, respectful, and supportive workplace where the mental health and wellbeing of every employee is prioritised. By proactively identifying and managing psychosocial risks, we aim to create an environment that promotes collaboration, resilience, and productivity, ensuring that our people feel valued and empowered to thrive.</p>	<p>Molycop’s <i>Work Health, Wellbeing and Safety Policy</i> is publicly available and every Molycop employee is inducted into these principles upon employment.</p> <p>Any breach to these expectations is investigated as a matter of utmost seriousness and may result in disciplinary action.</p>
Ethics & Integrity Channel	<p>Molycop’s Ethics & Integrity Channel provides employees, suppliers, and other associates with a secure way to report suspected Modern Slavery and other concerns without fear of retaliation. Reports can be submitted confidentially and, if preferred, anonymously, via our website.</p>	<p>Molycop’s Whistleblower Policy is publicly available. All employees receive training on how to report any concern or allegation, including modern slavery, child labor, and forced labor, with the Ethics & Integrity Channel as one reporting avenue. The Channel ensures confidentiality, employs encryption, and allows anonymous reporting.</p>
Third Party Due Diligence Policy and Procedure	<p>Molycop has rolled out comprehensive training to ensure that employees can identify modern slavery risks, understand high-risk locations, and report concerns through the Ethics & Integrity Channel.</p> <p>Our Third-Party Due Diligence Policy & Procedure enforces compliance with law and ethical standards using a risk checklist that incorporates the Global Slavery Index and other public sources to assess and mitigate modern slavery risks.</p>	<p>Any party engaging with Molycop is required to meet at least Molycop’s standards on Modern Slavery and related human-rights expectations. The Legal & Compliance Department is responsible for vetting and monitoring each third party to ensure all legal requirements and Molycop standards are duly met.</p> <p>Molycop personnel who engage or transact with third parties are inducted into the Third-Party Due Diligence Policy and Procedure, building the competence needed to fulfil due-diligence obligations and to address emerging concerns effectively.</p> <p>Further details are highlighted below.</p>



Modern slavery risk in Molycop Australia's operations and supply chain

Two reference points are used by Molycop Australia to identify modern slavery risks:

1. The country of origin for the goods or services; and
2. The product category or industry.

Molycop Australia has undertaken detailed considerations of its operations and supply chains in the context of these two reference points to identify and assess its modern slavery risks.

Regarding supply chain risk vectors, Molycop Australia recognises the materiality of imported steel bar and steel bloom being dominant, alongside the further import of finished grinding media both from international Molycop facilities, and direct from third-party suppliers.

Molycop recognises the inherent risks within the complex layers of its supply chain, particularly in the lower tiers, where visibility and influence are more limited.

To address these challenges, Molycop has implemented strong controls and robust processes to identify and mitigate potential risks. Additionally, an automated monthly monitoring system (NAVEX RiskRate), is utilised to screen the supply chain on a continuing basis.

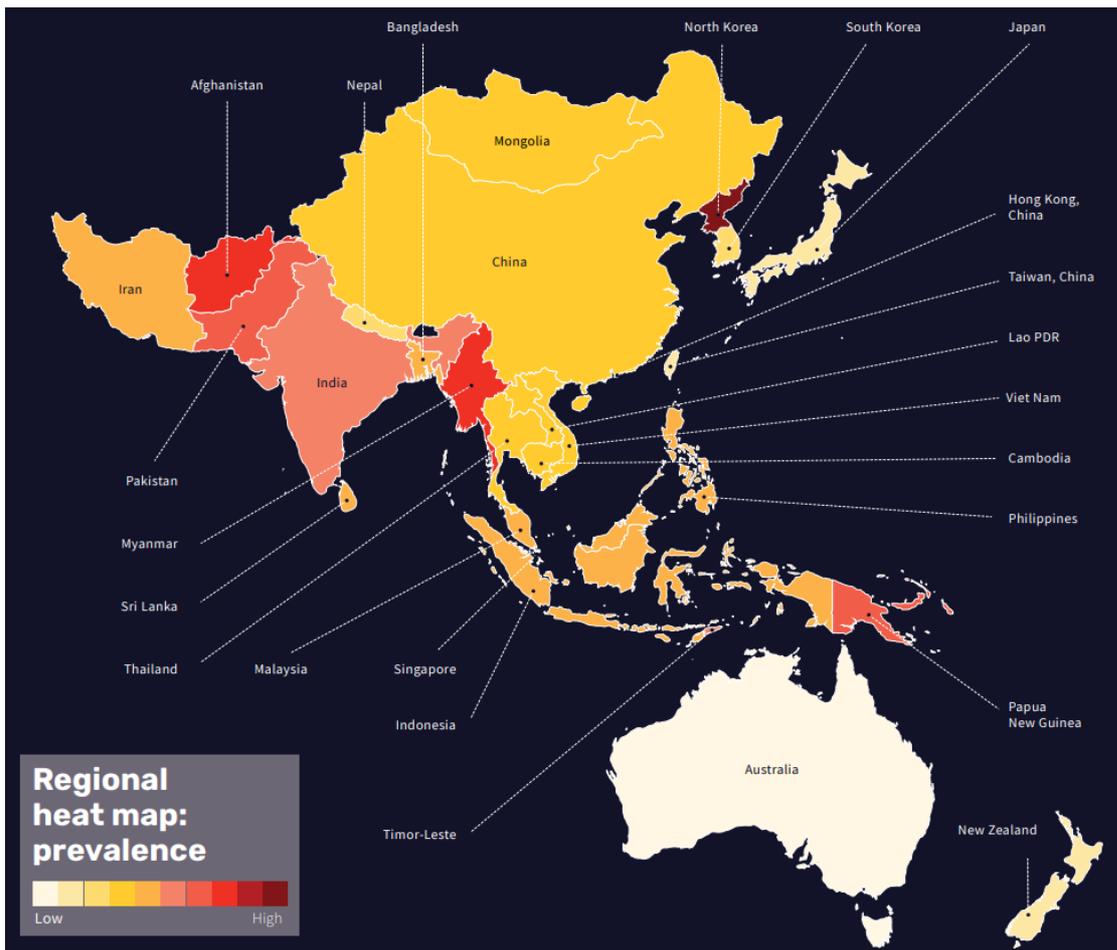


Table 2 - source: <https://cdn.walkfree.org/content/uploads/2023/05/24145725/GSI-2023-Asia-Pacific-Regional-Report.pdf>



Potential risks within Molycop Australia’s operations

Molycop Australia’s operations are predominantly performed from sites within Australia, which has a low modern slavery prevalence rate.

Molycop notes the various legal protections which prohibit modern slavery practices within Australia, and the extensive proactive engagement on workplace rights and entitlements by bodies including government agencies, not for profit organisations, and unions.

Potential risks within Molycop Australia’s supply chain

Product Category	Description of exposure	Country of origin / risk	Molycop controls	Residual risk
Molycop supplied imported grinding media	Molycop Australia imports grinding media from within the global Molycop corporate group, particularly from Molycop Indonesia	Predominately Indonesia, which carries a moderate regional-based Modern Slavery risk	Molycop Indonesia is governed by the same policies, procedures and structures as Molycop Australia with respect to operations and supply chain. *Molycop Indonesia operations possess low modern slavery risks however steel feed is procured from the same overseas suppliers referred to below, driving the moderate residual risk ranking	Moderate*
Imported semi-finished steel feed (bar / bloom)	Imported steel products have known modern slavery risk factors, depending on the region of origin, and the complexities of its upstream supply chain.	The majority of Molycop Australia’s imported steel feed was from China. The inherent modern slavery risk associated with Chinese-sourced steel feed is considered moderate but is regionally dependent.	Molycop operates a global procurement office (based across Singapore and Hong Kong) which leverages significant steel procurement expertise. Each Molycop supplier is audited by procurement experts. Each supplier is also required to complete an annual information request, which includes queries specifically designed to test modern slavery risks. In 2024 Molycop’s global compliance team led a risk assessment screening activity based in our Singapore procurement head office screening out major steel bar, bloom and media suppliers against modern slavery risk vectors. ¹	Moderate
Third-party supplied imported grinding media		Molycop Australia imported finished grinding media from both China and India in 2024 / 2025. India, compared to China, has an elevated modern slavery risk, and carries an inherently high risk.		High - Moderate
International Freight and logistics	There is a medium to high risk of labour exploitation and modern slavery in shipping and logistics	Molycop utilises bulk and container freight companies from various supply locations, including those with moderate modern slavery risks	Molycop carries out third party due diligence screening prior to engaging freight and logistics companies. We take a risk-averse approach to the engagement of freight and logistics partners and have set an internal standard that screening, monitoring and the consideration of additional specific reviews must be in place prior to engaging any partner in their services.	Moderate

¹ There are known significant forced labor risks in the Xinjiang Uyghur Autonomous Region (XUAR) of China, Molycop does not procure goods known to originate from this area



Molycop Australia’s actions to assess and manage modern slavery risks

Ongoing supplier and vendor engagement

Global procurement office	<p>The Molycop Group operates a global procurement office based across Singapore and Hong Kong. The procurement office is responsible for international bar and third-party grinding media purchases, and for maintaining steel and related commodity market intelligence. Molycop has a detailed steel product qualification and auditing practice, led by the international procurement office.</p> <p>Relevant to modern slavery risk this practice includes:</p> <ul style="list-style-type: none"> - The training of Singapore / procurement office staff in modern slavery risk assessment / identification - Periodic in-location, on-site facility and organisational audits and visits, carried out by experienced steel traders, often accompanied by technical staff - Annual auditing which includes a detailed data request, including a section of queries specifically designed to test the supplier against modern slavery risk <p>During on-site audits claims made via the annual data request are validated through observation by staff.</p>
Dedicated local procurement team	<p>Molycop Australia has a specialist and dedicated team of procurement and supply chain personnel that lead the supplier and vendor engagement process. This team operates under procurement guidelines which require a compliance qualification process to be undertaken for each new vendor. This process tests, among other factors, a vendor’s modern slavery risk. Where a procurement team member identifies an elevated modern slavery risk, additional information can be sourced from the vendor, allowing for further mitigating controls or action by Molycop.</p>
Supplier Code of Conduct	<p>Molycop’s <i>Suppliers Code of Conduct</i> specifies requirements with which all business counterparties must comply. Specifically covered are human rights and labour practices, in respect of which counterparties agree to:</p> <ul style="list-style-type: none"> • Uphold international human rights • Prohibit child and forced labour • Promote non-discrimination and respect in employment • Maintain a harassment-free workplace
Third Party Due Diligence	<p>Molycop complements its internal risk management processes by drawing on a third-party due diligence software tool, NAVEX RiskRate, to assess compliance, including any allegations or adverse media relating to modern slavery.</p> <p>This tool is utilised prior to the commencement of any supply chain engagements originating within jurisdictions with elevated inherent modern slavery risk and monitors suppliers on an ongoing monthly basis.</p>
Modern slavery remediation process	<p>Molycop has developed a framework for investigating and remediating compliance breaches including Modern Slavery. A detailed explanation of this process was published in Molycop Australia’s FY2023-24 statement, and the process remains unchanged for FY2024-25.</p>

Ongoing training and education

Global Code of Conduct training	<p>We have improved our culture, training, and third-party due diligence. In the last cycle, 91% of our global employees completed Code of Conduct training, reinforcing the importance of our Third-Party Due Diligence process.</p> <p>We equip every employee with clear guidance on Molycop’s stance against modern slavery so they can not only recognize potential indicators but also apply our controls and report concerns immediately.</p>
----------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------



Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks

Molycop Australia has implemented mechanisms to assess and address modern slavery risks in its supply chain, with components designed for ongoing evaluation of effectiveness.

The company uses “NAVEX RiskRate” for onboarding, due diligence, and continuous monitoring of vendors, suppliers, and business partners. RiskRate distributes assessments, collects documentation, applies approval workflows, and creates third-party profiles with risk scoring tailored to Molycop’s criteria.

During onboarding, RiskRate provides supply chain assessments covering human rights commitments, including modern slavery and forced labor. These assessments gather information on policies, practices, and controls, enhancing transparency and accountability. Higher-risk industries or regions receive increased scrutiny and may trigger additional due diligence steps.

Post-onboarding, RiskRate continuously monitors third parties against:

- Adverse media (200,000+ publications) for modern slavery allegations.
- Regulatory and sanctions lists related to forced labor and human rights violations.

Negative findings feed into risk scoring and prompt alerts. When modern slavery issues or other adverse media are detected, RiskRate generates real-time alerts that trigger automated workflows and escalation for immediate investigation and mitigation. This approach aligns with the United States Department of Justice and global enforcement guidelines for risk-based third-party due diligence.

Key controls include:

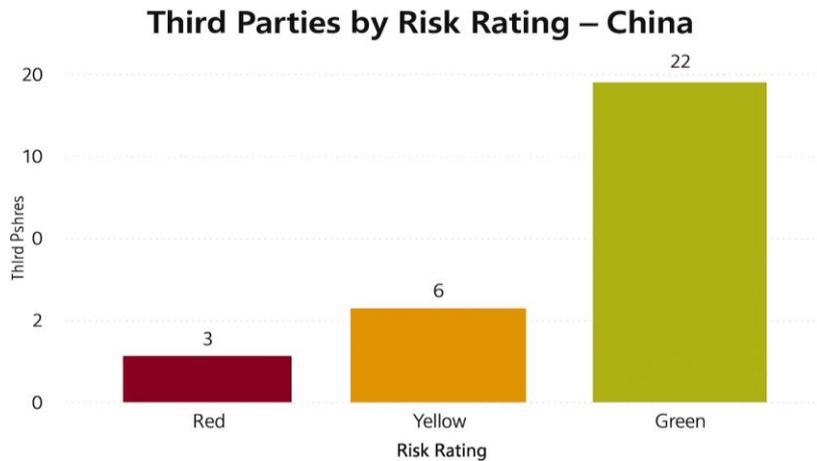
- In 2024, Molycop developed a Compliance Questionnaire issued via NAVEX to third-party contacts for detailed information.
- Responses are cross-checked against screening results, and the Legal & Compliance Department reviews all outcomes before engagement.

FY2024-25 results from RiskRate assessments across the high-risk regions included new suppliers only from the Philippines (a single supplier), and from China and Indonesia exclusively.

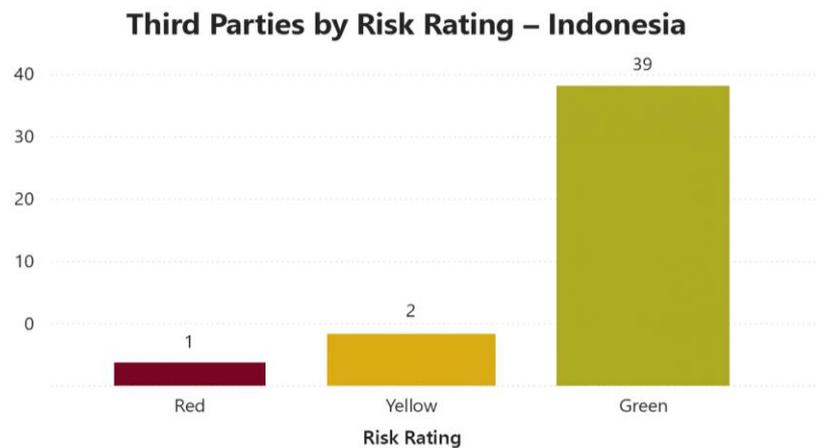
There were no new Suppliers reviewed or engaged from India, Afghanistan, Myanmar or any other higher risk countries.



China – Suppliers 1 Jul 24 to 30 Jun 25 – Of the three (representing under 10% of all new suppliers in China) Chinese Suppliers that received a ‘RED’ rating, all three were eventually onboarded as Suppliers after conducting enhanced due-diligence checks through questionnaires and/or signing up to Molycop’s Supplier Code of Conduct. This was similarly the case for all ‘ORANGE’ rated suppliers.



Indonesia - Suppliers 1 Jul 24 to 30 Jun 25 – The supplier (representing under 3% of all new suppliers in Indonesia) Indonesian Suppliers that received a ‘RED’ rating, the supplier was eventually onboarded after conducting enhanced due-diligence checks through questionnaires and/or signing up to Molycop’s Supplier Code of Conduct. This was similarly the case for all ‘ORANGE’ rated suppliers.



- Based also on the risk identified, further mitigation measures may be applied, for example: contractual clauses, on-site visits to verify that no modern slavery indicators are present, and enhanced (deep-dive) screening for higher-risk Third Parties.
- The development and imposition of supplier questionnaires and Key Performance Indicators for suppliers and vendors (including with respect to their risk and people management systems and strategies).
- Completion of audits and on-site visits by Molycop’s procurement and audit teams, focusing on suppliers of steel bar and traded ball. These on-site visits and audits elevate the considerations and on-site verification of workers conditions and enhances Molycop’s understanding of regional Chinese and Indian modern slavery risks in the relevant industrial sectors.



Forward-looking actions and strategic priorities, FY2025-26 and beyond

Building on the opportunities identified earlier in this Statement, Molycop has set several forward-looking objectives to strengthen the maturity and effectiveness of our modern slavery risk management program.

These actions are designed to improve the accuracy of our current assessment, enhance visibility across our supply chain and embed stronger governance throughout the organisation.

Strategic goals

a) Enhanced regional risk profiling

We aim to improve the geographic specificity of our risk assessments by incorporating province or state-level data where reliable sources exist, particularly for steel and finished media sourced from Asia. This will support more accurate identification of high-risk sourcing regions and help tailor engagement and mitigation measures to specific contexts.

b) Specialist site visits & identification of “top 3” tier-2 risk vectors

During FY2025–26, sustainability and procurement specialists will undertake site visits to key suppliers. These engagements will enhance due diligence, improve supplier understanding of our expectations and help validate the controls and conditions referenced in supplier responses.

We will also undertake a structured process to identify the “top three” tier-2 risk categories across our material supply chain categories. This work will map upstream processing steps to provide greater insight to where elevated modern slavery risks may sit beyond our immediate commercial relationships.

c) Strengthened governance and reporting

We will enhance communication with the Molycop Australia Board and the global boards to increase awareness of modern slavery risks, program performance and emerging trends.

This will help ensure that oversight of modern slavery matters is consistent, informed and embedded at the highest levels of governance.

d) Benchmarking within the Group and against peer organisations

We intend to benchmark our practices against other divisions within Molycop’s global operations and to assess available data from similarly exposed businesses to support external comparison.

e) Quantitative performance indicators

In FY2025-26 we will develop an initial set of quantitative performance measures. These indicators will support clearer expression of risk, enable year-on-year performance comparison and provide a more objective basis for evaluating the effectiveness of our activities.



Describe the process of consultation with any entities the reporting entity owns or controls and in issuing this modern slavery statement

In preparing this statement for Molycop Australia, the following key steps were implemented:

- Molycop's previous statement was reviewed by the internal project team to identify changes and updates
- Meetings were conducted with key stakeholders across each entity to identify any additional risks, changes and updates, as well as to verify the overall business risk profile and business practices
- Additional relevant information was located and collated by the internal project team in relation to all entities covered by this statement
- The internal project team completed a risk assessment (detailed above) covering, on a materiality basis, Molycop Australia's primary Modern Slavery exposures
- Board and executive engagement has occurred with an emphasis on those businesses most exposed to modern slavery risks – this included an opportunity for key representatives to consider, verify and provide feedback on drafted content prior to finalisation and submission.

This statement for Molycop Australia was approved by the board of Grinding Media Pty Ltd as the parent entity on 23rd December 2025.

Executed for: Grinding Media Pty Ltd / ACN: 615 611 759

By the following authorised delegate:

Name: Paul Griffiths

Position: Director

Date: 23 December 2025

Molycop Modern Slavery Statement 2025 Signed

Final Audit Report

2025-12-22

Created:	2025-12-22
By:	Daniel Hodges (dhod900@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAor6g9DDWFuK6zURThn-0sKu4WPYFBW2k

"Molycop Modern Slavery Statement 2025 Signed" History

-  Document created by Daniel Hodges (dhod900@gmail.com)
2025-12-22 - 11:10:00 AM GMT
-  Document emailed to Paul Griffiths (paul.griffiths@molycop.com) for signature
2025-12-22 - 11:10:43 AM GMT
-  Email viewed by Paul Griffiths (paul.griffiths@molycop.com)
2025-12-22 - 9:16:11 PM GMT
-  Document e-signed by Paul Griffiths (paul.griffiths@molycop.com)
Signature Date: 2025-12-22 - 9:16:43 PM GMT - Time Source: server
-  Agreement completed.
2025-12-22 - 9:16:43 PM GMT