

MODERN SLAVERY STATEMENT 2021



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Modern Slavery Statement

Marubeni-Itochu Tubular Oceania Pty Ltd

FY21

This statement covers the activities of Marubeni-Itochu Tubulars Oceania Pty Ltd (ABN: 87 077 953 827) during the year ended 31 March 2022 | period 1 April 2021 to 31 March 2022.

References in this statement to 'MITO', 'we', 'our' and 'us' are references to the Marubeni-Itochu Tubulars Oceania Pty Ltd.

This modern slavery statement is submitted under the *Modern Slavery Act 2018* (Cth) (**the Act**) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

MITO acknowledges the late submission of this statement as MITO was unaware of its reporting obligations under the Act at the time the statement was due to be submitted.

This statement has been approved by the Board of Marubeni-Itochu Tubulars Oceania Pty Ltd on 18th July 2023.



Hakim Messoussa

Managing Director



Our values

Strengthened by
Diversity

Driven by
Challenges

Propelled by
Agile Thinking

About us

MITO provides an exclusive and fully comprehensive supply chain concept designed to prioritise customer needs, and is dedicated to delivering better tubular solutions across the resource and energy industries.

Our Vision:

We will unlock potential to create an energised and sustainable future.

Marubeni-Itochu Tubulars Oceania Pty Ltd (MITO) is one of the largest steel tubulars and linepipe suppliers in the Oceania region including Australia, New Zealand and Papua New Guinea. Our head office is in Perth and branch offices in Brisbane and Auckland. With our strong relationships and global operations, we have the scope, dedication, and experience to supply valuable customised services with a wide range of steel products from the world's leading mills and manufacturers in Japan, USA, Korea, China and Europe.

For more information on Marubeni-Itochu Tubular Oceania Pty Ltd (MITO), please refer to:

<https://mito.net.au/>

Our structure

MITO is a proprietary company and is incorporated in Australia and our principal place of business is Level 9, 5 Mill Street, Perth WA 6000.

MITO is a subsidiary of Marubeni-Itochu Tubulars Asia Pte Ltd, incorporated in Singapore. Our ultimate parent company is Marubeni-Itochu Steel Inc, incorporated and headquartered in Japan.

MITO does not have any owned or controlled entities.

Our operations

We are one of the largest steel tubular suppliers in the Oceania region, providing an exclusive and fully comprehensive supply chain concept. Our head office is located in Perth, Western Australia, with facilities proximal to local operations in Dalby, Karratha, Moomba, Roma, Darwin and New Plymouth (NZ).

MITO is a fully integrated network and we have the scope, dedication and experience to supply valuable, customized services with a wide range of steel products from the world's leading mills and



manufacturers in Japan, USA, Korea, China and Europe to the Oceania region.

We engage 61 employees permanent full time or part-time employees, of which 56% work in office-based positions and 44% work in regional operations positions. Employment at MITO is underpinned by the Marubeni-Itochu Tubulars Oceania Pty Ltd Employee Collective Agreement 2018 and comprehensive and easily assessable Human Resource.



Our supply chain

The main types of goods and services that we procure are OCTG (Oil Country Tubular Goods), Linepipes as well as general goods and services including:

- Logistics and Transportation
- Inspections and marine surveys
- Engineering and fabrication services
- Corporate/building services including office rentals and office maintenance services
- Information and communications technology including hardware and software, printers, audio/visual equipment, data room services, desk phones and mobile phones used by our employees;
- External professional services including financial services, legal, insurance, consulting, professional and personal development, employment;
- Office consumables including stationery, amenities, kitchen consumables.

We engage our suppliers on either a long term or short basis depending on the requirements of the products or services.

We also have a number of indirect suppliers, including promotional products, personal protective equipment and tools.



35-Year History

Marubeni-Itochu Steel Oceania have supplied OCTG and Linepipe to the Oceania region for more than 35 years.



Leading Supplier

We've worked on some of the most demanding projects both offshore and onshore.



250,000 MT of OCTG

Within the last five years, MITO have imported over 250,000MT of OCTG into the Oceania region.



2870 KM of Linepipe

We've supplied approximately 2870km of Linepipe for some of the largest projects in the region.

Modern slavery risks

We recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

Risk assessment methodology

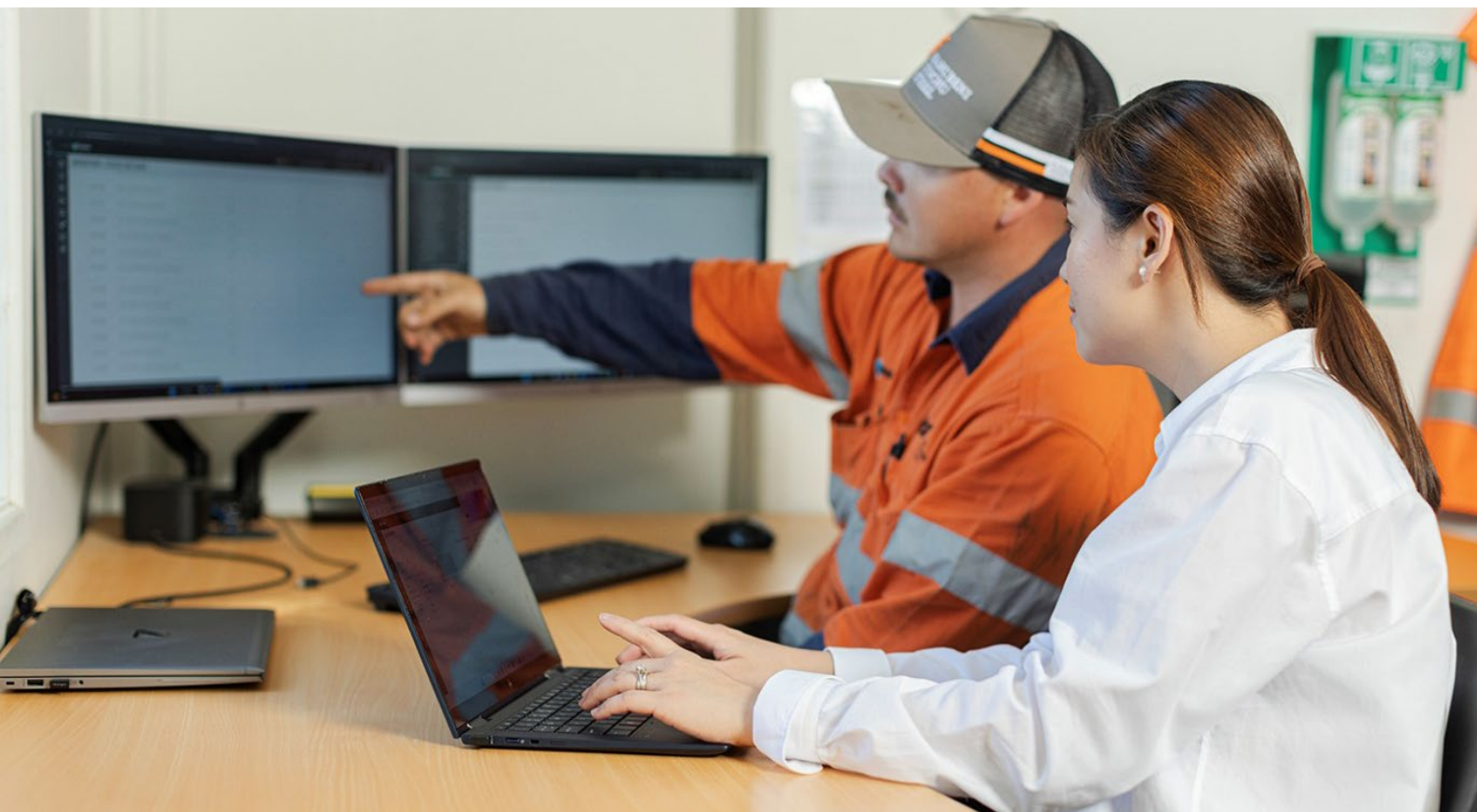
We are in the early stages of developing our understanding of modern slavery risks across our operations and supply chain. We will work towards developing a risk assessment methodology, in order to carry out a risk assessment in our supply chain and understand our risk profile.

Risk Profile

We acknowledge we are in the early stages of developing our understanding of the modern slavery risks across our operations and supply chain.

However, our risk profile can be summarised as follows:

Risk	Description of risk
Sector /Industry	Some sectors within our operations and supply chain that may have a higher prevalence of modern slavery risks include the supply of steel and non-steel products, transportation, and logistics.
Geographic	We have identified a number of countries in our supply chains which have a higher prevalence of modern slavery. This includes China and Indonesia.
Specific Entity	We are not aware of any specific risks associated with any particular supplier.



Actions to assess and address risk

We understand the importance of working collaboratively with our employees, suppliers and the broader industry to combat modern slavery. That is why during our first reporting we indicated that we will undertake to assess and address modern slavery in our operations and supply chains.

Governance and accountability framework

MITO seeks to conduct business in accordance with Australian law, rules and policy, best market practice and the highest standards of integrity and fair dealing. To assist in compliance with legislation, rules and regulations, MITO has established internal controls and procedures to manage its business effectively. Currently, MITO's Compliance Committee comprises of the Compliance Officer, Managing Director, Operations Manager, and Production Controller.

Policies and procedures

In our existing governance framework, we have a number of policies and procedures to ensure we have strong frameworks to enable us to assess and address modern slavery risks, including:

- Modern Slavery Policy, developed and deployed in March 2021 for our business, establishes our commitment to addressing modern slavery risks in our business and driving an accountability for ethical business practices across our organisation and supply chain.
- Complaints Procedure is in place that supports and encourages employees to raise concerns in relation to their work environment, persons or decisions affecting employment;
- Whistleblowing Policy has been established to provide a supportive work-relationship environment where wrongdoings such as corruption, illegal activities, unethical behaviour, harmful work practices, can be raised without fear that their future employment prospects will be adversely affected;
- Bullying, Harassment and Anti-Discrimination Policy is in place to ensure MITO provides a safe, flexible and respectful environment for Employees and Customers, free from all forms of discrimination, bullying and sexual harassment;
- Inclusion and Diversity Policy is also in place where everyone is treated with respect and equity, and diversity is celebrated.

These policies and procedures complement our existing governance framework which includes the Compliance Manual, Human Resources Manual, and General Policies and Procedures Manual.

Future actions

We have also planned to undertake further actions to identify and address our modern slavery risks as set out in the 'Looking forward' section below.

Looking forward

We will continue to review and consider the steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

As this is our inaugural statement and we are developing our modern slavery framework, we recognise there are further steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

Going forward, we will focus on key steps for future reporting periods, e.g.:

- undertaking detailed supply chain mapping to better understand our supply chain and modern slavery risks;
- developing a supplier questionnaire to engage with our suppliers and develop our modern slavery risk assessment procedures;
- reviewing supplier questionnaires, modern slavery statements and other information provided from suppliers to assess the modern slavery risks in our supply chains.

Impact of COVID-19

Since early 2020, COVID-19 had created disruptions in logistics and supply chain globally. The restrictions and forced border closures had made it difficult for us to perform visits and audits to the supplier sites. With the unpredictable challenges of COVID-19, it has also brought about uncertainty in the supply of our materials, and changes in our supply chain. We hope that regular site visits can resume when the global pandemic recovers.

Consultation

We do not own or control any other entities and therefore this criterion is not applicable.

However, prior to being put to the Board of Marubeni-Itochu Tubulars Oceania Pty Ltd for review and approval, this statement was reviewed by Chief Commercial Officer, Operations Manager, Finance Manager, and Head of People and Culture.

This statement was approved by the Board of Marubeni-Itochu Tubulars Oceania Pty Ltd in their capacity as the principal governing body of Marubeni-Itochu Tubulars Oceania Pty Ltd on 18th July 2023.

This statement is signed by Hakim Messoussa in their role Managing Director of Marubeni-Itochu Tubulars Oceania Pty Ltd on 21st August 2023.



Hakim Messoussa

Managing Director



Statement Annexure

Mandatory criteria

This statement complies with the mandatory criteria for a modern slavery statement outlined in section 16 of the *Modern Slavery Act 2018* (Cth). The below table indicates where each requirement is addressed in this statement.

Requirement	Page Number
(a) Identify the reporting entity.	3
(b) Describe the structure, operations and supply chains of the reporting entity.	5
(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	7
(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.	7
(e) Describe how the reporting entity assesses the effectiveness of such actions.	8
(f) Describe the process of consultation on the development of the statement with any entities that the reporting entity owns or controls (if a joint statement has been made under section 14, also describe the process of consultation with the entity giving the statement).	9
(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	9


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Final Audit Report

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