



MITSUI & CO. (AUSTRALIA) LTD.

MODERN SLAVERY STATEMENT 2025

Table of Contents

About this Statement.....	2
Introduction.....	2
Consultation in Preparing this Statement	2
Message from the Chair & Chief Executive Officer.....	3
Our Organisation.....	4
Our Corporate Structure.....	4
Our Operations and Supply Chain	4
Our Workplace	5
Workforce	5
'Fair Trade Workplace'	5
Assessing risk	6
Assessment.....	6
Risk Mapping	6
Managing risk.....	7
Policies and Monitoring Framework.....	7
Actions taken	8
Assessing Effectiveness	8
Looking Ahead	9



About this Statement

Introduction

This Modern Slavery Statement describes the steps taken by Mitsui & Co. (Australia) Ltd. ACN 004 349 795 (**Mitsui Australia**) during its financial year ending 31 March 2025 to address modern slavery risks in its operations and supply chains in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**).

Mitsui Australia is a reporting entity under the Act.

This statement has been approved by Mitsui Australia's Board of Directors on 8 September 2025, and signed by Chair and Chief Executive Officer Takashi Yamamura.

Consultation in Preparing this Statement

Mitsui Australia controls the entity Mitsui & Co Financial Services (Australia) Ltd ACN 002 884 737, which provides a treasury function to Mitsui group companies in Oceania. As this entity is a special purpose company with no dedicated employees, suppliers or an independent office, all consultation in respect of companies was carried out by and among employees of Mitsui Australia. Due to the limited business scope of these entities, the level of consultation required was accordingly limited.



Message from the Chair & Chief Executive Officer

We operate by a set of values which shapes the way we think, work and act to ensure we help people to achieve their ambitions in the right way.

This also means we aim to act fairly, ethically and openly in everything we do. We are committed to combating the risk of modern slavery in our supply chains or in any part of our business.

I am pleased to present Mitsui Australia's Modern Slavery Statement 2025, my first as Chief Executive Officer. It outlines our efforts and plans to address modern slavery risks in our operations and supply chain.

During the year ending 31 March 2025, we took a significant step towards strengthening our modern slavery risk management framework – by engaging an external professional to help us develop our Modern Slavery Roadmap for the next four years to 31 March 2029.

Other actions we have taken include:

- Provision of a refresher webinar and annual compulsory e-learning on modern slavery.
- Communication with our 11 new suppliers to share our expectations in order to eliminate modern slavery in their operations and supply chains which are outlined in our Sustainable Procurement Policy.
- Our newly developed Modern Slavery Roadmap will guide our actions in the year ending 31 March 2026. Our focus will include:
 - Strengthen our governance through an enhanced framework.
 - Establish a new modern slavery policy.

Conduct Tier-1 supply chain risk mapping taking account of the Australian context.

We recognise that the risks of modern slavery are complex and evolving. We will continue to work to address these risks in our business, and engage with a range of stakeholders to assess the effectiveness of our actions to enhance our approach.

Takashi Yamamura
Chair & Chief Executive Officer
Mitsui & Co. (Australia) Ltd.



Our Organisation

Our Corporate Structure

Mitsui Tokyo – Mitsui Australia is wholly owned by Mitsui & Co., Ltd. (**Mitsui Tokyo**) which is a global conglomerate with multiple businesses operating across different industries under the one corporate group. Together with its many subsidiaries and affiliates, Mitsui Tokyo operates business through its offices in countries across the world.

Mitsui Australia – Mitsui Australia has approximately 85 employees in Melbourne, Sydney, Brisbane and Perth operating multiple businesses such as:

- import and export trading business for steel, metal, minerals, chemical and food products;
- development of and investment in key infrastructure for sectors including energy and energy solutions, logistics, water, mobility, digital technology, and mining / construction equipment;
- agency, marketing and corporate services for Mitsui group companies in Oceania; and

Mitsui & Co Financial Services (Australia) Ltd ACN 002 884 737 which provides a treasury function to Mitsui group companies in Oceania. This entity is a special purpose company with no dedicated employees.

Our Operations and Supply Chain

- Chemical Division – Mitsui Australia imports and supplies essential commodities such as chloroprene rubber from Japan, sodium carbonate from Turkey, and belt conveyors from China, to large Australian and international chemical and other companies.
- Food Division – Mitsui Australia exports agricultural produce from Australia to countries across Asia, such as meat, dairy products (cheese and milk powders) and juice concentrates, and also imports pet food and seafood from Asia.
- Steel Division – Mitsui Australia supplies steel products to manufacturers and for infrastructure projects and major resources projects across Australia and New Zealand, such as electrical steel, coated steel, steel plate, steel pipes, stainless steel, cold-rolled coils and rail from Japan, Korea, China and India.
- Mineral & Metal Resources Division – Mitsui Australia trades and export scrap metals from Australia and provides agency business for ferrous and non-ferrous materials including iron ore, coal, lithium, cobalt and copper. We also have investments in several iron ore and metallurgical coal mines with operating partners including Rio Tinto, BHP and Anglo American. We are seeking other



MITSUI & CO.

Mitsui & Co. (Australia) Ltd
Level 15, 101 Collins Street
Melbourne VIC 3000

business opportunities including biocarbon used in the steel manufacturing process.

- Infrastructure & Energy Division – Mitsui Australia seeks new opportunities to develop infrastructure projects especially in the power sectors and next-generation fuel projects such as hydrogen, clean ammonia, and SAF, and to support oil, gas and other conventional natural resource projects.
- Mobility Business Division – Mitsui Australia's key mobility sector investments include Komatsu Australia – a supplier of construction, earthmoving, mining and utility equipment, Komatsu Australia Corporate Finance – a provider of leasing, hire purchase and other equipment finance solutions, and Aptella (formerly Position Partners) – a distributor of positioning and geospatial solutions for surveying, civil works, mining and building projects.

For more information on our organisation, please refer to our website below:

Corporate Profile: [About Us | Corporate Profile - Mitsui & Co. \(Australia\) Ltd.](#)

Our Workplace

Workforce

Mitsui Australia is committed to providing a safe, respectful, and equitable workplace for all employees and contractors. We maintain a comprehensive framework of policies, including our Discrimination, Harassment and Bullying Policy and Health, Safety and Wellbeing Policy, which promote dignity, courtesy, and respect, and help mitigate modern slavery risks in our operations.

Our Health, Safety and Wellbeing Policy ensures compliance with workplace health and safety laws, the elimination or minimisation of hazards, and the promotion of both physical and psychological wellbeing. All Mitsui Australia employees are engaged under Australian employment laws, with recruitment and onboarding managed in line with our Code of Conduct and Respect at Work principles.

'Fair Trade Workplace'

Since 2014, Mitsui Australia has been recognised as a [Fair Trade Workplace](#) by *Fair Trade Association of Australia and New Zealand (FTA)* having the '10 Principles of Fair Trade' which include fair payment, no child labour, no forced labour, good working conditions for workers who produce the goods.

This is due to our support for FTA's initiative through purchasing Fair Trade certified items consumed by our staff members in the office (such as tea, sugar, coffee) and raising awareness through internal educational activities and publications.

We will continue to challenge the conventional trade by placing fairness in prices and wages, improved market access, and poverty alleviation at the core of international trade practices.



Assessing risk

Assessment

Mitsui Australia has a unique business portfolio and organisational structure. Our supply base is diverse, including small and medium-sized businesses, as well as multinational corporations. Many of our direct suppliers have their own extensive supply chains, connecting us with businesses worldwide.

We recognise that such diverse and extensive supply chains call for a robust framework to assess our modern slavery risks.

For example:

- We have the following provisions included in our standard purchase contract aiming to ensure that we only work with appropriate suppliers who can meet the standards we expect:
 - Our entitlement to terminate the relevant contract in case of a breach or to assess any actual or potential breach;
 - Supplier warranties as to compliance with anti-slavery laws and investigations, appropriate levels of due diligence and remediation, and the presence of applicable policies, procedures and systems;
 - Supplier obligation to include similar warranties in contracts with its suppliers; and
 - Supplier obligation to comply with our Sustainable Procurement Policy.
- We provide our employees with regular training opportunities covering practical examples, so that they are equipped with a level of knowledge to watch out for signs of modern slavery taking place during the usual course of business (e.g., visit to supplier site).

Risk Mapping

Mitsui Tokyo has assessed our global supply chains in 2020 by assessing 3,128 transactions conducted by the head office and 7,820 transactions conducted by its overseas offices (which includes Mitsui Australia) from the human rights perspective broadly including modern slavery risks using human rights risk mapping, together with advice from and consultation with independent experts.

The assessment was based on leading international human rights risk indicators and other tools such as the “[List of Goods Produced by Child Labor or Forced Labor](#)” of Bureau of International Labor Affairs (ILAB) and “[Global Map of Environmental and Social Risks in Agro-Commodity Production](#)” of International Finance Corporation (IFC), placing emphasis on the core labour standards identified by the International Labour Organization (ILO).



MITSUI & CO.

Mitsui & Co. (Australia) Ltd
Level 15, 101 Collins Street
Melbourne VIC 3000

Through the risk mapping assessment, Mitsui Tokyo assessed inherent country risks and industry risks and identified 84 high risk combinations – i.e., a list of source country-procured goods combinations – such as garments manufactured in Bangladesh, rice produced in Myanmar, and coffee produced in Colombia, sesame in Myanmar and coconuts in Philippines.

Through this process, none of the existing suppliers of Mitsui Australia have been identified in the high-risk combinations, except rubber products made in China from a supplier in Singapore and pet food from a supplier in Thailand. Mitsui Australia continue to be satisfied, however, based on a preliminary analysis and its longstanding and reliable track record with both suppliers, that both suppliers have human rights policy and trainings in its global operations, taking labour practices and occupational health and safety as a priority.

Mitsui Australia also engages suppliers of banking and professional services (such as major banks, legal, accounting and engineering firms). Mitsui Australia is satisfied that these service providers have responsible supply chain policies and anti-modern slavery statements, and in relation to the services provided to Mitsui Australia, are unlikely to have high-risk combinations in those supply chains.

Managing risk

Policies and Monitoring Framework

Mitsui Australia maintains its [Business Conduct Guidelines](#), which oblige the company and its people to conduct our business in a manner that respects human rights and does not involve any modern slavery practices. The Guidelines also prohibit discrimination on the basis of any protected attribute under the law.

The Guidelines are Mitsui Australia's principal code of conduct for our employees and contractors, who are required to understand and adhere to the Guidelines throughout their employment or engagement.

We also have a [Whistleblower Policy](#) in place with the reporting route available for both internal and external reports in case of any complaint or concern regarding our modern slavery obligations.

We implemented and published our [Sustainable Procurement Policy](#) in June 2020 on our publicly accessible website. The policy outlines our expectations for suppliers and sub-suppliers to prevent and eliminate modern slavery in their operations and supply chains. It also sets out our intention to audit, monitor, and, if necessary, terminate business relationships in cases of continued non-compliance.

During the financial year, the policy was shared with 11 new suppliers, as part of our ongoing commitment to responsible sourcing and supplier engagement.



This exercise covered suppliers from the following trading business divisions:

- Steel Division
- Mineral & Metal Resources Division
- Infrastructure & Energy Division
- Mobility Business Division
- Food & Retail Business Division
- Chemical Division

Actions taken

For the reporting period ending 31 March 2025:

- Engagement of an external professional to support development of our Modern Slavery Roadmap covering four years to 31 March 2029, and to conduct refresher training for all employees (42 staff and management members attended live, and the recording was made available to those who missed it).
- Business Conduct Guidelines (e-learning) – our e-learning course on Mitsui Business Conduct Guidelines – include a module dedicated to modern slavery where we can learn modern slavery risks in the context of our trading and investment business model. This annual e-learning course is compulsory for all of our employees.

Assessing Effectiveness

We are assessing the effectiveness of our actions through the following activities.

- Annual compliance surveys to assess our employees' awareness of human rights. Response rates increased from 83% in 2023 to 100% in 2024. The latest survey showed that 93.2% of employees reported being familiar with the Business Conduct Guidelines (BCG). Additionally, 87.7% of employees are aware of internal reporting channels, and 86.3% know about the EthicsPoint platform, supporting accessible and confidential reporting of human rights concerns.
- Collaboration with Mitsui Tokyo to benefit from their reflections on their own due diligence efforts on human rights.
- During the reporting period ending 31 March 2025, we also conducted a brief survey after the refresher training mentioned in 4. above – to which 17 participants responded. 12% (18%) responded that their understanding of modern slavery (our whistleblower process) was uplifted.



MITSUI & CO.

Mitsui & Co. (Australia) Ltd
Level 15, 101 Collins Street
Melbourne VIC 3000

Looking Ahead

Guided by our newly developed Modern Slavery Roadmap, our focus for the next year will include the following areas.

- Strengthen our governance through an enhanced framework.
- Establish a new modern slavery policy.
- Conduct Tier-1 supply chain risk mapping taking account of the Australian context.