

Modern Slavery Statement 2019

Marubeni-Itochu Tubulars Oceania Pty Ltd

This statement covers the activities of Marubeni-Itochu Tubulars Oceania Pty Ltd (ABN 87 077 953 827) during the year ended 31 March 2020 | period 1 April 2019 to 31 March 2020.

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.

About us

Our company is dedicated to providing better tubular solutions across the resource and energy sectors, and we provide an exclusive and fully comprehensive supply chain concept to prioritise our customer needs.

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.

Our parent company is Marubeni-Itochu Tubulars Asia Pte Ltd, incorporated in Singapore. The 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, with our head office located in Perth (Western Australia), and 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 58 employees permanent full time or part-time employees, in both office-based positions and 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 accessible Human Resource Manual.

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. We work with more than 100 suppliers both locally and internationally. We engage our suppliers on either a long term or short basis depending on the requirements of the products or services. We also work with a number of indirect suppliers.

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 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 we indicated that we will undertake to assess and address modern slavery in our operations and supply chains.

Our 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:

- Complaints Procedure
- Whistleblowing Policy
- Bullying, Harassment and Anti-Discrimination Policy

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

Consultation

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

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 has been 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 21st November 2023.

This statement is signed by Hakim Messoussa in their role as Managing Director of Marubeni-Itochu Tubulars Oceania Pty Ltd on 18th December 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. | <u>1</u> |
| (b) Describe the structure, operations and supply chains of the reporting entity. | 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. | <u>3</u> |
| (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. | <u>3</u> |
| (e) Describe how the reporting entity assesses the effectiveness of such actions. | <u>4</u> |
| (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). | 4 |
| (g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant. | 4 |