

2025 MODERN SLAVERY STATEMENT

POSCO WA PTY LTD (ABN 57 145 260 108)

For the reporting period from 1 January 2025 to 31 December 2025

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1. ABOUT OUR MODERN SLAVERY STATEMENT

This Modern Slavery Statement details POSCO WA Pty Ltd's (ACN 145 260 108) (ABN 57 145 260 108) Human Rights Management for achieving sustainable management on Human Rights and Modern Slavery Risks as part of POSCO Group's Environmental, Social and Governance ("ESG") strategy.

POSCO WA Pty Ltd (hereafter "**POSCO WA**" or "**Reporting Entity**") has prepared this Modern Slavery Statement to disclose information on the corporate management of Human Rights practices to eradicate modern slavery risks in the entity's operations and supply chains in Australia. We have transparently included the identification of inherent and potential modern slavery risks in our business operations and supply chains, actions taken to assess and address those risks and measurement of the effectiveness of our risk management framework.

POSCO WA has consulted with POSCO Holdings Inc. and its related entities (hereafter "**POSCO Group**" or "**POSCO**") by incorporating POSCO's "Corporate Citizenship" management philosophy, articulated based on global compliance. POSCO supports international standards on human rights. We comply with the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Global Compact and OECD Guidelines for Multinational Enterprises. We are doing our utmost to prevent any violations of human rights and are working hard to resolve negative human rights impacts arising from our management activities.

As part of our commitment, POSCO WA will continue to discuss the importance of combating the modern slavery risks and complying with the reporting requirements under Australia's *Modern Slavery Act 2018* (Cth) (the "**Act**").

Reporting Principles

This report has been prepared in accordance with the Act. The Act established a national Modern Slavery Reporting Requirement supporting Australian entities to identify, assess and address modern slavery risks in its operations and maintain responsible and transparent supply chains.

This report describes and highlights key activities and action plans to disclose the information about the management of modern slavery risks and its corporate practices for the period from 1 January 2025 to 31 December 2025 ("**Reporting Period**").

ESG Approach

Corporate citizenship, the management philosophy of POSCO WA, is the beginning of ESG management. Serving society as a competent and mature corporate citizen is fundamental for realising ESG. POSCO WA has established the ESG Practice Framework to flesh out ESG management and systematically manage its performance. The company prepares key activities for each ESG area to form a consensus on ESG management and further its understanding among the employees. In addition, the company is enhancing its practices and improving its management system based on the ESG Practice Framework. Some of the information, such as the group-wide approach on the 'social' pillar of ESG on POSCO's global commitment to and respecting human rights, is introduced in this statement.

In this statement, the terms "we", "us", "our" and "the company" are used where reference is made, in general, to the Reporting Entity.

2. COMPANY OVERVIEW

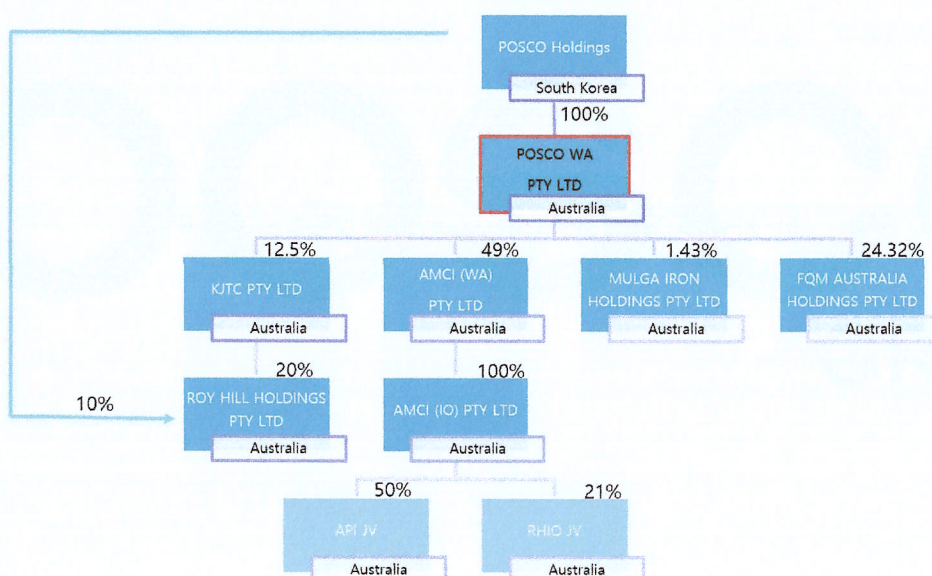
In 2010, POSCO WA was established as an Australian subsidiary of the South Korean steel maker, POSCO Holdings Inc., investing in Western Australian mining projects. POSCO WA is an Australian private company based in Perth, Western Australia and is a wholly owned subsidiary of POSCO Holdings Inc, headquartered in the Republic of Korea.

Currently, POSCO WA also aims to adjust its investment portfolio to be in line with the low-carbon era, and is promoting investments in clean hydrogen & green, renewable energy.

Our registered address and principal place of business is located at Level 48, Central Park, 152-158 St Georges Terrace, Perth WA 6000.

3. OUR STRUCTURE

The following diagram illustrates our group structure, including our current business operation structure:



POSCO WA's parent company, POSCO, is an integrated steel manufacturing company that produces steel products such as hot-rolled, cold-rolled, and stainless steel, headquartered in Pohang, Republic of Korea. Bolstered by advanced steelworks domestically and overseas, POSCO maintains a dominant global market share, generating an annual crude steel production volume of 41 million tonnes.

The steel analytics agency World Steel Dynamics ("**WSD**") ranked POSCO number one on its "*World's Most Competitive Steel Companies*" list for 15 consecutive years. Following this 15-year ranking, WSD inducted POSCO into its Hall of Fame in June 2025. Additionally, in April 2025, the World Steel Association named POSCO a "*Steel Sustainability Champion*," marking its fifth consecutive year receiving this ESG recognition.

In Australia, POSCO invests in resource projects across New South Wales, Queensland, and Western Australia. Through its Australian subsidiaries, the company has invested A\$4.7 billion in local commodities, including iron ore, manganese, lithium, and metallurgical coal.

4. OPERATIONS AND SUPPLY CHAINS

POSCO WA has been operating as an Australian inbound investment company since 2010. The principal activity of POSCO WA in Australia is investing in AMCI (WA) Pty Ltd, which invests in the West Pilbara Iron Ore Project, KJTC Pty Ltd, which invests in the Roy Hill Project, and FQM Australia Holdings Pty Ltd ("FQMAH"), which holds an interest in the Ravensthorpe Nickel Operation project.

Project	About the Project
West Pilbara Iron Ore Project	The West Pilbara Iron Ore Project ("WPIOP") is one of the largest independently owned undeveloped direct shipping iron ore projects in Australia. WPIOP is also known as the largest iron ore and infrastructure project proposed for the Pilbara region of Western Australia, encompassing integrated mining. In 2010, POSCO WA commenced its investment in WPIOP. POSCO WA has a 49% interest in AMCI (WA) Pty Ltd, which has a 100% interest in the AMCI (IO) Pty Ltd. AMCI (IO) Pty Ltd has a 50% interest in the Australia Premium Iron Ore Joint Venture ("API JV") with the objective of developing a long-term iron ore export operation located in the Pilbara region of Western Australia. AMCI (IO) Pty Ltd also has 21% interest in the Red Hill Iron Ore Joint Venture ("RHIO JV").
Roy Hill Project	Roy Hill is one of Australia's major resource-based mining operations, based in Western Australia's Pilbara region delivering 60 million tonnes per annum ("Mtpa") of iron ore to international markets, with recent approval to increase to 70 Mtpa. Roy Hill is an iron ore operation in the Pilbara region of Western Australia that is owned by Hancock Prospecting Pty Ltd, POSCO, and KJTC Pty Ltd. Hancock Prospecting Pty Ltd is the majority owner of the project. POSCO WA has invested a 12.5% interest in KJTC Pty Ltd, which is a company that includes Marubeni Iron Ore Australia and CSC Corporation Australia. KJTC Pty Ltd has a 20% interest in Roy Hill Holdings Pty Ltd.
Mulga Downs Iron Ore Project	During 2022, POSCO WA acquired a 1.43% interest in Mulga Iron Holdings Pty Ltd (ACN 600 967 404) as part of its strategic investment in iron ore, securing a minority position. Mulga Iron Holdings Pty Ltd is the parent company of Mulga Downs Iron Ore Pty Ltd (ACN 080 659 150), which holds the mining tenements for the proposed Mulga Downs Iron Ore Project. Hancock Prospecting's development vehicle, HanRoy, has officially completed the definitive Feasibility Study for the project, establishing plans for a 10 million tonnes per annum greenfield open-cut mine.

Project	About the Project
Ravensthorpe Nickel Operation ("RNO") Project	In September 2021, POSCO Holdings acquired a 24.32% equity stake in FQM Australia Holdings Pty Ltd ("FQMAH"), which wholly owns the Ravensthorpe Nickel Operation ("RNO") project in Western Australia. The RNO project produces MHP (Mixed Hydroxide Precipitate), an intermediate nickel product. In December 2025, this stake was transferred from POSCO Holdings to POSCO WA. The RNO project is currently under care and maintenance, with FQMAH managing all operational activities.

POSCO WA's operations are solely based in Australia, and it continues to invest in the mining sector to acquire purchasing rights for the raw materials produced from the mines as its key operating segment.

During the Reporting Period, POSCO WA had 10 employees who were employed in various professional roles such as resources, finance, accounting and human resources. Out of the 10 employees, 4 are in resource positions, 2 are in finance positions, 1 is in an administration position, and 3 are in research positions.

In our supply chain, POSCO WA's direct suppliers only include external professional services, including consulting, accounting, taxation, and other professional services, due to the nature of its business as an investment company. We did not engage any subcontractors during the reporting period.

We also recognise that our business involves indirect relationships with the suppliers from the operation of the projects. Our indirect supply chain is actively managed and monitored by the project operators under their Human Rights guidelines and Human Rights management framework.

5. MODERN SLAVERY RISKS

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

We understand that modern slavery can take many forms, but fundamentally is a range of exploitative practices including human trafficking, forced labour, servitude, deceptive recruiting and child labour. These modern slavery practices can occur in any industry or sector, causing grave abuses of human rights and distorting global markets. Thus, we have an important role to play in eradicating any form of modern slavery.

POSCO WA also has a responsibility to respect human rights, as outlined in the United Nations Guiding Principles on Business and Human Rights. This responsibility includes taking action to prevent, mitigate, and, where appropriate, remedy modern slavery in our business operations and supply chains.

During the reporting period, we were committed to identifying any inherent risks of modern slavery practices and the potential for our entity to cause, contribute to, or be directly linked to modern slavery through its operations and supply chains. The following factors were considered in evaluating the risk of modern slavery in our operations and supply chain:

- Sector and Industry risks;
- Product and service risks;
- Geographic risks; and
- Entity risks.

POSCO WA has assessed direct operations and workforce as being of low risk to modern slavery due to the nature of its investment activities in Australia. As noted above, POSCO WA holds minority interests in its investment entities and does not own or control any entities within the meaning of the accounting standards. Accordingly, the risks described in this section relate to POSCO WA's own operations and supply chains.

Furthermore, our employees are primarily working in professional services in Australia, and they are covered by Enterprise Agreements, the *Fair Work Act 2009* (Cth), and relevant modern awards. Each of these mechanisms meets or exceeds the minimum entitlements prescribed under the National Employment Standards. We have also put in place various HR policies, modern slavery trainings, and due diligence processes, as well as the Code of Conduct, to help mitigate potential modern slavery risks relating to our broader operations.

Based on our initial risk assessment, POSCO WA is not aware of any inherent modern slavery risks occurring in its supply chains during the reporting period. However, we recognise the importance of addressing any potential areas of risk that may cause modern slavery practices in our investment activities, including the suppliers we do not have a direct contractual relationship. As determined through the assessment, our highest risk areas may be the indirect supply chain from the project operations that we invested.

Although POSCO WA is not required to individually monitor or report on each project operator and their supply chains, POSCO WA is determined to raise awareness of modern slavery risks and collaborate with our business partners to combat any form of modern slavery risk.

POSCO WA does not tolerate modern slavery and will not knowingly engage with any consultants, suppliers or contractors that engage in modern slavery.

6. OUR COMMITMENT

POSCO WA observes and supports the globally recognised international human rights standards, such as the UDHR, the UN Guiding Principles on Business and Human Rights, the UN Global Compact Ten Principles, the OECD Guidelines for Multinational Enterprises, and the Fundamental Conventions of the International Labor Organization ("ILO").

POSCO WA has made efforts to prevent human rights violations and to take adequate measures to prevent and address adverse human rights impacts that may occur in the course of its business management activities and business relations.

To prevent human rights violations and fulfil the company's human rights management, POSCO enacted the POSCO Human Rights Protection Guidelines on 1 April 2014, in accordance with the UN Guiding Principles on Business and Human Rights and its own Code of Ethics. This was renamed the POSCO Human Rights Protection Operational Guidelines on July 31, 2020, and reflected in our company's regulations.

Aligning with our parent company's Human Rights Management Guidelines, POSCO WA is also committed to following POSCO's Human Rights management framework and processes in place to eradicate any modern slavery risks within its own business, in its supply chains and through other business relationships. POSCO WA is committed to the transparent disclosure of any inherent modern slavery risks in its Australian operations and supply chain in accordance with the Act to further mitigate the risks.

During this Reporting Period, we focused on the identification of inherent and potential modern slavery risks in our operations and supply chains and embraced the group-wide approach to the management of Human Rights to have better control of the modern slavery risks associated with our operations and supply chains in Australia.

We are committed to continuing to follow POSCO's risk management framework to ensure we identify, address and assess modern slavery risks and review the effectiveness of the actions undertaken to mitigate modern slavery risks in our investment activities.

As part of its statement, POSCO WA reports on how it assesses and addresses modern slavery risks when making investment decisions by following POSCO's ESG risk processes and outlines a plan it has established for how it would respond to modern slavery risks identified through the ESG process. We have undertaken a number of actions to address these requirements and worked with POSCO in updating this Statement.

7. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Our approach to modern slavery is group-wide. POSCO WA has undertaken a thorough review of the 'social' pillar of POSCO's ESG strategies and management in order to assess and address any inherent and potential modern slavery risks within our operations and supply chains. As part of the POSCO group, we have embraced key management activities on Human Rights risk management and process in our business operations and supply chains in Australia under the POSCO Human Rights Protection Guidelines. This initiative highlights POSCO WA's commitment to lead by example in the fight against modern slavery and will help to mitigate modern slavery risks.

Basic Position on Human Rights Management

In order to fulfil our responsibility with the aim of respecting human rights and meeting the expectations of our stakeholders, POSCO WA takes the following basic positions in relation to human rights management:

- POSCO WA observes relevant regulations and human rights standards in all places of business;
- When faced with conflicting local regulations, the company seeks ways to comply with international human rights standards; and
- The risk of a severe violation of human rights is an important management issue at POSCO WA.

As part of the strategy development, we progressed multiple initiatives designed to enhance our understanding of— and responses to—modern slavery risks during this reporting period. POSCO WA has made efforts to prevent violations of others' human rights and to take adequate measures to prevent and address adverse human rights impacts that may occur in the course of performing business activities. The following list of actions introduces POSCO's risk management frameworks that POSCO WA embraced as part of the Human Rights management process.

Human Rights Management Process

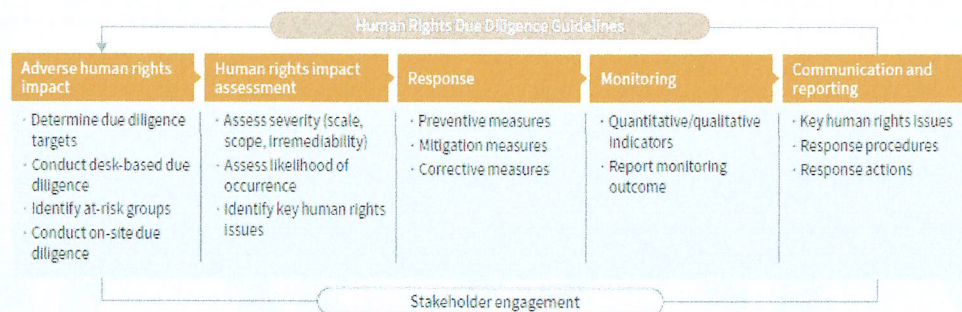
POSCO Approach

POSCO and POSCO WA conduct human rights due diligence processes when deemed necessary to identify, prevent, and mitigate negative impacts on human rights and fulfil their responsibilities.

This process involves identifying and assessing real and potential impacts on human rights, responding to issues identified, recording response activities and communicating with relevant stakeholders about how the impacts were addressed. POSCO and POSCO WA carry out efforts to identify and inspect the actual and potential negative impacts on human rights due to domestic and overseas business activities according to the following process.

Human Rights Due Diligence (HRDD) Process

Human Rights Due Diligence Process



As an effective means of remedy, POSCO WA offers a grievance handling program for its stakeholders. The grievance handling program is applicable group-wide to POSCO and POSCO WA.

In accordance with POSCO Group's Group-wide Grievance Handling Guidelines and grievance mechanism, which apply to POSCO WA, stakeholders may submit grievances through various channels, including email, the POSCO website, telephone, postal mail, and in-person visits.

Complaints may be lodged anonymously or under a real name and in the complainant's preferred language. POSCO Group also operates a whistleblower protection framework to safeguard individuals from retaliation or any other adverse consequences arising from the reporting of concerns. The grievance reporting and handling process are as follows.

Human Rights Grievance Handling Process

Grievance Reporting and Transfer Process by Type of Issue



Where human rights concerns arise, including workplace harassment, secondary victimisation, or inappropriate conduct, the matter may be reported to the relevant

Human Rights Management Process	POSCO Approach
	department manager and addressed through internal counselling processes in the first instance. Where necessary, individuals may also access external support through the POSCO Human Rights Centre in Korea or Australian human rights consultants. In addition, POSCO WA maintains reporting channels such as the Ethics Counselling Centre (helpline) and the Centre for Reporting Unethical Behaviour (hotline) to facilitate the prompt reporting, investigation, and remediation of concerns. Grievances may also be submitted directly to a Human Rights Centre using a dedicated email address. POSCO WA strictly adheres to whistleblower and grievance protection measures to ensure that employees and stakeholders who raise concerns are protected from retaliation, discrimination, or any other form of disadvantage.
Human Rights Policies and Procedures	POSCO has a suite of human rights policies and procedures that form the foundations of how we manage the risks of modern slavery across our operations and in our supply chain. These policies apply groupwide, and POSCO WA has fully incorporated POSCO's policies and procedures. In addition to the Code of Ethics, the following policies and procedures form part of POSCO's ESG framework and set clear expectations for respecting human rights, including in relation to modern slavery: ▪ Occupational Safety and Health Policy; ▪ Human Rights Management Policy; ▪ Diversity, Equity, and Inclusion Policy; ▪ Supply Chain Policy; ▪ Stakeholder Engagement Policy; and ▪ Anti-corruption Guidelines.
Supplier Code of Conduct & Supplier Training	The Supplier Code of Conduct ("Code of Conduct") sets out the minimum standards that POSCO and POSCO WA's business partners, subcontractors and suppliers (collectively, "Suppliers") are expected to comply with. The Code of Conduct requires Suppliers to uphold internationally recognised standards relating to human rights, environmental protection, workplace health and safety, anti-corruption, fair trading practices, anti-money laundering and fair remuneration. It also requires Suppliers to maintain appropriate grievance and whistleblower mechanisms, conduct business ethically, and comply with all applicable laws and regulations. POSCO distributed the Supplier Code of Conduct Guidelines to all suppliers with transaction records, requiring them to comply with the Code of Conduct. This applied to suppliers of raw materials, facilities and industrial inputs, who confirmed their agreement by electronic signature through the e-procurement website. POSCO FUTURE M also provides regular training on supply chain ESG risk management to employees responsible for purchasing, shared growth and supply chain management. To enhance suppliers' understanding and awareness of ESG matters, the company offers training covering domestic and international ESG trends, sustainable supply chain policies, the Supplier Code of Conduct, ESG risk assessment and due diligence procedures, and related response measures.

Human Rights Management Process

POSCO Approach

As part of the broader POSCO Group human rights and ethics framework, POSCO WA participates in initiatives aimed at fostering a respectful, safe and inclusive workplace.

During 2025, POSCO WA distributed monthly ethics management campaign materials to all employees and conducted monthly self-assessments to reinforce awareness of ethical conduct and human rights-related issues. In addition, employees have access to human rights and ethics training and awareness programs covering topics such as discrimination, workplace bullying, sexual harassment, workplace misconduct, human rights risk management and grievance mechanisms.

In addition, POSCO Group provides human rights and ethics training, campaigns and awareness programs across its global operations, as detailed in the table below.

Human Rights Programs for Employees

Program	Note
Human rights pledge	· Ensure all employees electronically sign the pledge on ethics and mutual respect (including contract positions)
Human rights training	Provide online mandatory training and offline training to all employees · (Online mandatory training) Prevention of workplace bullying, prevention of sexual harassment at work, understanding human rights management · (Offline training) Specialized training on human rights
Human rights campaign	Launch issue-specific campaigns through internal system announcements (at least 6 times per year)

Through these initiatives, POSCO WA seeks to strengthen employees' understanding of human rights responsibilities, encourage the reporting of concerns, and promote a workplace culture founded on dignity, respect and ethical conduct.

Human Rights Program for Employees

POSCO WA is supported by POSCO Group's ethical risk management framework, which is designed to identify, assess and monitor risks relating to unethical conduct, human rights concerns and compliance breaches. The framework includes periodic compliance assessments, ongoing monitoring activities, and mechanisms for identifying and investigating potential misconduct.

As part of this framework, POSCO WA annually completes and reviews the *"Human Rights & Ethics Compliance Checklist for Overseas Subsidiaries"* in accordance with POSCO's Code of Ethics. The checklist comprises 40 assessment criteria, including 28 mandatory human rights and ethics compliance questions and 12 additional questions selected by the subsidiary, and covers key operational areas such as management, procurement, production, investment and sales.

Ethical Risk Assessment

Key items on CP Desk Manual Checklist for Overseas Subsidiaries

The application of HQ compliance standards	The operation of the CP program at overseas subsidiaries
 ✓ Whether the stipulated/revised HQ regulations are distributed at overseas subsidiaries ✓ Whether the stipulated/revised checklist is applied at overseas subsidiaries	✓ Whether defined processes are practiced (responsible organization, cycle, and operation plan) ✓ Assess the quality of the compiled report submitted during regular review

The review process assists in identifying potential ethical and human rights risks, supports ongoing monitoring of compliance risks, and promotes continuous improvement in human rights and ethical business practices. Where necessary, findings may be subject to further review, investigation or corrective action.

8. MEASURING EFFECTIVENESS

POSCO WA continues to monitor the effectiveness of the processes and procedures to address the modern slavery risks that our business causes, contributes to, or is directly linked to, in line with the UN Guiding Principles and POSCO Human Rights Protection Guidelines. We are committed to assessing and measuring the effectiveness of our Human Rights management activities in identifying and addressing modern slavery risks in our operations and supply chains.

POSCO WA continues to review our action plans and manage areas of modern slavery risks by taking appropriate investigations and actions when a violation is suspected, partnering with both internal and external advisors, and undertaking regular internal governance and external assurance processes. Furthermore, we adopt and strengthen our actions to continually improve our response to modern slavery based on the results of these processes.

Human Rights Management Process	Actions taken to control and assess the effectiveness of our actions
Human Rights Due Diligence (HRDD) Process	Under the UN Guiding Principles, POSCO WA is expected to undertake human rights due diligence. POSCO WA will continue to make a firm commitment to POSCO's Human Rights Due Diligence Process and ongoing management process to identify, prevent, mitigate, and account for how we address actual and potential adverse human rights impacts in our operations and supply chains, including modern slavery. The following key activities of due diligence will be monitored and reported to POSCO: • Identifying and assessing actual and potential human rights impacts. • Integrating our findings across POSCO and taking appropriate action to address impacts. The above reports submitted to POSCO are used to track POSCO WA's performance and check whether impacts are being controlled and assessed adequately and effectively.
Human Rights Grievance Handling Process	Through the human rights grievance process, POSCO WA guarantees human rights by taking appropriate actions against violations of human dignity. POSCO's human rights grievance mechanism will: • Make it easy to identify negative human rights impacts and provide channels for directly affected stakeholders to raise concerns. • Prevent the spread of human rights abuses by addressing grievances and redressing victims early and directly. • Identify and improve problems with human rights policies and procedures through analysis of its current operations. POSCO's remediation process, with the support of a grievance mechanism, will allow our employees, suppliers and business partners to safely raise concerns about adverse human rights impacts, including modern slavery. The number, nature and resolution of grievances received through these channels (including the Ethics Counselling Centre helpline, the Centre for Reporting Unethical Behaviour hotline, and a dedicated email address) are monitored to assess whether concerns are being reported, investigated and remediated effectively, and whether whistleblower protections are operating as intended.

Human Rights Management Process	Actions taken to control and assess the effectiveness of our actions
	POSCO WA is committed to making this mechanism available and accessible in our operations and supply chains.
Human Rights Policies and Procedures	Consistent application of policies and procedures across our operations and supply chains is also our key approach to managing the risks of modern slavery. POSCO WA continues to make a firm commitment to Human Rights policies and procedures to respect human rights. The following measures are used to improve the effectiveness: • Key documents (policies and guidelines related to human rights) are reviewed and updated regularly. These documents are managed through an internal control documents library and, where required, are endorsed and approved at executive or board level. • As part of onboarding and contracting new suppliers, POSCO WA continues to perform due diligence on all new suppliers to determine their risk level and control procedures in relation to ethical sourcing and modern slavery, as appropriate for our business.
Supplier Code of Conduct & Supplier Training	POSCO WA monitors the extent to which its business partners, subcontractors and suppliers ("Suppliers") acknowledge and comply with the minimum standards set out in the Supplier Code of Conduct, including the standards relating to human rights, workplace health and safety, anti-corruption, fair trading practices, anti-money laundering and fair remuneration. The effectiveness of these actions is assessed through measures such as: • Tracking Suppliers' formal acceptance of the Supplier Code of Conduct, including agreement confirmed by electronic signature through the e-procurement website for suppliers of raw materials, facilities and industrial inputs. • Confirming that Suppliers maintain appropriate grievance and whistleblower mechanisms and comply with applicable laws and regulations. • Monitoring completion of, and engagement with, supply chain ESG risk management training provided to employees responsible for purchasing, shared growth and supply chain management, covering ESG trends, the Supplier Code of Conduct, ESG risk assessment and due diligence procedures. The outcomes of these measures are used to identify where supplier engagement or training should be strengthened to better manage modern slavery risks.
Human Rights Program for Employees	As part of the broader POSCO Group human rights and ethics framework, POSCO WA assesses the effectiveness of its employee human rights program through measures such as: • Monitoring distribution of, and engagement with, the monthly ethics management campaign materials provided to all employees during the Reporting Period. • Tracking completion of the monthly self-assessments used to reinforce awareness of ethical conduct and human rights-related issues.

**Human Rights
Management Process**

Actions taken to control and assess the effectiveness of our actions

- Monitoring participation in human rights and ethics training and awareness programs covering topics such as discrimination, workplace bullying, sexual harassment, workplace misconduct, human rights risk management and grievance mechanisms.

**Ethical Risk
Assessment**

POSCO WA is supported by POSCO Group's ethical risk management framework, which is designed to identify, assess and monitor risks relating to unethical conduct, human rights concerns and compliance breaches. POSCO WA continues to perform self-assessments through the checklist provided by the Corporate Audit Office of POSCO to identify and address any inherent modern slavery risks within our operations and supply chains in Australia. This review is carried out on an annual basis through the "*Human Rights & Ethics Compliance Checklist for Overseas Subsidiaries*" (comprising 40 assessment criteria across key operational areas such as management, procurement, production, investment and sales). Key effectiveness measures include:

- Detection of any human rights risks and potential issues, which will be reported to the Corporate Audit Office for appropriate actions through its risk assessment and continuous improvement of preventive actions;
- The performance of this assessment will be transparently evaluated and disclosed; and
- POSCO WA is also committed to partnering with an industry group or external auditor to undertake an independent review of our actions when required.

Consultation

This Modern Slavery Statement was prepared in consultation with our Board of Directors in accordance with the Act. During the reporting period, POSCO WA discussed details of the Act's reporting requirements to the Board by engaging the external advisor and provided information regarding the actions the entity intends to take to address these requirements under the POSCO Human Rights Protection Operational Guidelines. This statement has also been reviewed and approved by the executive representative of POSCO WA prior to publication.

Based on POSCO's management philosophy of '*Corporate Citizenship*', POSCO WA will engage and communicate with all stakeholders, including customers, employees and shareholders, and continually seek changes and innovation in pursuit of sustainability by ultimately creating greater value for the company, combating the risk of modern slavery. In addition, POSCO is upgrading its sustainability management system by revising and supplementing the company rules and the business guidelines that reflect ESG-related global initiatives.

9. APPROVAL

Principal Governing Body Approval

This Modern Slavery Statement for the reporting period from 1 January 2025 to 31 December 2025 was approved by the Board of POSCO WA Pty Ltd in our capacity as principal governing body as defined by the *Modern Slavery Act 2018* (Cth) on 26 June 2026.

Signature of Responsible Member

This statement was approved and signed by KIHOOON PYO in his role as the managing director of POSCO WA Pty Ltd as defined by the *Modern Slavery Act 2018* (Cth) on 26 June 2026.

표기훈

KIHOOON PYO
Managing Director of POSCO WA Pty Ltd
26 June 2026

POSCO
GROUP

10.ANNEXURE A

Mandatory Reporting Criterion	Reference in this statement
Identify the reporting entity	Introduction Company Overview
Describe the reporting entity's structure, operations and supply chains	Our Structure Operations and Supply Chains
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	Modern Slavery Risks
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Actions Taken To Assess and Address Modern Slavery Risks
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Measuring Effectiveness
Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a joint statement, the entity giving the statement	Consultation Approval
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Our Commitment