

INTRODUCTION

The United Nations and the Walk Free Foundation have estimated that globally there are 40 million victims of modern slavery. The term “modern slavery” is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery only describes serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. That said these practices are also unacceptable and are not condoned or tolerated by Coogee.

The Commonwealth of Australia Modern Slavery Act (2018) has defined eight forms of serious exploitation:

1. Trafficking in persons
2. Slavery
3. Servitude
4. Forced marriage
5. Forced labour
6. Debt bondage
7. Deceptive recruiting for labour or services
8. The worst forms of child labour - where children are subjected to slavery, similar practices, or engaged in hazardous work.

Coogee is committed to identify and address our modern slavery risk, and to this end, to maintain responsible and transparent supply chains.

Coogee operates predominately in Australia. We are conscious of where our raw materials are sourced and markets into which our finished products are sold.

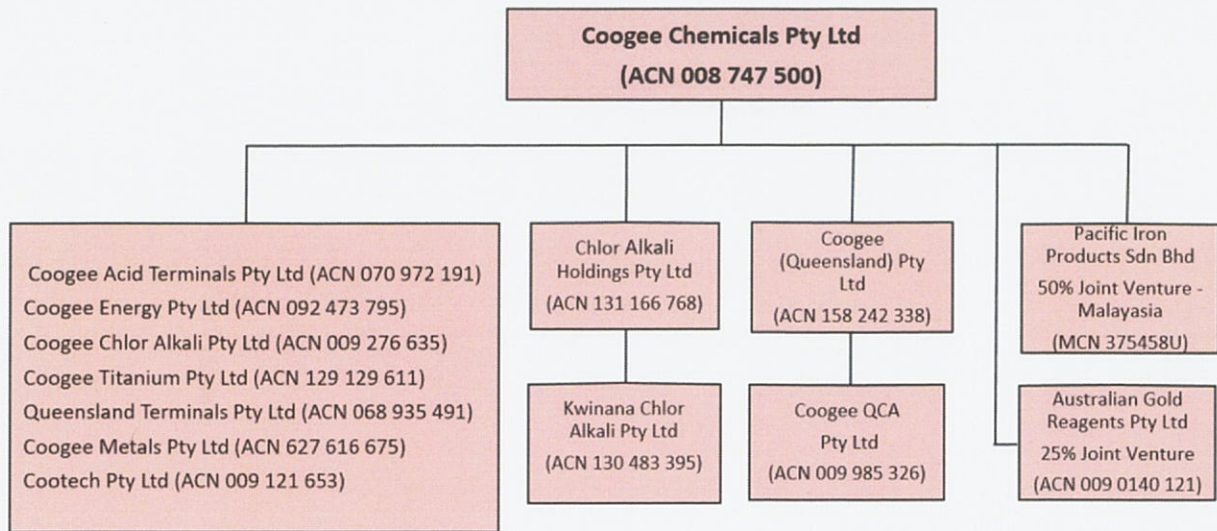
Our Statement on modern slavery reports on our actions to assess and address modern slavery risks with a view to safeguard human rights through ethical and sustainable business practices.

This is our first Statement in response to the Australian Modern Slavery Act (2018). We acknowledge we are on a journey to improve our risk identification and mitigation processes.

Our businesses and our people are all dedicated to the continuous improvement in our policies and procedures that could make a positive impact on modern slavery and oppose slavery in all its forms.

Embedded in Coogee's company values – Working Together, Accountability, Openness, Innovation and Integrity - has always been an expectation that we always operate at the highest ethical standard.

1. THE REPORTING ENTITY COVERED BY THIS STATEMENT



2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Structure

Coogee is a private and independent Australian company. The head office and main administrative centre is located in Kwinana, Western Australia. Coogee operates and manages four Major Hazardous Facility (MHF) sites in Australia. Across our Australian operations, we employ approximately 350 people directly, with the significant majority on a full-time permanent basis.

Operations

- CHLOR ALKALI

Coogee is one of Australia's largest manufacturers of chlor-alkali products with three chlor-alkali facilities across Australia – Kwinana (WA), Kemerton (WA) and Lytton (QLD). The process uses electricity to electrolyse sodium chloride solution to liberate chlorine gas and caustic soda (sodium hydroxide). In addition the downstream processes produce hydrochloric acid and sodium hypochlorite. These products are supplied to the chemical, mineral processing, mining, water treatment, galvanizing and swimming pool markets across Australia.

- BULK TANK STORAGE & TERMINALS

Coogee owns and operates a number of multi-purpose Bulk Liquid Dangerous Goods Terminals across Australia. These facilities have import and export capability and store a range of bulk chemicals and gasoline / fuels. Coogee acts as a service provider and terminal operator. These services include ability to receive or dispatch product via dedicated gantries into road tankers, rail tankers or isotainers. In some instances, pipeline networks connect directly to our customer's sites.

- **MANUFACTURING**

We have chemical manufacturing operations across a number of sites in Australia, including Kwinana (WA), Mt Isa and Lytton (QLD) and Melbourne (Vic). We produce a wide range of industrial, agricultural, mineral processing, water treatment and mining chemicals for supply to both the Australian and International markets. These products include Sodium Silicate, Sodium Aluminate, Aluminium Sulphate, Ferric Sulphate, Sulphur and Sulphur Bentonite and Sodium Ethyl Xanthates. Coogee also sources raw materials such as bulk ethanol, caustic and sulphuric acid for internal consumption.

- **TRANSPORT**

Coogee owns and operates a bulk liquid dangerous goods (DG) transport fleet in Western Australia and Queensland – this enables Coogee to have oversight and control of dangerous goods we manufacture, store, and deliver to our customers. This is a key part of our commitment to product stewardship. The fleet primarily transports product manufactured by Coogee to our customer's across the country.. Coogee's transport capability in Western Australia is based out of Kwinana. The Queensland transport group operates out of Lytton, Cairns, Townsville, Mount Isa and Gladstone, and it services Queensland, Northern Territory and New South Wales. We operate and maintain specialised DG transport equipment including isotainers, tankers, prime movers, pocket road trains and rigid trucks.

- **MELTFREE TITANIUM POWDER (TiRO™)**

Our Gen4 titanium powder demonstration scale facility is located at Kwinana, Western Australia. The facility is currently at low-rate production to demonstrate the process technology and our ability to make Ti64 titanium powder. The process inputs are magnesium metal powder and titanium tetrachloride (and other metal chloride alloy liquids). The product is designed for use in 3D metal printing for fabrication of specialised components in the aerospace, medical and automotive sectors.

- **AUSTRALIAN GOLD REAGENTS (AGR) (JOINT VENTURE)**

AGR is an unincorporated joint venture between Coogee (25%) and CSBP (75%), with CSBP acting as manager and operator of the facility and business. AGR is a manufacturer of sodium cyanide (solid and liquid forms) at Kwinana, Western Australia. Product is sold in the domestic and international market and is principally used in the gold processing sector.

- **PACIFIC IRON PRODUCTS (PIP) (JOINT-VENTURE)**

PIP is an unincorporated joint venture between Coogee (50%) and Venator (50%), with Venator acting as manager and operator of the facility and business. The joint venture takes by-product (copperas) produced from Venator's sulphuric acid based titanium pigment plant and converts this in a rotary drier to mono-hydrate and hepta-hydrate forms. The product is then packaged and supplied to the animal feed, construction and agricultural industries.

Supply Chain

Coogee has identified 17 main inputs to our manufacturing and trading operations and consequently has relatively few raw material suppliers. The majority of current supplier relationships are more than 20 years old. In most instances, the supplier's manufacturing operation is physically in Australia with their raw material sourced in Australia. On a regular basis over the term of these relationships, Coogee personal have visited these sites and in most cases are in direct contact with the source. The supply chain assessment also identified interactions on a small scale with countries recognised on the low end of the Global Slavery Index. In 2020-2021 Coogee will assess these suppliers to obtain a better understanding of their position on modern slavery.

3. THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATION AND SUPPLY CHAIN

Coogee has followed the Commonwealth Modern Slavery Act (2018) – Guidance for reporting entities and considered the following three (3) categories for risk:

(1) Geographic Risk

The Mindaroo Walk Free 2018 Global Slavery Index (GSI) ranked 176 countries according to their risk of modern slavery. 1 (most at risk) – 167 (the least at risk). Refer to Table 1.

Table 1. Outcome of our country ranking identified in our supply chain assessment.

Top third		Middle third		Bottom third	
Japan	167	China	111	India	53
New Zealand	164	Indonesia	74	Malaysia	42
Australia	163			Thailand	23
USA	158				
France	136				
Germany	134				
United Kingdom	132				
Italy	122				

Coogee believes that 99% of our existing supply chain costs arise from product supplied by counties that ranked in the top third of the (GSI). As such, from an overall geographical risk perspective, Coogee's risk is considered low.

(2) Product and Services Risk

The Mindaroo Walk Free 2018 Global Slavery Index identified "The most at-risk products" as:

- Cotton, Bricks, Garments, Cattle, Gold, Carpets, Coal, Fish, Rice, Timber, Brazil nuts/chestnuts, Diamonds, Electronics

Other than electronics (ie. computer hardware) none of the identified most at risk products feature in Coogee's supply chain.

(3) Sector and Industry Risk

We consider our product risk as well as our sector and industry risk as being low. Our chemical manufacturing occurs at scale and on a continuous basis. These facilities typically require a significant upfront capital investment, and uses technology and engineering solutions rather than manual labour.. In general the industry sector is less influenced by seasonal demands and the industry norm is to employ people on permanent or long-term contracts. As such the sector and industry risk for large-scale chemical process is considered low.

4. ACTIONS WE ARE TAKING TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY PRACTICES THAT COULD OCCUR IN OUR OPERATIONS AND SUPPLY CHAINS

- Coogee will develop a policy that guides the organisation to a better understanding of modern global slavery and ethical supply chain management. For our industry and sectors, it should address practices in our operations and supply chains that may lead to modern slavery, such as charging recruitment fees for workers, tying workers' accommodation to their employment status, unlawful wage deductions or underpayment
- Although our monetary spend is less than 1% with countries considered at risk of modern slavery practices, in our future business with these countries, we should question our supplier's impact on modern slavery risks and how they may contribute to reduce modern slavery through awareness raising and training.
- We will identify the country of origin for all bulk shipments of raw materials – although our sector risk is considered low, a complete record should be available.
- Although only a consumer a user of electronic goods, as an identified sector at risk, we will require further information from our suppliers or vendors with respect to their commitment to reduce modern slavery practices.
- Capital projects and term contracts lend themselves to short-term employment and casual labour from potentially undisclosed origins, Coogee will update project and contract management systems and terms and conditions to incorporate human rights and modern slavery clauses.
- Coogee will assign responsibility for assessing and addressing modern slavery risks to a senior manager and brief our board appropriately.
- An on-line Anti-Slavery Australia eLearning course will be completed by key stakeholders in the organisation. This two hour on line training module can be found at www.open.uts.edu.au

5. HOW COOGEE ASSESSES THE EFFECTIVENESS OF THE ACTIONS TAKEN TO ADDRESS THE POTENTIAL RISK OF MODERN SLAVERY PRACTICE.

Coogee will set up an annual management meeting to review our response to modern slavery and progress against actions agreed.

We will monitor the specific steps we have taken to assess modern slavery risks. This would include a review of prequalification checks of suppliers.

We will track the actions identified and report on open, outstanding and complete actions.

Similarly, we will work with suppliers to review how they have progressed and any actions they have put in place to address modern slavery risks.

6. HOW COOGEE CONSULTED ON THIS STATEMENT WITH OTHER ENTITIES WE OWN OR CONTROL.

Coogee has engaged with their joint venture partner in Malaysia to understand their commitment to alleviating modern slavery. Although listed on the NYSE exchange their head office in the United Kingdom has had mandatory reporting against similar legislation for 5 years.


Attached is a link to their most recent response:

<https://www.venatorcorp.com/~media/Files/V/Venator/guidelines-ethics/venator-uk-modern-slavery-act-statement-2019-jan-2020.pdf>

7. OTHER RELEVANT INFORMATION NOT COVERED BY PREVIOUS CRITERIA.

The effects of COVID and our continued operation has not identified a change in our impact to modern slavery. No other relevant information is applicable.

This Statement was approved by the board of Coogee Chemicals on 31st March 2021



Grant Lukey
Chief Executive Officer
31st March 2021.