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Modern Slavery Statement Mitsubishi Materials (Australia) Pty Limited

1. Reporting entity

This statement is a Modern Slavery Statement made by and on behalf of Mitsubishi Materials (Australia) Pty Limited (ABN 78 001 429 349) (**MMA**) of Suite 802, Level 8, 46-48 Market Street, Sydney NSW 2000, under the *Modern Slavery Act 2018* (Cth) for the reporting period of 1 January 2025 – 31 December 2025.

2. Overview of structure, operations and supply chains

2.1 Structure

MMA is an Australian proprietary company limited by shares headquartered in Sydney, New South Wales, Australia. The sole shareholder of MMA is Mitsubishi UBE Cement Corporation of 1-1, Uchisaiwaicho, 2-Chome, Chiyoda-Ku, Tokyo, Japan (**MUCC**), a foreign company incorporated in Japan and not registered in Australia.

In April 2022, MUCC started operations through the integration of the respective cement businesses and other related businesses of Mitsubishi Materials Corporation and Ube Industries Ltd.

MMA has 3 employees in Australia, no employees located overseas, and no subsidiaries.

However, its shareholder, MUCC, has several subsidiaries which are directly controlled by MUCC in the United States, Singapore, and Japan.

MUCC's group comprises MUCC and its domestic and international subsidiaries, including MMA, and has the following number of employees:

- Consolidated (MUCC and its subsidiaries): 7,646 employees; and
- Non-consolidated (MUCC): 1,834 employees.

MUCC and its subsidiaries are part of a larger corporate group of entities as detailed here: https://www.mu-cc.com/en/corporate/office/

MMA is a non-operating participant in an unincorporated joint venture, namely, the Warkworth Associates Joint Venture (**Joint Venture**), with a 6% interest.

2.2 Operations

MMA's principal activity is its participation through the Joint Venture, in a coal mining operation at the Warkworth mine in Singleton, NSW, and the sale of its share of coal produced.

MMA's activities are limited to its participation in the Joint Venture, in proportion to its 6% interest, being:

- contributing its proportionate share of the operating and capital costs of the Joint Venture; and
- receiving its proportionate share of coal produced from the Joint Venture's operations and the marketing and sale of which are managed by the Joint Venture Manager on behalf of the Joint Venture participants.

MMA does not undertake coal mining, extraction, or production activities itself. All such activities are carried out by the appointed manager of the Joint Venture, Yancoal Australia Limited (ACN 111 859 119) (**Joint Venture Manager**).

MMA has one office located at Suite 802, Level 8, 46-48 Market Street, Sydney NSW 2000.

MMA has the following arrangements:

(a) MMA's employees are responsible for overseeing MMA's participation in the Joint Venture.

(b) all activities of the Joint Venture in relation to coal mining, coal extraction and production, logistics, marketing and sales are attended to by personnel engaged by the Joint Venture Manager.

(c) save for what is set out in paragraph (b) above, MMA has no other contractual relationships with third parties in relation to the conduct of the operations of the Joint Venture.

(d) MMA has entered into a commercial lease for its registered office and principal place of business and has contractual arrangements in relation to the day-to-day running of its business, including employment agreements and agreements for the supply of office supplies and telecommunications services.

2.3 Supply chains

The number of direct suppliers to MMA is limited, as its business activities are confined to participation as a non-operating participant in the Joint Venture, as set out above.

MMA does not have any direct contractual arrangements with suppliers (including distributors) in relation to coal production, as these activities are conducted by the Joint Venture Manager on behalf of the Joint Venture participants.

MMA's direct supply chains relate to the sourcing of goods and services required to manage and oversee its activities. The primary types of goods and services acquired by MMA include:

- cleaning services;
- office rental;
- computer services and equipment;
- office supplies;
- security services;
- banking services;
- telecommunications services;
- insurance; and
- professional services.

To the best of its knowledge, MMA enters into contracts, where appropriate, with its direct suppliers, the majority of whom are based in Australia.

3. Risks of modern slavery practices in the operations and supply chains of MMA

For the reasons set out above, MMA has a limited number of direct suppliers. MMA has assessed its direct supply chains and considers the following to be potential risk areas, in particular the use by service providers of exploited workers, child labour, forced labour, or the underpayment of workers:

- cleaning services;
- security services; and
- computer services and equipment.

The level of risk is considered low in these potential risk areas given that MMA engages service providers that are local or service providers with local operations. All such service providers are subject to Australian laws and regulations in the provision of their services to MMA.

MMA acknowledges that traditionally modern slavery risks in the mining sector principally relate to the use of child labour and payment of workers below the minimum wage determined for the mining sector.

The mine with which the Joint Venture is concerned is located in Australia, a low-risk jurisdiction[1], with robust laws and enforcement mechanisms in place to discourage and prevent these instances of modern slavery practices. In the circumstances, MMA considers the risks outlined above to be low risk. As mentioned, it participates as a non-operating participant in the Joint Venture. The Joint Venture's mining sites have their own operating and management standards. The Joint Venture Manager is responsible for operating the Joint Venture in compliance with relevant laws and regulations. Accordingly, MMA is reliant on the Joint Venture Manager for the management of that venture in respect of the identification and management of modern slavery risks.

4. Actions taken by MMA to assess and address these risks, including due diligence and remediation processes

4.1 Actions of the Holding Company

MUCC had the following in place during the reporting period:

- The MUCC Corporate Philosophy and MUCC Guiding Principles (**MUCC Corporate Philosophy**): https://www.mu-cc.com/en/corporate/philosophy.html; and
- The MUCC Corporate Governance Policy.

MUCC aspires to continue to support the future of the planet by providing the highest quality with the best technology and services, by adhering to its core values:

- acting with integrity and sincerity, and deeply pursuing the essence of things;
- respecting individual diversity and integrating the knowledge and skills of all employees to maximize the strength of the Group; and
- boldly taking on challenges and going beyond convention, continuing to innovate to meet the demands of the world.

In order to ensure that these values are carried through to grass-roots level, MUCC adheres to management principles in the making of all of its decisions, including:

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[1] Australia is ranked as Tier 1 in the 2025 Trafficking in Persons Report issued by the US Department of State.

- health and safety;
- compliance with social norms and laws;
- quality that earns customer trust;
- environmental protection; and
- social contributions, and profits that support corporate growth.

MUCC implements the following 6 principles set out in MUCC's code of conduct (**Code of Conduct**):

- put health and safety first: it always makes safety and health its top priority, as they are the foundation of all of its activities.
- take responsibility as individual members of society: as responsible members of society, MUCC complies with laws and regulations, respects human rights, strives to protect the environment, and conducts fair and honest corporate activities.
- deliver reliable product quality: MUCC complies with all quality-related regulations, standards, and agreements with its customers and delivers reliable products and services.
- deliver value worthy of trust: MUCC continues to ensure delivery of high-quality products and services as a reliable and consistent business partner for its customers.
- collaborate closely with diverse individuals: Each employee of MUCC prides themselves on their work, recognizes one another's talents, and actively helps others to accomplish tasks beyond their individual capabilities.
- take on challenges and growth for the future: MUCC does not settle for the status quo, but thinks creatively, acts with a sense of urgency to capture changing trends, and continues to take on the challenges involved in building a better world.

4.2 Actions of MMA

MMA aspires to fulfill its corporate responsibility by implementing the 6 principles found in the Code of Conduct (which MMA adheres to) (available here: https://www.mu-cc.com/en/corporate/philosophy.html). The Code of Conduct is reflective of MMA's company values to challenge, change, grow, praise and appreciate, and to always act with integrity, creating a better future for people, society, and the earth. The 6 principles that it implements are as follows:

- MMA will put health and safety first.
- MMA will take responsibility as an individual member of society.
- MMA will deliver reliable product quality.
- MMA will deliver value worthy of trust.
- MMA will collaborate closely with diverse individuals.
- MMA will take on challenges and growth for the future.

The principles and their underlying values, outlined above, both those of MUCC and MMA, are carried through in all of MMA's business practices. MMA follows a strict guideline provided to it by MUCC regarding MMA's working environment and leverages the policies and procedures that are implemented by MUCC. MMA closely adheres to all work-related legislative obligations, guidelines and regulations, including prohibiting any discrimination (including on the basis of age, race, gender, sexual orientation and disability) in its business practices. As a result, MMA respects the traditions, culture, labour and business practices of Australia.

In an effort to manage its exposure to modern slavery risks, MMA only participates in the Joint Venture on the basis that it is operated by a reputable organisation that has a strong commitment to addressing modern slavery risks. The Joint Venture Manager's modern slavery statement for the 2024 reporting period can be found here:

https://modernslaveryregister.gov.au/statements/23254/

The Joint Venture Manager's modern slavery statement for the 2025 reporting period has not yet been lodged and/or published.

4.3 Due Diligence

MUCC conducts an internal audit with subsidiary companies by asking for feedback from employees, in order to identify and address internal issues, including modern slavery-related issues. MUCC's internal auditor also conducts audits of MUCC's subsidiary companies in respect of those companies' compliance with relevant laws, regulations, and their respective obligations in relation to the protection of human rights, including obligations relating to modern slavery.

During the reporting period, MMA did not onboard any new suppliers in the identified higher-risk categories (being cleaning services, security services, and computer services and equipment). MMA continued to engage with its existing suppliers and had regard to:

- existing contractual arrangements which govern the terms of supply, under which no modern slavery concerns have been identified;
- the Australian-based nature of all of MMA's direct suppliers and their subjection to Australian laws and regulations, noting that MMA has not identified any incidents or indicators of modern slavery practices in its dealings with those suppliers; and
- ongoing monitoring through day-to-day business interactions with those suppliers.

Given MMA's limited number of direct suppliers and its assessed low-risk profile, no additional formal due diligence processes (such as supplier questionnaires or certifications) were implemented during this reporting period.

4.4 Employees

All of MMA's employees' contracts are reviewed annually to ensure that the contracts are in line with current Australian legislative requirements.

MMA employees are required to comply with the MUCC internal codes and policies which require them to act lawfully, ethically and with integrity and encourage them to raise compliance and ethics concerns. Any MMA employee who violates MMA's standards may be subject to disciplinary action up to and including termination of employment.

MMA has an Employee Handbook (**Employee Handbook**) that ensures all its staff are employed in accordance with employment laws and standards. MMA also adheres to MUCC's Corporate Philosophy and Guiding Principles (**MUCC Corporate Philosophy**) (Available here: https://www.mu-cc.com/en/corporate/philosophy.html).

In 2025, MMA's parent company conducted two internal audits and gave employees the opportunity to raise any internal issues.

MMA has a whistleblowing policy in place in its Employee Handbook which ensures that its staff have a safe way of raising concerns confidentially including when this concerns suspicion of modern slavery. The MUCC Group Global Hotline for whistleblowing was established in 2023. MMA also adheres to MUCC's Group Global Whistleblowing Regulations.

4.5 Policies

During the reporting period, MMA did not identify any instances of modern slavery in its operations or supply chains.

MMA undertook a comprehensive review of its suite of policies to determine if MMA had sufficient policies in place to address human rights and modern slavery. MMA determined that its adoption of, and adherence to, the MUCC Corporate Philosophy, as well as its policies contained in the Employee Handbook, were sufficient in holistically addressing human rights and modern slavery.

4.6 Remediation

Where modern slavery is found in any of MMA's supply chains or operations, MMA is committed to:

- ensuring its actions are not adverse to the interests of the suspected victim or victims;
- promptly involving law enforcement so the situation is properly investigated, any victims are identified and protected, and the perpetrators are held to account;
- if MMA has caused or contributed to the exploitation, addressing the harm caused including issuing formal apologies and using its leverage to work with the entity that caused the harm to prevent or mitigate its recurrence;
- taking steps to ensure the harm should not recur, including engaging with suppliers to improve their response to modern slavery, training and awareness-raising;
- urging suppliers to respond to modern slavery risks in a way that is appropriate to their circumstances, including their size, capacity, structure, risk profile and leverage with their sub-suppliers;
- ensuring a 'zero tolerance' approach for inaction following engagement with suppliers where there is a suspected or found instance of modern slavery; and
- considering ending the relationship with a supplier that has caused or contributed to modern slavery if that supplier refuses to address the issue and there is no real prospect of change in their behaviour following engagement.

4.7 Training

During the reporting period, MMA took the following steps to continue building internal awareness of modern slavery:

- it dedicated a portion of the newly appointed director's onboarding process to modern slavery; and
- it leveraged the attendance of two directors at a training session on CSR and compliance organised by MUCC in October 2025, to disseminate relevant knowledge to MMA staff.

MMA intends to further formalise its modern slavery training program in future reporting periods, including by providing staff with access to dedicated training materials and online resources to increase their knowledge and awareness of modern slavery.

5. MMA assessment of effectiveness of actions taken

MMA recognises that assessing the effectiveness of its actions to address modern slavery risks in its operations and supply chains is essential.

MMA's actions to identify and address modern slavery risks, and to assess the effectiveness of such actions, are an ongoing and evolving process. During the reporting period, MMA did not undertake a formal review of the Joint Venture Manager's modern slavery statement. MMA will implement the following actions in the upcoming reporting period:

- reviewing information that is made publicly available by the Joint Venture Manager in relation to modern slavery, including internal reporting prepared by the Joint Venture Manager, to understand the actions taken on behalf of the Joint Venture participants to manage modern slavery risks. In this regard, MMA intends to review the Joint Venture Manager's modern slavery statements for the 2024 and 2025 reporting periods;
- formalising and expanding upon the modern slavery onboarding briefing commenced during the reporting period, including by establishing a structured educational program delivered by an external legal advisor of MMA for newly hired employees and newly assigned directors. The program will include lectures on modern slavery law delivered by the legal advisor, as well as the development of an annual human rights training held at MMA's headquarters. A review and assessment of the effectiveness of these activities will form part of the agenda at an MMA board meeting held at the end of the financial year; and
- establishing internal rules to include a modern slavery clause that prohibits modern slavery practices in the business contracts to be executed by MMA.

6. Process of consultation

Notwithstanding that this is not a joint statement, MMA actively engaged and consulted with MUCC in the preparation of this statement.

7. Any other relevant information

MMA recognises that the modern slavery landscape is such that a proactive approach is required in order to combat modern slavery and its effects. MMA is committed to managing the risks of modern slavery in its business practices, and will continue to adopt a transparent, modern slavery risk-averse and proactive approach to dealing with modern slavery and its risks.

Approval and signature

This modern slavery statement was approved by the Board of Directors of MMA on 24 June 2026.

Shunichiro Ohdate

Shunichiro OHDATE
Managing Director
Mitsubishi Materials (Australia) Pty Limited