

Southern Cross Aluminium Pty Limited

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AUSTRALIA

Modern Slavery Statement

Southern Cross Aluminium Pty Limited (ABN: 25 063 778 996)

Southern Cross GPS Pty Limited (ABN: 50 063 779 028)

FY2022

This joint statement covers the activities of Southern Cross Aluminium Pty Limited (ABN: 25 063 778 996) and its wholly owned subsidiary Southern Cross GPS Pty Ltd (ABN: 50 063 779 028) during the year ended 31 December 2022.

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

Throughout 2022, we have continued to communicate and assess the implementation of governance and policies with regards to modern slavery risks identification and remediation, if any, in relevant business entities.

This joint statement has been approved by the Board of Southern Cross Aluminium Pty Ltd in their capacity as the principal governing body for Southern Cross Aluminium Pty Ltd and as the parent company for Southern Cross GPS Pty Ltd on 22 June 2023.

About us

At Southern Cross Aluminium Pty Ltd (**SCA**) and Southern Cross GPS Pty Ltd (**SCG**), we recognise that respecting the human rights of those affected by our business activities is important as all businesses should proactively assess and respond to the risks of modern slavery in their operations and supply chains.

Our structure

SCA and SCG are both incorporated companies in Australia and our registered office is located at Suite 1703, Level 17, 120 Collins Street, Melbourne, VIC 3000, Australia.

SCA is a jointed owned company by Marubeni Aluminium Australia Pty Ltd (**MAA**) (52.95%) and SC Metal Pty Ltd (**SCM**) (47.05%). SCA have a minority share of 17% in pot line 3 of the Boyne Island Aluminium Smelter (via Boyne Smelters Ltd) (BSL) in Gladstone, Queensland.

SCG is a wholly owned subsidiary of SCA, and the only entity SCA owns or controls SCG itself has a minority interest (8.5%) in Gladstone Power Station located in Gladstone, Queensland, Australia. SCG sell all offtake electricity generated to Boyne Smelters Limited and CS Energy Ltd.

SCA does not own any entities (other than SCG) and SCG does not have any owned or controlled entities.

Our operations

Southern Cross Aluminium Pty Ltd (SCA):

SCA is a project investment company in aluminium smelting business. SCA have a minority share of 17% in pot line 3 of the Boyne Island Aluminium Smelter (via Boyne Smelter Limited (**BSL**)) in Gladstone, Queensland. SCA sells all its offtake aluminium production from Boyne Smelters Limited to its shareholders MAA and SCM.

SCA do not engage any employees or contractors. SCA together with its subsidiary company SCG engaged with MAA to provide certain services in connection with the daily and business operations of SCA and SCG.

BSL is Australia's second largest aluminium smelter and has been operating since 1982. The operation is located at Boyne Island in Central Queensland and activities include manufacturing carbon anodes in the carbon plant, aluminium production (smelting) in pot line 1&2 and pot line 3, and casting of molten metal into aluminium products ready to ship.

BSL is a joint venture between Rio Tinto (59.39%), YKK Aluminium (9.50%), UACJ Australia (9.29%), Southern Cross Aluminium (7.71%, equivalent to 17% in pot line 3 production), Ryowa Development II (6.46%), Ryowa Development (5.19%) and Sumitomo Chemical (2.46%).

As BSL is partially owned and controlled by Rio Tinto, its Modern Slavery Statement is included in a joint statement prepared by Rio Tinto on behalf of the group. Accordingly, BSL is listed as a reporting entity under a joint statement with Rio Tinto, in accordance with the requirements of both the United Kingdom Modern Slavery Act 2015 (the 'UK MSA') and Australian Modern Slavery Act. Please refer to the joint statement issued by Rio Tinto Group for details.

Southern Cross GPS Pty Ltd (SCG):

SCG is a project investment company in power generation business. We have a minority interest (8.5%) in Gladstone Power Station located in Gladstone, Queensland, Australia. SCG sell all offtake electricity generated to Boyne Smelters Limited and CS Energy Ltd.

SCG do not engage any employees or contractors. SCG together with its parent company SCA engaged MAA to provide certain services in connection with the daily and business operations of SCG and SCA.

GPS is a world-class coal fire electricity generation facility. Gladstone Power Station was built by the Queensland Government and first commenced operation in 1976. The station has been a significant part of the Gladstone community and an important energy provider for Queensland since that time. After 30 plus years of operation Gladstone Power Station is still Queensland's largest single power station and remains an important generating facility in the National Electricity Market.

Since 1994, the station has been operated by NRG Gladstone Operating Services (**NRGGOS**) on behalf of Joint Venture participants Rio Tinto Ltd (42.125%), NRG Energy Inc (37.5%), SCG (8.50%), Ryowa II GPS Pty Ltd (7.125%) and YKK GPS (Queensland) Pty Ltd (4.75%).

Gladstone Power Station operator NRGGOS currently does not have specific practices or procedures in place with regard to modern slavery. However, in accordance with the GPS Code of Conduct, the core values serve as the foundation for ethical and responsible behaviour toward each other, business partners and the communities where they live and serve. This includes integrity in business dealings and transactions. The Company and its employees are required to conduct all activities in compliance with all Commonwealth, State and local laws and by-laws, and with statutory and regulatory requirements.

Our supply chain

SCA and SCG do not involve and engage with suppliers for the operations of their investment projects. Boyne Smelter Limited is an incorporated joint venture operated by Rio Tinto; Gladstone Power Station is an unincorporated joint venture operated by NRG Energy.

Modern slavery risks

We recognise that modern slavery may impact our business activities and we endeavour to actively monitor and liaise with the operator Rio Tinto (Boyne Smelters Limited for SCA investment) and NRGGOS (Gladstone Power Station for SCG investment) and other joint venture partners to reduce the risk that we might contribute to modern slavery through our operations and supply chains.

Risk assessment methodology

We utilise a risk assessment methodology which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location and specific entity risk.

Using this methodology, we undertook risk assessments of modern slavery risks in our operations and investment projects over their supply chains throughout the reporting period to consider the extent to which we cause, contribute to, or are directly linked to modern slavery practices. These risk assessments have confirmed that our operations and investment project supply chains continue to have a low potential for modern slavery risks.

Our risk profile is summarised in the table below.

Risk profile

Risk	Description of risk
Sector /Industry	Our business invests in the Australian aluminium smelting sector and Australian power generation sector. We do not operate our joint ventures directly. The Australian aluminium smelting and power generation sectors are considered low risk as it relies on well trained specialist workers and is highly regulated and monitored by independent and governmental parties.
Product / Service	There are no goods and services that we directly procure in relation to our investments.
Geographic	All of our investments are in Australia, and we consider Australia as a low-risk jurisdiction.
Specific Entity	We have not identified any entity specified risks.

Actions to assess and address risk

We understand the importance of working collaboratively with all relevant parties and the broader industry to combat modern slavery.

Noting that our investment joint ventures are not operated by SCA and SCG and we are not directly involved in the day-to-day operations, during FY2022 we continuously maintained the steps set out in further detail below to assess and address modern slavery in our operations and investment projects.

Due diligence

As noted above, even though SCA and SCG do not operate investment joint ventures and the Australian aluminium smelting and power generation sectors are considered low risk as it relies on well-trained specialist workers and is highly regulated and monitored by independent and governmental parties, we undertook desk-top assessment with investment project operators (including undertaking a review of their modern slavery statement where available) on any risk of modern slavery. We received responses from each of the investment project operators which indicated that they do not present and identify modern slavery acts and unethical procedures in their respective operations and supplier chains.

Governance and accountability framework

MAA (as the service provider for SCA and SCG) are responsible for considering any risks of modern slavery within SCA and SCG's ordinary course of business.

MAA consult with the director of SCA who is responsible for monitoring compliance and the preparation of this statement.

Policies and procedures

Our policies and procedures ensure we have strong frameworks to enable us to assess and address modern slavery risks. These policies include a standalone Modern Slavery Policy for our business that establishes our commitment to addressing modern slavery risks in our business and driving accountability for ethical business practices across our organisation.

We also continuously check and work closely with investment project operators on the modern slavery monitoring, identification, and rectification, if any, of modern slavery behaviours within their operations or supply chains.

During the reporting period, invested joint venture operator Rio Tinto advised that there are several improvements in reporting process and structure to the Rio Tinto 2022 MSS which covers BSL:

- a greater focus on annual performance outcomes, rather than restating process;
- streamlining the internal consultation and review process;
- referencing the Annual Reporting Suite and other publications to reduce duplication;
- preparing more case studies, tables and infographics to improve proof-points and readability; and
- Streamlining consultation with Reporting Entities to focus on impact, rather than process.

During the reporting period, MAA has also enhanced group policies including the Human Rights Policy and Code of Conduct, enhanced training on slavery and labour rights, and strengthened collaborative partnerships.

Assessing our effectiveness

We are committed to reviewing the effectiveness of our actions by regularly reviewing our modern slavery processes and identify any potential risk of modern slavery.

Externally, SCA and SCG will check with invested joint ventures on their assessment of modern slavery risks. Internally, SCA and SCG will encourage service provider MAA to follow Modern Slavery guideline from government regulatory bodies.

Consultation and approval

As noted above, MAA is responsible for setting SCA and SCG's approach to managing modern slavery risk within our operations and supply chain which promotes ongoing consultation.

This joint statement was developed in consultation with both SCA and SCG and this joint statement is issued on their behalf by the Board of SCA.

This consultation was achieved through;

- common Board members sitting on each of the reporting entity Boards; and
- both SCA and SCG reviewing and having an opportunity to contribute to the statement

This joint statement was approved by the Board of Southern Cross Aluminium Pty Ltd in their capacity as the principal governing body for Southern Cross Aluminium Pty Ltd and as the parent company for Southern Cross GPS Pty Ltd on 22 June 2023.

This statement is signed by Takeshi Kondo in his role as the Director and Chairman of Southern Cross Aluminium Pty Ltd.



Takeshi Kondo
Director