

FY2024 Slavery and Human Trafficking Statement

1. Introduction

This is the first Modern Slavery Statement produced by Mitsubishi Material Trading Corporation (ARBN 121 426 131) ('MMTC'), published in accordance with the Australian Modern Slavery Act 2018 (Cth) ('MSA'). The Statement sets out the steps we have taken to mitigate risks of modern slavery in our operations and supply chains during the year ended 31st March 2024.

2. Company structure, operations and supply chains

MMTC is a wholly owned subsidiary of Mitsubishi Material Corporation ('MMC').

MMTC itself has three owned and controlled entities, namely, Ryoko Service Corporation ('RS'), Ryoko Sangyo (Thailand) Co., Ltd. ('RST') and PT. Ryoko Sangyo Indonesia ('RSI').

MMC is engaged in the manufacture and sale of copper products, electronic materials, etc., the manufacture and sale of cemented carbide products, etc., the smelting and sale of copper, gold, silver, palladium, etc., and energy-related and environmental recycling-related businesses mainly in Japan.

MMTC is engaged in the sale of non-ferrous metal ingots, processed metals, machine tools, fuels, chemical products, electronic components, building materials, mineral residues, steel materials, precious metals, etc., and environmental recycling-related businesses and Material procurement services.

MMTC works with 2614 suppliers from a number of countries including Japan. Our suppliers are primarily located in Japan, accounting for 94% of our total supplier spend. Further, of this amount, purchases from the MMC Group account for 28% of the total supplier spend.

The main types of goods and services that we procure are processed metals.

3. Risk assessment and Initiatives

Risk assessment through due diligence

Methodology

MMTC operates across a range of countries and our risks reflect this diversity. Through the modern slavery risk assessments we undertake across the MMC Group, MMTC identified potentially vulnerable workforces and high risks. As our business evolves, we recognise that the nature of the risks will also change.

As such, we are committed to improving our processes to ensure that we adapt appropriately and capture any risks as effectively as possible.

This methodology is supported by extensive due diligence on our operations and supply chains, as noted below.

Overview of Due Diligence on Suppliers

In conducting procurement, MMC Group established our Procurement Policy, and we are committed to respecting internationally declared human rights principles. Our Procurement Policy sets forth our responsibilities for fair trade, respect for human rights, legal compliance, procurement ethics, occupational health, environmental protection, and information security in addition to child labour and forced labour.

Supplier Assessment

To ensure the effectiveness of initiatives at our suppliers, MMC conduct supplier recruitment audits and supplier evaluations, which have been in place since April 2016, and conduct on-site audits as necessary.

Our company also plans to establish a system in accordance with this.

Overview of Due Diligence on Mitsubishi Materials and Our Group Companies

In 2022, the MMC Group began building a human rights DD system within the Group. Subsequently, in 2023, MMC distributed SAQ to all 105 Group sites and Group companies, and

analyzed the responses to identify human rights risks.

The SAQ developed questions based on international human rights and work-related sustainability standards, such as the United Nations Guiding Principles for Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct, and the ILO Core Labour Standards (5 Areas and 10 Conventions), with input from external experts. The SAQ covers key areas related to human rights in 20 areas, including child labour and forced labour, and identifies areas of risk where the operations of the MMC sites and MMC group companies adversely affect human rights.

As a result of analysis of responses to the SAQs distributed in 2022 and 2023, MMC Group identified human rights risks such as harassment, discrimination in the employment process, and procurement of raw materials. To reduce these risks, MMC Group will further strengthen our existing efforts to create an organizational culture that prevents harassment and to promote responsible procurement. At the same time, MMC Group will consider efforts to prevent discrimination in the employment process.

In addition, in order to continue implementing human rights DD in the future, MMC Group have formulated the “Mitsubishi Materials Group SAQ Internal Operation Manual.” The manual reflects the knowledge gained from our efforts in 2022 and 2023 and covers the assessment and identification of human rights risks, as well as the planning and implementation of follow-up and improvement plans.

4. Potential Risks in Operations and Supply Chains

Our initial risk assessment has indicated that our operations and supply chain have a low potential for modern slavery risks.

Our risk profile is summarised in the table below.

Risk	Description of risk
Geographic	In developing countries, there is a potential risk that modern slavery may be widespread due to factors such as poor governance, weak rule of law, conflict areas, high immigration rates, poverty and other socio-economic weaknesses.

5. Actions to Address Potential Risks in MMC Group's Supply Chain

Due diligence

As noted above, we undertook a risk assessment through due diligence.

The SAQ, which is used for human rights DD in our sites, assesses human rights risks by including questions on forced labour and child labour.

Relevant policies and commitments

MMTC is committed to respecting human rights and strives to ensure that our business activities do not cause or contribute to adverse human rights impacts, including modern slavery. This commitment is expressed through a variety of policies set by our parent company MMC. The following policies are available to all employees through our MMC intranet and are communicated through various training sessions throughout the year.

MMC Group's Initiatives of Respecting for Human Rights

Since 2022, MMC Group have been working on the following three issues in accordance with the United Nations Guiding Principles on Business and Human Rights in order to prevent and mitigate the adverse effects of its businesses on human rights, including the risks of forced labour and child labour.

- Dissemination of commitment to human rights policy
- Implementing Human Rights Due Diligence ("human rights DD")
- Remedial Measures

Policies and Commitments Related to Human Rights

Policies	Description
Code of Conduct	<p>We have established a code of conduct to foster an ethical corporate culture and organizational culture.</p> <p>It consists of five chapters: Respect for Human Rights, Safety First, Compliance, Mutual Prosperity and Environmental Management.</p>

Sustainability Policy	Commitment to further accelerate our proactive engagement with sustainability to achieve sustainable growth as a corporate group.
Human Rights Policy	"Human Rights Policy of the Mitsubishi Materials Group" (the "Policy") was established based on the Sustainability Policy. It is committed to identifying, preventing and improving the adverse impacts of the Group's business on human rights in all areas of its business activities and to promoting efforts to respect human rights, including the prohibition of forced labour and child labour.

Commitments	Description
UN Global Compact	This agreement supports the 10 principles of the Global Compact, which consists of four areas: human rights, labour, environment, and anti-corruption.

Remedial Measures

MMC Group has established a report and consultation desk for employees to receive reports and consultations on human rights. The desk accepts anonymous reports and consultations, guarantees strict confidentiality, and has a system to implement remedies. There were no reports or consultations regarding forced labour or child labour at the employee desk during the reporting period.

In addition, MMC Group have established a human rights inquiry desk that is accessible to our external stakeholders. This inquiry desk can be consulted anonymously.

Awareness-raising and training

MMC Group believes that respect for international human rights standards, as well as compliance with laws and regulations in each country, is essential for its global operations. Therefore, in December 2021, MMC Group formulated our Human Rights Policy. Based on this policy, MMC Group is strengthening its initiatives of respecting human rights, including the prohibition of forced labour and child labour.

In addition, MMC Group conduct human rights training for employees in Japan and overseas in

order to penetrate them with these policies regarding respect for human rights and the human rights risks and issues MMC group are facing.

In addition, initiatives and examples of respecting human rights are handled in governance training for directors of our company and our group companies in Japan and overseas, and compliance training for managers of overseas group companies.

These training sessions are positioned as opportunities to cultivate global human rights awareness and to understand corporate responsibility.

7.Looking ahead

As MMTC continues the development of its program to prevent and reduce the risks of forced and child labour in its supply chains and operations in 2024, it will consider and implement measures to assess the effectiveness of these processes.

8. Assessing effectiveness

We are committed to reviewing the effectiveness of our actions when commencing a new operation or engaging a new supplier by assessing whether our existing risk management processes remain appropriate..

We also monitor our performance against a number of key performance indicators. These include the number of suspected or identified modern slavery incidents.

9. Consultation

RS, RST and RSI are owned proprietary subsidiaries of MMTC.

MMTC consults with RS, RST and RSI in respect of the actions it takes to combat modern slavery in MMTC Group's supply chain and business operations.


This Statement has been prepared in consultation with RS, RST and RSI, and RS, RST and RSI are aware of and committed to the ongoing actions outlined in this Statement.

The boards of RS, RST and RSI have been consulted and have approved this Statement.

10. Approval

This statement was approved by the board of Mitsubishi Material Trading Corporation in their capacity as principal governing body of Mitsubishi Material Trading Corporation on 27 September 2024.

This statement is signed by Ryosaku Hashimoto in their role as the director of Mitsubishi Material Trading Corporation on 27 September 2024.



RYOSAKU HASHIMOTO

PRESIDENT

Mitsubishi Material Trading Corporation