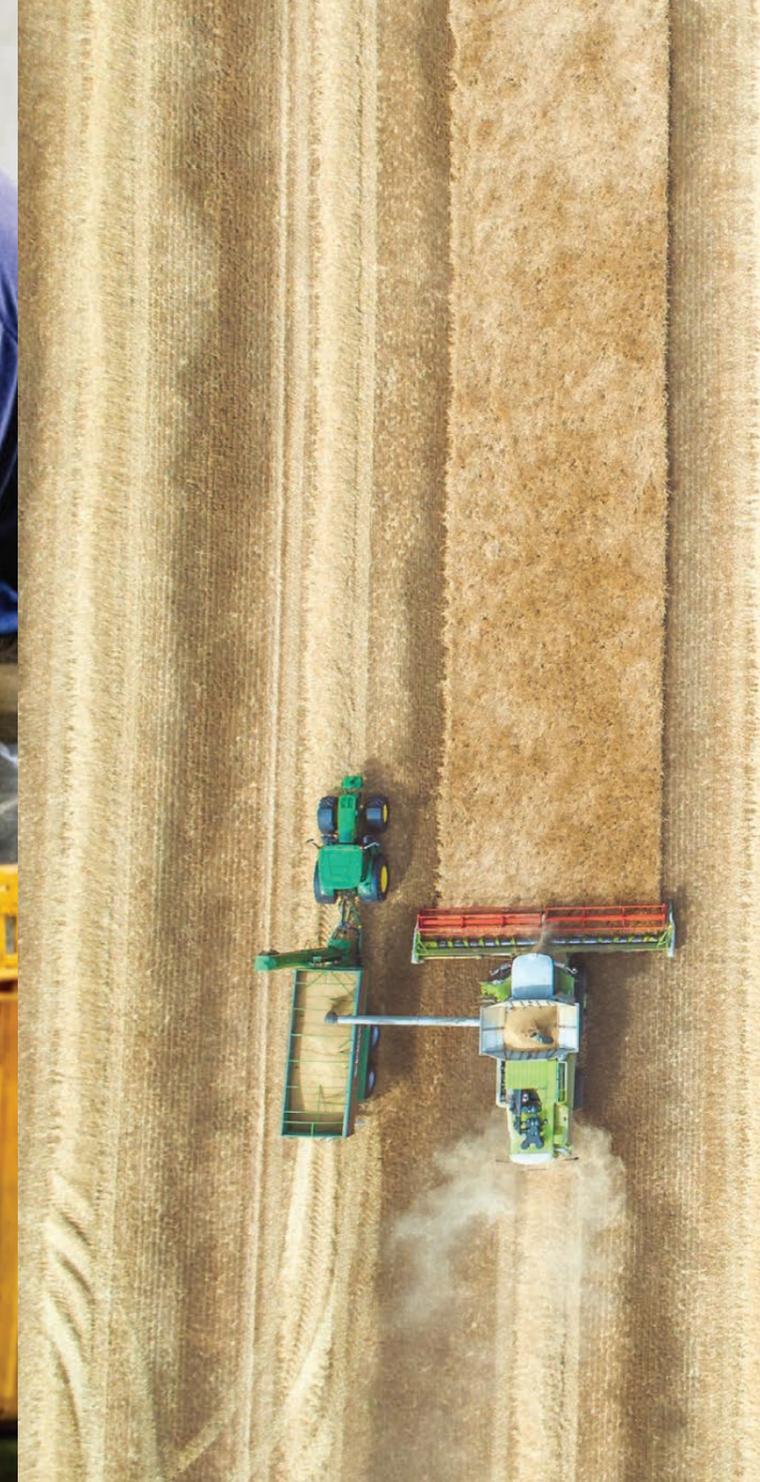
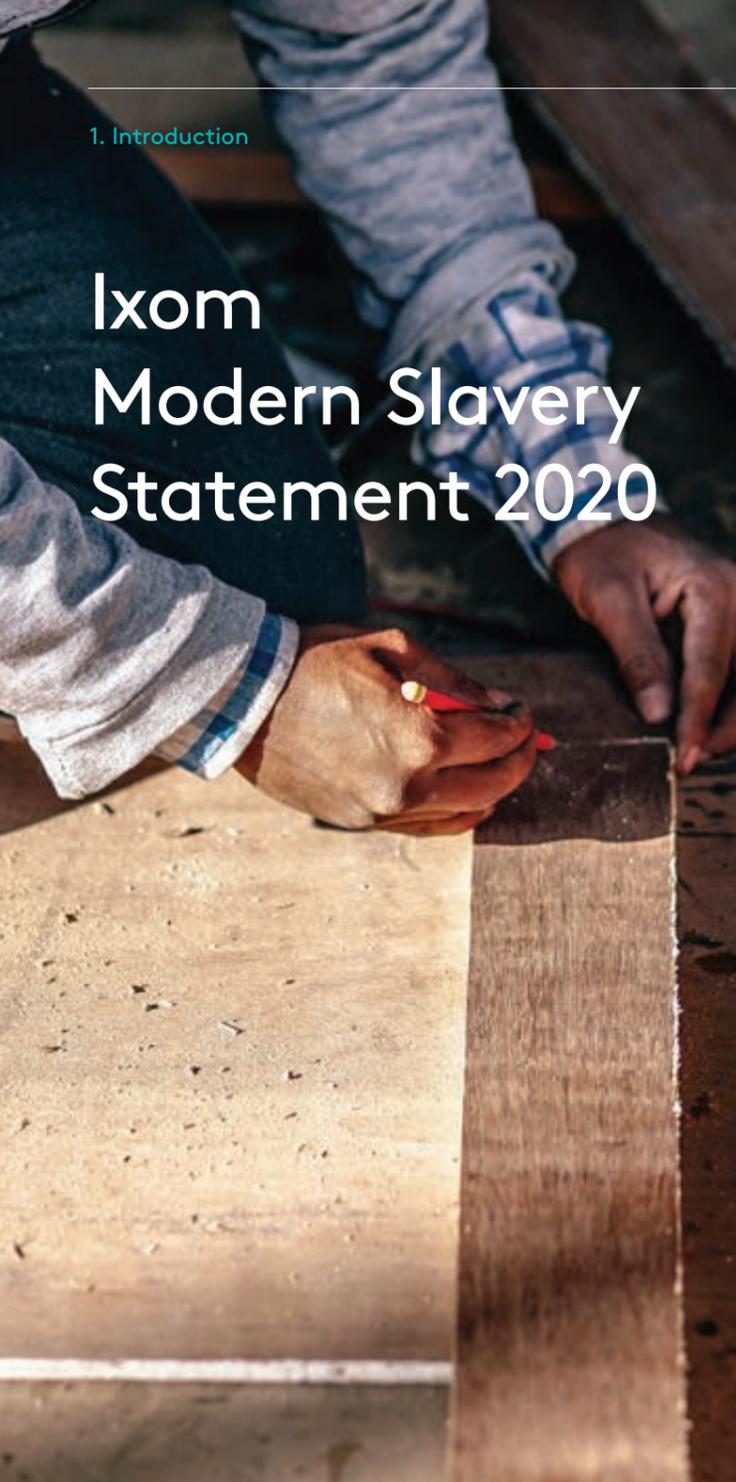


Modern Slavery Statement 2020



Ixom Modern Slavery Statement 2020



Ixom's Modern Slavery Statement (**Statement**) which meets the requirements of the Australian Modern Slavery Act 2018 (Cth) (**Act**), describes the steps taken by IX Infrastructure Pty Ltd and its subsidiaries (collectively, **Ixom**) to comply with its obligations under the Act.

For the purpose of this Statement Ixom's reporting period is 1 October 2019 to 30 September 2020.

This Statement is a joint statement comprising the following reporting entities under the Act (**Reporting Entities**):

1. IX Infrastructure Pty Ltd (ACN 629 750 401);
2. Ixom HoldCo Pty Ltd (ACN 602 722 547);
3. Ixom Pty Ltd (ACN 602 723 768);
4. Ixom Holdings Pty Ltd (ACN 131 367 112);
5. Ixom Operations Pty Ltd (ACN 600 546 512); and
6. Ixom International Holdings Pty Ltd (ACN 602 439 878).

Modern slavery describes situations of severe exploitation and deprivation of the freedom of its victims through force, coercion, threats or deception. Broadly, the term modern slavery extends to any situations of serious exploitation where a person cannot refuse to work or leave work due to intimidation, abuse of power or violence. Further, modern slavery is used to refer to other illicit activities that have adverse effects on human rights, such as corruption and environmental damage.

With more than 950 employees globally, Ixom is the market leader in chemical manufacture and distribution in Australia and New Zealand. Ixom also has a growing presence in Australia, New Zealand and South East Asia through its life sciences raw materials and ingredients distribution business and in the USA and the United Kingdom through its source water technology businesses. Ixom recognises the existence of modern slavery practices in some industries around the world. Consistent with its corporate principals of conducting its business

safely and with integrity, Ixom is working to identify and mitigate any risks associated with modern slavery for all of its businesses globally, and to measure the effectiveness of its actions.

The Act requires Ixom to prepare a report providing information on:

- Ixom's structure, its operations and supply chains;
- the risks of modern slavery in Ixom's operations and supply chains;
- the actions taken to assess and address those risks, including due diligence and training;
- the effectiveness of those actions;
- how Ixom assesses the effectiveness of those actions; and
- the process of consultation between Ixom and its related entities in respect of modern slavery compliance.

From the CEO

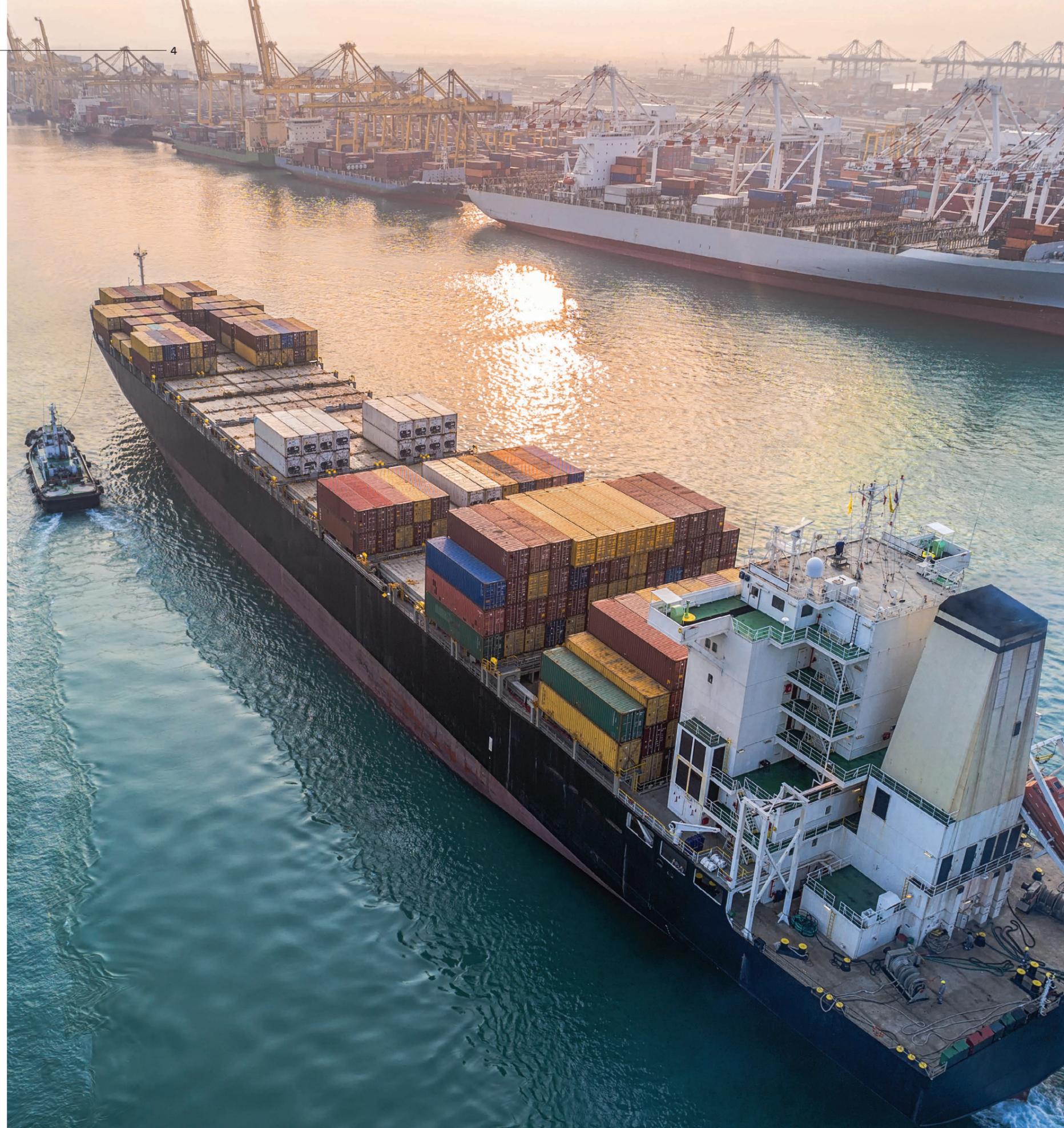
Ixom opposes slavery in all its forms. Operating in a global environment, Ixom is committed to transparency around our supply chains. We have welcomed the introduction of modern slavery laws which target modern slavery and human trafficking and take our obligations very seriously. We have undertaken a lot of work to build and launch a program around identifying and managing modern slavery risks in Ixom's supply chain for our first reporting year and to execute our first work plan.

Ixom, in all of our operations, is committed to developing and implementing policies and procedures that aim to reduce the risk of modern slavery at our operations and in our supply chains. Our modern slavery statement recognises we are on a journey to ensuring we have a supply chain that is free of modern slavery and committed to continuous improvement.

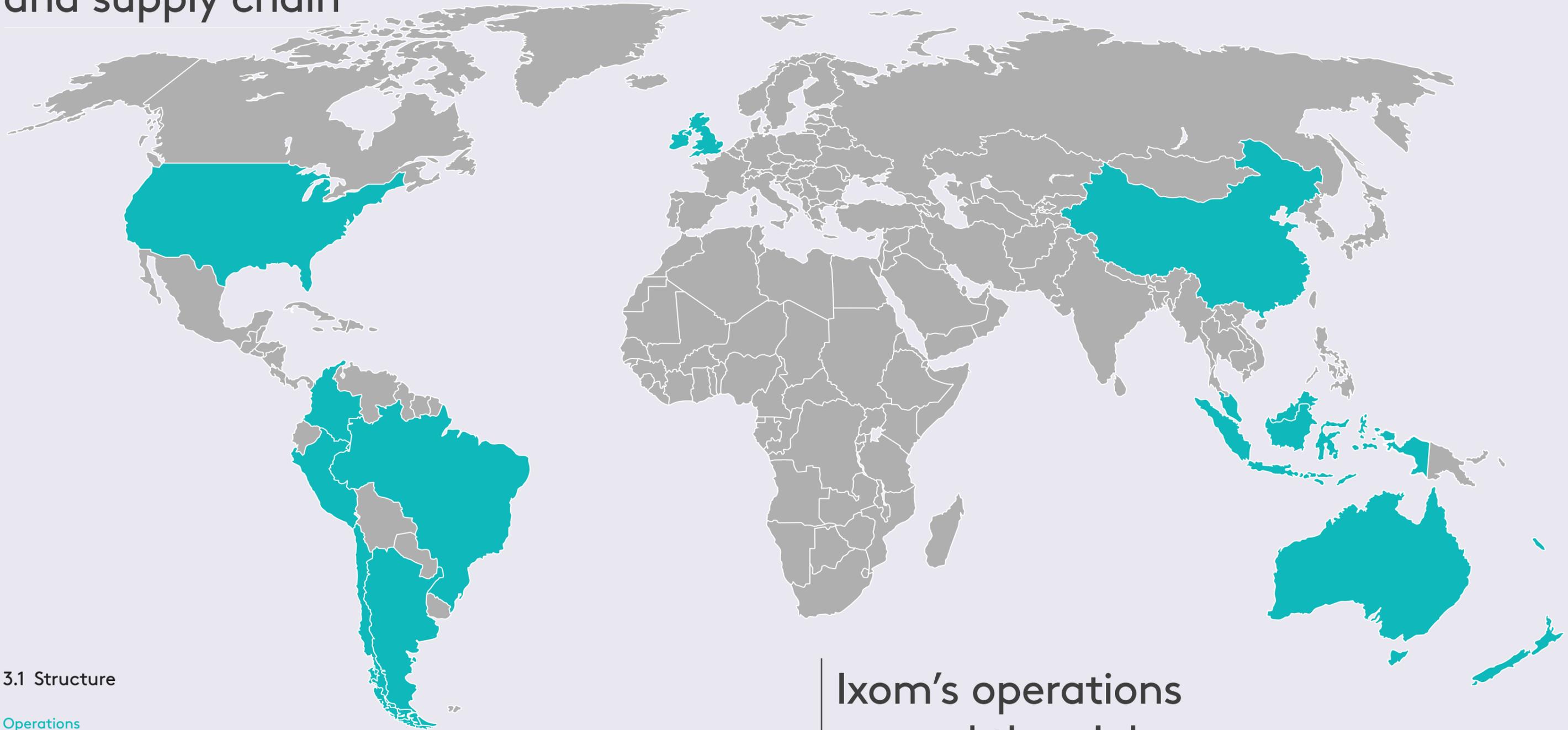


David Head

Managing Director and CEO



Structure, operations and supply chain



3.1 Structure

Operations

Ixom's headquarters are located in Melbourne, Australia. During the reporting period Ixom consisted of 26 registered companies, incorporated and operating in 16 countries, as set out in Annexure A (page 18).

A number of Ixom entities do not have operations, such as holding companies. During the reporting period Ixom undertook processes to divest the entities that operated its businesses in Latin America, China and Hong Kong and these divestments were successfully completed shortly after the end of the reporting period.

Ixom's operations around the globe

3. Structure, operations and supply chain

Brands



Suppliers

During the reporting period Ixom conducted operations in the following countries:

- Australia
- Colombia
- Peru
- Argentina
- Fiji
- Singapore
- Brazil
- Hong Kong
- Thailand
- Canada
- Indonesia
- United Kingdom
- Chile
- Malaysia
- United States of America
- China
- New Zealand

Our values



DRIVEN



ENERGISE



EXCEL



GROW





3.2 Operations

Ixom's industry segments are intertwined, supplying manufactured chemicals and services, traded chemical products and providing logistics solutions and products to the mining, oil and gas industries. Chemicals are commonly used across many industries and essential services and feature in the food we eat, the water we drink and the utilities that we enjoy and add value to our lives.

Ixom supplies chemicals, raw materials, equipment and services solutions to industrial customers operating in the following end markets:

- Food, beverage and nutrition
- Process cleaning technologies
- Personal care, health & household
- Agriculture
- Water treatment
- Pulp and paper
- Building and construction
- Industrial
- Plastics
- Mining and metals
- Oil and gas.

Ixom's chemicals and materials businesses manufacture chemical products and also procure chemicals and materials for resale with Ixom acting as distributor or reseller.

3.3 Supply chain

- Ixom's supply chain for products and services focuses on, amongst other things, safety, reliability, quality and functionality of products and services, regulatory compliance and the ability to source and supply in the volumes required when needed. Ixom's traded chemicals, and also equipment components used in its manufacturing plants and water technology equipment, are sourced from manufacturers and resellers that meet Ixom's standards.
- These products are in most cases imported in to the country of resale via ocean shipping. Ixom's suppliers outside Australia and New Zealand are located predominantly in North America, Asia and Europe.

4. Risk of modern slavery practices

Risk of modern slavery practices

4.1 Overview

Whilst it is not aware of any modern slavery in its own operations or supply chains, Ixom wants to ensure its suppliers continue to uphold the highest standards expected of them. Ixom maintains zero tolerance for slavery in its operations and supply chain.

Ixom's Legal and Compliance Group, in consultation with a multidisciplinary working group including Ixom's product managers, procurement teams and other internal stakeholders, undertook a modern slavery compliance risk assessment in 2019. The process involved the analysis of cross sections of Ixom's Australian, New Zealand and South East Asian businesses to identify those parts of its operations and supply chain that carry a higher level of modern slavery risks. From this analysis, Ixom developed a set of key focus areas for modern slavery compliance and due diligence for the forthcoming 12 month period as well as a longer horizon work plan for the forthcoming 3 years.

The 'Bowtie' methodology used in this risk assessment was implemented as an important element of Ixom's risk assessment, a model generally applied to analyse and demonstrate causal relationships in specific risk scenarios. In utilising this method, Ixom composed a visual summary of a range of plausible scenarios that could arise in relation to modern slavery and subsequent control measures to reduce or eliminate the risk of modern slavery being or becoming present within its operations and supply chain. In evaluating the potential occurrence of non-compliance, Ixom considered appropriate recovery measures and possible consequences of actions taken.

Based on the outcome of this risk assessment, Ixom developed a work plan for its first reporting period which comprised of applying its modern slavery due diligence process in respect of third parties who supply the following goods and services to Ixom:

- office and site cleaning service providers;
- ocean shipping and freight services; and
- raw materials grown or extracted from the earth and supplied to Ixom with little or no refinement.

4.2 Operations

During the reporting period approximately 70% of Ixom's employees were based in Australia, New Zealand and the USA. Ixom takes its compliance with labour laws extremely seriously. During the reporting period Ixom had robust systems in place regarding local labour law compliance in each country where it employed people.

The outcome of the modern slavery compliance risk assessment demonstrates that Ixom's operations may be susceptible to the presence of modern slavery risks through its engagement of direct and indirect suppliers, and in the supply chains of indirect suppliers who provide products and services to Ixom, including cleaning, transport and shipping, (particularly in the operations of shipping companies engaged by service providers engaged by Ixom to arrange the transport of Ixom's products on Ixom's behalf).

4.3 Supply chain

In the reporting period Ixom chose to focus the majority of its work plan activities on the supply chains of Ixom's Australian and New Zealand businesses. Those businesses are operated solely by Ixom Operations Pty Ltd and represent the majority of Ixom's revenue and earnings at a group level and also the majority of the Ixom Group's supply chain activities.

Ixom has identified the potential for modern slavery risks to arise in the following parts of its supply chain:

- raw materials procured to produce goods and finished products;
- countries from which Ixom sources chemicals or materials where those countries have little or no human rights or worker protections, poor law enforcement or where modern slavery is widely practiced or accepted; and
- particular industries in which modern slavery practices or violations have been uncovered by third parties and publicly documented.

The risks associated with modern slavery increase when these factors intersect.

Ixom acknowledges that risks may also be present deep in its supply chains, such as the mining of certain minerals and the production of raw materials that are sold or resold to Ixom.

Raw materials

With reference to the Verisk-Maplecroft index, certain raw materials distributed by Ixom, as follows, are associated with industries that carry a higher risk of modern slavery practices:

Citrus fruits	Cumin	Tea
Fish	Vanilla	Coffee
Cobalt	Cocoa	

Geographic locations

Ixom has identified modern slavery risks based on geographic locations of suppliers in Ixom's supply chain located in countries listed as higher risk by Transparency International and the Global Slavery Index. Ixom's suppliers operating in such higher risk countries are predominantly located in China and India.

Industries

In consideration of the industries in which Ixom operates, the Global Estimates of Modern Slavery as developed by International Labour Organization (ILO) and the Walk Free Foundation in partnership with the International Organization for Migration¹ refers to industries that carry a higher risk of modern slavery practices:

Manufacturing	Construction	Commercial agriculture
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As part of Ixom's forthcoming reporting periods Ixom will utilise these learnings to focus on a selection of suppliers identified as 'high risk' on the basis of raw materials, regions and industries, products or service sector.

¹ International Labour Organization, Walk Free Foundation and International Organization for Migration. Global estimates of modern slavery: Forced labour and forced marriage. Geneva, 2017. http://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms_575479.pdf

5. Key actions taken to assess and address risks

Key actions taken to assess and address risks

During the reporting period Ixom undertook the following key actions to assess and address modern slavery risks.

5.1 Due diligence

Development of a due diligence process to assess suppliers engaged during the reporting period. The process includes initial information gathering through to escalation and management of any identified modern slavery risks and involves two stages:

Basic due diligence

Suppliers of any products or services to any Ixom business that fit within the target categories of Ixom's modern slavery work plan must undergo basic due diligence. Where, following completion of that due diligence, there are unresolved red flags, and Ixom still wishes to transact with the relevant supplier, the supplier will be subject to advanced due diligence.

Advanced due diligence

The scope of the advanced due diligence for those suppliers requiring addition due diligence will be tailored based on the nature of the unresolved red flags arising from basic due diligence.

Advanced due diligence must be periodically repeated if Ixom has previously had to undertake advanced modern slavery due diligence over the supplier or an affiliated company of the supplier in the previous five year period.

'Red flag' concept

Ixom has developed a due diligence criterion which, if met by a supplier, would prompt a 'red flag' in relation to modern slavery non-compliance such as presence of illegal activity, lack of controls surrounding labour law compliance and slavery, servitude, underage labour and human trafficking avoidance or failure to return or complete Ixom's modern slavery questionnaire.

If after advanced due diligence red flags still exist and have not been addressed by the supplier, Ixom's Modern Slavery Policy (MSA) requires Ixom to suspend its use of the supplier until such time as the supplier has resolved the red flags to Ixom's satisfaction.

Ixom has completed modern slavery due diligence of a selection of suppliers identified as part of Ixom's modern slavery work plan.

5.2 Policies

- Preparation and implementation of an MSA Policy, which was approved by the Ixom executive leadership team. Amongst other things, the MSA Policy prohibits Ixom entities from procuring goods, services or labour from any supplier that Ixom knows or suspects, based on available information, engages in modern slavery practices or human rights abuses in connection with the provision of goods, services or labour to Ixom, unless the supplier permanently eradicates slavery practices and human rights abuses from its operations in a timely manner.
- The development of an escalation process for dealing with any possible breaches of the MSA Policy, including the ability to make reports via Ixom's confidential 'Speak Up' line which exists as part of Ixom's Whistleblower Protection Policy.

5.3 Training

- Commencement and development of a training program for employees of Ixom's Australian entities who work with suppliers and/or work in supply chains, with a focus on ensuring the training of Ixom's product managers.
- Published Ixom entity wide communications through 'Ixom News' and 'Yammer' to Ixom personnel to publicise the MSA Policy and Ixom's stance on modern slavery including how to report any concerns.

5.4 Response team

Establishment of a modern slavery working group consisting of internal lawyers, product managers, regional business managers, procurement personnel and supply chain personnel to establish a modern slavery avoidance program and to undertake a risk assessment to identify those parts of Ixom's supply chains that carry a higher modern slavery risk.

The outcome of this has informed the focus areas for the relevant work plan referred to in 4.1.

5.5 Further actions taken

- Update of Ixom's procurement agreement templates to make modern slavery practices a ground for Ixom to terminate the agreement. Further clauses refer to anti-bribery and anti-corruption practices and impose limitations on the engagement of subcontractors.
- Modern slavery questions were added to Ixom's existing supplier desktop audit process used by its Australian and New Zealand businesses.
- Preparation of a supplier statement and acknowledgment of Ixom's modern slavery requirements.

Assessing effectiveness

6.1 Overall assessment

- The Ixom working group met to plan the initial program and during the reporting period a separate working group was tasked with various action items. These groups met regularly, and awareness of modern slavery risks increased.
- An annual review of the effectiveness of the work plan was conducted by Ixom's internal legal team.
- Ixom measured its progress by tracking suppliers who were targeted for due diligence on a case by case basis during the reporting period. Ixom is able to track the progress of the supplier from identifying any red flags noted in the completed due diligence through to any recommendations made to the business.
- Ixom has started increasing awareness of modern slavery risks amongst its employees by communications and training. As a result of Ixom employee awareness on modern slavery the modern slavery avoidance, legal and compliance inboxes are being effectively used.

6.2 Reporting and remediation

If an Ixom employee or representative has any concerns that a supplier may be involved in modern slavery practices, these concerns along with information outlining the basis for these concerns must be reported to Ixom's Legal and Compliance Group immediately or alternatively reported in detail through Ixom's relevant communication channels.

Where 'Red Flags' are identified in relation to a supplier that Ixom uses or proposes to use these are addressed in accordance with a detailed procedure set out in Ixom's MSA Policy.



Consultation with Ixom entities and approvals

Ixom's MSA Policy applies to all Reporting Entities and their wholly owned members. Ixom has made available the MSA Policy to personnel in all wholly owned members of Ixom.

Ixom's consultation process included engagement with personnel across Ixom to confirm alignment of policies, systems and processes across its businesses.

This Statement was endorsed and approved by the principal governing bodies of the following:

- IX Infrastructure Pty Ltd on behalf of that company, Ixom Holdco Pty Ltd and Ixom Pty Ltd; and
- Ixom Holdings Pty Ltd on behalf of that company, Ixom Operations Pty Ltd and Ixom International Holdings Pty Ltd.

This Modern Slavery Statement is approved by Matthew Pollard, Director, Ixom Holdings Pty Ltd and IX Infrastructure Pty Ltd.

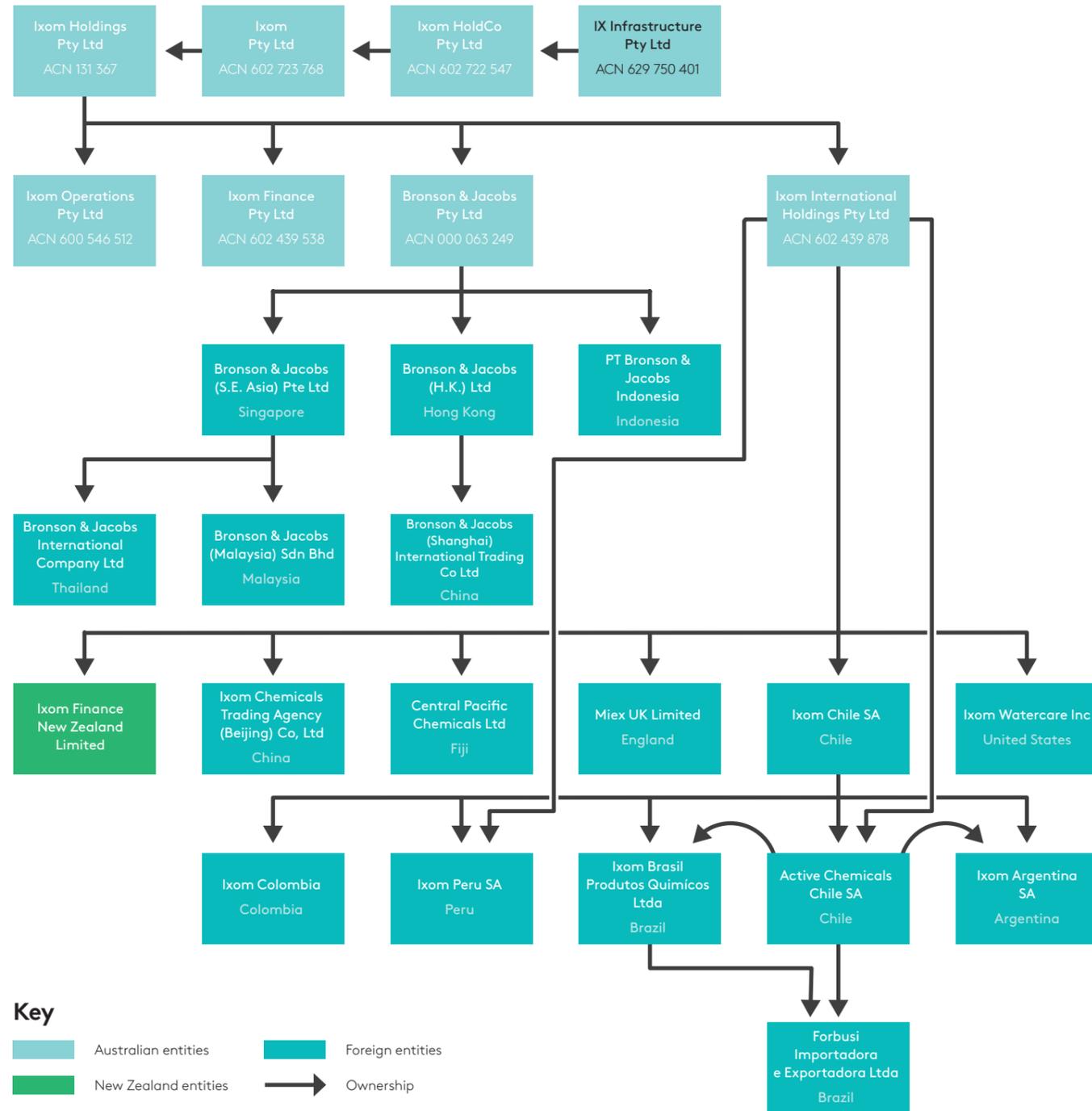


Matthew Pollard

30 March 2021

Annexure A

Corporate Structure





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