



Modern Slavery Statement

ASCC Group of Companies

Joint Statement for Financial Year 2022



Document Summary

This statement, made on behalf of the business entities known as the ASCC Group of Companies, outlines our commitment and methodologies as used in identifying and addressing any modern slavery risks within our supply chain and operations, including those of the entities we control as located in other countries. Each section addresses the mandatory reporting criteria of the Modern Slavery Act, (Commonwealth) 2018 as listed in the table of contents below, and includes any actions taken during the financial reporting year period which ended on 30th June 2022. As a Group of Companies, ASCC opposes all forms of human rights abuses, and we pride ourselves on strict adherence to the highest ethical standards and compliance.

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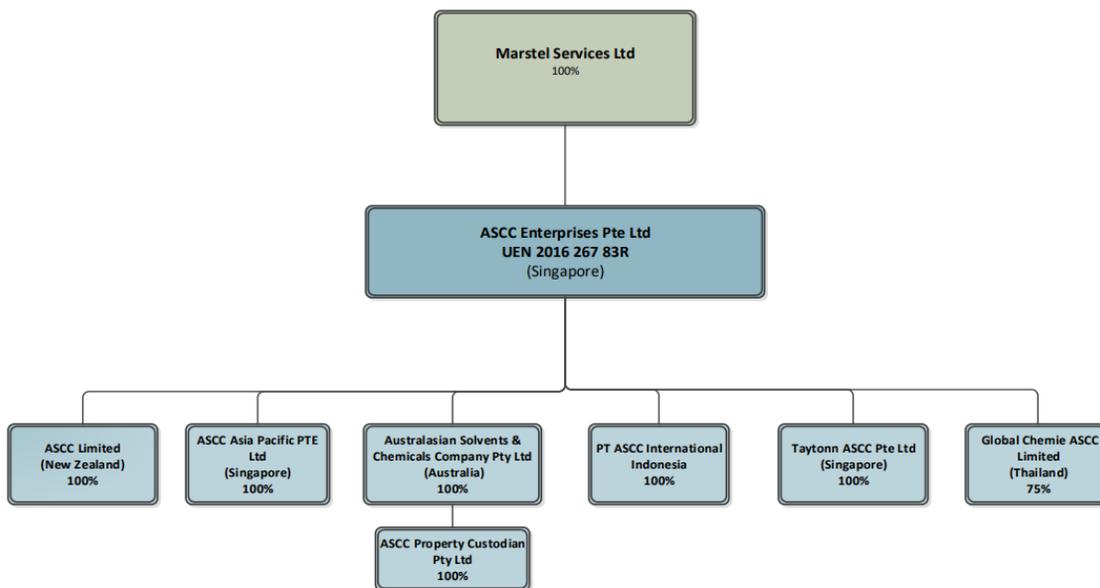
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Introduction to the ASCC Group of Companies

Australasian Solvents & Chemicals Company Pty Ltd (ASCC), which operates under Australian Business Number (ABN) 57 095 441 080, is a privately owned and operated chemical distribution business first founded back in 1997 as Solchem Pty Ltd. The company, which is the originating business of the ASCC Group, provides a wide range of raw materials to a diverse customer base which are predominantly involved in the manufacturing sector. Since 2016, the ASCC Group now includes operations across the Asia Pacific Region with offices in Brisbane, Australia, Auckland in New Zealand, Singapore and Indonesia, along with owning a majority shareholding in Global Chemie, a chemical distribution business based in Thailand. As of July 2019, ASCC also owns and operates a bulk chemical storage site, formerly owned by Stolthaven Australia, located in Altona, Melbourne. The entire group of companies employs approximately 155 personnel across all of the aforementioned locations.

ASCC Group Structure



Overview of the ASCC Group

With its origins in Australia, Australasian Solvents and Chemical Company Pty Ltd (ASCC) is part of a larger group of six companies, which all operate under a parent company of ASCC Enterprises Pte Ltd, as based in Singapore. The 100% shareholder of the Singapore based parent company is Marstel Services Ltd of New Zealand. This Statement is made on behalf of the entire ASCC Group of Companies and is made as a joint statement regarding our entire operations.

The ASCC Group of Companies consists of the following business entities.

1. Australasian Solvents and Chemicals Company Pty Ltd (*Australia*)
2. ASCC Ltd (*New Zealand*)
3. ASCC Asia Pacific Pte Ltd (*Singapore*)
4. PT ASCC International (*Indonesia*)
5. Taytonn ASCC Pte Ltd (*Singapore*)
6. Global Chemie ASCC Ltd (*75% shareholding, based in Thailand*)

Our Operations

The ASCC Group of Companies are a raw chemical and materials distribution network located across Asia-Pacific which has no interest in, or ownership of, any actual manufacturing operations. The materials we distribute are predominantly sourced from chemical producers based in Asian countries such as South Korea, Taiwan, Singapore and China, with a smaller portfolio of products sourced from the USA and Europe. In a significant change this year, the ASCC Group engaged a Group Purchasing Manager based in Shanghai, China in a move designed to ensure greater connection to our supply sources located within the region. This appointment has led to better communications and more efficient procurement processes for the group. The person employed in this position has been trained and is well informed about the risks and seriousness of Modern Slavery practices and thereby ensures our Supplier Evaluation Processes, which are described in greater detail later within this document, are strictly adhered to. This process has oversight as provided by our Group Strategic Director, who is responsible for all Supply Chain and Procurement activities of the entire group.



Global Chemie ASCC Ltd, Office & Terminal Facility located at Bangpoo, Thailand

Our Supply Chains

While our supply chains are relatively complex, they rely in most cases on external, third-party suppliers who provide shipping, logistics, warehousing and storage. Each of our regional business entities source products from multiple suppliers from various regions. However, our higher volume distribution agreements are generally with larger, more well-known producers, and these are managed in a centralised model, with all procurement activities and supplier agreements overseen by our Group Strategic Director from our Australian head office located in Brisbane, Australia. Our 2022 Modern Slavery Statement was devised in consultation with our Strategic Director, along with each of our regional Purchasing staff and General Managers who are accountable for our business activities in each country of operation.



Our Identifiable Risks, Actions and Controls to Mitigate

As the ASCC Group of Companies are a materials distributor and not a direct manufacturer, we are somewhat limited in our ability to control how our suppliers treat their employees, contractors, and their suppliers, aside from requesting their agreement to comply to our supplier related policies.

To strengthen our ability to adequately assess our supplier base, ASCC has partnered with Ecovadis, the world's largest and most trusted provider of business sustainability ratings for global supply chains. The criteria used by Ecovadis covers four categories including environment, labour and human rights, ethics and sustainable procurement. They follow verifiable international Corporate Social Responsibility standards including Global Company Principles, International Labour Organisation conventions, the Global Reporting Initiative Standard and ISO 26000. ASCC also partners with Avetta, a supply chain compliance solution for organisations who need assurance that their service providers conform to industry Health, Safety & Environment standards.



ASCC Australia Terminal Facility as located in Altona, Victoria

Aside from the above actions, ASCC has always aimed to only partner with reputable companies who have adopted the highest ethical and legal standards. Senior representatives from our company visit the manufacturing sites of our supply partners and therefore view first-hand the working conditions of their employees. The global COVID-19 pandemic obviously made this practice difficult, so during 2021, in order to bolster our overall due diligence processes, we reviewed and updated our **Supplier Evaluation Assessment form**, which is a comprehensive questionnaire requesting all potential suppliers and contractors responses to a series of questions regarding their operations, and additionally requests written confirmation that the company complies with all regulatory and legislative requirements at all times, including compliance with local employment laws. Furthermore, we request that the supplier has systems and processes in place to eliminate the risks as covered under the Modern Slavery Act. Additionally, we request that the supplier notify ASCC of any breach with regards to compliance with legislation and regulations, immediately upon recognition.

Our Evaluation of the Effectiveness of our Actions

Since implementation of the updated supplier assessment, the ASCC Group of Companies is satisfied that we only source products and services with reputable organisations who share our values with regards to slave or bonded labour. These assessments of effectiveness are made between our Group Strategic Director, who has jurisdiction for all procurement activities globally, in collaboration with each our Regional Directors and Country General Managers.

In general, the suppliers that the ASCC Group partner with are known to be reputable, ethical and are generally very well-known brands with a global presence, that operate under strict governance and compliance due to the highly regulated nature of petrochemical manufacturing.

Our well-established (Tier 1 & 2) suppliers include notable companies and brand names.

- ✓ **ExxonMobil Chemical Company (Singapore/Europe/USA)**
- ✓ **Eternal Chemical Company (Taiwan)**
- ✓ **Hanwha Total Chemical (South Korea)**
- ✓ **Nan Ya (South Korea)**
- ✓ **S-Oil (South Korea)**
- ✓ **Savita (India)**

Therefore, in summary the ASCC Group as a collective purchaser of chemical raw materials, are satisfied that we do not trade with any suppliers who fail to comply with the policies we have in place that cover human rights and the dignified treatment of people.

While we are aware that the travel sector is an industry considered at higher risk of modern slavery practices, and we acknowledge that we frequently have personnel travelling for the purpose of conducting business, we only ever utilise well-known hotel chains, airlines and travel agencies.

The only other potential risks which we had previously identified, is our occasional sourcing of lower dollar value marketing items and company branded uniforms, as it is known that the clothing and textile industry is at higher risk of modern slavery practices. In response to this, we requested our supplier of uniforms, clothing and marketing items to also complete our Supplier Evaluation form and they responded by advising that they take corporate social responsibility very seriously, and as part of their indent/offshore production of work uniforms program, independent audits are conducted by SGS within their supply chain. ASCC is therefore satisfied that this less frequent trading transaction by our business is also free from support of any forced labour, child labour or any other form of modern slavery practices.

The ASCC Group Consultation Process

This statement was prepared in consultation with our Board of Directors, including our Strategic Director, whose remit includes the procurement and sourcing of all distributed products, along with our Executive Director and all key stakeholders who are involved in our supply chain, logistics, operations and material sourcing, as these personnel are best positioned to support the delivery of our commitment to eliminate Modern Slavery risks from our entire supply chains.

Our Vision, Mission & Values

Our Vision statement declares, “**We Exist to Enhance Lives.**” Whether it be our employees, their families, the people employed by our customers, our shareholders or those living within the communities in which we operate, our major priority is always on the safety and the wellbeing of people.

Our Mission states that, “**We will outperform by exceeding expectations in our service and supply to the manufacturing industries.**” We consider our dedication to outperformance to also apply to our compliance with regulations, and in our equitable treatment of people.

Our 6 Core Values also reflect our philosophy of genuine care for people. Mindfulness, for people’s welfare and our environment, is one of our guiding principles that helps to shape both our policies and our codes of conduct.

- ✓ **Innovation**
- ✓ **Mindfulness**
- ✓ **Professionalism**
- ✓ **Accountability**
- ✓ **Communication**
- ✓ **Teamwork**

From our humble beginnings with a mere handful of employees in Brisbane in 1997, to today, where we now employ more than 150 people across Australia, New Zealand, Singapore, Indonesia and Thailand, our commitment has always been to inspire improvement in the quality of people’s lives, while also building a successful and sustainable company for the future.

Our Human Rights Related Policies

ASCC has a Code of Conduct Policy that sets the framework on how we, as an organisation will treat people and our expectations. This policy includes a section on Forced Labour which states, “*ASCC does not tolerate any form of forced labour, including bonded, slave or compulsory labour, or the hiring of child labour under any circumstances. The minimum age for all full-time employment must be 15 years of age, or the legal minimum age for employment, whichever is the greatest.*”

Aside from the Code of Conduct Policy, the ASCC Group also has the following policies in place to support our commitment to The Ten Principles of the United Nations Global Compact.

- ✓ **Procurement & Supplier Risk Policy**
- ✓ **Whistleblower Policy**
- ✓ **Anti-Bribery and Anti-Corruption Policy**
- ✓ **Code of Conduct for Suppliers**
- ✓ **Anti-Discrimination Policy**

ASCC employees in all regions of operation are expected to strictly conform with these policies and mandatorily report any failures to comply. Disciplinary action, including written warnings or even termination of employment, are potential outcomes for any failure to comply.

Our Commitment to Continual Improvement

As an ISO 9001, 14001 & 45001 accredited business, ASCC is focused on continual operational improvement, and this includes our commitment to eliminating our risk of inadvertent support of modern slavery practices. We will therefore continue to review and develop our practices, our procurement procedures and our policies to assist in the elimination of human rights abuse globally.



Furthermore, during the coming financial year, ASCC will be partnering with a third-party digital training provider in Safetrac, who have been awarded Learnx's Platinum Award for Best Compliance Training Program continually from 2011-2021. One of the many training packages we have requested from them is on the topic of Modern Slavery, and this specialised awareness training will be rolled out to all ASCC employees and associates who are involved in our procurement and supply chain functions, including those engaged in these activities within our offshore entities.



Our decision to partner with Safetrac was largely guided by their claim that during their 20-year history, none of their clients who have rolled out compliance training annually had ever been found by a regulator to have an inadequate compliance training program in place. This was the type of assurance ASCC was seeking in ensuring awareness for our employees around serious topics such as Modern Slavery Awareness, Whistleblowing Protections, Discrimination and Integrity and Compliance.

Statement Approval

This statement was approved by the ASCC Group Board of Directors, after review by the above-mentioned stakeholders, the General Managers in each country where we operate, our Group Chief Financial Officer, our South-East Asia Regional Director, along with our Chief Executive Officer, who also signed this statement under instruction by the Board of Directors during a board meeting held on the 23rd of November 2022.



Michael Frost
ASCC Chief Executive Officer
5th of December 2022