



DITH AUSTRALIA PTY LTD

MODERN SLAVERY STATEMENT 2021

This Modern Slavery Statement describes the steps taken by DITH Australia Pty Ltd. (ACN 620 953 166) (**DITH Australia**) during its financial year ending 30 September 2020 to address modern slavery risks in its business and supply chains.

DITH Australia Pty Ltd makes this statement in accordance with the Modern Slavery Act 2018 (Cth).

Our Company

In this statement the “DITH Group” refers to Duferco International Trading Holding S.A. (“DITH”) and its subsidiaries. DITH is a Limited company with registered office at 6, Rue Guillaume Schneider, L-2522 Luxembourg.

DITH Australia is wholly owned by Duferco International Trading Holding S.A. , a global leader in the trading and distribution of steel and steel-related raw materials. DITH has over 3000 employees operating in more than 115 countries worldwide and currently trading approximately 17 million tonnes of products every year. The trading headquarter for the worldwide activities of DITH is based in Switzerland.

Our business in Australia

DITH Australia currently has 26 employees and supplies approximately \$ 250 million worth of steel to over 150 customers located in the Australian territory. DITH Australia primarily provides supply of steel products sourced from international producers to consumers in Australia and NZ. DITH Australia manages the supply chain risk, foreign exchange, international and domestic transport, customs clearance, duties, and provides working capital support through open account payment terms.

Our Supply Chain

DITH Australia sources steel products from international producers based on multiple locations. Our supply chain related counter parties include steel mills, freight forwarders, international freight providers, domestic transport providers, warehouse operators, trade finance banks, credit insurers, and Australian steel consumers.

Our Actions

The DITH Group is committed to act in compliance with applicable laws in all its business dealings and relationships, wherever it operates and with whoever it works.

In addition to operating in compliance with applicable laws, the DITH Group is also committed to conduct its business in a fair, honest and ethical manner. Our governance model is described in the [Responsible Practice section](#) of our website. This includes a description of the applicable Global Compliance Framework including the [Business Principles](#) and [Policy of Business Conduct](#) governing the operations of the DITH Group.

With the support of senior management, we have implemented and published the Corporate Social Responsibility Report for our financial year ended on 30 September 2021 based on the guidelines of ISO 26000 and adopting the Global Reporting Indicators (GRI) applicable to its business.

The CSR initiative extends and improves the DITH assessment capabilities and further reduce the, limited, risks connected to potentially “cause” or “contribute” to modern slavery practices in its activities. This led, in the course of the financial year ended on 30 September 2021, to the adoption of new group policies (applicable also to DITH Australia) concerning human rights, the environment and health and safety in the workplace.

Consistent with the policies and principles referred to above, the DITH Group takes steps to conduct its affairs in a manner which provides for equal opportunities, respects human rights, provides for the highest standards of health and safety and protects the environment. These include efforts by the DITH Group to prevent modern slavery or human trafficking in our business. Such steps include, amongst others: know your counterparty checks; incorporation in contracts with our business representatives of clauses requiring our counterparties to comply with applicable laws and our policy of business conduct; and education and training for all of our employees on compliance issues.

Consultation

The activities and efforts of the DITH Group are focused to implement measures that can reduce the risk of entering in business “connection” with counterparties not

Consultation (continued)

complying with applicable laws on modern slavery despite the complex and fragmented supply chain of the trading and trading related activities

The DITH Group has dedicated corporate functions (including risk management, compliance and legal) to which employees can refer to and address any issue relating to the compliance of the DITH Group with applicable laws. DITH Group’s Director of Risk and Compliance has been designated as our nominated contact for the Modern Slavery Act. In this respect, DITH approved a Group Whistleblowing Policy with a dedicated and protected telephone line activated with an external provider and accessible to all group companies, where the independent professional can assess any potential risk of violation under the Policy.

In addition, DITH thanks to its global presence composed by over 70 locations, and to a reliable worldwide network of representatives, DITH can ensure its efforts to continuously monitor the supply chain also for risk linked to any violation of modern slavery.

Besides the effective controls on the ground, DITH efforts are also focused to extend the content of its CSR principles to all main suppliers/producers.

Assessing Effectiveness

DITH Australia has reviewed operations to minimize the risks of modern slavery in its supply chain through the various due diligence requirements described in this statement. DITH Australia will continue to implement processes to monitor compliance and identify modern slavery in the supply chain and in business operations.

The company will measure effectiveness by undertaking biannually meetings with key stakeholders to address any concerns raised by supplier, customers and/or employees in relations to DITH Australia Pty Ltd.'s approach to Modern slavery.

No instances of Modern Slavery have been reported or alleged in FY19

Future Actions

1. Continue in house education for all employees covering all aspects of Modern Slavery in order to maintain awareness and training standards
2. Introduce a modern slavery questionnaire for all new service supplier and will form part of DITH Australia Pty Ltd's existing counter party check.
3. Implement a modern slavery risk assessment matrix, which will contain key risk indicators for modern slavery and related risk factors.

Impact of COVID-19

The COVID-19 pandemic impacted human rights around the world. While people's health and safety were obviously impacted. It also impacted people's loss of income, necessary goods becoming scarce, travel and contact restrictions which caused people to become isolated, affecting mental health and non-emergency medical care becoming more difficult to obtain. These issues combined has added more financial pressure and made many people more vulnerable to the risks of modern slavery to sought new sources of income. Recognising this, we implemented precautionary measures for our employees, swiftly shifted to working from home arrangements and south to maintain continuity in our commercial arrangements with suppliers to the greatest extent possible.

This statement was approved by the board of DITH Australia on 11th April 2022

11th Apr 2022



Paul Whitehead

Managing Director of DITH Australia Pty Ltd