



HOUSEHOLD PRODUCTS  
THAT ARE EFFICIENT AND  
QUALITY-TESTED TO HELP  
FAMILIES LIVE BETTER.

Pental Limited (“The Company”, “Pental”)

# Modern Slavery Act Statement 2022



This is Pental's third Statement made under the Australian Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2022 ("FY22"). Pental (including its 100% owned subsidiary Pental Products Pty Ltd) recognises the importance of protecting the human rights of all people impacted by its operations and supply chain and is committed to eradicating the risks of supporting or engaging with companies complicit in practices constituting modern slavery.

*Modern Slavery refers to situations where one person has taken another person's freedom-inclusive of the following exploitation behaviours:*

*Trafficking in persons, Slavery, Servitude, Forced Marriage, Forced labour, Debt bondage, Deceptive recruitment of labour & services, Child labour.*

## **About Pental, its Operations, and Supply Chains**

Pental is a trusted manufacturer and distributor of personal, household, and commercial products across Australia, New Zealand, and Asia, and an online retailer for luxury and gourmet gift hampers.

The company is based in Australia and has approximately 180 employees across all business functions.

The Company manages a portfolio of leading brands, which are household names in Australia and New Zealand - it is a branded market leader and the largest local manufacturer of bar soaps, liquid bleach, and firelighter cubes.

The Company also provides distributorship services to brands and products that are non-perishable and have a long shelf life.

For more than 60 years we have worked hard to stay true to our Australian heritage, investing in our manufacturing plant in Shepparton, Victoria.

Across Australia and New Zealand, Pental's products are stocked in all major grocery retailers and convenience stores that sell personal care and household cleaning products.

The Shepparton facilities comprise:

Manufacturing.

- Household Cleaning Liquids plant.
- Bar Soap plant.
- Laundry and Dishwashing Liquids plant.
- Firelighters plant.

Warehousing & Distribution Facility.

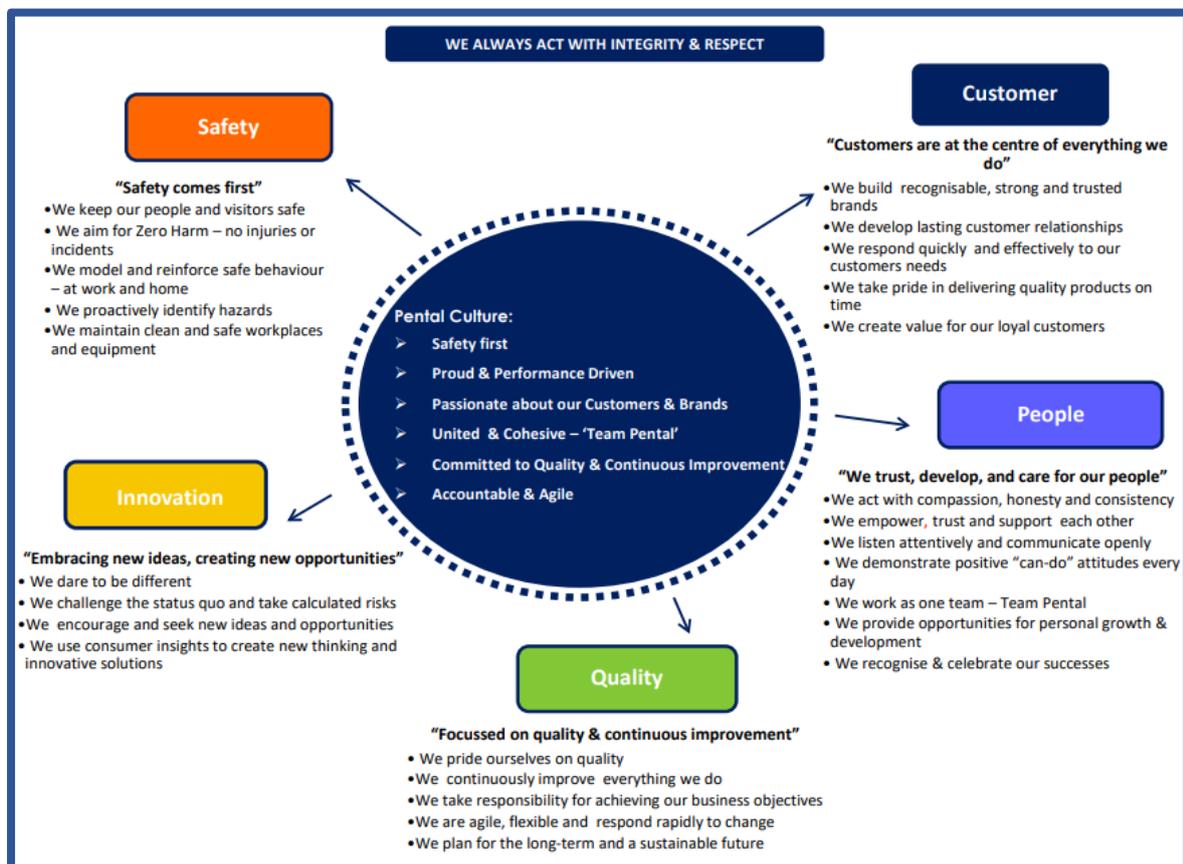
The Hampers with Bite online hamper gifting business has been part of the Pental portfolio since September 2021 aligning with Pental's Modern Slavery Statement.

Pental's supply chain across all business divisions consists of approximately 350 suppliers in FY22 who supplied various raw materials, services, and finished goods to the Company. These suppliers are located in the following regions:

- Australia.
- Asia (China, Malaysia, Singapore, South Korea, Thailand).
- Europe (UK, Germany, Netherlands).
- North America (USA).
- South America (Brazil)

We are committed to ensuring responsible, ethical, and sustainable engagement with our suppliers of materials and services. We believe that the key to a successful business is a collaborative approach with our suppliers, service providers, and customers

## Our Values.



## **Risks of Modern Slavery Practices**

Pental has not been made aware of any allegations of modern slavery activities against any of its suppliers during this reporting period.

## **Risk of Causing Modern Slavery Practices**

Pental considers the risk of it causing modern slavery practices (i.e., the risk of Pental's operations directly resulting in modern slavery practices) to be extremely low. Pental's operations are based in Australia and Pental actively complies with all applicable workplace health and safety laws, immigration laws, whistle-blower laws, and employment laws. Pental is not aware of any actions on its part which would cause modern slavery practices.

## **Supply Chain Risks**

Pental acknowledges that there is a risk of it indirectly contributing to modern slavery practices (i.e., the risk of Pental's operations and/or actions in its supply chain facilitating or incentivising modern slavery) through its supply chain.

Our long-term strategic relationships with key suppliers provide stability in our supply chain and procurement processes.

Pental has surveyed its suppliers identified as high risk, the process did not identify any modern slavery practices.

Pental has partnered with Sedex to provide even further oversight between Pental, its suppliers, and customers on responsible sourcing indicators.

## **Actions taken to assess and address the risks**

This statement outlines Pental's approach to ensuring our business has the framework and processes in place to identify potential Modern Slavery risks in our operations and Supply Chain.

## **Risk Assessment**

Pental completed a desktop risk assessment in line with annual supplier reviews across the Pental supplier base considering:

- The risk profile of individual countries based on the Global Slavery Index
- The presence of vulnerable demographic groups

These assessments assist in determining the Company's response and risk controls.

Pental has implemented a vendor approval process that includes a mandatory Modern Slavery Declaration to its core suppliers that were identified as being in high-risk

geographical regions. The vendor process has been extended in FY22 to include medium-risk core suppliers.

The objective of this exercise was to build awareness and understanding of the risks of modern slavery within the supply chain and develop commitment and compliance.

Using data collected from this survey in FY22, Pental monitors and refines policies and procedures further to mitigate the risk of modern slavery through supply chains.

## Assessing the Effectiveness of Pental Actions

Pental has focused on establishing a system of enhanced controls to monitor compliance with its policies, processes, and training.

The key activities that enable monitoring of the implementation of the modern slavery approach include:

Framework	Activity- Access, Mitigate, Remediate	Measurement- Monitor/Review & Report
Governance	Staff training	100% of the team trained
	Policy Reviews	All policy reviews are in line with the plan.
Monitoring	Internal Audits	Audit of Modern Slavery plan
Risk Management	Due diligence vendor questionnaires/compliance	100% of questionnaires returned and compliant
	Risk assessment	Measured % of risk assessments completed.
	Remediation	Timely remediation of non-conformances if/when identified.
Grievance Systems	Systems for grievances to be raised.	Awareness of channels and remedies for grievances to be raised.
		No cases requiring remediation



## COVID-19 pandemic

Pental is aware that many businesses have been affected by the COVID-19 pandemic, and that these impacts may have flow-on effects that may increase the level of vulnerability experienced by workers within these businesses. These considerations will be considered in the risk analysis process.

The COVID-19 pandemic also had an impact on various aspects of Pental's business. However, the activities undertaken by Pental with respect to assessing and the ongoing addressing the risks of modern slavery as set out in this statement have not been materially impacted by the pandemic.

## Policies and procedures

As a publicly listed company, Pental has sound experience in maintaining the highest standards of management surveillance and risk management. Pental has a strong and long-serving board and senior management team that is supported by an experienced compliance team.

Pental believes that a well-structured framework of policies and procedures, with sound management practices requiring high standards of compliance, creates a strong cultural foundation in which corrupt practices and the abuse of human rights will not flourish.

Pental operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- **Whistleblowing Policy** -

is provided to ensure business and operations are free from modern slavery risks, Pental has considered the Policy a key policy in identifying potential modern slavery risks in its supply chain.

The Policy provides Pental's people and suppliers with the confidence to talk freely about information that may have negative impacts on others. The Policy is part of Pental's commitment to ensure the systems, processes, and accountabilities are in place to fully support individuals who report wrongdoing or suspected wrongdoing, including with respect to matters relating to modern slavery.

We encourage all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.

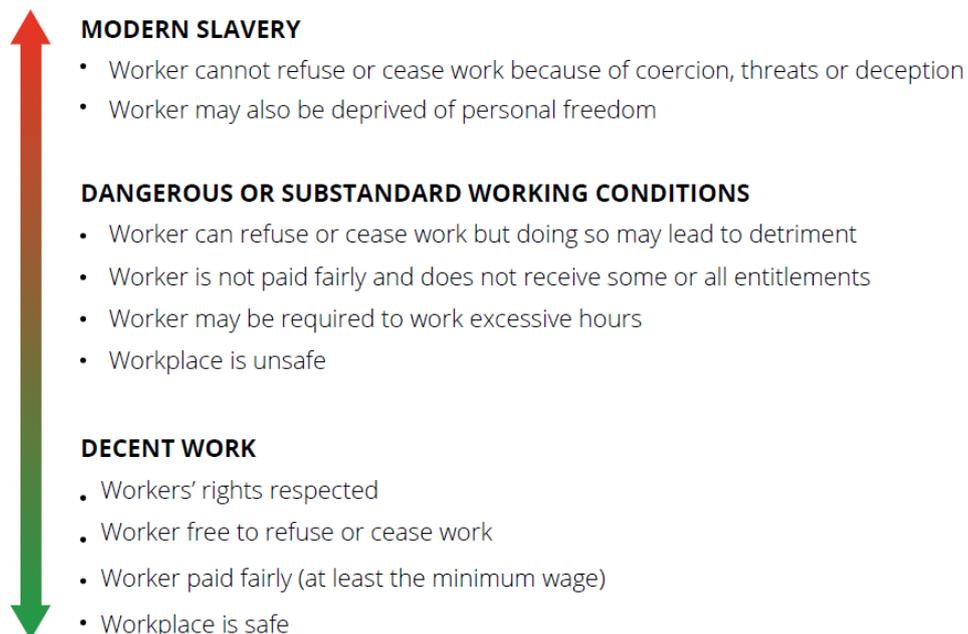
- **Code of Conduct** - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

- **Vendor Approval Process** – The Vendor Approval Process makes explicit reference to slavery and human trafficking.

Over the reporting period, the Hampers with Bite business were aligned to ensure compliance to all aspects of Pentals Modern Slavery policies and procedures.

The induction process has been updated to ensure all new employees across all understand our policies and procedures across all business streams.

## **Pental's Ethical Commitment - Decent Worker Rights**



Pental is committed to ethically conducting our business, requesting our business partners conduct their dealings with us in a fair, honest, and ethical manner. Pental has taken a zero-tolerance approach to modern slavery.

We establish a relationship of trust and integrity with all our suppliers.

Our supplier selection, procurement and supplier vendor assurance program includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety, environmental standards, and assurance that we do not engage directly or indirectly with slavery.

We ensure that we communicate respect for human rights, seeking suppliers to uphold these principles and we conduct due diligence to ensure that they have appropriate policies and procedures in place.

## Supplier Due Diligence program

Pental conducts due diligence on all new suppliers during onboarding/approval and on existing suppliers at regular intervals.

This includes:

*Assessing risks in the provision of supplies through supplier surveys.*

*Documentation and sign off by supplier stakeholders on modern slavery.*

### **We require all suppliers to attest that:**

- *They don't use any form of forced, compulsory, or slave labour.*
- *Their employees work voluntarily and are entitled to leave work.*
- *They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment.*
- *They don't require employees to post a deposit/bond and don't withhold their salaries for any reason.*
- *They don't require employees to surrender their passports or work permits as a condition of employment.*

## Performance Indicators

Pental periodically reviews suppliers to ensure they remain in line with our values and modern slavery laws.

## Awareness

Pental has raised awareness of modern slavery issues by the distribution of bulletins across our facilities specifically focussed on modern slavery.

Bulletin Coverage:

- Our commitment to the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery.

Pental employees know that they have a role to play in the integrity of our supply chains and they all receive and have access to relevant policies. All employees are made aware of our whistleblowing policy, and we encourage and support all of our employees to identify any suspected misconduct, including violations of labour laws or unethical labour practices.

## Training

In addition to the awareness program, Pental has partnered with an e-learning course provider to roll out Modern Slavery and Whistle Blower rights and Protection training for all staff annually.

## Remediation

In the event that slavery, human trafficking, or child labour is suspected or discovered in any part of our supply chain, the Supply Chain General Manager, and our Compliance Manager, and/or our Managing Director will open discussions with the affected vendor so that a remediation plan can be created.

## Additional Information.

### Community Support

The Pental business supports a number of disadvantaged communities, connecting them with goods to assist:

Mooroopna Park Primary School. The students predominantly come from a low-socioeconomic background and are ranked as being in the top 3% of the most disadvantaged schools in Australia.

Two East Timor girls' orphanages- *Venilale and Laga*.

Church Hygiene Goods Donations- Uniting Church Shepparton disadvantaged families.

The hamper gifting business unit donates a meal for vulnerable children in Uganda as part of their partnership with the House of Hope. An Australian charity that provides meals and education to children in need. Every hamper purchased provides a donated meal. Over 200,000 meals were donated over FY22.

## Corporate Governance

Pental will continue to review our policies and procedures to ensure that we have sound governance processes in place to meet our modern slavery compliance requirements. Pental will conduct reviews of policies to ensure the inclusion of modern slavery clauses to increase employee awareness of the risks of modern slavery in our business and our supply chain.

## Approval of this Statement

Pental Limited is managed by a senior management team. This statement was prepared in consultation and input from managers responsible for Pental's operations, supply chain, and procurement. This statement was circulated to relevant members of the management team prior to board approval.

This statement was approved by the Board of Directors of Pental Ltd. on the 15 December 2022 and has been approved and signed by the Managing Director as the responsible executive of Pental.

**Signature:**



**Date:** 16/12/2022