

FY 2023 Modern Slavery Statement

1. Introduction

This is the Modern Slavery Statement made by UACJ Australia Pty. Ltd. (“UAAU”) for the financial year ending 31 December 2023 (the “**2023 Statement**”), which marks UAAU’s fourth Modern Slavery Statement following its 2020, 2021, and 2022 statements. This 2023 Statement is submitted as a single statement in accordance with section 13 of *Modern Slavery Act 2018* (Cth) (the “**Act**”). This Statement sets out the actions UAAU has taken to identify, assess and address the risks of modern slavery in its business operations and supply chains during the financial year stated above (the **Reporting Period**).

UAAU again confirms its support to combat modern slavery, and has taken the actions detailed in this 2023 Statement to assess and address modern slavery during the Reporting Period.

2. Company overview, structure, business operations and supply chains

(a) Reporting Entity’s Background

The reporting entity, as defined under section 5 of the Act, for this 2023 Statement is UAAU, an Australian proprietary limited company (ACN: 005 579 840) registered at Level 17, 120 Collins Street Melbourne VIC 3000 Australia. UAAU was established on 31 July 1979.

UAAU is a wholly owned subsidiary of UACJ Corporation (“**UACJ**”), a company registered in Tokyo, Japan. UACJ is not a reporting entity under the Act.

(b) Business Operations

Similarly to the past three reporting periods, during this Reporting Period, UAAU’s main business operations were (i) the purchase of alumina; (ii) outsourcing the smelting of alumina into aluminium metal; and (iii) sale of aluminium metal to UACJ. Aspects of UAAU’s business operations are contracted to third party contractors, described in detail below. UAAU does not have any employees in Australia. There are three officers of UAAU, the President and two directors, who reside in Japan. The fourth officer is the Managing Director of Marubeni Aluminium Australia (**Marubeni**), and resides in Australia. UAAU does not have any direct employees.

UAAU continues to hold 9.29% of shares in Boyne Smelters Limited (“**BSL**”), but does not own or control any entities inside or outside of Australia. UAAU is therefore the sole entity covered by this 2023 Statement.

(c) Supply Chains

There are no significant changes to UAAU's supply chain since the reporting period of 2021. UAAU's first tier supply chain consists mainly of:

- (i) an Australian company that supplies alumina (which is produced in Australia) to UAAU;
- (ii) an Australian company that provides toll processing arrangements whereby UAAU supplies alumina to the company, which they smelter into aluminium metal in Australia and then ships to its purchasers;
- (iii) a Japanese company that provides export services from UAAU to the purchaser of the aluminium metal;
- (iv) Marubeni which provides local operational services to UAAU, including accounting, taxation and general office administration, including the provision of the office facility; and
- (v) a freight forwarding company that arranges export services for UAAU.

Other than the above, UAAU's supply chain also includes professional support services for our organisation, such as financial, legal, accounting and consulting services. The three officers of UAAU that reside in Japan work from the office of UAAU's parent company, UACJ. One of them is also an officer of UACJ and the other two are employees of UACJ. UAAU implements the policies and procedures of UACJ in respect of UAAU's operations and supply chains.

UAAU mostly outsources its general office administrative work to Marubeni. UAAU has reviewed Marubeni's modern slavery statement for the 2022 financial year.¹ In addition, during this Reporting Period on 15, December 2023, UAAU has separately conducted due diligence on Marubeni to discuss and assess how it identifies, assesses and addresses risks of modern slavery in its supply chain, UAAU will be detailing these actions in the following sections.

(d) Risk assessment

UAAU recognizes that some parts of its supply chain and contractors which it deals with may pose modern slavery risks. These risks include the employment or engagement of personnel in roles that represent higher risks for modern slavery, for example personnel who:

- refine alumina;
- provide logistics, shipping or export services;
- are engaged in smelter operations; and
- provide office facilities that include maintenance services, particularly cleaning services.

In an effort to deepen its understanding of the supply chain across these key risk areas, likewise

¹ <https://modernslaveryregister.gov.au/statements/file/ef2e249a-1c68-4a7b-8b80-eabbe0b51b0f/>

in 2022, UAAU has confirmed the status of modern slavery due diligence conducted by its direct suppliers by researching their compliance with certain applicable human rights, modern slavery due diligence and reporting laws. UAAU has identified that all except three companies in its supply chain (a logistics company, export company and purchaser of aluminum), have reported their modern slavery statement under the Act. Two of the three companies publicise their efforts to prevent modern slavery on their website and provide access to their modern slavery statement prepared in accordance with the United Kingdom’s modern slavery laws. These materials have supported UAAU’s understanding of the supply chain beyond its direct suppliers.

3. Actions to assess and address risks of modern slavery

(a) Policies

The policies of UACJ are group-wide policies and apply to UAAU’s operations. UACJ has a strong code of conduct concept called the “UACJ Way”, which sets “Safety and Compliance” as the fundamental principle². As part of the “UACJ Way”, UAAU is required to value and contribute to engagement with the local community, sincerely respond to stakeholder expectations and stay ahead of emerging trends.

The UACJ Group established the “UACJ Group Code of Conduct” (“**Code of Conduct**”) on the UACJ intranet in June 2014, and updated from time to time. The last update of Code of Conduct was in December, 2023, and in 2023 UACJ published the Code of Conduct Guidebook, which explains the contents of the Code of Conduct in an easy-to-understand manner. The Code of Conduct states that all officers and employees of the UACJ Group shall comply with the international standard of human rights set out in the United Nations International Bill of Human Rights, as well as the laws and regulations of the relevant country and region. Further, the Code of Conduct states that the UACJ Group shall make its best efforts to respect human rights throughout its business operations generally, and states that the UACJ strictly prohibits any form of forced labor, human trafficking or child labour. Each division or group company is further required to provide a signed annual statement that all personnel in that division or group company have learnt and agree to abide by the Code of Conduct. This is part of mandatory training on human rights issues, including modern slavery issues.

The UACJ Group further published the “UACJ’s Human Rights Policy” (“**Human Rights Policy**”) on the UACJ website available to the public as well UACJ group personnel and suppliers in March 2022³. The Human Rights Policy is intended to apply to all directors, employees, and

² <https://www.uacj.co.jp/english/company/management/uacjway.htm>

³ https://www.uacj.co.jp/english/sustainability/social/pdf/UACJ_CSR_HumanRightsPolicy_en.pdf

business partners of UACJ, including UAAU. The Human Rights Policy was formulated with reference to the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the Government of Japan's Action Plan on Business and Human Rights. UACJ also updated its whistleblower system to be consistent with this policy, by implementing a grievance mechanism. Details about the new grievance mechanism will be provided in the following sections.

In 2023, UACJ set up a reporting desk for suppliers in case potential risks or concerns of modern slavery are identified. The desk is scheduled to be made known in 2024.

UAAU acts in accordance with UACJ's three corporate values, which are "respect and understand your associates", "embrace honesty and foresight" and "be curious and challenging" – all of which go against any form of modern slavery.

During this Reporting Period, UACJ updated its procurement guidelines, replacing its "UACJ Group CSR Deployment Guideline for Suppliers" ⁴("CSR Deployment Guideline for Suppliers") with the new "UACJ Group Sustainable Procurement Guidelines" ⁵("Sustainable Procurement Guidelines"). The new guideline was published on December 2023 and will be available to the public, including to UACJ and UAAU's suppliers, via the UACJ website starting January 2024. The Sustainable Procurement Guidelines updates the contents of the CSR Deployment Guideline for Suppliers but will continue to communicate the expectations of UACJ and UAAU's suppliers, including provisions regarding human rights, forced labor, inhumane treatments, child labor, appropriate wages, regulation on working hours, rights of freedom of association for employees, and workplace hygiene, health and safety.

In the "Sustainable Procurement Guidelines", "CSR Deployment Guideline for Suppliers" was revised to clarify the promotion of sustainability management based on UACJ Group Philosophy, and to establish a mechanism for consultations, negotiations, and remedies that are available for stakeholders, including workers and business partners, in order to prevent improper conduct in the company and its supply chain.

(b) Supplier engagement

⁴ https://www.uacj.co.jp/english/csr/social/pdf/UACJ_CSR_Guidelines.pdf

⁵ https://www.uacj.co.jp/english/sustainability/social/pdf/UACJ_Sustainable_Guidelines.pdf

As described under the “Policies” heading above, UAAU has been developing its new Sustainable Procurement Guidelines during the 2023 reporting period. These Guidelines will set expectations for suppliers (see above section for detail on the contents of those Guidelines). In 2024, UACJ plans to distribute the “Sustainable Procurement Guidelines” to suppliers and implement activities to seek sign-back.

Last three financial years, UAAU has been considering ways to contact its suppliers who have not made public commitments to identify, assess and address risks of modern slavery, and how they can encourage their supply chain to do so. In 2021, as a part of its due diligence effort, UAAU engaged with its major supplier and parent company, UACJ, to ensure that further engagement was undertaken with UACJ’s suppliers to assess and address modern slavery risks in its supply chain. UACJ committed to actively distributing its CSR Deployment Guideline for Suppliers to its direct suppliers to obtain their signatures in agreement. UACJ commenced contacting its suppliers during 2021; further detail is provided in the following sections. This has been implemented as a new strategy in 2021 to actively raise awareness of modern slavery issues, and to emphasise the passion and commitment of the UACJ Group (including UAAU) to eliminate modern slavery in its supply chain, as opposed to simply providing the Guideline on its website.

As noted above, UACJ’s distribution to suppliers of its CSR Deployment Guideline for Suppliers commenced during 2021. UACJ engaged directly with its and with UAAU’s suppliers in 2022. This included engagement with Rio Tinto, whose representatives signed the recognition of and agreement to UACJ’s CSR Deployment Guideline for Suppliers in April, 2023. Rio Tinto is the controlling shareholder of BSL, which is one of UAAU’s most significant business partners, therefore Rio Tinto’s recognition and agreement covers a significant portion of UAAU’s supply chain.

(c) Whistleblower reporting system

UACJ has a whistleblower reporting system, which can be used when any potential risks or occurrences of modern slavery are identified. The whistleblowing system is administered by a third party which then escalates issues to UACJ’s internal legal department. UAAU has confirmed with UACJ that UACJ has not received any whistleblower reports relating to modern slavery. Up until the previous Reporting Period, UACJ’s whistleblower reporting system was open only to UACJ group employees. During this Reporting Period, UACJ worked to widen the scope of its reporting system. As a result, a grievance mechanism was developed at the end of 2023 which will now allow not only employees but suppliers of UACJ Group to access its reporting system. In 2024, UACJ plans to establish a procedure that clearly outlines the process for responding to a

report to the grievance mechanism. Full scale operation of this new mechanism is scheduled to commence in 2024.

(d) Human rights due diligence

In 2023, UAAU conducted a human rights due diligence program for Marubeni, one of UAAU's most significant business partners. UAAU visited Marubeni's Australian offices to confirm:

- appropriate management of office maintenance services
- the work environment is free of noise and other adverse health effects.
- Marubeni has internal rules and regulations and a whistleblower hotline in place, and they are well known to its employees.
- there is no forced labor, such as wage-free overtime work in Marubeni's operations.
- there is no child labor.
- workers are afforded freedom of association.
- any social contribution activities such as support for organisations engaged in human rights activities

UAAU also revamped the Human Rights Risk Self-Assessment Sheet in implementing human rights due diligence. The self assessment sheet is roughly five categories:

- work environment
- discrimination
- child labor
- forced labor
- freedom of association and collective bargaining

The part on child labor directed Marubeni to the meaning of the “worst form of child labor” in the United Nations' “Convention on the Immediate Action for the Prohibition and Elimination of the Worst Forms of Child Labour (1999)” . Also, the part on work environment and forced labor stated to Marubeni that nonpayment of wages and forced overtime constituted forced labor.

UAAU asked Marubeni to complete a self-assessment in respect of these five categories and implement human rights due diligence based on the response.

UACJ, as UAAU's parent company, is seeking to establish and implement a human rights due diligence mechanism which will apply to its group companies including UAAU. This human rights due diligence mechanism will aim to identify the negative human rights impacts of the group's business activities and risks of human rights violations in the group's business activities. In UAAU's 2021 Statement, it made a commitment to establishing and implementing a human rights due diligence mechanism (designed by UACJ and to be integrated across all UACJ group entities). During the Reporting Period, UACJ assessed its human rights risks across its worldwide operations and conducted human rights due diligence of two of its rolling and extrusion plants in

Japan.

UACJ is still in the process of implementing its human rights due diligence mechanism across all group entities, and will work with UAAU to conduct human rights due diligence over UAAU's operations and supply chain.

(e) Awareness-raising and training

Within the UACJ Group, its officers and employees undergo education on the Code of Conduct from October to December every year, and the same training was conducted in this reporting period, confirming their understanding and reiterating the group's approach to human rights protection. As noted above, this training is mandatory and all personnel must evidence their completion to their relevant division.

4. Assessment of response

Due to its corporate structure, UAAU implements UACJ's policies and guidelines. The guidelines generally cover the concept of modern slavery as defined under the Act. However, these guidelines are directed to the UACJ Group across the globe, they do not expressly refer to the Act or Australia's modern slavery concerns specifically. UAAU will keep considering appropriate mechanisms that it could implement in the next reporting period to directly review and assess the effectiveness of its actions, including the guidelines, to assess and address risks of modern slavery in its supply chain and operations.

That is why during the previous reporting periods, UACJ, as UAAU's parent company, implemented a new measure to directly contact its suppliers and seek agreement of the guidelines, so that UACJ Group's corporate philosophy and fundamental principle of safety and compliance can be protected and upheld against the risk of modern slavery.

In seeking agreement from suppliers on the CSR Deployment Guideline for Suppliers, UAAU has been able to confirm that UACJ was able to engage in effective communications to seek agreement to the guideline which addresses issues of modern slavery. Through 2021 and 2023, UACJ has contacted 56 of its suppliers, of which 48 (86%) responded by providing their signatures on the CSR Deployment Guidelines. In and after 2024, UACJ will provide the newly issued "UACJ Group Sustainable Procurement Guidelines" to suppliers it engages with and plans to widen the scope of suppliers to be contacted. This will include suppliers of UAAU as well.

UAAU acknowledges the importance of assessing the effectiveness of the steps it is taking to identify risks of modern slavery in its supply chain, including steps to raise widespread

understanding and awareness of modern slavery risks. UACJ has confirmed that it will further consider how to measure the effectiveness of its actions in the coming year.

5. Approval by Board of Directors

This Statement has been approved by UAAU's board of directors on 28 June, 2024.

UAAU is the sole reporting entity and does not own or control any other entities.



Hirokazu Ishikawa, Director

MSA Section	Reporting Criterion	Section of Statement
16(1)(a)	Identify the reporting entity	1, 2(a)
16(1)(b)	Describe the structure, operations and supply chains of the reporting entity	2(a), 2(b), 2(c)
16(1)(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	2(d)
16(1)(d)	Describe the actions taken by the reporting entity and any entities the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	3
16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions	4
16(1)(f)	Describe the process of consultation with any entities that the reporting entity owns or controls, and in the case of a reporting entity covered by a statement under section 14 – the entity giving the statement	N/A
16(1)(g)	Include any other information that the reporting entity considers relevant	N/A