

A woman wearing a white hard hat with the DGL logo, safety glasses, and a high-visibility vest is looking at a tablet. The background is a warehouse with orange shelving. The image is framed by a white diagonal shape in the top right and a red diagonal shape in the bottom left.

DGL

MODERN SLAVERY STATEMENT

2024

DGL GROUP LIMITED

ABN: 71 002 082 646

on behalf of the DGL Group, including

DGL Warehousing & Distribution Pty Ltd

dglgroup.com

About DGL Group Limited's Modern Slavery Statement FY24

This statement has been prepared in accordance with the reporting requirements of Australia's *Modern Slavery Act 2018* (Cth) (**MS Act**) and associated guidelines. It describes the steps taken by the DGL Group during the financial year ending 30 June 2024 to assess and address the risk of modern slavery in its operations and supply chains.

This statement is submitted by DGL Group Limited as a joint modern slavery statement on behalf of all entities within the DGL Group (**Statement**).

For the purposes of the MS Act, the reporting entities covered by this Statement are DGL Group Limited and DGL Warehousing & Distribution Pty Ltd. DGL Group Ltd is a public company listed on the ASX which has effective ownership and control of all entities in the DGL Group (**Controlled Entities**).

As DGL Group's consolidated annual revenue exceeded \$100M in FY24, DGL Group Limited is a reporting entity under s.5 of the MS Act. DGL Warehousing & Distribution Pty Ltd, a private company and Controlled Entity, is also a reporting entity for FY24 because its standalone revenue was greater than \$100M in that reporting period.

In this Statement, 'DGL Group' means DGL Group Limited and its Controlled Entities, including DGL Warehousing & Distribution Pty Ltd.

Further details about DGL Group Limited, DGL Warehousing & Distribution Pty Ltd and the Controlled Entities in the DGL Group are included in Appendix 1. More information on the DGL Group can also be found on our website: www.dglgroup.com.

1. Introduction

DGL Group acknowledges that we are active members of a global community in which, sadly, serious human rights abuses of the most vulnerable occur. We take pride in the many ways that DGL Group supports our diverse and dynamic customer base across multiple industries, ensuring that our clients and stakeholders can and do rely on DGL Group to act responsibly in managing dangerous goods and in all aspects of our operations. This commitment extends to identifying, assessing, addressing, and striving to eliminate the risks of modern slavery from our operations and supply chains.

Modern slavery takes many forms,¹ exists in supply chains, across multiple industries worldwide, including in Australia and New Zealand, where DGL Group operates. No modern slavery incidents were detected within the DGL Group in FY24, but we accept that DGL Group's management of our modern slavery risks is maturing. We are committed to continuous improvement, ensuring that our people are equipped to identify potential modern slavery risks, and feel empowered and encouraged to raise their concerns without hesitation, enabling us to take swift and effective action.

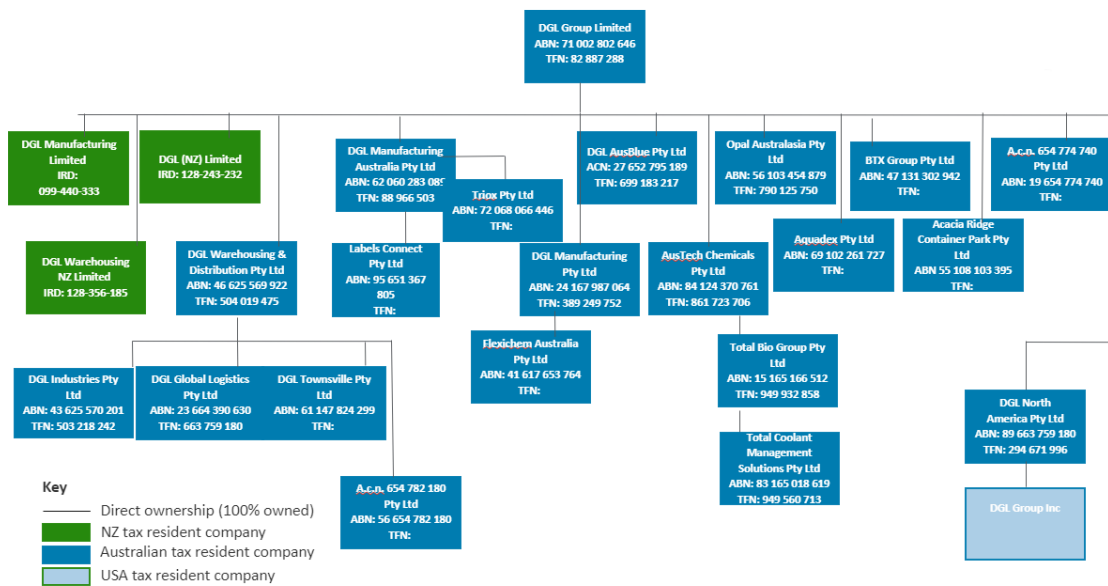
¹ As per the *Modern Slavery Act 2018* (Cth) references to 'modern slavery' in this Statement mean trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour and occurs where coercion, threats, or deception are used to exploit victims and undermine their freedom

2. DGL Group's Structure, Operations, and Supply Chains

2.1 DGL Group's Structure

DGL Group Limited is a public company listed on the ASX. It controls the DGL Group². The DGL Group operates as a diversified industrial group with three distinct segments: Warehousing and Distribution, Chemical Manufacturing, and Environmental Solutions. The functions of each segment of the DGL Group are described below (2.2.1, 2.2.2 and 2.2.3).

At the conclusion of FY24, DGL Group's structure was as follows:



2.1.1 Employees and Location

In FY24 DGL Group employed approximately 800 employees in Australia and operated from more than 70 sites in Australia and New Zealand.³

2.2 DGL Group's Operations

DGL Group's operations are conducted across three segments, each of which is a total product management business unit, aiming to free clients from resource-intensive back-end processes. DGL Group serves more than 5,000 customers based in Australia, New Zealand, and internationally, from a wide range of industries including: agriculture, water treatment, mining, construction, automotive, food, pharmaceutical, lead smelters, plastic recyclers, galvanizers, manufacturing, home and garden, and chemical companies.

2.2.1 DGL Group's Chemical Manufacturing segment

² See Appendix 1 for identifying information on DGL Group (DGL Group Limited and its Controlled Entities).

³ See Appendix 1 for further detail

DGL's Chemical Manufacturing segment provides materials and formulations to a range of industries, and supplies products to end-user consumer and industrial companies. Related services include procurement, full-service formulation and packing services, formulation development and contract manufacturing.

2.2.2 DGL Group's Logistics (Warehousing and Distribution) segment

DGL's Logistics segment offers transport, logistics and warehousing services and is focused on hazardous goods across Australia and New Zealand. Key components include freight forwarding, inventory management, warehousing, and transport.

2.2.3 DGL Group's Environmental Solutions segment

DGL's Environmental Solutions segment undertakes resource recovery and hazardous waste management activities. Its core activities comprise liquid waste treatment, end-of-life lead acid batteries (ULAB) recycling and lead smelting.

2.2.4 DGL's Supplier Relationships and Business Partnerships:

DGL Group maintains a diverse network of suppliers, with relationships varying in nature from short-term to long-term, depending on the specific requirements of our operations. In addition to DGL Group's supplier network, DGL Group collaborates with partners and other business entities to enhance our capabilities and offerings.

2.3 DGL Group's Supply Chains

DGL Group's supply chains form an integral role in our business operations and include the sourcing and procurement of goods and services for our customers and to meet our own requirements for the formulation and manufacturing of a range of potentially dangerous and reactive chemicals, for the warehousing and distribution of these chemicals within a highly licensed transport and warehouse network, and for disposal or recycling required to safely manage the full life cycle of these products.

2.3.1 Goods procured by DGL Group

Goods for resale sourced by DGL Group include chemicals, ingredients, and raw materials such as emulsifiers, minerals, antioxidants, phosphates, acids, fertilisers, salts, solvents, plasticisers and scrap metal. These goods are sourced from manufacturers and distributors in Australia, New Zealand, Germany, China, South Korea, Japan, Indonesia, Malaysia, India, Thailand, and Vietnam.

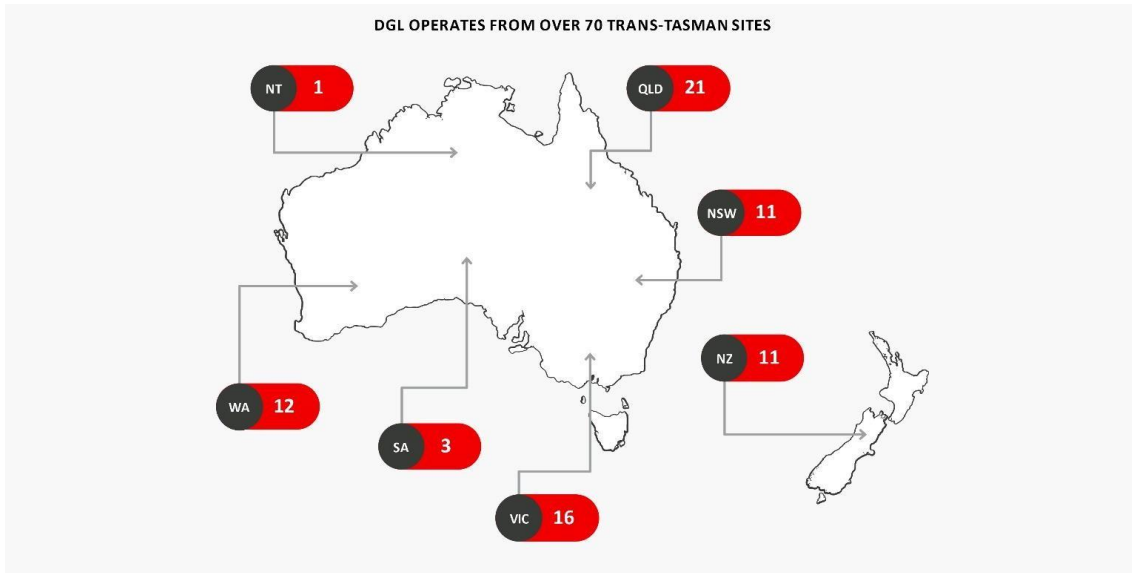
Goods consumed by DGL Group include minerals, salts, IT equipment, tools, machinery, packaging, office supplies and uniforms. These goods are sourced from manufacturers and distributors in Australia, New Zealand, Italy, South Korea, China, and India.

2.3.2 Services procured by DGL Group

Services procured by DGL Group for our clients include transport logistics sourced from service providers in Australia, New Zealand, Switzerland, Italy, Denmark, France, China, Germany, Taiwan, Japan, South Korea, Israel, and Singapore.

Services procured by DGL Group for our own operational needs include transport logistics sourced from service providers in Australia, New Zealand, Switzerland, Italy, Denmark, France, China, Germany, Taiwan, Japan, South Korea, Israel, and Singapore.

2.3.3 Geographic regions



3. Modern Slavery Risks in DGL Group's Operations and Supply Chains

3.1 DGL Group's Operations

The risks identified by the DGL Group in its operations following its modern slavery risk assessment for FY24 are set out below. Broadly, the risk of modern slavery in DGL Group's operations is assessed to be low.

1. General assessment of the risk landscape.

DGL Group's operations and workforce are based in Australia and New Zealand. Walk Free's 2023 estimates that Australia has the lowest rates of modern slavery in the Asia Pacific region and New Zealand's rates are only slightly higher (although Japan has a lower rate per 1,000 of population).⁴ Walk Free's 2023 estimates also indicate Australia has taken the most action to combat modern slavery in the Asia-Pacific region in the period.

2. Specific modern slavery risks.

⁴ Walk Free, *The Global Slavery Index 2023*

The greatest areas of vulnerability, risk, and uncertainty in DGL Group's operations were identified and assessed to be those arising from:

- outsourced services and use of labour hire contractors;
- procurement of materials from higher-risk geographical regions, including China, Indonesia and Vietnam; and
- limited information provided to the DGL Group in response to supplier modern slavery questionnaires provided to suppliers in higher-risk geographical regions;
- difficulty in auditing or inspecting supplier's sites in higher-risk geographical regions given distance.

3.2 Assessment of modern slavery risks: DGL Group's Supply Chains

The risks identified by the DGL Group in its supply chains following its modern slavery risk assessment for FY24 are set out below. DGL Group recognises that we may have exposure to the risk of modern slavery practices through our supply chains.

The modern slavery risk factors that DGL Group has identified in its supply chains are:

- Geographical risks associated with the location of some of our suppliers and where we source certain goods or services, including China, Vietnam, India and Indonesia;
- Reliance on information provided by direct suppliers in relation to their upstream supply channels, particularly in higher-risk geographical regions.
- DGL Group notes that it does not currently import higher-risk products identified in the Walk 2023 Global Slavery Index such as electronics, fish, garments, solar panels or textiles.

Our supply chains include greater geographical breadth than do our operations. They extend to: Italy, South Korea, China, India, Thailand, Vietnam, Indonesia, Switzerland, Denmark, France, Germany, Taiwan, Japan, South Korea, Israel, and Singapore. Due to this diversity and the associated complexity in our supply chains and the limitations on our direct oversight of working conditions within our supply chains, DGL Group's risk of exposure to modern slavery within supply chains has been assessed to be greater than those which apply in DGL Group's operations in FY24.

4. Actions taken by DGL Group to address identified modern slavery risks.

During FY24 all members of the DGL Group have supported DGL Group's group-wide focus on developing our systems and processes to identify, prevent, mitigate and remedy actual or potential adverse human rights impacts, including that DGL Group has:

- Applied our established risk management strategy to assessment of the risks of modern slavery in our operations and supply chains.
- Monitored CENTRL's Modern Slavery Act Compliance Platform (MSA360) (implemented in FY23) to allow the continued assessment and management of risks within internal operations and with suppliers.

- Further reviewed our supplier evaluation process to make this uniform across the DGL Group.
- Continued to maintain key governance documents aimed at assessing and addressing modern slavery risks, including:
 - our Modern Slavery Policy; and
 - Code of Conduct; and
 - Whistleblower Policy.

each of which can be found on our website at <https://www.dglinvestors.com/Investor-Centre/>.

Our corporate governance documents aim to create transparency and accountability for addressing modern slavery and human rights issues within our workforce, but also apply to our consultants, agents, contractors, and suppliers, who are expected to respect and comply with our corporate governance documents.

- Retained a central focus on the provision of a safe and inclusive workplace for all employees.
- Continued to apply equitable and transparent remuneration, comply with applicable laws in relation to wages, working conditions and the rights of workers to be represented collectively, did not employ forced, bonded or child labour, applied regular measures to mitigate the risks of modern slavery and labour exploitation, did not hold original copies of any employee's passport, engaged reputable recruitment agencies with ethical recruitment practices, completed work rights and skills checks and provided all employees with written employment contracts setting out terms and conditions.
- Standardised employee on-boarding processes across the group, including working rights checks and minimum age checks.
- Continued to communicate DGL Group's approach to eliminating modern slavery risks to all workers and suppliers at, or prior to the time of hire, onboarding, or other initiation of the relationship and periodically reinforce this approach.
- Provided key suppliers identified to have a high potential for risk with our Modern Slavery Policy, and advised them of our expectations and goals related to acting ethically in the marketplace, behaving with integrity with respect to all workers, and providing transparency to stakeholders.
- Provided a questionnaire to key suppliers, identified to have a high potential for risk.
- Included in our reporting procedure prompts whether an incident, including a complaint, has human rights implications and identified the specific human rights the incident may have impacted, including through introduction of a targeted questionnaire relating to labour rights and modern slavery.
- Established and allocated responsibility for the management of DGL Group's obligations in relation to modern slavery.

- Reviewed and developed frameworks and policies to clearly outline the processes DGL Group will implement to address modern slavery risks and clarify our expectations for employee responses where concerns or red flags in relation to modern slavery are identified or raised. This includes maintaining the DGL Group risk register where modern slavery risks are recorded, reported on and escalated in accordance with our risk management strategy, as well as the DGL Group modern slavery policy.
- Developed our processes for greater direct engagement with our suppliers in relation to modern slavery, including screening and qualification to aid supplier evaluation and the communication of clear expectations.
- Considered the need for a broader human rights strategy to be developed and adopted by DGL Group, aligned with our approach to modern slavery. Human rights risks, including labour rights, health and safety, equality, and discrimination, have been identified as issues which would fall within this strategy.
- Committed to greater ongoing stakeholder engagement to ensure that DGL's approaches to modern slavery risks are consistent with stakeholder values.
- Via the Board, DGL Group has committed to transparency in our approach to addressing modern slavery risks and implementing actions and policies to mitigate these risks and move beyond compliance.

5. Effectiveness of DGL Group's assessment and action on modern slavery risks

DGL Group monitors and assesses the effectiveness of the actions taken to assess and address modern slavery risks in a number of ways. This includes:

- Monitoring the response rate for questionnaires issued to DGL Group's suppliers to identify actions that could be taken to improve our hit rate (e.g. distributing questionnaires to more targeted supplier contacts, that is the appropriate sales or procurement contact of the supplier); and
- Monitoring the outcome of visits to select suppliers and audits of select supplier processes and methodologies, conducted to assess whether instances of non-compliance with anti-modern slavery standards is increasing or decreasing, with findings reviewed and corrective actions implemented as needed.
- Enabling relevant personnel in key functional roles to identify potential risks and warning signs in order to respond effectively.
- Undertaking evaluations of its operations across logistics and warehousing to identify potential modern slavery risks, to assess whether the occurrence of potential modern slavery risks is increasing or decreasing.
- Monitoring working conditions in warehouses and manufacturing sites to ensure compliance with Australian workplace health and safety standards and internally reporting on any trends in incidents.

6. Consultation with members of the DGL Group.

DGL Group is committed to ensuring that the actions we take are appropriate to and consistent across all entities in the DGL Group. To support this commitment, DGL Group has established centralised support functions that are accessible to each of the divisions and have taken the interests of each entity into account in preparing this Statement. Therefore, the needs of each of DGL's divisions have been closely considered during with whom we have engaged and consulted in the development of this Statement.

7. Additional information

DGL Group recognises that preventing and addressing modern slavery risks in our operations and supply chains requires an ongoing commitment to minimise the risks and continuously improve our approach. During FY25, DGL's aims include:

- Establishment of a Modern Slavery Training platform, accessible by all members of the DGL Group.
- Review all supplier contracts amongst the Group.

8. Principal Governing Body Approval

This Statement is made by DGL Group, including DGL Group Limited and DGL Warehousing & Distribution Pty Ltd, and was approved by DGL Group Limited's Board in their capacity as the principal governing body of the DGL Group, on 20 December 2024.

9. Signature of Responsible Members

This Statement is signed by Mr. Tim Hosking, in his role as Chair and Non-Executive Director of the Board of Directors, DGL Group Limited, on 20 December 2024.



Timothy Hosking

Chair, Board of Directors, DGL Group Limited

Appendix 1

DGL Group's reporting entities for this Statement and FY24			
Name of Entity	ABN/ACN	Location of registered office	Description
DGL Group Limited	ABN 71 002 802 646	Level 1 80 George Street, Parramatta NSW 2150	<p>DGL Group Ltd is an Australian public company listed on the Australian Securities Exchange (ASX: DGL) which controls the DGL Group, including the entities listed below and DGL Warehousing & Distribution Pty Ltd.</p> <p>DGL Group's consolidated annual revenue for FY24 exceeded \$100M.</p> <p>DGL Group Ltd is therefore a reporting entity under the MS Act.</p>
DGL Warehousing & Distribution Pty Ltd	ABN 46 625 569 922	Level 1 80 George Street, Parramatta NSW 2150	<p>DGL Warehousing & Distribution Pty Ltd, is an Australian private company and a member of the DGL Group, controlled by DGL Group Ltd.</p> <p>In FY24 as a standalone entity, DGL Warehousing & Distribution Pty Ltd exceeded \$100M and is therefore a reporting entity under the MS Act.</p>

Australian entities owned or controlled by DGL Group Limited in FY24:				
Name of Entity	ABN/ACN	Description of ownership	Location of registered office	Number of employees
DGL Group Ltd	ABN: 71002802646	Publicly listed on the ASX	Level 1 80 George Street, Parramatta NSW 2150	100
DGL Warehousing & Distribution Pty Ltd	ABN: 46 625 569 922	Wholly owned by DGL Group Limited	Level 1 80 George Street, Parramatta NSW 2150	325
DGL Industries Pty Ltd	ABN: 43 625 570 201	Wholly owned by DGL Warehousing & Distribution Pty Ltd	Level 1 80 George Street, Parramatta NSW 2150	No employees

Australian entities owned or controlled by DGL Group Limited in FY24:				
Name of Entity	ABN/ACN	Description of ownership	Location of registered office	Number of employees
DGL Global Logistics Pty Ltd	ABN: 23 664 390 630	Wholly owned by DGL Warehousing & Distribution Pty Ltd	Level 1 80 George Street, Parramatta NSW 2150	11
DGL Townsville Pty Ltd (formerly NLW Group Pty Ltd)	ABN: 61 147 824 299	Wholly owned by DGL Warehousing & Distribution Pty Ltd	Level 1 80 George Street, Parramatta NSW 2150	10
DGL Manufacturing Australia Pty Ltd	ABN: 62 060 283 089	Wholly owned by DGL Group Limited	Level 1 80 George Street, Parramatta NSW 2150	112
Triox Pty Ltd	ABN: 72 068 066 446	Wholly owned by DGL Manufacturing Australia Pty Ltd	Level 1 80 George Street, Parramatta NSW 2150	9
Labels Connect Pty Ltd	ABN: 95 651 367 805	Wholly owned by DGL Manufacturing Australia Pty Ltd	Level 1 80 George Street, Parramatta NSW 2150	9
DGL AusBlue Pty Ltd	ABN: 27 652 795 189	Wholly owned by DGL Group Limited	Level 1 80 George Street, Parramatta NSW 2150	13
DGL Manufacturing Pty Ltd	ABN: 24 167 987 064	Wholly owned by DGL Group Limited	Level 1 80 George Street, Parramatta NSW 2150	77
Flexichem Australia Pty Ltd	ABN: 41 617 653 764	Wholly owned by DGL Manufacturing Pty Ltd	Level 1 80 George Street, Parramatta NSW 2150	12
AusTech Chemicals Pty Ltd	ABN: 84 124 370 761	Wholly owned by DGL Group Limited	Level 1 80 George Street, Parramatta NSW 2150	42
Total Bio Group Pty Ltd	ABN: 15 165 166 512	Wholly owned by AusTech Chemicals Pty Ltd	Level 1 80 George Street, Parramatta NSW 2150	No employees
Total Coolant Management	ABN: 83 165 018 619	Wholly owned by AusTech Chemicals Pty Ltd	Level 1 80 George Street, Parramatta NSW 2150	No employees

Australian entities owned or controlled by DGL Group Limited in FY24:				
Name of Entity	ABN/ACN	Description of ownership	Location of registered office	Number of employees
Opal Australasia Pty Ltd	ABN: 56 103 454 879	Wholly owned by DGL Group Limited	Level 1 80 George Street, Parramatta NSW 2150	13
Aquadex Pty Ltd	ABN: 69 102 261 727	Wholly owned by DGL Group Limited	Level 1 80 George Street, Parramatta NSW 2150	17
BTX Group Pty Ltd	ABN: 47 131 302 942	Wholly owned by DGL Group Limited	Level 1 80 George Street, Parramatta NSW 2150	No employees
Acacia Ridge Container Park Pty Ltd	ABN: 55 108 103 395	Wholly owned by DGL Group Limited	Level 1 80 George Street, Parramatta NSW 2150	24
A.c.n 654 782 180 Pty Ltd	ABN: 56 654 782 180	Wholly owned by DGL Warehousing & Distribution	Level 1 80 George Street, Parramatta NSW 2150	No employees
A.c.n 654 774 740 Pty Ltd	ABN: 19 654 774 740	Wholly owned by DGL Group Limited	Level 1 80 George Street, Parramatta NSW 2150	No employees

Appendix 2

This table identifies where each of the seven mandatory reporting criteria under the MS Act is addressed by DGL Group in this Statement.

Seven Mandatory Criteria under the MS Act	Section of this Statement in which the criterion is addressed
Identify reporting entities.	About this Modern Slavery Statement Introduction Appendix 1
Describe the reporting entities' structure, operations, and supply chains.	About this Modern Slavery Statement Section 2 Appendix 1
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entities and any entities it owns or controls.	Section 3
Describe the actions taken by the reporting entities and any entity that the reporting entities own or control, to assess and address those risks, including due diligence and remediation processes.	Section 4
Describe how the reporting entities assess the effectiveness of such actions.	Section 5
Describe the process of consultation with (i) any entities the reporting entities own or control; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.	Section 6
Include any other information that the reporting entities consider relevant.	Section 7