

MODERN SLAVERY STATEMENT 2025

INTRODUCTION

Modern Slavery describes situations where individuals are subjected to exploitation through coercion, threats, deception or abuse of power, resulting in the loss of their freedom. It includes practices such as forced labour, child labour, human trafficking and debt bondage.

As a leading specialty and chemicals distribution partner, IMCD Australia Pty Ltd and IMCD New Zealand Limited (together, IMCD ANZ) recognise our responsibility to respect human rights and to identify, assess and address modern slavery risks that may arise within our operations and supply chains. IMCD ANZ is committed to conducting business responsibly and in accordance with applicable laws and internationally recognised human rights standards.

This Modern Slavery Statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Commonwealth Act of Australia) and outlines the steps taken by IMCD ANZ during the 2025 reporting year to assess and address modern slavery risks, as well as the actions undertaken to strengthen our risk management and due diligence processes.

REPORTING ENTITIES

This Modern Slavery Statement is a joint statement for the following reporting entities, together referred to as IMCD ANZ:

- IMCD Australia Pty. Ltd
- IMCD New Zealand Limited

Both entities operate under the same executive management, governance framework, and policies. This statement reflects our consolidated approach to identifying, assessing, and addressing modern slavery risks across all operations and supply chains controlled by IMCD ANZ.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

IMCD ANZ is part of the global IMCD Group, a leading distributor and formulator of speciality chemicals and ingredients, providing solutions to its partners across multiple industries. IMCD strives to be the global sales channel partner of choice to which customers of speciality chemicals and ingredients turn for first-class technical expertise, optimum logistics and solutions that help them innovate, simplify and sustainably grow their business.

IMCD ANZ operates across Australia and New Zealand through a combination of own-operated and third-party warehousing and logistics providers. The head office for IMCD ANZ is in Melbourne.

IMCD ANZ offers a comprehensive and complementary product portfolio by partnering with globally reputable suppliers. We cover various industries including Advanced Materials, Beauty and Personal Care, Coatings & Construction, Food & Nutrition, Homecare and I&I, Industrial Solutions, Lubricants & Energy and Pharmaceuticals.

IMCD ANZ manages its supply chains through contractual obligations, supplier codes of conduct, and ESG standards, aiming to ensure responsible practices and transparency. These measures support our commitment to prevent modern slavery within our operations and supply chains.

RISK ASSESSMENT

IMCD ANZ recognizes that modern slavery risks can arise both within our operations and throughout our supply chains. To manage these risks effectively, we conduct ongoing assessments based on our operations, supplier locations, industry sectors, and product characteristics.

Operations

At IMCD ANZ, we have several global policies and procedures that promote a safe working environment and support the health, safety and security of our employees. Our business partners are expected to adhere to the same guiding principles.

Our operations in Australia and New Zealand are generally low risk due to compliance with local labour, employment, and health and safety laws. IMCD ANZ has established several controls to reduce operational risks.

The IMCD Group Human Rights Policy encapsulates our commitment to internationally recognised human rights standards and outlines our approach to safeguarding human rights within our operations and supply chains. IMCD supports the International Labour Organisation (ILO)'s aim to implement universally accepted labour standards and recognise and respects human rights. In addition, IMCD supports the United Nations "Guiding Principles on Business and Human Rights" and the Ten Principles of the United Nations Global Compact, to which IMCD is a signatory.

In addition to these existing group policies and procedures, IMCD ANZ complies with all applicable local labour, employment and fair work laws in Australia and New Zealand. Our internal auditing programs ensure the effectiveness of our risk control framework and compliance with our policies.

These controls assist IMCD ANZ in managing the risk of Modern Slavery within our operations effectively. However, we recognise there may be residual areas of vulnerability in our operations due to the nature of our service providers. For example, these could include outsourced services such as office and site cleaning, facilities management and the use of labour-hire contractors.

Supply Chains

The nature of our business means that our supply chains are diverse and, in some cases complex. As a result, IMCD ANZ recognises the need to continuously review, address and mitigate modern slavery risks in any form within our supply chains.

IMCD ANZ has identified potential modern slavery risks based on the geographic locations of suppliers within our supply chain, including suppliers operating in countries identified as higher risk by the Global Slavery Index 2025. For IMCD ANZ, China and India represent higher risk geographic areas within our supply chain.

In addition, certain industry sectors serviced by IMCD ANZ, including the construction industry, are recognised as having higher inherent risk of modern slavery practices. IMCD ANZ also distributes specialty chemicals to a range of market segments, including products such as rubber-related products, which are known to carry higher modern slavery risks due to how they are produced, provided and used.

IMCD ANZ utilises an extensive network of warehousing and logistics suppliers to facilitate the distribution of imported products. These activities may involve higher modern slavery risks due to reliance on manual labour and subcontracting.

IMCD identifies and assesses modern slavery risks through supplier approval questionnaires, insights from sourcing offices, and the use of a risk matrix. IMCD sourcing offices established in China and India, support traceability of product sources and conduct on-site audits to confirm supplier compliance with environmental, social and governance (ESG) requirements.

KEY ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Supplier Due Diligence and Engagement

IMCD ANZ applies a risk-based approach in assessing and addressing modern slavery risks within our operations and supply chains.

IMCD's Code of Conduct and ESG standards for IMCD Business partners outline our zero tolerance approach to unethical business practices, including bribery, modern slavery, human trafficking and any other improper conduct. These standards are communicated to all new and existing direct suppliers.

We expect our business partners to comply with applicable laws and the principles outlined in the IMCD Code of Conduct. We recognise that the responsible management of modern slavery risk within our supply chains requires ongoing collaboration with suppliers.

IMCD has policies and procedures in place to assess new and existing suppliers using a risk-based approach that considers factors such as product characteristics, geographic location, supply chain complexity and industry developments. Suppliers acting as distributors are subject to additional checks to review upstream supply chains prior to goods being delivered to IMCD ANZ.

IMCD ANZ also utilise a third-party risk monitoring system, Dow Jones, which operates in the background to support our supplier due diligence processes. All suppliers within our database are automatically screened against the system every 24 hours.

This monitoring process identifies potential risk indicators, including financial, compliance, sanctions, regulatory, and other adverse findings. Where significant alerts or major hits are identified, the relevant supplier account is placed on hold pending further review and final internal checks by IMCD team.

This ongoing monitoring process assists us in identifying and responding to potential modern slavery and broader compliance risks within our supply chain in a timely manner.

If a potential modern slavery situation is identified with a supplier, IMCD conducts a root cause analysis to understand the contributing factors. Suppliers are required to implement corrective action plans, and progress against these actions is regularly monitored. Where risks cannot be adequately addressed, IMCD may suspend or terminate supplier relationships.

Employees, Training and Internal Controls

IMCD ANZ employees must review and agree to comply with the IMCD Company policies, IMCD Business principles, IMCD values and IMCD's Code of Conduct, which set out our expectations for ethical behaviour and respect for human rights.

Employees receive mandatory training on the Code of Conduct, which includes content relevant to safe working conditions, ethical standards, and the prohibition of forced labour and child labour. Employees are required to periodically acknowledge their understanding of and compliance with these requirements.

IMCD ANZ maintains internal controls to support the identification and escalation of potential concerns. These include a confidential Internal Alert Procedure and an Ethics and Compliance Hotline, which are available to all employees to seek guidance or report concerns relating to unethical, illegal or irresponsible conduct. All issues are handled seriously and investigated in a fair and confidential manner, in accordance with established procedures.

Contractors

IMCD's standard contracts consist of explicit prohibitions on slavery, forced labour and human trafficking.

EFFECTIVENESS ASSESSMENT

As part of IMCD's ESG reporting commitments, IMCD conducts regular reviews of our modern slavery risk management action plan and due diligence processes to assess our ongoing effectiveness.

IMCD ANZ assesses effectiveness of its actions through a combination of internal reviews and third-party assessments.

Internal Reviews

- Monitoring supplier compliance with the principles and requirements set out in part three of the IMCD ESG standards in relation to labour standards and human rights.
- Reviewing outcomes of supplier risk assessments, questionnaires and supplier performance reviews.
- Monitoring the implementation and progress of corrective action plans where supplier risks or non-compliance are identified.
- Periodic review of employee training completion relating to the IMCD Code of Conduct, which covers working environment standards, including forced labour and child labour set out in part two of the code.
- Reviewing issues raised through internal reporting mechanisms, including incident reports and ethics and compliance channels.

Use of Third-Party Assessment Tools

In addition to internal reviews, IMCD measures its sustainability performance through third-party assessment programs such as EcoVadis. The IMCD Group EcoVadis assessment is representative of all IMCD companies, and IMCD Australia and New Zealand contribute data to support this assessment. These assessments form the basis of how IMCD assesses and monitors the effectiveness of its actions towards combating modern slavery in its operations and supply chain.

IMCD ANZ also utilises Sedex tools and services to support supplier engagement and the monitoring of ethical, social and labour standards within its supply chain. IMCD Australia and New Zealand are members of SEDEX and work with its suppliers through the platform to promote safe, ethical and sustainable business practices and to help protect working conditions within the supply chain.

Use of Findings and Continuous Improvement

The findings from these reviews and assessments are analysed to identify trends, patterns, emerging risks and potential areas of improvements. Where opportunities to strengthen controls or engagement are identified, these are used to inform enhancements to supplier due diligence processes, risk prioritisation and internal awareness activities.

Sustainability reports published by IMCD Group annually are based on an analysis of social, environmental, and economic performance and further support the evaluation of IMCD's ESG practices.

IMCD ANZ's audit and monitoring processes primarily rely on the practical implementation of supplier questionnaires, risk assessments and supplier review processes.

PATH FORWARD

IMCD ANZ recognises that addressing modern slavery risks requires ongoing vigilance and continuous improvement.

Over the next reporting period, IMCD ANZ will focus on:

- Continuing to monitor and manage modern slavery risks within its existing supplier network using a risk-based approach
- Transitioning to the online supplier questionnaire system by progressively migrating suppliers from the manual process to the digital platform, ensuring full adoption across all suppliers to improve efficiency, data accuracy, and tracking capabilities.
- Leveraging the supplier ESG program to strengthen engagement with suppliers and promote alignment with IMCD's expectations regarding labour standards and human rights
- Enhancing data transparency and supplier oversight through continued use of third-party reporting platforms, including EcoVadis and Together for Sustainability
- Continuing to review external guidance and industry developments to inform enhancements to its modern slavery approach
- Reviewing risk assessment methodologies and supplier engagement processes to ensure they remain effective and responsive to emerging risks

IMCD ANZ remains committed to working collaboratively with suppliers and the IMCD Group to promote responsible and ethical supply chains.

THE PROCESS OF CONSULTATION ACROSS THE IMCD ANZ TEAM

IMCD ANZ is pleased to submit this Modern Slavery Statement under section 13 of the Modern Slavery Act 2018 (Commonwealth Act of Australia) for the financial year ending 31 December 2025.

The consultation across the Australian and New Zealand teams occurs through regular meetings, joint audits and collaboration between relevant internal stakeholders, including those responsible for supply chain, procurement, operations, human resources, compliance and ESG matters. Consultation includes discussion on risk identification, supplier management practices and the preparation of this statement.

IMCD Australia Pty Ltd and IMCD New Zealand Limited operate under the same governing policies and share the same executive management, enabling a consistent and coordinated approach to addressing modern slavery risks across both entities.

This Modern Slavery Statement has been approved by the Board of Directors of IMCD Australia Pty Ltd and IMCD New Zealand Limited on **June 2026**.



Ryan Harrison

Managing Director- Australia and New Zealand

