

POLYMER DIRECT MODERN SLAVERY STATEMENT

DIRECTORS STATEMENT

Polymer Direct opposes 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 workforce and those of our suppliers and customers.

We are committed to identifying, assessing and managing the risks of modern slavery within our own business and with our customers and suppliers.

Over the past year we have established a governance framework along with policies and procedures that aim to mitigate the risks of modern slavery across our supply chain. We aim to add to this a process of assessment and where necessary monitoring of our suppliers in relation to modern slavery risks.

We are committed to sourcing ethically and sustainably through collaboration with our suppliers. We seek to partner with suppliers and customers who share our values for human rights.

We view the management of modern slavery risks as one of continuous improvement and we 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 2023.

This Modern Slavery Statement has been approved by the directors of Polymer Direct Pty Limited on 29 January 2024



Anthony Hurley
Director of Polymer Direct Pty Ltd



Stephen Williams
Director of Polymer Direct Pty Ltd

WHO ARE WE AND OUR STRUCTURE.

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

We source these products from around 16 different suppliers based in the US, Canada, Europe, South East Asia, Israel and South Korea.

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We are part of Vinmar International - a global marketing and distribution company with over 50 offices across 35 countries. Vinmar is an American company based in Houston USA.

Polymer Direct is based in Melbourne Australia with staff also located in NSW. The total number a staff is around 15 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.

We are 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 helps us identify and mitigate potential human rights and modern slavery risks.

ACTIONS TAKEN TO ASSESS MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

Our People

Polymer Direct employees are required to undertake training delivered either on-line or in person relating to human rights, such as discrimination, harassment and bullying. We are currently developing content around modern slavery awareness to be added to this training.

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 companies operations and also 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 found 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 that would be deemed high 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 were generally smaller entities from high risk locations supplying low volume products.

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. 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 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.

MEASURING EFFECTIVENESS OF RISK REDUCTION ACTIONS

We intend to measure our suppliers' compliance with the Sustainable Procurement Policy by developing a Sustainable Procurement Scoring Process to track and monitor suppliers and ensure corrective actions are addressed.

NEXT STEPS

- Train our employees in relation to modern slavery and human rights (including bullying, harassment and discrimination)
- Develop a Sustainable Procurement Scoring System
- Carry out review of suppliers identified as having the potential for medium to high risk workplace practices.