

## POLYMER DIRECT MODERN SLAVERY STATEMENT 2025

This Modern Slavery Statement has been prepared according to the requirements of the *Modern Slavery Act 2018*

### DIRECTORS STATEMENT

Polymer Direct Pty Limited (“Polymer Direct”) stands firm on the abolishment of slavery and human trafficking globally. We are opposed to Modern Slavery in all its forms, and we view this as part of our broader commitment to support the human rights and freedoms of our people and other stakeholders including our suppliers and customers.

Polymer Direct being a key supplier of imported polymers to the manufacturing industry in Australia, is committed to identifying, assessing, and managing the risks of modern slavery within our business and with our customers and suppliers.

Over the past year we have broadened the established governance framework and supplemented it with additional policies and procedures that aim to mitigate the risks of modern slavery across our supply chain. To reinforce our commitment, we have implemented a process of assessment and where necessary monitoring, of our suppliers regarding modern slavery risks.

Polymer Direct is committed to sourcing ethically and sustainably through collaboration with our suppliers and developing partnerships with both suppliers and customers who share our values for human rights.

We view the management of modern slavery risks as one of continuous improvement and aim to monitor our approach and respond to feedback to improve our policies and procedures to further mitigate risk in this area.

Polymer Direct submits this Modern Slavery Statement in accordance with section 13 of the Modern Slavery Act 2018 (Commonwealth Act of Australia) for the financial year ending 31st December 2025.

Polymer Direct Pty Ltd is majority owned by Prime Plastichem Holdings LLC. Notwithstanding this ownership structure, the Board of Directors of Polymer Direct Pty Ltd is the principal governing body of the reporting entity for the purposes of the Modern Slavery Act 2018 (Cth).

This Modern Slavery Statement was approved by the Board of Directors of Polymer Direct Pty Ltd in its capacity as the principal governing body of the reporting entity on 10<sup>th</sup> March 2026.

In recognition of Prime Plastics Holdings LLC's role as majority shareholder and group governance oversight body, this Statement has been provided to Prime Plastics Holdings LLC for acknowledgment and alignment with group compliance standards. A copy of their acceptance is attached

This statement is signed by two Directors of Polymer Direct Pty Ltd as responsible members of the reporting entity



**Anthony Hurley**  
Director of Polymer Direct Pty Ltd



**Stephen Williams**  
Director of Polymer Direct Pty Ltd



**Vishal Goradia**  
Prime Plastics Holdings LLC.

## WHO ARE WE AND OUR STRUCTURE.

Polymer Direct is an Australian company supplying a range of imported polymer raw material products to industry, including polyethylene, polyvinyl chloride and polypropylene resins and a range of specialist engineering additives, elastomers and polymers. Polymer Direct is not a manufacturer.

Products are sourced from more than 16 different suppliers based in the US, Canada, Europe, South-East Asia, Israel and South Korea.

Polymer Direct is a subsidiary of Vinmar International (Vinmar), a global marketing and distribution company with over 50 offices across 35 countries. Vinmar is a company incorporated in the United States with its headquarters in Houston Texas, USA. Vinmar, through its a wholly owned subsidiary, Prime Plastics, is the principal governing body of Polymer Direct Pty Ltd.

While Prime Plastics Holdings LLC exercises shareholder oversight consistent with group governance requirements, Polymer Direct Pty Ltd remains independently governed by its Board of Directors for statutory compliance purposes in Australia.

Polymer Direct is based in Melbourne Australia with a branch office in NSW. The company has a staff strength of around 20 people. All Polymer Direct employees are based in Australia and subject to prevailing labour standards.

This Modern Slavery Statement summarises steps taken by Polymer Direct to identify, prevent, mitigate, and manage the risk of modern slavery in our operations and supply chains.

Polymer Direct is committed to implementing the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the ten principles of the United Nations Global Compact. Following these principles ensures that Polymer Direct meets its fundamental responsibilities in the areas of human rights, labour, environment, and anti-corruption.

## ACTIONS TAKEN TO ASSESS MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

### Our People

Polymer Direct employees are required to undertake training relating to human rights which includes understanding of discrimination, harassment, and bullying. We are currently developing content around modern slavery awareness which will be included in this training.

Modern slavery awareness training will be formalised and delivered periodically to relevant employees to strengthen understanding of risk indicators and reporting mechanisms.

### Supplier Risk Assessment

Polymer Direct has undertaken a risk assessment of our suppliers in terms of modern slavery. Our products are sourced from varied locations around the world from companies based in USA, Canada, Spain, Vietnam, Thailand, Israel, Germany, and South Korea.

Our assessment considered the overall labour standards associated with each company's operations and looked at the commitments of each individual company with respect to modern slavery. Whilst the prevailing labour standards at each location were a key contributor to our assessment, it was established that the individual company profile and type of product being supplied, had a significant impact on the ultimate risk outcome.

The risk assessment identified that over 85% of the products sourced by Polymer Direct were from low-risk entities. In many cases suppliers from locations with an elevated risk because of their prevailing labour standards, were in fact large companies employing significant numbers of people and had established commitments to effectively manage human rights and modern slavery.

The identified medium and high-risk suppliers are in general smaller entities from high-risk locations supplying low volume products.

Polymer Direct acknowledges that modern slavery risks may include forced labour, bonded labour, child labour, exploitative recruitment practices, excessive working hours, and risks within secondary supply chains such as logistics, warehousing, cleaning, and manual labour services.

In assessing risk, Polymer Direct considers geographic risk, sector risk associated with petrochemical and polymer manufacturing, supplier governance maturity, and supply chain transparency.

#### **ACTIONS TAKEN TO MITIGATE MODERN SLAVERY RISKS**

##### Procurement Policy

We are committed to ethical and sustainable sourcing of products. Our Sustainable Procurement Policy embodies our commitment to understanding our supply chain and ensuring that environmental, health, safety, modern slavery, labour, and human rights considerations are embedded into our sourcing processes and procedures. Polymer Direct is strictly against the use of forced labour and specifically against the use of child labour in any of form. This policy defines our expectations.

As part of the supplier onboarding process, we will require new suppliers to accept and agree to comply with the requirements of this policy. As our existing supply agreements come up for renewal, we require these suppliers to accept and agree to comply with the obligations specified in this policy.

Polymer Direct has developed a Supplier Review Process as part of our Sustainable Procurement Policy. This involves suppliers formally responding to a suite of questions that includes their commitment to demonstrating that the issue of modern slavery is being addressed within their business.

Suppliers identified as Medium and High risk are also being physically audited as part of our Sustainable Procurement Policy.

Polymer Direct applies a risk-based due diligence framework that includes initial supplier screening, completion of modern slavery questionnaires, review of supplier labour standards policies, and escalation of higher-risk suppliers for enhanced review where appropriate.

Polymer Direct is progressively incorporating contractual provisions into supplier agreements that prohibit forced labour, child labour and human trafficking, require compliance with applicable labour laws, permit requests for supply chain information, and provide rights to suspend or terminate agreements in cases of serious non-compliance.

#### **REMEDIATION AND GRIEVANCE MECHANISMS**

If Polymer Direct becomes aware of credible allegations or evidence of modern slavery within our operations or supply chain, we will engage with the relevant supplier to seek clarification, require corrective action plans where appropriate, monitor implementation of corrective measures, escalate serious matters to senior management and the Board, and consider suspension or termination of the supplier relationship where remediation is not achieved.

Employees and business partners are encouraged to raise concerns regarding unethical conduct, including modern slavery risks. Reports will be treated confidentially and without retaliation.

#### **ASSESSING EFFECTIVENESS OF RISK REDUCTION ACTIONS**

Polymer Direct will assess supplier compliance in line with the principles of the Sustainable Procurement Policy. Polymer Direct will evaluate suppliers' activities, monitor any areas of concern, and ensure corrective actions are implemented.

The effectiveness of our actions is further assessed through annual review of supplier risk assessments, monitoring the proportion of suppliers assessed, tracking completion of supplier questionnaires, reviewing reported concerns, and monitoring employee training completion rates.

#### **CONSULTATION**

Polymer Direct Pty Ltd does not own or control any other entities for the purposes of the Modern Slavery Act 2018 (Cth).

Given Prime Plastics Holdings LLC's position as majority shareholder, this statement was prepared with appropriate engagement at shareholder level to ensure alignment with broader group governance and compliance frameworks, while maintaining the statutory approval responsibilities of the Polymer Direct Pty Ltd Board.

#### **NEXT STEPS**

- Reinforce the awareness of our employees with regular training to identify risks associated with modern slavery and human rights (including bullying, harassment, and discrimination)
- Implement a periodic review of suppliers identified as having the potential for medium to high-risk workplace practices.
- Continue enhancing contractual modern slavery provisions across supplier agreements.
- Conduct annual review of our modern slavery risk assessment framework.
- Improve visibility of secondary supply chain risks where practicable.

