



# Modern Day Slavery Statement

Reporting Period: 01 January 2023 to 31 December 2023

**Date of Issue:** 30 June 2024

**Issued to:** Pon Australia Management Team  
Callidus Group Management Team  
Prochem Group Management Team  
Fire Protection Technologies Group Management Team  
Pon.Bike Australia Management Team  
Australian Border Force

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# Introduction

This statement is made pursuant to the Australian Commonwealth Modern Day Slavery Act 2018, and sets out to identify and mitigate any form of modern day slavery that may be present within the Pon Australia Group of companies and our supply chains.

This statement follows the the seven mandatory criteria (MC1 to MC7) as set out in the Guidance for Reporting Entities and draws on the United Nations Guiding Principles on Business and Human Rights.

## Reporting entity:

- Pon Holding Australia Pty Ltd (PHA), holding company.

## Joint reporting entities:

- Callidus Process Solutions Pty Ltd (CPS), Head Office, 100% owned by PHA.
- Callidus Welding Solutions Pty Ltd (CWS), 100% owned Subsidiary of CPS.
- Callidus New Caledonia SARL (CNC), 100% owned Subsidiary of CPS.
- Callidus Process Solutions Madagascar SARL (CMA), 100% owned Subsidiary of CPS.

(Collectively referred to as **Callidus Group**)

(Prochem Group Holdings Pty Ltd (PGH), Holding Company, 100% owned by PHA)

- Prochem Pipeline Products Pty Ltd (PPP), 100% owned Subsidiary of PGH
- Prochem Group NZ Pty Ltd (PGNZ) 100% owned Subsidiary of PHA
- AVFI Pty Ltd (AVFI), 100% owned Subsidiary of PHA

(Collectively referred to as **Prochem Group**)

(Fire Protection Technologies Pty Ltd (FPT), Holding Company, 100% owned by PHA)

- Fire Protection Technologies Pty Ltd Australia (FPTA), Head Office, 100% owned by FPT
- Fire Protection Technologies Ltd New Zealand (FPTNZ), 100% owned Subsidiary of FPT
- Energy Conservation Technologies Pty Ltd Australia (ECT), 100% owned Subsidiary of FPT

(Collectively referred to as the **Fire Protection Technologies Group**)

- Pon.Bike Australia Pty Ltd (PBA), Head Office, 100% owned by PHA

## Our business

Pon Holding Australia (PHA) is the holding company for all Pon's activities in Australia, consisting of Callidus Group, Prochem Group, Fire Protection Technologies Group and Pon.Bike Australia (collectively referred to as **Pon Australia** or the **Pon Australia Group of companies**).

Pon Australia is involved in mobility products, services, and solutions globally. We also offer hundreds of industry solutions.

### **Callidus Group:**

Callidus Group is a West Australian registered company since January 1997. Now consisting of CPS, CWS, CNC and CMA, the primary business centres around providing engineering solutions to the Nickel Industry and Oil & Gas Industry. This includes procurement, servicing, repair and modification of valves and associated equipment within our workshops and on-site work such as shutdown management and recertification of pressure safety valves.

CWS joined the group to expand on the range of welding, fabrication and erosion control services.

CNC and CMA were opened to provide local maintenance support to clients in those countries.

CPS opened a branch office and workshop in the Philippines to provide local maintenance support to clients in the Philippines.

### **Prochem Group:**

Prochem Group consists of three operating entities, PPP, PGNZ and AVFI.

PPP primary business centres around procurement and distribution to provide flow control solutions to the Oil and Gas, Mining and general industry in Australia. This includes procurement, stocking and distribution of flow control products through a network of warehouse and sales support centres across Australia.

PGNZ is a recent start-up based in Hamilton New Zealand stocking and distributing the range of PPP and AVFI product ranges.

AVFI primary business is procurement, stocking and distribution of valves and fittings for the water and waste water industry. AVFI head office is based in Bundoora Victoria.

### **Fire Protection Group:**

Fire Protection Technologies is an Australian, New Zealand & Singaporean registered company since 1 September, 2019. The primary business centres around the design and supply of specialised fire detection and suppression systems to Australia, New Zealand and South East Asia. This includes marketing, sales, design, supply and commissioning of system to the integration market.

Energy Conservation Technologies is an Australian and Singaporean registered company since 1<sup>st</sup> September, 2019. The primary business centres around the supply of air infiltration equipment for the energy and fire market throughout Australia, New Zealand and South East Asia.

## **Pon.Bike**

Pon.Bike Australia NZ was established in 2021 as a wholly owned subsidiary. The business supplies bicycles into the Australian market via a retail dealer network. The business distributes three of the Pon global owned brands.

### [Supply chain overview](#)

Callidus Group procure complete valves, spare parts, associated equipment and consumables from a wide variety of vendors in many countries around the world. This is driven primarily by the need to procure from the Original Equipment Manufacturer (OEM) stipulated by the client.

Prochem Group procure pipe, tube, flanges, fittings and valves and associated equipment from a variety of vendors in several countries around the world. This is driven primarily by the need to procure from the Original Equipment Manufacturer (OEM) Prochem Group is the agent for or through qualified/ISO-9001 approved mills and stockists.

The Fire Protection Technologies Group represents specific manufacturers of these specialised industry fire protection products. The OEM are primarily located in North America and Europe. Main responsibilities include marketing, selling, designing and supplying OEM products in the specific markets. Local assembly is often undertaken to modify the OEM's equipment to suit the specific application it is being supplied for. The equipment sold is also supported with after sales support with periodic service and maintenance.

Energy Conservation Technologies Group represents a specific OEM (Wohler Retrotec) and they primarily market and sell into the Australian, New Zealand and South East Asia market. The produce is procured from the USA and imported to either the Melbourne or Singapore facility.

Pon.bike supplies bikes to the Australian market place manufactured via the parent company owned brands of Focus, Cervelo and Kalkhoff. These brands source products primarily for SE Asia and are assembled primarily for Focus and Kalkhoff brands in Germany or Taiwan for the Cervelo brand.

Support services are generally procured local to the facility requiring the service, with corporate contracts in place for services such as I.T.C., Accounting, Banking etc.

## Corporate Social Responsibility (CSR)

As part of our CSR strategy and policies, the Pon Australia companies are committed to making a positive ethical, environmental and social contribution to society. Part of this commitment is to ensure all possible risk of any form of modern slavery within our business activities are identified and mitigated. This requires close working relationships with clients and key suppliers which is something Pon Australia strive to achieve.

### Addressing modern slavery

The Pon Australia companies are adopting a 3 step approach to addressing modern slavery impacts identified through either direct or indirect activities;

**1) Audit and identification**

All facilities and supply chains are being audited to identify any potential risk.

**2) Resolving and mitigating**

Actions are put into place to address the risk and either resolve the issue completely or mitigate the risk as far as possible.

**3) Training and communication**

Training is being implemented internally to educate management and procurement personnel on the risks around modern slavery. Communication is in place both internally and externally on our expectations and the effectiveness of our actions.

The Pon Australia companies submit this statement as part of our continued efforts to develop and improve our processes and procedures to ensure modern day slavery is eradicated within our business and our business partners.

## Approvals:

This statement for Pon Australia consisting of Callidus Group, Prochem Group, Fire Protection Technologies Group and Pon.Bike Australia was approved by the Board of Pon Holding Australia Pty Ltd as the principal governing body on 20 June 2024.



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**Jack Guidry**  
Chief Executive Officer Pon Australia  
Pon Holding Australia Pty Ltd  
Date of Approval: 20 June 2024



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**Ed Pepper**  
Chief Executive Officer (CPS)  
Callidus Process Solutions Pty Ltd.  
Date of Approval: 20 June 2024



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**Duncan Bews**  
Chief Operations Officer (CWS)  
Callidus Welding Solutions Pty Ltd.  
Date of Approval: 20 June 2024



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**Paul Clarke**  
General Manager  
Callidus Process Solutions Madagascar Sarl (CMA)  
Date of Approval: 20 June 2024



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**Guillaume Bunel**  
General Manager  
Callidus Process Solutions New Caledonia Sarl (CNC)  
Date of Approval: 20 June 2024



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**Guy Standing**

Managing Director (PPP)  
Prochem Pipeline Products Pty Ltd.  
Date of Approval: 20 June 2024



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**Richard Moulton**

General Manager (AVFI)  
AVFI Pty Ltd.  
Date of Approval: 20 June 2024



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**Guy Standing**

(on behalf of **Greg Addison** (Country Manager) who left the business in 2022)  
Managing Director (PPP)  
Prochem Group New Zealand Pty Ltd.  
Date of Approval: 20 June 2024



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**Anthony Stagg**

Managing Director  
Fire Protection Technologies Pty Ltd (Australia).  
Energy Conservation Technologies Pty Ltd.  
Date of Approval: 20 June 2024



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**David Boff**

General Manager  
Fire Protection Technologies Pty Ltd (New Zealand).  
Date of Approval: 20 June 2024



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**Graeme Moffett**

Managing Director  
Pon.Bike Australia Pty Ltd  
Date of Approval: 20 June 2024



# MC1: Reporting Entities

## **Pon Holding Australia Pty Ltd**

Australian Company Number: 164 517 104  
Registered Office: 18 Ledger Road, BALCATTA WA 6021  
Operational Locations: n/a  
Status: Private Company

## **Callidus Process Solutions Pty Ltd (Head Office)**

Australian Company Number: 077 149 529  
Registered Office: 18-20 Ledger Road, Balcatta, WA, 6021, Australia  
Operational Locations: Australia: Perth, Adelaide, Brisbane, Darwin, Karratha  
Philippines: Manila (Branch Office)  
Status: Private Company

## **Callidus Welding Solutions Pty Ltd**

Australian Company Number: 104 455 164  
Registered Office: 18-20 Ledger Road, Balcatta, WA, 6021, Australia  
Operational Locations: Australia: Perth  
Status: Private Company

## **Callidus Process Solutions Madagascar SARL**

Company Registration Number: 2013 B 00110  
Registered Office: Immeuble Wu Chao Ying, Tanandava – RN2,  
Toamasina 501 - Madagascar  
Operational Locations: Madagascar: Toamasina  
Status: Private Company

### **Callidus New Caledonia SARL**

Company Registration Number: 779025.001  
Registered Office: 13 Rue Georgette Mourin, Parc des entreprises de la Yahoué,  
Normandie, BP 30033, 98895 NOUMEA Cedex, New Caledonia  
Operational Locations: New Caledonia: Noumea  
Status: Private Company

### **Prochem Pipeline Products Pty Ltd**

Australian Business Number: 74 000 337 824  
Registered Office: 6 Forge Street, Welshpool, WA, 6106, Australia  
Operational Locations: Australia: Perth, Adelaide, Melbourne, Hobart, Sydney,  
Brisbane  
Status: Private Company

### **Prochem Group New Zealand Pty Ltd**

NZ Business Number: 9429046835840  
Registered Office: 560 Arthur Porter Drive, Te Rapa Gateway, Hamilton, 3200,  
NZ  
Operational Locations: New Zealand: Hamilton  
Status: Private Company

### **AVFI Pty Ltd**

Australian Business Number: 83 159 299 242  
Registered Office: 54 Enterprise Drive, Bundoora, Victoria, 3083  
Operational Locations: Australia: Melbourne, Brisbane, Perth  
Status: Private Company

### **Fire Protection Technologies Pty Ltd (Head Office)**

Australian Company Number: 634 309 461  
Registered Office: 1/251 Ferntree Gully Road, Mount Waverley, 3149. Australia  
Operational Locations: Australia: Melbourne, Sydney, Perth, Brisbane  
Status: Private Company

### **Fire Protection Technologies Pty Ltd**

Australian Company Number: NZCN 7585736  
Registered Office: 2-13 Airborne Road, Rosedale, North Shore, 0632  
Operational Locations: New Zealand, Auckland  
Status: Private Company

### **Energy Conservation Technologies Pty Ltd**

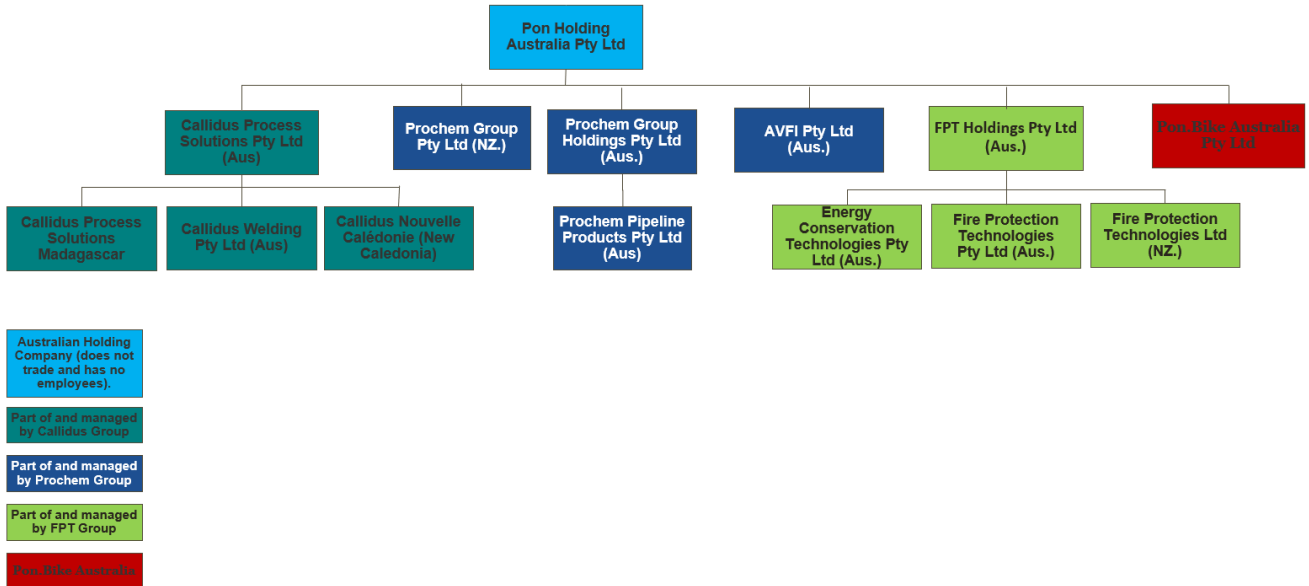
Company Registration Number: 634 309 292  
Registered Office: 1/251 Ferntree Gully Road, Mount Waverley. 3149. Victoria  
Operational Locations: Australia  
Status: Private Company

### **Pon.Bike Australia Pty Ltd**

Australian Company Number: 150 559 925  
Registered Office: 58 David Terrace, Kilkenny, SA, 5009  
Operational Locations: Australia: Adelaide  
Status: Private Company

# MC2: Structure, Operations and Supply Chains.

## Structure:



## Workforce Composition:

	Direct	Contractor	Agency	Temporary	Seasonal
CPS	218	0	0	0	0
CWS	52	4	0	0	0
CMA	7	31	0	0	0
CNC	28	0	0	0	0
PPP	61	0	0	0	0
PGNZ	4	0	0	0	0
AVFI	19	0	0	0	0
FPT-Aus	35	0	0	0	0
FPT-NZ	2.5	0	0	0	0
ECT-Aus	1	0	0	0	0
PBA	8	2	0	0	0

Union membership is confidential between the employees and the Union. Individual membership is not reported to the Company so actual numbers are unknown. The Australian Metal Workers Union (AMWU) has members at CPS and CWS. The Union des Syndicats des Ouvriers et Employés de Nouvelle-Calédonie (USOENC) has members at CNC. There are no known union members at any other entity.

# Operations:

## Main Products Supplied:

### **Callidus Group**

Valves, Actuators, Spare Parts, Pipes, Elbows, Vessels and Ancillary Equipment.

Products can be sourced from Original Equipment Manufacturers and/or agents and distributors anywhere in the world.

Some products are manufactured by Callidus using raw material (e.g. titanium plate) being sourced primarily from China.

### **Prochem Group**

Pipe, Tube, Flanges, Fittings, Valves and associated products.

Products can be sourced from approved Original Equipment Manufacturers and/or agents, distributors and mills globally.

### **FPT Group**

Cylinder & Valve Assemblies, Actuators, Valves, Fire Panels, Thermal Detectors, Flame Detectors, Smoke Detectors, tanks, fire fighting foams, nozzles, pumps, pressure relief vents.

Products can be sourced from Original Equipment Manufacturers in North America and Europe.

### **Pon.Bike Australia**

Complete Bicycles assembled in either German or Taiwan. Components for bicycles sourced from factories globally including Taiwan, China, Malaysia, Vietnam and Japan.

## Main Services Offered:

<b>SERVICE</b>	<b>LOCATION</b>
Supply	CPS, CNC, CWS, PPP, PGNZ, AVFI, FPT & ECT, Pon.Bike
Overhaul and Repair	CPS, CNC, CWS, CMA, CMOG, FPT(AUS), FPT(NZ)
Engineering Support	CPS, CNC, CWS, FPT(AUS), FPT(NZ)
Pressure Testing	CPS, CNC, CWS, CMA, CMOG, FPT(AUS), FPT(NZ)
Erosion and Corrosion Control	CPS, CWS, CMA
Calibration	CPS
Valve Recertification	CPS, CNC, CMA, CMOG
Welding / Fabrication	CWS
On-Site Labour	CPS, CNC, CWS, CMA
Recharging	FPT(AUS), FPT(NZ)
Commissioning	FPT(AUS)
Training	FPT(AUS), FPT(NZ) & ECT

## Supply Chains:

Main categories of products/services/parts/raw material that is procured, and sourcing country.

Category of Product/Service	Country of Purchase	Origin of Service/Material
<b>Callidus Group:</b>		
Valves and Spare Parts	Australia, Malaysia, USA, Canada, Japan, China, Singapore	USA, Mexico, Canada, UK, Italy, Spain, Netherlands, Austria, Germany, Belgium, France, China, Malaysia, Singapore, Japan, Hungary
Pipes, Elbows, Raw Material, Fittings	Australia, China	Australia, Austria, Germany, China, India, Malaysia, Taiwan, Europe.
Services	Australia, New Caledonia, Philippines, Madagascar	Worldwide
<b>Prochem Group:</b>		
Pipe, Tube, Flanges, Fittings, Valves	Australia, USA, Canada, UK, Spain, France, Netherlands, Belgium, Italy, Germany, China, Taiwan, South Korea, Singapore, Japan, India, Turkey, Israel, New Zealand	Australia, USA, Canada, UK, Spain, France, Netherlands, Belgium, Italy, Germany, China, Taiwan, South Korea, Singapore, Japan, India, Turkey, Israel, New Zealand, Thailand
Actuators, Cylinder & Valve Assemblies	USA, UK.	USA, UK, China
<b>Fire Protection Group:</b>		
Fire Panels	USA, UK	USA, UK
Fire Detection	USA, UK, Germany	USA, UK, Germany
Tanks	Australia	China
Fire Fighting Foams	Sweden	Sweden
Pumps	Germany, UK	Germany, UK
PRV's	UK	China, UK
<b>Pon.Bike:</b>		
Bicycles	Germany, Taiwan	Taiwan, China, Malaysia, Vietnam, Japan

Vendors are either:

Original Equipment Manufacturers (OEM).

- In this case they are usually dictated by the Client, either by way of being an approved vendor of the client, or by way of providing spare parts to repair previously supplied OEM equipment.

Agents / Distributors:

- Acting on behalf of the OEM in a specific region. We may be directed to deal with agents/distributors by the OEM.

Operational Third Parties:

- Parts manufacturer, machine shops, freight forwarders, calibration services etc. Selected by way of Callidus Group approved vendors based on performance, cost, ability to meet deadlines.

Commercial Third Parties:

- I.T. Support, Insurance Brokers, Realtors, Cleaners, etc Selected by location, ability to meet the scope of work.

Goods and services are provided by these vendors all year round, i.e. not seasonal.

# MC3: Risk Assessment

## Operations : Risk Review

There are three main ways the Pon Australia companies can have an impact on Human Rights:

- Cause
- Contribution
- Linkage

### Cause:

A review of the eight types of exploitation defined by The Act was completed to identify any risk within our own operations caused by our own actions.

<b>Trafficking in persons</b>
• No Risk Identified
<b>Slavery</b>
• No Risk Identified
<b>Servitude</b>
• Local workers in third world countries employed through a sub-contractor.
<b>Forced labour</b>
• No Risk Identified
<b>Forced marriage</b>
• No Risk Identified
<b>Debt Bondage</b>
• No Risk Identified
<b>The worst forms of child labour</b>
• No Risk Identified
<b>Deceptive recruiting for labour or services</b>
• No Risk Identified

### Contribution:

Contribution can be made in two ways;

- Contribution through a business relationship
- Contribution in parallel (multiple entities contributing to a greater impact).

<b>Contribution through a business relationship</b>
• Undue pressure on Vendors to meet deadlines/budgets may result in a breach of labour standards in order to deliver.
<b>Contribution in parallel</b>
• No Risk Identified



**Linkage:**

Pon Australia could be linked to Modern Day Slavery breaches through its relationship with its vendors.

To identify potential high risk areas in our supply chain we have used the following references;

- Country Risk: Walk Free Foundation Global Slavery Index 2018, Appendix 2, Part C, Table 6 and Table 7.
- Product Risk: Walk Free Foundation Global Slavery Index 2018, Appendix 3, Table 2.
- Service Risk: Walk Free Foundation/International Labour Office, Global Estimates of Modern Slavery, Part 1, Section 1.2.1, Figure 9.

<b>Country Risk</b>
<ul style="list-style-type: none"><li>• Products, services and raw materials originating from high risk countries. China, Malaysia, Singapore, India, Taiwan, Madagascar, Papua New Guinea, Thailand, Turkey, Vietnam, Japan.</li></ul>
<b>Product Risk</b>
<ul style="list-style-type: none"><li>• Clothing (Uniforms, PPE)</li><li>• Electronics</li></ul>
<b>Service Risk</b>
<ul style="list-style-type: none"><li>• Cleaners</li><li>• Manufacturing</li></ul>

# MC4: Due Diligence and Remediation

## Due Diligence:

### Identifying and assessing:

#### Cause Risk

- Local workers in Madagascar are employed through a sub-contractor.

To address this risk the Sub-contractor must submit monthly payroll information to CPS for review and approval. Interviews with contractor employees are carried out to confirm payments are made correctly. Regular discussions around working conditions are carried out between employees and General Manager for Madagascar. The sub-contractor is a natural person who resides in Madagascar and also provides other services for the Company. In 2023, additional audit on payslips submitted to employees and payment to third party pension scheme.

#### Contribution Risk

- Breach of Labour conditions by vendor.

To address this risk only reputable vendors are used. The vendor is requested to quote lead times allowing them time to complete the work. Vendor assessments are carried out to confirm ability to perform work safely and ethically. In 2023, no complaints were received by vendors relating to undue pressure to perform or meet deadlines.

#### Linkage Risk

Pon Australia use a wide range of vendors, for a wide range of products and services, sourced from a wide range of countries. To identify potential high risk areas in our supply chain we map products and services against the following;

Country Risk: Walk Free Foundation Global Slavery Index 2018, Appendix 2, Part C, Table 6 and Table 7.

Product Risk: Walk Free Foundation Global Slavery Index 2018, Appendix 3, Table 2.

Service Risk: Walk Free Foundation/International Labour Office, Global Estimates of Modern Slavery, Part 1, Section 1.2.1, Figure 9

In addition, vendors are asked to confirm the following;

- 1) Are they currently reporting on Modern Day Slavery.
- 2) Do they have a Modern Day Slavery / Human Rights Policy.
- 3) Do they address Modern Day Slavery Risk within their Terms and Conditions of Purchase.
- 4) Will they sign to confirm acceptance of Pon Group of Companies Supplier Statement on Modern Day Slavery.

Finally a Google search is carried out to identify any existing news stories relating to any kind of breach.

Based on the vendors response, they are scored against each of the assessment points above and given an overall Risk Category.

Total Score	Risk Category	Definition
1 – 5	A	Negligible Risk
6 – 99	B	Minor Risk
100 - 9,999	C	Low Risk
10,000 - 39,999	D	High Risk
40,000 +	E	Major Risk

A Risk Category of 'C' – is an acceptable starting point for vendors complying with minimum requirements.

Vendors that are proactively taking steps to mitigate their risk and can demonstrate this can potentially score an 'A' or 'B'.

Vendors with higher risk scores 'D' or 'E' will be subject to further review to confirm the accuracy of the rating. A decision is then made on future use of this vendor and any other action that should be taken.

**High Level Risks identified:**

None

### **Integrating the findings:**

Training : Modern Day Slavery training has been developed and distributed across all Opcos to raise awareness. This is a requirement for all employees to complete and forms part of the onboarding process.

Reporting : This report is published publically and made available to all employees.

Communication : Direct reporting channels for identified impacts or concerns are established in each Opco.

### **Tracking Performance:**

Annual reviews are performed to ensure training is rolled out and supplier risks are identified and mitigated.

### **Public Communication:**

This report will be published publicly as per reporting guidelines.

### **Remediation:**

For the year 2023 there were zero impacts identified. As such, no remediation activity has occurred.

# MC5: Effectiveness

The individual Opco's monitor the effectiveness of their actions in a number of ways:

- Management Review of this report and supporting documentation.
  - Annual review of actions taken, any breaches etc..
- Review of the Risk Management Process to ensure M.D.S. risks are included.
  - Internal review as part of the ISO9001 requirement to review and ensure process are up to date and remain effective.
- Audits to ensure controls are implemented, e.g. training.
  - Internal audit of control, e.g. ensuring training is being carried out in a timely manner.
- Review of actions taken to ensure they are completed on time.
  - Regular review of actions to ensure they are completed in a timely manner and achieve the expected outcome.
- Grievance reporting procedure is in place and communicated to all staff.
  - Documented procedure and communication channels/contacts are communicated. H.R. follow up on necessary actions to address any issues.
- Engagement Surveys (OPCO specific) / Employee feedback – and then actioning of any issues raised.
  - CPS/CWS/CMA and CNC completed a full Engagement Survey of all personnel in 2022 with the intention of repeating every two/three years.
  - Employee feedback sought at all locations as an open form of communication at any time.

# MC6: Consultation

All reporting entities were consulted at the highest level regarding the Guidance for Reporting and actual report contents.

Each entity is responsible for the roll out of training within their own employees.

Feedback from consultation with each entity is collected and collated at the Reporting Entity level to ensure consistency across all areas of the business.

Results are reviewed at Senior Management level and any high risk areas identified are to become a focus for the next report.

# MC7: Other Relevant Information

No further information to report.