



Sabco Australia Pty Ltd

Modern Slavery Compliance Statement

For the financial year ending June 2025

This statement is prepared in accordance with the Modern Slavery Act 2018 (Cth) and sets out the steps taken by Sabco Australia Pty Ltd ("Sabco") during the reporting period to identify, assess, and address the risks of modern slavery in our operations and supply chains.

Our Commitment

At Sabco, we remain committed to acting with integrity, transparency, and accountability across all aspects of our business.

We believe ethical business practices are fundamental to sustaining trust with our customers, suppliers, and employees.

Modern slavery has no place in our operations or supply chains. We are dedicated to identifying risks, implementing effective controls, and driving continuous improvement in line with the UN Guiding Principles on Business and Human Rights.

Reporting Entity

This statement covers Sabco Australia Pty Ltd (ACN 108 341 911), a reporting entity under the Act.

9-13 Link Way, Laverton North, VIC 3026

Sabco is wholly owned by The Libman Company, a company registered in Illinois, United States.

Sabco owns two subsidiaries, Innotrade Group Limited (company number: 013954V) (**Innotrade**), a foreign company registered in the Isle of Man, and Libman APB Pty Ltd (ACN 078 635 195) (**Libman APB**), an Australian Proprietary Company (together, **Subsidiaries**).

It reflects actions taken during the reporting year 1 July 2024 to 30 June 2025.

Our Business

Sabco has been operating since 1892 and is a leading manufacturer and distributor of cleaning products in Australia. Guided by a strong heritage and a commitment to innovation, we aim to provide high-quality, sustainable products to households and businesses.

Sabco Australia Pty Ltd is wholly owned by The Libman Company, headquartered in Illinois, United States, with subsidiaries including Innotrade Group Limited (Isle of Man) and Libman APB Pty Ltd (Australia).

Our operations include the import, manufacture, and distribution of cleaning products from our facility in Laverton North, Victoria. We market products under well-known brands such as Sabco, Sabco Professional, Sabco Bulldozer, Mr. Clean, Turtle Wax, Oakwood, and Dishmatic.



Our Supply Chains

Sabco's supply chains span multiple geographies and include raw materials, manufacturing, packaging, logistics, professional services, and office-based goods. Our supply base covers Australia, Asia, Europe, and North America, which exposes us to differing regulatory standards, labour practices, and country-level risks.

Risks of Modern Slavery

Geographic risks were assessed using the Global Slavery Index: Low risk (Australia, NZ, USA, UK), Moderate risk (Europe, Brazil, Thailand), High risk (Pakistan, Sri Lanka, Malaysia, China).

Sector risks are more prevalent in labour-intensive manufacturing, packaging, logistics, cleaning services, and contingent labour arrangements.

We are aware of the challenges that exist where our tier one suppliers engage with channel suppliers beyond our scope, we believe we have addressed this in engaging a training partner – Australian Red Cross & SBS Modern Slavery Training Program which will provide additional awareness in this field.

Over the past 12 months, we have come to better understand the very real risks of modern slavery within Australia and the importance of avoiding complacency. We recognise that these risks are not confined to global supply chains but also exist locally. Issues such as underpayment of workers, debt bondage, and recruitment-related debt are significant concerns, and we remain committed to addressing them with vigilance and responsibility.

Actions to Assess and Address Risks

Supplier Engagement: ESAQ extended to Tier 2 suppliers; 100% Tier 1 completion achieved. Expanded audits and overseas site visits conducted. Contracts updated with compliance clauses and warranties. Supplier Code of Conduct reissued.

Investigations: Two supplier breaches investigated – one resolved, one is awaiting a secondary audit for compliance.

As part of our risk assessment, we are prioritising preventative measures, targeted training, and increased awareness of these issues across our operations and supply chains. To reinforce this commitment, we are launching a national training program designed to equip our teams and partners with the knowledge and tools needed to identify, prevent, and respond to potential instances of modern slavery.

Training: We have engaged [Australian Red Cross & SBS Modern Slavery Training Program | Australian Red Cross](#).

While this training program will be mandatory for all employees within – Procurement – Supply Chain – Customer Service – International Trade, we will extend training to all employees within Sabco.

This module training program identifies four key areas.

- 1) What is Modern Slavery
- 2) Recognising Modern Slavery
- 3) Responding to Modern Slavery
- 4) Organisations & Modern Slavery

Described as a “best-in-class course & has been designed to give every workplace practical tools to help prevent Modern Slavery in their own operations and supply chains.”

Governance: Bi-monthly Modern Slavery Working Group continues to meet and review our practices and process. KPIs implemented for audits, risk resolution, and corrective actions.

As a part of this process, we review Modern Slavery breaches and challenges business are dealing with here in Australia and in the countries in with we trade.

Effectiveness of Our Actions

Effectiveness measured through supplier audits, KPIs, board oversight, and regular consultation with subsidiaries. Audits verified corrective actions, KPIs tracked supplier compliance, and quarterly reporting ensured accountability.

Where potential breaches have been identified, we respond quickly and directly to the supplier involved. This immediate action sends a clear message of our intent to question, verify, and, where necessary, conduct audits to ensure the issue is properly addressed. By taking this proactive approach, we aim to strengthen accountability, support ethical practices, and uphold our responsibility to protect vulnerable workers.

Consultation

Consultation included Sabco subsidiaries, supplier partners, and internal stakeholders across Procurement, Supply Chain, HR, and Legal. Modern slavery risk review is now a standing agenda item at monthly management meetings.

We also partner with SEDEX and share our experiences via the community hub and shared resource process.

Looking Ahead – Future Commitments

Sabco will expand supplier mapping to Tier 3 suppliers, develop a supplier training program, enhance reporting systems, increase industry collaboration, and reduce reliance on high-risk geographies by supporting local sourcing and manufacturing.

Progression of Modern Slavery Actions

Comparison: FY2024 vs FY2025

Focus Area	2024 Compliance Statement	2025 Compliance Statement (Updated)
Supplier Engagement	ESAQ rolled out to Tier 1 suppliers with >90% completion.	ESAQ extended to Tier 2 suppliers with 100% Tier 1 completion achieved.
Audits & Site Visits	Initial supplier audits and limited site visits.	Expanded program of audits including overseas suppliers; two potential breaches investigated (one resolved, one pending an audit update).
Contractual Controls	Contracts included basic modern slavery clauses.	All new contracts include warranties, audit rights, and mandatory Supplier Code of Conduct compliance.
Supplier Code of Conduct	Issued to key suppliers; under review for updates.	Updated Code of Conduct reissued to all suppliers with mandatory acceptance.
Training & Awareness	Training delivered to procurement managers; awareness sessions limited.	Expanded training in procurement and supply chain teams; company-wide awareness materials launched. Including the Australian Red Cross and SBS Modern Slavery Training Program.
Governance & Oversight	Annual board approval; ad hoc management reviews.	Bi-monthly Modern Slavery Working Group established; quarterly reporting to the executive team.
KPIs & Effectiveness	Early development of KPIs (supplier response rates, training hours).	KPIs expanded (audits completed, risks resolved, corrective actions monitored).

Consultation	Engagement with subsidiaries and key stakeholders; limited supplier consultation.	Regular consultation with subsidiaries, suppliers, and external partners; modern slavery review added as a standing management agenda item.
Future Commitments	Expand ESAQ, improve supplier mapping, continue training.	Expand mapping to Tier 3 suppliers, develop supplier training program, improve reporting systems, increase industry collaboration, and reduce reliance on high-risk geographies.

Statement Approval

This Statement is made pursuant to the Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2025.

It has been reviewed and approved by the CEO & the Board of Sabco Australia Pty Ltd.

Mr. Herman Verhofstadt

CEO

Sabco Australia Pty Ltd

Date: 11/20/2025

Signature

Signed by:

Herman Verhofstadt

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Mr. Andrew Libman

Chairperson

Sabco Australia Pty Ltd

Date: 12/3/2025

Signature

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Andrew Libman

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