

**FLS**



# **FLSmidth Modern Slavery Act Statement 2025**

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## 1.1 Introduction

This is the 2025 Modern Slavery Statement of the FLSmidth Group. It is prepared pursuant to the reporting obligations of:

- FLSmidth Pty Ltd (FLSmidth Australia) as a relevant 'reporting entity' under the Modern Slavery Act 2018 (Cth) of Australia<sup>1</sup>.
- FLSmidth Ltd. (FLSmidth Canada) as a relevant 'reporting entity' under the Fighting Against Forced Labour and Child Labour in Supply Chains Act of Canada<sup>2</sup>.

This joint statement covers the activities of all FLSmidth subsidiaries, including those in Australia and Canada.

The statement targets human rights risks in FLSmidth's supply chains and own operations, particularly addressing 'modern slavery' as defined in Section 12, Part 2 of the Australian Modern Slavery Act 2018 (Cth), as well as forced and child labour, as described in Part 2 of the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act. Throughout this report, the terms modern slavery and forced labour will be used interchangeably to align with the definitions of both Acts.

This statement provides an overview of FLSmidth's policies and due diligence processes relating to the risk of modern slavery and forced labour. It should be viewed as complementary to the Sustainability Statement in [FLSmidth's Annual Report 2025](#).

The document has been prepared by FLSmidth's People & Sustainability, in collaboration with Procurement, Operations, Compliance, and representatives from FLSmidth Australia and Canada. It outlines the measures taken by FLSmidth to address the risks of modern slavery during the reporting period from 1 January 2025 to 31 December 2025 and sets out priorities for 2026.

This is the sixth statement submitted by FLSmidth Australia under the Australian Modern Slavery Act 2018 (Cth), and the third statement submitted under the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

## 1.2 Structure of Organisation, Operations, and Supply Chain

FLSmidth deliver full flowsheet technologies and services, optimising asset efficiency while managing risk and prioritising environmental impact to meet the world's demands for metals and minerals.

Our value proposition is to empower our customers to optimise production and meet global metals and mineral demands responsibly. This proposition is anchored in our industry expertise, a foundation built on trust and proficiency, a team of highly skilled professionals, a significant installed base and a commitment to sustainability and technological innovation. We leverage these strengths to meet the evolving needs of our customers, ensuring they can navigate the complexities of their operating contexts effectively and sustainably. Recognising this, our MissionZero program is at the heart of our ongoing commitment to providing technologies and services that help customers significantly reduce their environmental footprint.

Founded in 1882 and headquartered in Copenhagen, Denmark, FLSmidth has grown into a global market leader in Mining over the past 140 years. As of the end of 2025, we employ 5,494 people. We serve customers in approximately 125 countries and with local presence in approximately 40 countries. In 2025, FLSmidth generated revenue of DKK 14.6 billion.

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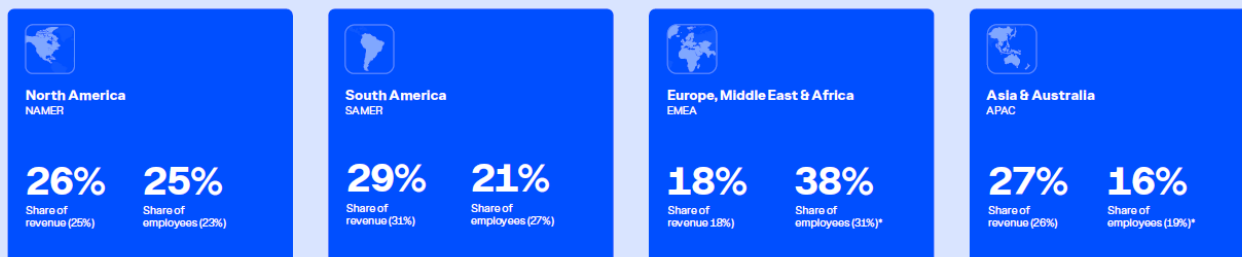
<sup>1</sup> An overview of the operating structure for FLSmidth Australia, including details of the relevant reporting entities under the Modern Slavery Act 2018 (Cth), operations and supply chains, is included in Annex 1.

<sup>2</sup> An overview of the operating structure for FLSmidth Canada, including details of the relevant reporting entities under the Fighting Against Forced Labour and Child Labour in Supply Chains Act, is included in Annex 2

# FLSmidth in the world



■ Corporate Centre, Copenhagen  
■ Global Business Centres  
■ Technology Center



\* As India is now included in the Europe/Middle East & Africa region in 2025, the comparative figures for 2024 have been restated accordingly. Numbers in brackets are comparative 2024 figures.

## Operations and Supply Chain

In the past year, we achieved key milestones in focusing on core Mining activities, de-risking our order intake, optimizing our product portfolio, and we completed the divestment of the cement business, marking a strategic shift that now positions mining as our core focus.

We have also made significant progress in simplifying our business, including consolidating office locations, delayering the organization, and near-shoring support functions to our three global business centres. These changes have impacted all levels of the organization, including Executive Leadership Team. While such transitions can be challenging, we believe embracing change is crucial for our long-term success. Our transformation reflects our commitment to maintaining a market-leading position, and we are confident that, together, we will emerge stronger.

A key element of our Mining strategy is to drive consistent value creation and a stable financial performance. The exit from legacy project-focused and engineering-heavy business, combined with the implementation of a stringent commercial risk management framework, has contributed to a more consistent and reliable financial performance. This strategic shift has not only reduced exposure to high-risk commitments but also allowed the organisation to focus on areas of core strength, driving sustainable value creation for our customers and partners. By embedding principles of business excellence across our operations, we have created a solid foundation of consistent performance that positions the company for longer-term growth.

Our strategy emphasises an asset-right model and a streamlined setup. Localising our service footprint whilst consolidating our supply chain and execution centres are key. This ensures organisational efficiency and prompt delivery.

Our supply chain is as vast and diverse as our global operations. Our suppliers and partners are located across various regions, providing the raw materials, equipment, and services essential to support the advanced solutions we offer to the mining industry. As part of our due diligence processes, we continue to assess and address potential risks related to modern slavery and forced labour within this complex and extensive supply chain.

We are committed to working closely with our suppliers to ensure they meet our high standards of ethical business conduct and sustainability. This includes enforcing compliance with our Code of Conduct and aligning with the values we uphold in our own operations.

In 2025, the FLSmidth continued to operate a globally shared and managed supply chain, however divided across different Business Lines (hereafter BL), with rather independent setups. However, some strategic topics like sustainability, incl. modern slavery are still aligned across the BLs and applied globally. In Service BL, operational execution from proposals, order handling, operational procurement and logistics are organized predominantly into two global business centers in India and Mexico. Strategic functions like sourcing, supplier management, operational quality and planning are organized in global functions, but resources spread across the globe. In Product and PCV BLs, procurement operates in a global setup. In our Manufacturing function, procurement teams are based in each manufacturing location and responsible for all operational activities.

Strategic procurement and sourcing related activities are guided and driven centrally with resources based in different global locations. Our internal manufacturing sites are primarily located in India, USA, South Africa, Chile and China and we also engage with 5000 supplier groups across the globe to ensure timely and flexible deliveries. Due to increasing urbanisation and geographical concentration of mining opportunities, we operate in a range of countries classified as high-risk, according to established country classification indices.

### **Operations of FLSmidth Australia**

FLSmidth Australia is an integral part of FLSmidth's global network of wholly owned subsidiaries. In alignment with our global business structure, the Products Business Line offers technology solutions to our mining customers worldwide, including Australia. Meanwhile, the Service Business Line provides aftermarket sales and services, such as spare parts, consumables, upgrades, and retrofits, to customers across Australia. Additionally, our Australian operations include shared functions such as finance, people, legal, and IT. These functions report centrally and offer support to our employees in this region, although not exclusively. As of 31 December 2025, FLSmidth Australia employed approximately 550 people across 10 operational sites and reported a consolidated annual revenue of approximately AUD 453 million.

### **Operations of FLSmidth Canada**

FLSmidth Canada is also part of FLSmidth's global network of wholly owned subsidiaries. FLSmidth Canada delivers service and technology solutions to regional mining customers. Our mining business structure, the Products Business Line provides technology solutions to mining customers worldwide, including those in Canada. The Service Business Line offers aftermarket sales and services, such as spare parts, consumables, upgrades, and retrofits, to customers in the region. Additionally, our Canadian operations include shared functions like finance, people, and IT. These functions report centrally and provide support to our employees in this geography, although not exclusively. As of 31 December 2025, FLSmidth Canada employed approximately 150 people across 7 operational sites and reported a consolidated annual revenue of CAD 154 million.

## **1.3 Policies and Governance**

As a global technology provider to the mining industry, we recognise the potential risks related to human rights across our value chain. We are committed to safeguarding all internationally acknowledged human rights for our employees, customers, suppliers, business partners, and the communities in which we operate. This includes the right to freedom of association, the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the abolition of child labour, the elimination of discrimination in employment and occupation, and the provision of a safe and healthy working environment.

Human rights, including the prevention of modern slavery, are integral to FLSmidth's strategic objectives and are implemented through a range of policies and procedures. FLSmidth and its subsidiaries are committed to conducting business responsibly and upholding human rights across our value chain. Our commitment is articulated in our Human Rights Policy. We explicitly prohibit any form of modern slavery, including but not limited to forced labour, human trafficking, child labour, and debt bondage, in all our operations and value chain. FLSmidth does not tolerate nor contribute to threats or attacks against human rights defenders related to our operations and value chain. This commitment is further reinforced in the FLSmidth Code of Conduct and our Supplier Code of Conduct.

Our human rights work is driven by a cross-functional approach, with oversight from People and Sustainability, Health & Safety (H&S), Procurement, and Compliance. People & Sustainability is responsible for overseeing the Modern Slavery Statement and the related processes for identifying, addressing, and mitigating modern slavery risks across FLSmidth's operations and business relationships. These processes ensure that appropriate remedial actions are taken by FLSmidth management if modern slavery cases are identified.

Ultimate responsibility for human rights oversight lies with the Audit, Risk & ESG Reporting Committee of the FLSmidth Board of Directors, which receives quarterly updates on all compliance matters, including human rights.

The Chief People Officer and Global Business Services, EVP is accountable for implementing our human rights commitments and making decisions on human rights issues. In severe cases, the decision-making process is escalated to the Group CEO.

## **Human Rights Policy**

Our Human Rights Policy defines FLSmidth's commitment to ensuring that our business operations cause no harm. As part of this commitment, we respect fundamental human rights as outlined by the UN Guiding Principles on Business and Human Rights. In addition, we conduct our business in accordance with the International Labour Organisation's Core Labour Standards, which emphasise the elimination of all forms of forced and compulsory labour.

## **Grievance Mechanism and Remediation Procedure and Whistleblower Hotline**

We take any allegations that human rights are not respected in our operations or business relationships very seriously. Our whistleblower hotline serves as a tool for filing grievances, and our Grievance Mechanism and Remediation Procedure details how to submit a human rights grievance report. All FLSmidth employees, as well as external parties, are encouraged to report any suspected human rights abuses via the Grievance Mechanism, including violations occurring at business partners' sites. In this way, we aim to provide access to remedy for anyone who has witnessed or been affected by a potential human rights violation connected to our conduct or business activities.

## **Supplier Code of Conduct**

FLSmidth's Supplier Code of Conduct ensures a responsible sourcing approach by outlining our expectations for suppliers. We use our leverage as a buyer by demanding compliance with human rights frameworks within our supply chain. The Supplier Code of Conduct specifies requirements related to human rights, labour, health and safety, the environment, compliance, and management systems. It is based on industry requirements set by the Responsible Business Alliance, as we seek to align with other companies setting similar targets for their suppliers, making it easier for suppliers to conform and comply.

## **Conflict Minerals Sub-policy**

The Conflict Minerals Sub-policy outlines the basic rules regarding conflict minerals, including the mapping of conflict minerals in our supply chain and how to address any issues identified.

These policies and governance schemes all apply throughout the FLSmidth Group, including FLSmidth Australia and FLSmidth Canada, and their direct interactions with respective customers and business partners.

## **Working hours policy**

FLSmidth's Working Hours Policy enhances our efforts to mitigate the identified risks related to labour standards. This policy sets out our commitment to higher labour standards and ensures consistent practices across the organization.

## **1.4 Assessing Risks of Modern Slavery**

FLSmidth is a global company exposed to risks related to our industry, operation and the countries in which we operate. The motivation of active Enterprise Risk Management (ERM) is to continuously assess how threats and opportunities influence our ability to achieve our long-term targets, strategic risks, and our short-term plans referred to as operational risks.

Our business faces risks due to our complex supply chain and sourcing from regions with significant environmental and human rights concerns. To address these challenges, we adopt a proactive and collaborative approach, adhering to international standards to promote ethical and sustainable operations. This commitment is central to ensuring the integrity and transparency of our operations across the value chain.

Potential risks related to modern slavery are assessed and categorised by country based on Global Slavery Index – Proportion in Slavery (Walk Free Foundation) and the ILAB Child and Forced Labor Indicator (US Department of Labor). The main risk of modern slavery in the FLSmidth supply chain is linked to geographical regions in the countries where we operate. We also monitor our spend in countries in which the risk of forced labour is high.

## **1.5 Due diligence process**

Modern slavery risks associated with our business relationships are assessed through systematic due diligence processes. Our due diligence practices are aligned with our broader commitment to responsible and sustainable business practices. We are continually enhancing these practices in our efforts to uphold international due diligence standards, such as the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the OECD Due Diligence Guidance for Responsible Business Conduct.

We have implemented methodologies as part of our sustainability blueprints to ensure that we have relevant effective actions and initiatives in place to prevent and mitigate impacts and risks related to modern slavery and human rights.

In our operations, additionally to regular engagement with their direct manager, employees can provide anonymous feedback and input through quarterly surveys. Periodic roundtable discussions between employees and management are also held to gather targeted feedback.

In our value chain, after identifying the potential and actual negative impacts on workers in the value chain, ESG policy owners and relevant subject matter experts are responsible for updating policies and identifying appropriate mitigating actions. This is included in continuous assessments based on additional information and resources related to that impact. There is a reputational risk involved with our customers and suppliers potentially using forced labour. This has been monitored through our customer due diligence, and we aim to implement actions and milestones, such as human rights clauses in customer contracts, to discourage the use of forced labour.

To help ensure our practices do not cause or contribute to negative impacts, we conduct due diligence on customers and sales agents, which includes a human rights assessment.

In the supply chain, our process screens suppliers in relation to sustainability. This screening includes specific human rights questions. The screening is carried out on-site during visits to our suppliers. Suppliers are required to address any gaps in the implementation of requirements through a time-bound improvement plan in consultation with FLSmidth. Periodic reviews and follow-ups are then conducted on a regular basis. For key suppliers, we monitor media updates to ensure prompt responses to emerging concerns.

During our 2025 reporting period, our due diligence and assessment activities have not identified any instances of modern slavery at the locations where our products or services are used, nor where we source from.

The risk of modern slavery within the specific supply chain of FLSmidth Australia and FLSmidth Canada is included within FLSmidth's global supply chain and is therefore part of the same risk assessment, due diligence processes, and reporting as the FLSmidth Group.

## **1.6 Our actions in 2025 and effectiveness assessment**

### **Human rights**

Human rights and labour rights at FLSmidth are part of our wider company strategy and implemented through various policies and procedures. In 2025, as part of this commitment, we have updated our Human Rights Policy to further strengthen our dedication to providing fair, safe, and respectful working conditions.

In 2025 we changed from monthly employee engagement surveys to quarterly as a direct result of employee feedback on the matter. The employee engagement surveys gather employees views on engagement drivers such as growth, freedom of opinion, reward, health & wellbeing and Diversity and inclusion, with the objective to inform and shape the development and implementation of policies and initiatives through specific action plans.

### **Supply chain**

In 2025, employees were trained in responsible conduct in the supply chain, as training on responsible business conduct was made available to all indirect employees and procurement employees were offered a specialized course focusing on how procurement decisions can promote decent work within supply chains.

We have continued to monitor our onsite supplier assessments, in which we evaluate our suppliers' sustainability performance in relation to labour, health and safety, environment, compliance and management systems.

### **Due Diligence**

Aware of our key role in building a sustainable economy and society, this year we have updated our Due Diligence Policy which describes our commitment to avoiding, causing or contributing to adverse impacts on workers in the value chain and to preventing adverse impacts directly linked to operations, products or services through business relationships.

## **1.7 Training**

We believe that strengthening the capabilities of our employees is a vital step towards creating a value chain free from modern slavery. Embedding this commitment throughout the business is essential, and to support this, we provide a variety of training programmes focused on human rights. Employees can easily access our human rights policy and training resources through our internal website.

In 2025, 22 out of 66 relevant procurement employees were trained in responsible conduct in the supply chain. The specialised course focused on how procurement decisions can promote decent work within supply chains.

Throughout 2025, we continued to promote participation in our Human Rights course, which is mandatory for all new employees at FLSmidth. 3,127 White-collar employees have completed training in human Rights, the course offers a broad introduction to human rights, the specific challenges we face as a company, and how we can take action to prevent adverse impacts.

## 1.8 Access to remedy

We are committed to avoiding any actions that may cause or contribute to adverse impacts on individuals and communities. However, we recognise that such impacts can still occur. In these instances, we accept our responsibility to provide access to remedy where our operations have negatively affected human rights.

We seek to remediate or participate in remediation of any direct or indirect adverse impacts on employees, including collaborating with judicial or non-judicial mechanisms for remedy access.

To support this, we have ensured that our human rights grievance and compliance system is accessible via our existing [whistleblower hotline](#). This channel is confidential and remains the most efficient way to raise concerns. Our [grievance mechanism and remediation procedure](#), available on our website, clearly outline the steps involved in submitting a grievance and how it will be addressed.

Employees and third parties can raise concerns directly related to our business through our whistleblower hotline and human rights grievance mechanism.

To ensure effectiveness of these channels, we communicate about them through our company website and internal communications and regularly assess and promote awareness of the channels. All workers and third parties can access these channels, via our website, email and mail which are managed by a third-party provider who tracks and registers all admissible cases. From this information, we are able to continuously assess and update appropriate procedures in order to ensure effective mitigation actions.

We are also continually working to enhance access to these mechanisms, particularly for the most vulnerable groups within our value chain. FLSmidth is committed to collaborating with judicial and non-judicial mechanisms to provide access to remedy in the event that we cause or contribute to an adverse impact. In instances where FLSmidth is directly linked to an impact, we will seek leverage to promote adequate remedy.

Ways to remedy include: apology, restitution, rehabilitation, compensation, sanction or non-repetition. We will develop a more thorough remediation process plan. This process will be an ongoing assessment based on learnings from remediation cases.

In 2025, we did not receive any reports classified as human rights grievances.

## 1.9 Looking ahead

The prevention of modern slavery remains an ongoing and evolving responsibility. In 2026, we will continue to regularly review our operations, engage meaningfully with relevant stakeholders, and maintain a sustained, long-term commitment to upholding labour standards across our value chain.

Building on the foundation established in previous years, we will further strengthen our due diligence framework. Our approach has developed into a structured and comprehensive process that enables not only the assessment of current practices but also the systematic tracking, measurement, and documentation of progress over time. In 2026, we will continue to refine and enhance this process to ensure continuous improvement.

We remain committed to providing training to all employees, including targeted sessions for relevant functions and higher-risk areas. Internal communication across FLSmidth will continue to be a key priority. Through focused awareness campaigns and active knowledge sharing, we aim to further strengthen understanding, accountability, and engagement throughout the organisation.

# Annexes

## 1.10 Annex 1: Structure, Operations & Supply Chains of FLSmidth Australia

### Reporting entities:

FLSmidth Pty Ltd (ABN 85 000 221 590) is an Australian incorporated proprietary company. It is the primary operating entity of the FLSmidth Group in Australia and is a reporting entity for the purposes of the Modern Slavery Act 2018 (Cth).

### Structure:

FLSmidth Pty Ltd is a wholly owned subsidiary of the FLSmidth Group, for which FLSmidth & Co A/S (Denmark) is the ultimate parent company. FLSmidth Pty Ltd is also the holding company of several dormant, non-operational legacy entities in Australia that did not trade during the reporting period.

FLSmidth Pty Ltd also holds an interest in the operational joint venture entity Intertek Robotic Laboratories Pty Ltd but the day-to-day management and control of the operations and supply chain of that entity continues to reside outside of FLSmidth.

### Operations and supply chains:

FLSmidth Australia supplies our customers with service and technology solutions. As of 31 December 2025, FLSmidth Pty Ltd and its active subsidiaries in Australia employed approximately 550 employees across 10 operational sites/offices.

## 1.11 Annex 2: Structure, Operations & Supply Chains of FLSmidth Canada

### Reporting entities:

FLSmidth Ltd (Corporation No. 1516256-4) is a Federal Canadian company. It is the primary operating entity of the FLSmidth Group in Canada and is a reporting entity for the purposes of the Fighting Against Forced Labour and Child Labour in Supply Chains Act of Canada.

### Structure:

FLSmidth Ltd is a wholly owned subsidiary of the FLSmidth Group, for which FLSmidth & Co A/S (Denmark) is the ultimate parent company. FLSmidth Ltd. is the sole Canadian entity in Canada since the amalgamation of FLSmidth Ltd. (Corporation No.1180382) with FLSmidth Industrial Solutions (Canada) Inc. (Corporation No. 091289).

During the 2025 calendar year the subject of this statement, the above-mentioned entities were the only Canadian entities of the FLSmidth Group active in Canada.

### Operations and supply chains:

FLSmidth Canada supplies mining customers with engineering, equipment, and service solutions. As of 31 December 2025, FLSmidth Ltd employed approximately 150 employees across 7 operational sites/offices.

Consultation with owned / controlled entities Companies owned or controlled by the identified reporting entities were consulted in the development of this joint statement, as applicable.

Relevant managers and internal stakeholders of each of the Australian and Canadian reporting entities covered by this statement were engaged in the preparation of this joint statement.

This included board meetings of FLSmidth Pty Ltd in Australia and FLSmidth Ltd. in Canada to review and approve the contents of this statement.

As noted above, due to the status of the registered subsidiaries of FLSmidth Pty Ltd and noting they all have common officeholders with FLSmidth Pty Ltd, no formal consultation was necessary nor undertaken with respect to these entities.

## Statement Regarding Approval and Signature of Modern Slavery Statement

This statement has been approved by FLSmith Board of Directors and is signed by Group CEO, Asia Pacific Region President, Sales & Service and North America Region President, Sales & Service, as listed below. This joint statement was approved by the principal governing body of FLSmith Pty Ltd (its board of directors) and FLSmith Ltd., by way of a board resolution confirming the same.

In accordance with the requirements of the Act, and in particular section 11 thereof (*Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act*), I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

**Toni Laaksonen**

Chief Executive Officer  
FLSmith & Co. A/S

I have the authority to bind  
FLSmith & Co. A/S

**Kenny Don**

APAC Regional President Sales &  
Service,  
Director – FLSmith Pty Ltd

I have the authority to bind  
FLSmith Pty Ltd.

**Todd Moir**

North America Regional President  
Sales & Service  
Director – FLSmith Ltd.

I have the authority to bind  
FLSmith Ltd

## Get in touch

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