

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of

MITSUI IRON ORE DEVELOPMENT PTY LTD

as defined by the *Modern Slavery Act 2018* (Cth)¹ (“the Act”) on 09/30/2021

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of

MITSUI IRON ORE DEVELOPMENT PTY LTD

as defined by the Act²:



TAKAHIRO DOUCIHI

President and Managing Director

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	1
b) Describe the reporting entity's structure, operations and supply chains.	1-2
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.	2-3
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	3
e) Describe how the reporting entity assesses the effectiveness of these actions.	4
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	2, 4
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

- Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.
- Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.



MITSUI IRON ORE DEVELOPMENT PTY LTD

MODERN SLAVERY STATEMENT 2021

This Modern Slavery Statement describes the steps taken by Mitsui Iron Ore Development Pty Ltd (ACN 008 734 361) (**MIOD**) during its financial year ending 31 March 2021 to address modern slavery risks in its operations and supply chains in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**).

MIOD is a reporting entity under the Act.

Our organisation

MIOD is an Australian proprietary company that was established in 1970 and is headquartered in Perth, Western Australia. MIOD is jointly owned by Mitsui & Co. (Australia) Ltd (ACN 004 349 795) (**MCA**) (20%) and Mitsui & Co. Mineral Resources Development Pty Ltd (ACN 160 296 462) (**MMRD**) (80%), both being wholly owned subsidiaries of Mitsui & Co., Ltd. (**Mitsui Tokyo**), and is a holding company for Mitsui Tokyo's Australian iron ore investments. Mitsui Tokyo is a true global conglomerate with multiple businesses operating across different industries under the one corporate group. With approximately 44,500 employees and 514 affiliated companies, Mitsui Tokyo does business in 63 countries from 131 offices around the world.

MIOD understands that we need to lead by example in the way we do business. We operate by a set of values which shapes the way we think, work and act to ensure we are helping people to achieve their ambitions – in the right way.

This also means we aim to act fairly, ethically and openly in everything we do. We are committed to combating the risk of modern slavery in our supply chains or in any part of our business.

Our business in Australia

MIOD is located in Western Australia and directly employs 12 staff. MIOD holds a 33% interest (20% direct and 13% indirect) in the Robe River Iron Associates (RRIA) unincorporated joint venture (JV) which operates iron ore mines and mining related infrastructure in Western Australia's Pilbara region. The RRIA JV is ultimately owned by Rio Tinto Plc (Rio Tinto) (53%), Mitsui & Co. Ltd (Mitsui Tokyo) (33%) and Nippon Steel Corporation (NSC) (14%). The JV operates two sets of open pit mines in Western Australia one being in the Robe Valley, and one located in West Angelas, and is managed by Robe River Mining Company Pty Ltd (RRMC) (which is majority owned by Rio Tinto

Ltd). The joint venture also owns and operates Port Walcott (Cape Lambert), one of the three major iron ore exporting ports in the Pilbara region of Western Australia, and rail networks across the region.

MIOD does not own or control, whether directly or indirectly, any other entity.

In addition to our JV interests, MIOD is committed towards making a valuable contribution to the local communities in and around the regions in which the JV operates. MIOD's focus in these areas involves health, education, community, arts and culture and included donations to the Royal Flying Doctor Service, SciTech, WA Ballet, Cancer Council and Graham (Polly) Farmer Foundation.

Assessing and managing risk

Through its investment in RRIA JV, MIOD is exposed to large supply chains from a variety of suppliers across multiple continents. The day-to-day operation of the JV has been conducted by the JV manager, therefore MIOD's involvement and control is limited in terms of identification and management of modern slavery risks in the supply chain of the JV. However, we do seek to manage our exposure to modern slavery risks by selecting joint venture partners with strong governance and human rights practices and ensuring they have adequate risk mitigation processes. As majority shareholder and manager of the joint venture, Rio Tinto manages risks MIOD may be exposed to through the supply chain on behalf of participants. Their statement can be found:

<https://www.riotinto.com/-/media/Content/Documents/Sustainability/Corporate-policies/RT-Slavery-human-trafficking-statement-2020.pdf?rev=5cb2fea89124432e8829961e0b78f9b0>

MIOD engages the services from MCA and Mitsui Tokyo for shared services and has performed a risk assessment of human rights violations within those services, deeming them low risk. Both MCA and Mitsui Tokyo are committed to upholding modern slavery legislation and MCA has published its own statement under the Act, and Mitsui Tokyo has published its own [statement](#) under the UK Modern Slavery Act since 2016. Mitsui Tokyo assesses global supply chains for modern slavery risks using human rights risk mapping, together with advice from and consultation with independent experts. The assessment included MIOD as a wholly owned subsidiary, and was based on leading international human rights risk indicators and other tools such as the "[List of Goods Produced by Child Labor or Forced Labor](#)" of Bureau of International Labor Affairs (ILAB) and "[Global Map of Environmental and Social Risks in Agro-Commodity Production](#)" of International Finance Corporation (IFC), placing emphasis on the core labour standards identified by the International Labour Organization (ILO). Through this process, none of the existing suppliers of MIOD have been identified as high risk in the human rights risk mapping.

MIOD's direct supply chains relate to the procurement of goods and services needed to manage the administrative side of our business. MIOD has processes that aim to ensure that we only work with appropriate suppliers who can meet the standards that we expect.

This may include confirmation that these service providers have responsible supply chain policies and anti-modern slavery statements of their own, and where not, are aware of modern slavery principles. The majority of our direct suppliers are from Australia. Our direct supply chains include the procurement of the following types of goods:

- IT equipment;
- business cards and promotional materials such as coffee mugs bearing the corporate logo;
- office stationery;
- coffee and tea for the staff breakout area;
- banking services from leading Australian banks;
- legal, accounting and engineering services from professional services firms;
- software licences and subscriptions to industry publications and alerts;
- travel;
- cleaning services

Actions Taken

MIOD monitored and oversaw risk management (including with respect of modern slavery risks), through implementing policies and guidelines, having a remediation process and undertaking due diligence on our suppliers.

MIOD maintains a set of Business Conduct Guidelines, which oblige the company and its people to conduct our business in a manner that respects human rights and does not involve any modern slavery practices. The Guidelines also prohibit discrimination on the basis of any protected attribute under the law. The Guidelines are MIOD's principal code of conduct for our employees and contractors, who are required to understand and adhere to the Guidelines throughout their employment or engagement. These guidelines are continuously reviewed to ensure they meet the high standards set by MIOD and Mitsui Tokyo, annually committed to by all employees and contractors, and supported via formal training and information sessions.

We are also committed to the reporting of and speaking out against realised or suspected breaches of any internal policies or laws which we are required to follow. MIOD have adopted a [Whistle blower Policy](#) which coupled with the compliance reporting route, are made available for both internal and external reports in case of any complaint or concern regarding our modern slavery obligations. These protections are available to both current and former employees and extend to our own suppliers. Governance and transparency are key values for MIOD, and these messages are communicated and demonstrated from the highest levels within MIOD, to all employees.

Assessing effectiveness and looking ahead

At the date of this report, no breaches had been reported through any of our compliance reporting routes but MIOD does not take this to mean we have fully met our obligations. MIOD strive for continuous improvement and review our policies and processes to ensure there is no modern slavery within our supply chains, and that we have the protocols in place to detect or identify actual or potential breaches of this.

Moving ahead we are currently working to implement a framework in line with Mitsui Tokyo to assess and monitor the modern slavery risks in our supply chain.

We recognise that the risks of modern slavery are complex and evolving. We will continue to work to address these risks in our business and engage with a range of stakeholders to assess the effectiveness of our actions and enhance our approach.

Consultation

MIOD does not own or control, whether directly or indirectly, any other entity.

MIOD does however perform administrative functions for the Pannawonica Iron Associates and Cape Lambert Iron Associates partnerships which hold a direct interest in the JV. MIOD does not have a controlling interest in these partnerships but maintains a 20% interest in the Cape Lambert Iron Associates partnership which is reported through our 33% share of the JV. Nippon Steel Australia Pty. Limited and Nippon Steel Raw Materials Australia Pty Ltd are the other partners to these partnerships. Supply chains related to these partnerships directly, and their involvement in the JV, are included in the respective partners' individual statements.

Declaration

I, Takahiro Doiuchi hereby certify this Modern Slavery Statement, has been approved by the Board of Directors of Mitsui Iron Ore Development Pty Ltd on 24 September 2021.



TAKAHIRO DOUCIHI
President and Managing Director
24 September 2021