



DETMOLD HOLDINGS PTY LTD
Modern Slavery Act
Statement FY21



DETMOLD GROUP

Detpak



PAPERPAK™

**DETMOLD
PACKAGING**

**DETMOLD
Medical**



Modern Slavery Statement FY21

This statement sets out the actions taken by Detmold Holdings Pty Ltd (ACN 007 527 022) to address modern slavery in our business and supply chain for the 2021 financial year. The statement includes owned / controlled entities which form the “Detmold Group” headquartered in Adelaide, Australia.

The Company Secretary and the Directors of all the Detmold Group owned, or controlled entities were consulted during the development of this Modern Slavery Statement.

Our Position

Safeguarding human rights across our global supply chain and operations is an absolute commitment of the Detmold Group. Modern slavery is not acceptable within our business and supply chains.

Taking action to address and ultimately eliminate exploitation of people is our policy. This is even more so when these practices may be linked to our operations, either directly or indirectly. It is core to our business ethics and values.

We understand that clear steps are needed to address modern slavery and we take our responsibility to respect and promote human rights seriously. As such, the Detmold Group have outlined clear expectations and standards that our people and suppliers must follow.

Our Modern Slavery Statement FY21 formalises the actions that the Detmold Group is taking to identify and eliminate any risk of modern slavery within our supply chain and operations. It ensures we are fully compliant with all requirements, and stay true to our commitment.

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DETMOLD GROUP

- Sales
- Manufacturing & Sales



Our Structure, Operations and Supply Chains

Established in 1948, the Detmold Group is a privately owned Australian business. Head quartered in Adelaide, Australia, the Detmold Group operates across the globe to manufacture and supply some of the world's largest and most iconic food and retail brands with specialised board and paper packaging solutions.

In total, the Detmold Group produces over 22,000 different food and retail packaging products.

The Detmold Group employs approximately 3,000 people worldwide across seven manufacturing facilities and 15 sales entities.

Manufacturing operations are located in Australia, China, India, Indonesia, Vietnam and the Philippines. Manufacturing also operates out of South Africa, as a joint venture.

The Detmold Group encompasses the following brands:

- Detpak
- PaperPak
- Detmold Packaging
- Detmold Medical
- D&D
- Detmold Industrial
- Detmold Cartons

The Detmold Group works with up to 4,000 direct suppliers from 38 different countries around the world.

The Detmold Group employs approximately 3,000 people worldwide

Our Values

Our values shape what we do and how we do it; to drive success for the Detmold Group and ultimately deliver value to our stakeholders.



Focus: Concentrate on the key priorities which will make the business successful.



People: Demonstrate respect, integrity and loyalty to each other, our business & our community.



Passion/Persistence: Be relentless in driving forward to achieve our objectives and deliver success.



Performance: Take accountability for our own results whilst supporting others to achieve their best.



Leadership: Consistently demonstrate these Values & take responsibility for the impact of our own behaviours & actions.



Sustainability: Believing the foundations for tomorrow are built today and therefore strive to continuously improve.



FY21 Key Actions Taken

During FY21 the Detmold Group undertook:

- Three Sedex Members Ethical Trade Audits (SMETA), conducted at our manufacturing sites in Indonesia, Australia and Vietnam. Further SMETA's are due and scheduled in FY22 for the Philippines, China and India.
- Three Supplier Workplace Accountability (SWA) audits, conducted at our manufacturing sites in China, Indonesia, Australia and Vietnam.

All of these audits contain criteria to ensure that child or forced labour is not used at any of our facilities. These audits are conducted as part of our Global Commitment to Responsible Business Practices.

As committed in previous Modern Slavery Statements, the Detmold Group also undertook the following:

- All manufacturing operations have either had a SMETA conducted, or an audit has been scheduled.
- Revising our Business Code of Conduct to cover all forms of modern slavery, as defined in the legislation.
- Revising the current Pre-Qualification Process for strategic external material providers to include criteria specific to modern slavery in the Business Ethics section.
- Included compliance with modern slavery, along with other applicable legislation, in Detmold Group contracts and Purchase Order Terms & Conditions.
- Developed a Detmold Group **Statement of Commitment** for the prevention of modern slavery.
- Rolled out an **External Provider Code of Conduct** based on Detmold's Code of Business Conduct and Values that includes a commitment to not engaging in any form of modern slavery practice. This has commenced with strategic external material providers.
- Require all current "High Risk" and "Strategic" providers to sign and commit to Detmold's **External Provider Code of Conduct**.
- Utilised our "influence" with external providers that have greater ability to identify and report modern slavery red flags, in particular our labour hire providers and the financial institutions that we conduct business with.

Supplier Audit Program

The number of supplier audits were limited in FY21 due to impacts from COVID-19 which prevented travel to overseas supplier sites to conduct the audits.

However, supplier audits were conducted at the local country level in Australia, Vietnam, China, Philippines, Indonesia, and India.

In addition to these audits, we also requested that selected strategic suppliers undertake self-audits. There were 24 self-audits conducted by our strategic suppliers in FY21.

Assessment and Mitigation of Modern Slavery

The Detmold Group undertook rigorous assessment across sector, industry, country and suppliers. To ensure we were thorough and impartial, we engaged with external, specialised consultants to assess the potential risk of modern slavery within our operations and supply chain. This review utilised several published sources of known modern slavery risk, including:

- The 'Global Slavery Index' produced by Minderoo's 'Walk Free' Foundation
- The 'Modern Slavery Risk, Rights & Responsibilities – A Guide for Companies and Investors' commissioned by the Australian Council of Superannuation Investors (ACSI).
- The US Department of Labor's 'List of Goods Produced by Child Labor or Forced Labor'.
- The US Department of State's 'Trafficking in Persons Report – 20th Edition'.

We are very pleased to confirm that the risk of modern slavery within the Detmold Group manufacturing operations is believed to be low, due to regular auditing of the operations by the Detmold Group, customers, and independent auditors.

Since this assessment, there has been no substantive change in the Detmold Group operations and supply chains. We therefore remain on track in our pursuit to eliminate modern slavery. As such, this report incorporates the analysis of the Detmold Group operations and supply chains as outlined in the FY20 Modern Slavery Statement.

Identified Sector and Industry Risk

Analysing the Detmold Group's supply chain with reference to the ACSI 'Modern Slavery Risks, Rights & Responsibilities – A Guide for Companies and Investors' identified the following sectors as potential areas of risks for our "Corporate & Sales divisions":

- Branded and unbranded goods (including garments) not for re-sale utilised for Marketing or Cleaning.
- Transport and accommodation utilised by our people when they travel for work
- The manufacturer of the Information Technology equipment we use including computers and printers.
- Raw material extraction and the smelting of minerals utilised in the production of that Information Technology equipment.

The following sectors were identified as potential areas of supply chain risk for our "Manufacturing & Warehousing" operations:

- Security, maintenance and cleaning
- Asset and tenant Management
- Transportation: Ports, maritime freight and truck drivers
- Storage of Hazardous material
- Base skill processing labour
- Raw Materials: paper and card.



Country Risk

The Detmold Group's direct suppliers have been assessed for risk against globally recognised data sources, such as, the Walk Free Foundation's Global Slavery Index 2018 and the US Department of State "Trafficking in Persons report" 20th Edition.

These sources categorise countries as Tier 1, 2, 2 Watch List or 3 based on the following definitions.

TIER	DEFINITION
1	Countries whose governments fully meet the US Trafficking Victims Protection Act (TVPA) minimum standards for the elimination of trafficking.
2	Countries whose governments do not fully meet the TVPA's minimum standards but are making significant efforts to bring themselves into compliance with those standards.
2 Watch List	Countries whose governments do not fully meet the TVPA's minimum standbut are making significant efforts to bring themselves into compliance with those standards, and for which: <ul style="list-style-type: none"> a the estimated number of victims of severe forms of trafficking is very significant or is significantly increasing and the country is not taking proportional concrete actions; b there is a failure to provide evidence of increasing efforts to combat severe forms of trafficking in persons from the previous year, including increased investigations, prosecution, and convictions of trafficking crimes, increased assistance to victims, and decreasing evidence of complicity in severe forms of trafficking by government officials.
3	Countries whose governments do not fully meet the TVPA's minimum standards and are not making significant efforts to do so.

Source: US Department of State 'Trafficking in Persons Report' 20th Edition.

This analysis identified that the Detmold Group has direct suppliers across Tier 1, Tier 2, Tier 2 Watch List and Tier 3 countries.

TIER	NUMBER OF DIRECT SUPPLIERS	COUNTRIES IN WHICH SUPPLIERS ARE BASED
1	22	Australia, Austria, Belgium, Canada, Chile, Colombia, Czech Republic, Estonia, Finland, France, Israel, South Korea, Netherlands, New Zealand, Philippines, Singapore, Spain, Sweden, Switzerland, Taiwan, United Kingdom (UK) and the United States of America (USA).
2	12	Denmark, Egypt, Germany, India, Indonesia, Italy, Japan, Mexico, Poland, South Africa, Thailand and the United Arab Emirates (UAE).
2 Watch List	3	Hong Kong, Malaysia and Vietnam
3	2	China and Russia

It is our commitment to ensure suppliers from all countries will continue to be reviewed, in particular those from Tier 2 and 3.





Need to Remediate

We are pleased to confirm that as no modern slavery practices have been identified in our operations or supply chain to date, the Detmold Group have not had any need for remediation.

We do commit that if the Detmold Group were to uncover modern slavery practices in our supply chain or business operations, we will take action to cease any related activity and prevent our contribution to modern slavery practices. **Any impact detected will be remedied.**

The Detmold Group will also use our leverage to influence any entities causing a risk of modern slavery to take action and to consider our role in remedying any impact. If we are unable to exert due influence to have the entity cease the modern slavery practices, we will consider terminating the business relationship.

Assessing the Effectiveness of our Actions

The Detmold Group acknowledges the significant responsibility of our business to continue to respect and protect human rights and to act with due diligence to prevent the violation of these rights.

Actions to date have been effective, as no modern slavery practices have been identified in the SMETA, SWA and Ethical Sourcing audits of our operations.

However, we acknowledge that the actions we have taken to date have been primarily focussed on our own operations and not on our suppliers and extended supply chain.

Given the prevalence of modern slavery around the world, as highlighted by the 'Walk Free' Foundation, there is the possibility that modern slavery may be found in our supply chain as we increase efforts to identify and eliminate these practices.

The effectiveness of our actions in subsequent years will be determined by either the absence of modern slavery practices or by the speed at which any identified modern slavery practices are ceased and remedied.

The Detmold Group acknowledges the significant responsibility of our business to respect and protect human rights



Looking Forward

The Detmold Group is committed to strengthening our response to modern slavery across our operations and supply chains.

Upcoming actions include:

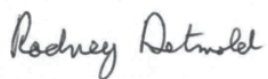
- Continuing to monitor our goods and service suppliers to drive improvements within our supply chain.
- Renew and re-audit our manufacturing sites through the SEDEX SMETA Program.
- Continue to educate key stakeholders on the identification of risk factors associated with modern slavery.
- Continue to educate our people on the Ethical Trading Initiative (ETI) Base Code.
- Investigate and, where possible, implement opportunities with our suppliers to assist in eradicating modern slavery within our supply chain.

We understand that clear steps are needed to address modern slavery and we take our responsibility to respect and promote human rights seriously

Statement Approval

This statement sets out the actions taken by Detmold Holdings.

This statement is prepared pursuant to Modern Slavery Act 2018 (Cth) and has been approved by the board of Detmold Holdings Pty Ltd on 13/12/2021.



Rodney Detmold

Director

Detmold Holdings Pty Ltd

13/12/2021

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ACN 007 527 022