

Modern Slavery Statement

REGUPOL Australia Pty Ltd

Reporting period: 1 January 2025 – 31 December 2025

REGUPOL Australia Pty Ltd acknowledges the Traditional Owners of the land on which we live and work. We pay our respects to their Elders, past, present and emerging, and recognise their continuing connection to country.

This modern slavery statement was approved by the Board of REGUPOL Australia Pty Ltd in its capacity as the principal governing body of REGUPOL Australia Pty Ltd on the 17th of March 2026

A handwritten signature in black ink, appearing to be "Ben Jarrett", written over a horizontal line.

(Signed with approval of the Board)

Name: Ben Jarrett

Position: Managing Director

1. Reporting entity

This Modern Slavery Statement is made by REGUPOL Australia Pty. Ltd. (ABN 97 094 053 399) (**REGUPOL Australia**), a proprietary limited company incorporated in Australia with its registered office at 155 Smeaton Grange Rd, Smeaton Grange NSW 2567.

REGUPOL Australia is part of the global REGUPOL group headquartered in Germany, which has been in operation for over 65 years.

This is a voluntary Modern Slavery Statement prepared in accordance with section 16 of the Modern Slavery Act 2018 (Cth) (**Act**). REGUPOL Australia is not required to publish a Modern Slavery Statement under the Act. However, as a demonstration of its commitment to properly assess and address the risks of modern slavery within its operations and supply chains, REGUPOL Australia has voluntarily prepared this Modern Slavery Statement, which fulfils the seven mandatory reporting criteria under the Act.

This Statement has been prepared in consultation with senior management and approved by the Board of REGUPOL Australia.

2. Structure, operations and supply chains

2.1 Structure

REGUPOL Australia is a wholly owned subsidiary of REGUPOL GmbH & Co. KG, a German-headquartered multinational corporation that is one of the world's leading processors of recycled elastomers. Elastomers are used to create high-performance sports and safety flooring, antislip mats for load securing, products for impact sound insulation and vibration isolation, and protective and separating layers for construction projects. In 2019, the REGUPOL group of companies with around 750 employees recycled more than 90,000 tons of elastomers.

REGUPOL Australia is a reseller of the products manufactured by its parent company. It is headed by an Australian-based Managing Director and supported by a local management team.

The Board of REGUPOL Australia comprises the Managing Director and a non-executive director.

2.2 Operations

REGUPOL Australia's primary activities are the supply and installation of sustainable flooring and acoustic and vibration solutions.

Our operations are in Smeaton Grange, NSW, and we employ approximately 25 staff in sales, administration, and logistics.

2.3 Supply chains

REGUPOL Australia maintains a high level of visibility over our supply chain.

As we are a seller of products of our parent company, our largest supplier is the REGUPOL Group of companies.

Accordingly, many of our sub-suppliers are within the supply chain of the REGUPOL Group. They are engaged by our parent company, REGUPOL GmbH & Co. KG, or by another REGUPOL Group company.

We also have our suppliers, which are not within the REGUPOL Group supply chain.

Key products and materials in our supply chain include recycled rubber, polyurethane binders, adhesives and installation components sourced through the REGUPOL network. We also have logistics and distribution partners in Australia and internationally.

3. Risks of modern slavery practices in operations and supply chains

3.1 Operations risk

We consider there is a low inherent risk of modern slavery practices within our Australian operations due to robust labour laws which we comply with, a direct employment model and our relatively small workforce.

REGUPOL Australia has written employment agreements with all our employees and maintains a comprehensive employee handbook and employee policies in relation to workplace health and safety, overtime and entitlements. These policies were prepared in consultation with our legal advisors.

In addition to meeting all legal requirements and adopting codes and directives for workplace health and safety, we utilise risk identification, assessment and control as our primary tools for ensuring a safe work environment, to prevent accidents or even deaths at work. Further, REGUPOL Australia has written procedures for handling hazardous chemicals, including a risk assessment, register and checklist. The dangerous chemicals procedures are reviewed regularly and updated where necessary.

The contractually agreed working time for REGUPOL Australia employees is 37.5 hours per week or, for most staff, including managers, 40 hours per week. If additional working hours are required, employees are paid overtime and loading for weekends and public holidays.

REGUPOL Australia pays wages above the minimum wage in accordance with Australian Federal law (the Fair Work Act 2009 (Cth)). We ensure the wages we pay exceed the minimum wage standard, and we consider this allows our employees to achieve a living wage, i.e. to ensure they do not live in poverty. REGUPOL Australia rejects any exploitation of our employees, including permitting excessive work-time.

3.2 Supply chain risk

As REGUPOL Group companies are our largest direct suppliers, we rely on the operations and supply chains of our parent and sister companies. The REGUPOL Group has high standards regarding workplace health and safety and human rights, and we are confident that their operations and supply chain risks are low.

For example, as part of an annual update on the prequalification procedure for the Association for the Prequalification of Construction Companies (*Verein für die Präqualifikation von Bauunternehmen e.V.*), REGUPOL Australia's sister company REGUPOL Holding GmbH has stated as a matter of public record that there is no serious misconduct that calls into question its reliability including any bans, violation of German law or final judgment against employees with performance duties comprising supervision of management, including for labour exploitation or withholding or embezzlement of remuneration.

The REGUPOL Group further has a Compliance Directive that applies to all employees and includes rules for conduct. This Compliance Directive states: "REGUPOL respects internationally recognised human rights as the basis of business relationships. "

Due to familiarity and long-standing relationships with our suppliers - especially our direct suppliers, but also including many of our indirect suppliers - we have confidence that there is a low risk of modern slavery practices in our supply chains. Our suppliers operate in countries considered lower-risk according to the 2023 Global Slavery Index, such as Germany (ranked 158th globally for prevalence of modern slavery) and Japan (152nd globally). For example the recycled rubber in our products has been sourced from the same supplier in Germany for over 30 years.

However, we recognise that modern slavery risks can exist even in lower-risk jurisdictions and sectors. We also acknowledge that there is a risk of modern slavery practices in certain outsourced services, such as logistics, where subcontracting may occur on an ad hoc or casual basis and where we have less ability to identify indirect suppliers or ascertain their practices. Accordingly, our approach of vigilance and continuous improvement remains necessary.

4. Actions taken to assess and address these risks

In assessing the risks of modern slavery practices in our operations and supply chains, we note that, overall, to date, REGUPOL Group and REGUPOL Australia have identified all direct (Tier One) suppliers and have visibility of up to 80% of the supply chains for products and services of our supply chains. Accordingly, notwithstanding the potential risks identified in section 3 above, we maintain confidence that our greatest strength in assessing (and accordingly addressing) risks in our supply chains is our close and longstanding relationships with our direct suppliers.

REGUPOL Australia and our parent company, REGUPOL GmbH & Co. KG, have identified senior managers as responsible for modern slavery matters. Within the larger REGUPOL Group, the person responsible for overseeing modern slavery risks is the Compliance Officer, who is employed by our parent company, REGUPOL GmbH & Co. KG. Within REGUPOL Australia, our Operations Manager generally has responsibility for compliance matters. However, REGUPOL's Managing Director is responsible for overseeing modern slavery risks and notifying our parent company of any modern slavery risks or incidents if required.

REGUPOL Australia has a Modern Slavery Policy applicable to all employees to make our employees aware of what modern slavery is, the responsibilities of the company and employees, and the reporting channels for concerns. This policy has been uploaded to REGUPOL Australia's employee communication software, Employment Hero, where it is easily accessible.

We also have a Supplier Code of Conduct requiring all direct suppliers to adhere to standards prohibiting child labour, forced labour and coercion, and requiring compliance with workplace laws. This is available to suppliers upon request.

Awareness training has been provided to 100% of employees on the nature of modern slavery and how to identify risks of modern slavery. The training is included in onboarding for new employees.

REGUPOL Australia has developed a questionnaire response resource to ensure consistent and accurate disclosure to customer requests regarding our approach to modern slavery risks.

REGUPOL Australia has also established an internal grievance channel through our Managing Director, allowing employees to report modern slavery concerns confidentially.

REGUPOL Australia held Good Environmental Choice Australia (GECA) product certification during the reporting period and expects to complete the next certification audit by end of March 2026. GECA certification is an independent, multi-criteria ecolabel that recognises products meeting rigorous standards for environmental performance, human health and social

responsibility across their life cycle. This achievement reflects REGUPOL Australia's ongoing commitment to sustainable manufacturing, the responsible sourcing of materials, and continuous improvement in environmental management practices. Regaining GECA certification also assures customers and stakeholders that REGUPOL products are verified to meet recognised best practice benchmarks in sustainability.

REGUPOL Australia is a signatory to the United Nations Global Compact (**UNGC**), the world's largest corporate sustainability initiative. By joining the UNGC, REGUPOL Australia has committed to aligning its strategies and operations with the UNGC's Ten Principles covering human rights, labour, environment, anti-corruption, and supporting the UN Sustainable Development Goals (SDGs). This step formalises our dedication to ethical business practices, transparency and corporate sustainability. It provides us access to a collaboration and shared learning platform with thousands of like-minded organisations worldwide.

All REGUPOL Australia's suppliers are long-term and have established relationships. If a prospective supplier were to be considered, REGUPOL Australia would conduct screening of that prospective supplier to assess modern slavery risks via questionnaires and other appropriate methods. Although REGUPOL Australia does not conduct formal ongoing monitoring of suppliers, we maintain good relationships with our key suppliers through which a level of informal monitoring occurs.

Under REGUPOL Australia's Modern Slavery Policy, as previously mentioned, incidents of modern slavery must be reported to the Managing Director, who will escalate the incident to our parent company as appropriate. In terms of remediation, if modern slavery is identified in operations or the supply chain, REGUPOL Australia will take a victim-centred approach, consulting with the parent company and considering a range of responses, from ceasing supply to working with the supplier to improve standards.

5. Describe how the entity assesses the effectiveness of these actions

To assess the effectiveness of the actions set out in section 4, REGUPOL Australia

- (a) tracks staff training completion rates (100% completion during the reporting period);
- (b) records and reviews any concerns raised internally or externally in relevant policy matters, including workplace health and safety and modern slavery (no concerns were raised during the reporting period);
- (c) monitors our supplier risk, informed by changes in high-risk ratings of products, services, sectors and geographies (see section 3.2);
- (d) conducts management oversight of policy updates including a scheduled review of the Modern Slavery Policy in 2026 (see section 7); and
- (e) conducts Board review of this Statement.

6. Describe the consultation process with any entities the reporting entity owns or controls

REGUPOL Australia does not own or control any other entities.

The management team prepared this statement under oversight by the managing director in consultation with operations and compliance functions.

We engage regularly with our parent company, REGUPOL GmbH & Co. KG, to align with group-level supply chain due diligence processes and supplier management protocols.

7. Any other relevant information

As a member of the global REGUPOL group, REGUPOL Australia has a strong culture of quality, safety and environmental awareness, which helps ensure we have a responsible and well-trained workforce. In conducting our operations, we attach great importance to consistent quality, environmentally friendly production and compliance with occupational safety regulations.

We comply with the REGUPOL group management systems that require all employees of REGUPOL Australia to be responsible for product quality, environmental protection, occupational safety, and the prudent handling of the energy used in their area of responsibility. These management systems are reviewed and documented annually as part of audits.

These values, policies, systems, and procedures demonstrate our culture of responsibility and high standards, which are consistent with the seriousness with which we approach our ethical and legal obligations to address modern slavery risks in our operations and supply chains.

REGUPOL Australia notes the Australian Federal government's ongoing consultation into strengthening the Act. We will ensure we remain abreast of government and legislative responses to remain compliant with the Act now and in the future. We welcome the important contribution of these developments to enhancing transparency and accountability in addressing and reporting on modern slavery.

In the coming reporting period, REGUPOL Australia intends to conduct a review of its Modern Slavery Policy, while continuing our approach of maintaining staff awareness, remaining engaged with our suppliers, monitoring and learning from any relevant incidents or matters that may arise and staying current with best practice.