

MODERN SLAVERY STATEMENT THE HILDITCH GROUP

1. Introduction

Hilditch Pty Ltd and its wholly owned subsidiaries (collectively described as the **Hilditch Group**) are pleased to present the Hilditch Group's Modern Slavery Statement (**MSS**).

The MSS is made pursuant to the *Australian Modern Slavery Act 2018* (Cth) (**MS Act**). It relates to the reporting period from 1 July 2023 to 30 June 2024.

The MSS addresses the mandatory criteria contained in section 16 of the MS Act.

Hilditch Group opposes all forms of slavery. The MSS sets out the Hilditch Group's commitment to identifying and acting on any modern slavery risks.

Mandatory Reporting Criteria under the MS Act

The mandatory criteria for modern slavery statements, set out in section 16(1)(a) to (g) of the MS Act, have been addressed as follows:

2. Description of the Hilditch Group

The parent company of the Hilditch Group is Hilditch Pty Ltd (**Hilditch**). Hilditch is a Victorian-based distribution, trading, consulting and importing company that supplies its customers with various oils and chemicals. As of 30 June 2024, Hilditch Group had 37 employees.

This MSS includes the below entities:

THE HILDITCH GROUP TABLE OF REPORTING ENTITIES

	Entity Name	Australian Business Number
1	Hilditch Pty Ltd	47 005 669 161
2	The Trustee for Hilditch Oilchem Trust	77 207 529 590
3	The Trustee Hilditch Oils Australia Trust	17 283 842 288

3. Structure of the Hilditch Group, their Operations and Supply Chain

The Hilditch Group is administered from its head office located in Cremorne, Victoria. The Trustee for Hilditch Oilchem Trust (**Oilchem**) operates out of a warehouse and manufacturing facility located in Epping, Victoria.

The Hilditch Group operates through the below entities:

- **Hilditch** which supplies its customers with various chemicals and oils including fuel, base oil, raw materials, solvents, polymers and chemical raw materials;

- **Oilchem** which provides services including storage and warehousing of dangerous goods, solvent and chemical blending services, repacking and distribution of products as well as maintenance and operation for a fleet of fuel tankers; and
- The Trustee Hilditch Oils Australia Trust (**Hilditch Oils**) exports refined oil to its overseas customers.

The Hilditch Group's supply chain includes the procurement of goods. The Hilditch Group imports oil and other chemicals from two large oil refineries located in South Korea (owned by SK Lubricants and Chevron) and an oil refinery located in Geelong, Victoria (owned by Viva Energy Australia).

The Hilditch Group supplies to customers across a broad range of industries, including mining, agriculture, automotive, transport, manufacturing and construction. The majority of the Hilditch Group's customers are located in Australia, however, it also supplies to customers in New Zealand, South Africa, as well as parts of Asia, including, Singapore and Malaysia.

4. Modern Slavery Risks in the Hilditch Group's Operation and in its Supply Chains

The Hilditch Group acknowledges that modern slavery encompasses a range of exploitative practices where coercion, threats or deception are used to compel individuals to provide labour under unlawful or unethical conditions. Such practices deprive workers of autonomy over their employment terms and conditions, and include, but are not limited to, human trafficking, debt bondage, slavery, servitude, forced labour, and child labour.

The Hilditch Group recognises modern slavery as a pervasive global issue, with the potential for both direct and indirect risks within its operations.

The Hilditch Group's Operation

The Hilditch Group employs 37 direct employees who are located in Australia. These employees are covered by individual employment contracts. These contracts ensure that the Hilditch Group comply with the minimum pay obligations and statutory entitlements proscribed by the *Fair Work Act 2009* (Cth) and other Fair Work instruments. A small number of these employees are covered by an applicable Modern Award. At the recruitment stage, the Hilditch Group ensure that their employees have the right to work in Australia.

The Hilditch Group engages around 15 sub-contractors to provide ancillary services within its operation. The major sub-contracting activity is transportation of dangerous chemicals. The Hilditch Group does not use labour hire arrangements.

The Hilditch Group provides its employees with a safe and sustainable workplace by implementing the following measures:

- complying with all Fair Work instruments and obligations, including the *Fair Work Act 2009* (Cth) and the *Occupational Health and Safety Act 2004* (Cth);
- employing a quality and compliance officer, who monitors and enforces compliance with occupational health and safety standards;
- ensuring various company accreditations are up to date, including:
 - ISO 45001:2018 Occupational Health and Safety Management Systems;

- ISO 14001:2015 Environmental Management Systems;
- ISO 9001:2015 Quality Management Systems; and
- International Sustainability and Carbon Certification (ISCC); and
- implementation of an Environmental Management Plan.

The Hilditch Group's Supply Chain

The Hilditch Group recognises the potential risks of such practices occurring both within its own business and across its supply network.

While the Hilditch Group continues to mitigate modern slavery risks within its direct operations, it acknowledges the potential for indirect modern slavery risks that may arise from work with external suppliers.

While the Hilditch Group procures products from the mining industry, which typically has a high risk for modern slavery, the Hilditch Group mainly imports from South Korea, where the prevalence of modern slavery is low.

The Hilditch Group also mitigates risks by working with a limited number of suppliers and actively takes steps to further reduce any association with modern slavery by implementing a high-level supplier approval process, including detailed check lists for suppliers.

The Hilditch Group is dedicated to identifying and eliminating modern slavery risks and associated abuses within its operations and throughout its supply chain including the following:

- implementing mandatory checklist for suppliers to ensure they meet all legal requirements and has measures to protect against modern slavery practices;
- appointing a designated quality and compliance officer who ensures that suppliers comply with the Hilditch Group's mandatory supply checklist;
- maintaining full and accurate records of all transactions with suppliers; and
- conducting internal audits of company practices and procedures in order to obtain ISO accreditations.

5. The Hilditch Group's Actions to Assess and Address Modern Slavery Risks

The Hilditch Group has systems to minimise, and where possible eliminate, the risk of modern slavery in its business, including to:

- ensure that all employees are engaged with a formalised contract and/or letter of offer which is in writing;
- comply with all Fair Work instruments to ensure employees received their minimum statutory entitlements and pay;
- review its labour practices, including ensuring that:
 - employees are lawfully able to work;

- the workplace is a safe and non-discriminatory workplace;
- employees are paid in accordance with minimum standards prescribed by the relevant instrument;
- comply with all applicable laws and regulations including occupational health and safety laws;
- implement various policies including:
 - a Drug and Alcohol policy;
 - Occupational Health and Safety Management Systems;
 - Environmental Management Systems; and
 - Quality Management Systems.

Hilditch will continue to assess any new supplier for modern slavery risks.

6. The Hilditch Group's Assessment of Risks in its Operations and Supply Chain

For the relevant reporting period, the Hilditch Group focused on understanding modern slavery and the ways in which it may present in its supply chains. It aims to establish processes to reduce any risks of modern slavery within its operation. The Hilditch Group is committed to minimising modern slavery by:

- developing a modern slavery policy;
- developing other labour related policies;
- communicating with suppliers on any issues arising from the modern slavery policy with an aim to work with suppliers to address any modern slavery risks within their business; and
- increasing human resources function by engaging additional consultants.

The Hilditch Group will continue to assess its measures to mitigate modern slavery risks and ensure compliance with the MS Act within their operations.

7. Process of consulting with any entities owned or controlled by Hilditch

In developing this MSS, the Hilditch Group consulted with any relevant companies that it owns and/or controls.

Conclusion

The contents of this MSS have been approved by the Board of Hilditch Pty Ltd on **29/12/2024** in its capacity as the principle governing body of Hilditch within the meaning of section 13 of the MS Act. The MSS has been signed by Patrick Hilditch, the Managing Director of Hilditch Pty Ltd on **29/12/2024**.

Patrick Hilditch

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