

# Valvoline Australia's Modern Slavery Statement



## Introduction

This Modern Slavery Statement (**Statement**) has been prepared by Valvoline (Australia) Pty Ltd (**Valvoline Australia**) to meet the requirements of the *Modern Slavery Act 2018 (Cth)* (the **Act**) for the period 1 October 2022 – 31 December 2023.

This Statement sets out the risks of modern slavery in Valvoline Australia's operations and supply chains and the actions Valvoline Australia has taken and/or will take in the future to address these risks.

Valvoline Australia supports the elimination of all forms of modern slavery. Modern slavery is at odds with Valvoline Australia's ethics and its strong commitment to respecting human rights in its operations and supply chains. Valvoline Australia expects its suppliers (both direct and indirect) to uphold this commitment.

## (1) Structure, Operations and Supply Chains

Valvoline Global Operations, headquartered in Kentucky, United States of America, is a leading worldwide manufacturer and supplier of automotive and industrial solutions.

Valvoline Australia is part of the Valvoline Global Operations group of companies and is a subsidiary of Aramco Valvoline Global Holding Corporation.

Globally, Valvoline Global Operations operates 22 blending facilities, one of

which is located in Wetherill Park, Sydney, New South Wales, Australia. 90% of Valvoline Australia's products supplied to its customers across the Australia Pacific region are blended and produced at the facility in Australia. Valvoline Australia has 7 major and 20 regional warehouses in Australia.

Valvoline Australia engages with several suppliers and/or service providers, including but not limited to:

- commercial real estate services to assist with real estate leases for warehouses and office spaces within Australia, New Zealand and the Philippines;
- applicable service providers to assist with forklift and pallet wrapping equipment leases;
- freight organisations to deliver and export / import finished goods and raw materials;
- building maintenance organisations for required site maintenance and upgrades; and
- a marketing procurement supplier.

## (2) Risks of Modern Slavery Practices

Valvoline Australia operates within the mining, metals, chemicals and resources industry sector, an industry which is recognised as a high risk industry globally.



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Valvoline Australia is also aware that the resources sector is generally an industry which is at a higher risk of modern slavery practices as a result of operations and supply chains being located in higher risk geographies.

## **(3) Assessing and Addressing Modern Slavery Risks**

Valvoline Australia assess and addresses the risk of modern slavery practices in its operations and supply chains by:

- engaging suppliers and service providers from developed markets which have established labour laws and labour practices; and
- establishing policies and procedures which includes Global Standards of Business Conduct and the Supplier Code of Conduct (the **Code**).

Valvoline Australia is committed to taking appropriate measures where it believes third parties have not met its expectations or their contractual obligations.

Valvoline Australia provides employees, contractors and suppliers with mechanisms to report suspected compliance or ethical issues or illegal or unethical activities. In the current reporting period, Valvoline Australia received no reports of modern slavery, actual or suspected.

As part of Valvoline Australia's ongoing risk assessment and due diligence processes it considers whether circumstances warrant it carrying out

audits of suppliers for their compliance with the Code.

If Valvoline Australia identifies employees, business partners or interested parties working on its behalf who have breached requirements under its Modern Slavery Policy, then it will ensure that it takes appropriate action. Such action may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

## **Policies and Procedures**

One of Valvoline Australia's approaches to addressing modern slavery risks within its operation is to ensure that policies and procedures are communicated throughout its business, including to its directors, management and employees. Valvoline Australia does this through broadly distributing its policies and procedures within its workplace and providing training to workplace participants on the contents of its policies and procedures.

Valvoline Australia also expects (through its contractual arrangements) its agents, consultants, joint venture partners (not managed by Valvoline Australia) and other third parties to hold themselves to similar standards when acting on Valvoline Australia's behalf.

Valvoline Australia's policies and procedures which support its commitment to addressing risks of modern slavery include:



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- Global Standards of Business Conduct;
- The Code;
- Modern Slavery Policy;
- Anti-Discrimination & Anti-Harassment Policy; and
- Environmental Policy

## **Global Standards of Business Conduct**

The Global Standards of Business Conduct sets out the global commitment of Valvoline Global Operations to the protection of people's rights including (without limitation):

- Protecting human and economic rights;
- Complying with wage and hours laws; and
- Keeping the workplace safe.

Valvoline Australia, as an entity within the Valvoline Operations Group, is committed to and implements the Global Standards of Business Conduct within its business.

In relation to the protection of human and economic rights, the Global Standards of Business Conduct provides that:

*"Valvoline has zero tolerance policies for the use of child labor, forced labor, human trafficking or land grabbing practices. We will also refuse to do business with subcontractors, business partners and suppliers who engage in these practices. If you have reason to believe that anyone we do business*

*with is violating these policies, speak up."*

## **Supplier Code of Conduct**

To address the risk of modern slavery practices in Valvoline Australia's supply chains, Valvoline Australia has enacted the Code. The Code reinforces Valvoline Australia's support for the elimination of all forms of modern slavery, such as human trafficking, slavery and child labour.

The Code is based on Valvoline Australia's values and principles, as well as expectations for how the Valvoline Australia business operates. The Code:

- applies to all Valvoline Australia suppliers; and
- makes explicit reference to the role that all parties can play in the elimination of modern slavery practices.

## **Modern Slavery Policy**

Valvoline Australia expects its employees, business partners and other interested parties to support and uphold the following principles and prevent modern slavery:

- there is no place for any forms of modern slavery in Valvoline Australia's organisation and its supply chains;
- the prevention, detection and reporting of modern slavery in any part of Valvoline Australia's organisation or supply chain is the responsibility of all those:
  - working for Valvoline Australia;



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- partnering with Valvoline Australia; or
  - supplying Valvoline Australia products.
- No party may engage in, facilitate or fail to report any activity that may lead to, or suggest, a breach of the Modern Slavery Policy;
- Valvoline Australia is committed to engaging with its business partners and other interested parties to address the risk of modern slavery in its operations and supply chain; and
- Valvoline Australia takes a risk based approach and assesses the risk of modern slavery when selecting and continuing its relationships with business partners and suppliers.

## **Supplier Compliance with Terms and Conditions**

Suppliers must comply with the terms and conditions of any executed contracts and all purchase orders that have been accepted by the supplier, including any general terms and conditions of Valvoline Australia which are presented to suppliers from time to time. The Code, once signed and accepted by suppliers, constitutes a part of any existing contractual relationship between Valvoline Australia and its suppliers.

## **Training**

Valvoline Australia continues to strengthen employee awareness of potential human rights impacts that may arise from the company's work.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in Valvoline Australia's supply chains and business, all Valvoline employees will receive a copy of this statement as well as being published on the ANZ intranet.

Valvoline Australia will develop and deliver more specialised training to our employees in the form of e-learning to capture labour rights, modern slavery and labour practices associated with increased worker vulnerability, how modern slavery risk indicators may occur in the company's industry or supply chains; and how to identify warning signs. Valvoline Australia will also provide role-specific information on ways individuals can help identify and implement effective prevention measures and remedies.

## **(4) Assessing the Effectiveness of Valvoline Australia's Actions**

Valvoline Australia assesses the effectiveness of its actions by:

- Providing employees working throughout the business with training in relation to modern slavery risks;
- Performing investigations and internal or external audits to verify that business is being conducted in compliance with the Modern Slavery Policy;
- Requiring Valvoline Australia's employees and third parties through whom Valvoline Australia conducts business to fully and promptly cooperate with the internal and external

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auditors and investigators, and to respond fully and truthfully to their questions, requests for information, and documents; and

- Considering disciplinary action, where necessary, for any failure by an employee to fully cooperate with an investigation, or taking any action to hinder an investigation or audit.

## **(5) Consultation**

Valvoline Australia Pty Ltd does not currently own or control any other entities in Australia. Accordingly, there are no additional controlled entities to consult in preparing this Statement.

## **Next Steps**

Valvoline Australia is satisfied with the progress that has been made to date in its approach and in response to the risk of modern slavery in its operations and supply chain for the reporting period FY2023 which is relevant to this Statement.

Valvoline Australia remains committed to continuously improving its approach and response to the risks associated with modern slavery practices within its organisation.

This Modern Slavery Statement was approved by the Board of Directors of Valvoline Australia Pty Ltd on 3 February 2025, in accordance with Section 13(2) of the Modern Slavery Act 2018 (Cth):

A handwritten signature in black ink, appearing to read 'Michelle Brewin', positioned above a horizontal line.

Michelle Brewin  
Company Director and Managing  
Director Australia/Pacific  
Valvoline (Australia) Pty Ltd