

Haymes Paint Modern Slavery Statement

1 July 2024 – 30 June 2025



Australia's first family of paint.



SINCE 1935

CONTENTS

Modern Slavery Statement

Modern Slavery Compliance Framework

This Modern Slavery statement (Statement) made under the Modern Slavery Act 2018 (Cth) (Modern Slavery Act) outlines how we have been assessing and addressing modern slavery risks in our operations and supply chains in the reporting period from 1 July 2024 to 30 June 2025 (FY25 Reporting Period).

This Statement identifies our key risks that we will focus on moving forward in a prioritised risk-based approach, which includes:

- our overseas raw materials suppliers for core paint products;
- cleaning services providers for our Haymes Paint Ballarat store and office premises

+ Provides an overview of the steps we intend to take in future reporting periods as part of our modern slavery compliance roadmap including: training and education, reviewing our key supplier list, developing modern slavery focused contractual controls and reviewing and updating our employee code of conduct (our compliance roadmap is set out in greater detail in section 7).

We have followed the Commonwealth Guidance closely in preparing our Statement and informing the consideration of the steps we intend to take in future reporting periods, and we look forward to reporting on our progress in our next Statement.

Principal Governing Body Approval

This Modern Slavery statement was approved by the Board of Henry Haymes Pty Ltd (ABN 14 004 201 638) in their capacity as the principal governing body of Henry Haymes Pty Ltd pursuant to section 13 of the Modern Slavery Act 2018 (Cth) on the 12 December 25.

Foreword from the CEO

Founded in Ballarat in 1935, Haymes Paint is driven by its passion to provide quality and innovative paint and coating products to all Australians.

Underpinning our business are the values which we live and breathe every day:

- **Truth**
- **Passion**
- **Motivation**
- **Respect**
- **Listen & Learn**

These values drive our decision making and demonstrate our commitment to ensuring that people involved with our business are protected from harm.

Haymes Paint acknowledges that, regrettably, modern slavery and human trafficking exist in Australia and around the world. Let me be emphatically clear – Haymes Paint considers slavery and human trafficking in any form abhorrent. This statement demonstrates our commitment to ensuring that it has no place in the operations of our business.

As a large-scale paint manufacturer sourcing inputs domestically and from overseas, we recognise there are modern slavery risks in our operations and supply chain, and our efforts to address these risks form a key pillar in our sustainability journey. We understand the importance of taking meaningful steps to help stamp out this issue, and this Statement outlines our achievements so far and our future intentions in achieving that overarching objective.



A handwritten signature in white ink on a grey background. The signature reads "Rodney Walton" in a cursive script.

Rod Walton
CEO

Signature of Responsible Member

This Modern Slavery Statement is signed by Mr Rod Walton in his role as Chief Executive Officer and member of the Board of Henry Haymes Pty Ltd (ABN 14 004 201 638) in accordance with section 13 of the Modern Slavery Act 2018 (Cth) on 12 December 2025.



CRITERION 1

Identify the reporting entity

- + The reporting entity is Henry Haymes Pty Ltd (ABN 14 004 201 638), trading as Haymes Paint, Waringa Drive, Wendouree Industrial Park, Ballarat, Victoria 3355 (referred to as 'we', 'us', 'our' or 'Haymes Paint' in this Statement).
- + Haymes Paint is a reporting entity under the Modern Slavery Act and this Statement is submitted and published for the FY25 Reporting Period.
- + Haymes Paint makes this Statement in accordance with section 13 of the Modern Slavery Act as a single reporting entity. Haymes Paint does own one other dormant and non-operational entity, HH Tas Pty Ltd (ABN 48 601 938 532).
- + Our Statement covers all of the seven mandatory criteria for reporting as set out in Section 16 of the Modern Slavery Act. In preparing this Statement, we have used the Commonwealth Guidance for Reporting Entities and updated Modern Slavery Act Supplementary Guidance by the Attorney General's Department (together, the Commonwealth Guidance) to help inform and guide our approach.

CRITERION 2

Describe the reporting entity's structure, operations and supply chain

2.1 OUR STRUCTURE

- + Haymes Paint is an Australian private company limited by shares and is incorporated in Australia.
- + Haymes Paint was established in 1935 in Ballarat, Victoria, where today, its manufacturing facility and registered office are still located.
- + Haymes Paint also owns and operates a network of 40 company owned Haymes Paint Shops across Australia, as well as supplying to 20 Haymes Paint Shops that operate under franchise, 39 PaintRight outlets, and several hundred independently owned and operated stockists.

2.2 OUR OPERATIONS

- + Haymes Paint's principal activities include the manufacturing, distribution, retail operations, marketing and sale of Haymes Paint's Australian made paint and coatings products to Australian customers, as well as small volumes exported to Japan. To date, Haymes Paint is available through more than 350 stockists nationwide, including 40 company owned Haymes Paint Shops, 20 Haymes Paint Shops that operate under franchise, and 39 PaintRight stores and several hundred independently owned and operated businesses.
- + As of 30 June 2025, the majority (95%) of Haymes Paint's 411 employees are permanent employees, including full time and part time employees. The remainder are casual employees.

411

TEAM MEMBERS

250+

INDEPENDENT STOCKISTS

60

Haymes PAINT SHOP

WE'VE GOT YOU COVERED

39

PAINT RIGHT

From start to finish!

Product / Service category	Description
Processing, production and packaging of Haymes Paint products	A 100 percent Australian owned and operated Australian paint and coatings manufacturer, with operations and a registered office in Ballarat, Victoria. Almost all Haymes Paint branded paint and coatings products are manufactured at this site.
Direct employment of workers supporting the paint brand	<p>Various teams are employed across a wide range of functions to support the manufacture, distribution and sale of paint, coatings and related tools and equipment. These include:</p> <ul style="list-style-type: none"> + manufacturing and research and development teams based in Ballarat + teams that transport products to customers + store-based retail operations teams (via company-owned Haymes Paint Shops) + in-field and commercial sales teams that operate throughout Australia + professional, administrative and support teams (eg people and culture, finance, IT) + sales support and marketing teams.
Our physical stores including our franchise operated stores and online store	<p>We sell our wide range of paint and coatings products physically through our 350 stockists which include:</p> <ul style="list-style-type: none"> + our company owned Haymes Paint Shops + our franchise operated Haymes Paint Shops; + a cooperative of independently owned and operated stores operating under the PaintRight banner; and other independent retailers that stock our products. <p>We also retail a select range of products directly to consumers via our e-commerce channel. Both our online and physical stores provides colour services support to help our customers with their paint projects.</p>

Table 1: Key Operations

As a full-scale paint manufacturer, retailer and supplier operating in all Australian states, our supply chain is long and complex, and is made up of both Australian and overseas-based suppliers.



2.3 OUR SUPPLY CHAIN

As a full-scale paint manufacturer, retailer and supplier operating in all Australian states, our supply chain is long and complex, and is made up of both Australian and overseas-based suppliers.

To maintain our reputation for producing paint and coatings products of the highest standards, we have stringent requirements around sourcing the highest quality raw materials. These materials are sourced from a panel of known suppliers, many of which we have had commercial relationships for many years. The majority of raw materials that go into our products are sourced and produced in Australia. While we aim to procure materials locally where possible, there are instances where we source materials from overseas to meet our operational needs.

We have mapped out our supply chain at a high level in the following table.

Product / Service category	Description
Key suppliers used in relation to core Haymes Paint products	
Raw materials suppliers for paint and coating products (including, but not limited to: pigment, resin, solvent, additives and other chemicals)	<ul style="list-style-type: none"> + The majority of the raw materials that go into our paint and coating products are sourced in Australia. + Where necessary, we also procure raw materials for manufacturing purposes from Australian-based suppliers that source their materials from operations overseas. In addition, we also source directly from international suppliers. + In many cases, these overseas operations are located in Asia – in particular – China, Indonesia and Pakistan. We recognise that some of these direct suppliers have their own supply chain (Tier 2 Suppliers), in other countries. + We also procure for resale hardware, painting tools and accessories from a range of suppliers + In future reporting periods, we intend to conduct supplier due diligence on our key direct raw materials suppliers in a prioritised risk-based approach.
Hire gear suppliers (spray guns)	
Logistics and distributors who transport our paint and coating products to our retailers, shops and stockists, and occasionally to our customers	
Merchandise providers and manufacturers	
Suppliers of hardware, painting tools and accessories	
Suppliers for non-core paint products	
Office Supplies	<ul style="list-style-type: none"> + To support our operations, Haymes Paint engages a range of suppliers that supply goods or services that are not integrated or used in the manufacture and distribution of Haymes Paint’s core products. These include, but are not limited to, utilities, (energy, water), office supplies, professional services, cleaning, routine maintenance, security, and technology
Indirect suppliers - IT Equipment	
Indirect suppliers - Security Services	
Indirect suppliers - Cleaning Services	
Direct Supplier - products available for resale	

Table 2: Supply chain



CRITERION 3

Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities it owns or controls.

In this section we identify the 'risks of modern slavery practices', meaning the potential for Haymes Paint to cause, contribute to, or be directly linked to modern slavery through our operations and supply chain.

In this context, 'risk' means to people, rather than the risks to Haymes Paint (such as reputational or financial damage).

The risk mapping of our operations and supply chain was informed by the Commonwealth Guidance, known 'modern slavery indicators' and the Global Slavery Index 2023. The findings of the risk-mapping are set out in Table 3.

At a high level, our risk mapping indicated that our modern slavery risks were higher outside our core operations of paint manufacturing and reside predominantly within our supply chain. This can be attributed to the bulk of our operations occurring on Australian shores, our compliance with local employment laws and regulations, and our employment practices that generally involve directly employed staff.

Our supply chain can involve sourcing materials through suppliers where resources and operations are located offshore. This presents a higher risk of causing, contributing or being directly linked to modern slavery. To mitigate this risk, Haymes Paint has enacted policies and follows procedures that seek to identify potential exposure to modern slavery, and to set out that modern slavery, in all its forms, is not tolerated.

As part of our compliance roadmap, work will begin to develop a more robust risk assessment process for our suppliers in order to both anticipate and identify additional risks to mitigate for future reporting periods.

**Our operations are based in
and carried out within Australia
as an Australian Owned and
Made paint brand.**



Category of modern slavery risk indicators	Explanation	Risk/Exposure
Sector & Industry Risks	<p>A sector or industry that is informal and unregulated or has limited visibility over lower-tier suppliers, is higher risk.</p> <p>A sector or industry that uses seasonal, low-paying or low-skilled labour or dangerous work is higher risk.</p> <p>Cleaning, textiles and fashion (garment industry), protective equipment (PPE) and industries which manufacture and produce raw materials are all identified as higher risk industries and sectors.</p>	<p>Haymes Paint's operations involve the use of:</p> <ul style="list-style-type: none"> + some overseas direct suppliers for procurement of raw materials + cleaning service providers for office premises and the Ballarat store. The Australian Government recognises cleaning services as a high-risk sector + suppliers of PPE used in manufacturing facilities + branded merchandise suppliers for shirts, jackets, uniforms, and other clothing merchandise (textiles/cotton manufacturing/processing industries). <p>With respect to the sale of our products through retail stores (whether operated directly by Haymes Paint or via our franchise network), the retail industry is known to have a risk of exposure to modern slavery through use of casual employment and engaging migrant workers (and other groups who may be at higher risk of being impacted by modern slavery).</p>
Product & Service Risks	<p>Some products and services are considered a higher modern slavery risk because of the way they are produced, provided or used, and importantly, where they are sourced.</p> <p>The development of a product or delivery of a service may have been reported as involving labour exploitation by international organisations or NGOs. For example, the sourcing of raw materials, textiles and some PPE are recognised as having a higher modern slavery risk. Cleaning services are acknowledged globally as a key industry sector that has an elevated modern slavery risk globally.</p>	<p>We identified raw materials, cleaning services, PPE and cotton (for Haymes Paint merchandise) as higher risk products and service risks.</p> <p>The products that Haymes Paint makes available for resale through company owned and franchised Haymes Paint Shops, PaintRight, franchise partners and independents stockists, including hardware, painting tools and accessories may pose a modern slavery risk, especially given their often low price point and the disposable/consumable nature of these items.</p> <p>We are not aware of any other products or services related to Haymes Paint's business that can be considered higher risk; risk assessments will be revisited regularly.</p> <p>We are not aware of any reports connected with Haymes Paint's business involving labour exploitation by international organisations or NGOs.</p> <p>Haymes Paint is not aware of any elevated risk of modern slavery exposure. Many of these items are sourced through suppliers that have long-standing relationships with Haymes Paint and are regularly stocked at other national retailers that abide by modern slavery legislation.</p>

Table 3: Category of modern slavery risk indicators

Category of modern slavery risk indicators	Explanation	Risk/Exposure										
<p>Geographic Risks</p>	<p>Victims may be working in a country that has a high prevalence of human rights violations (eg, modern slavery), has inadequate protections for workers, weak rule of law, forces parts of the population to work for development purposes (for example, to assist on a compulsory basis with construction or agriculture projects), or has a high prevalence of people who are vulnerable to exploitation.</p> <p>The Global Slavery Index 2023 is a useful tool to identify the prevalence of modern slavery and human trafficking in a particular country, and to assess the adequacy of a government's response to modern slavery and human trafficking risk (see the list below of countries identified in the Global Slavery Index as taking the least action in respect to modern slavery), and that prevalence of modern slavery is not necessarily uniform across a particular country.</p> <p>The Global Slavery Index</p> <table border="0"> <tr> <td>1. North Korea</td> <td>6. Tajikistan</td> </tr> <tr> <td>2. Eritrea</td> <td>7. United Arab Emirates</td> </tr> <tr> <td>3. Mauritania</td> <td>8. Russia</td> </tr> <tr> <td>4. Saudi Arabia</td> <td>9. Afghanistan</td> </tr> <tr> <td>5. Türkiye</td> <td>10. Kuwait</td> </tr> </table> <p>Source: Global Slavery Index 2023</p>	1. North Korea	6. Tajikistan	2. Eritrea	7. United Arab Emirates	3. Mauritania	8. Russia	4. Saudi Arabia	9. Afghanistan	5. Türkiye	10. Kuwait	<p>With the majority of our raw materials sourced from within Australia, our modern slavery risk is lessened.</p> <p>There are instances where we may source raw materials from overseas suppliers. These suppliers are based in countries including China, Canada, Indonesia, and Germany.</p> <p>Some raw materials have been recognised as being sourced from geographies with a high risk of modern slavery, including China, Indonesia and Pakistan. While the majority of Haymes Paint's raw materials are sourced onshore, we understand that, in some cases, these Australian direct suppliers will have sub-suppliers that source materials from higher-risk locations.</p> <p>Accordingly, Haymes Paint intends to prioritise and use its leverage with key direct suppliers to better understand the risks of modern slavery in respect of those who provide raw materials for Haymes Paint's core paint products.</p>
1. North Korea	6. Tajikistan											
2. Eritrea	7. United Arab Emirates											
3. Mauritania	8. Russia											
4. Saudi Arabia	9. Afghanistan											
5. Türkiye	10. Kuwait											
<p>Entity Risks</p>	<p>Some businesses or other entities may have be higher risk because of poor governance structures, a record of treating workers poorly or a track record of human rights violations.</p>	<p>We need to undertake further risks assessment to determine entity risks within our supply chain, including our raw materials suppliers, including via the rollout of steps set out in Criterion 4 such as the [Supplier Handbook.]</p>										

Table 3: Category of modern slavery risk indicators

Our approach

Based on our risk assessment, we will continue to take a prioritised risk-based approach as recommended by the Commonwealth Guidance.

In future reporting periods, we will focus our efforts on the following key areas which we have identified as having higher risks and where we have the most leverage:

- + the key direct overseas suppliers of raw materials for Haymes Paint core paint products
- + cleaning providers for Haymes Paint's stores and office premises

CRITERION 4

Actions taken to assess & address risks, including due diligence & remediation

Set out below is a summary of measures taken during the current reporting period and their status to assess and address the modern slavery risks in our operations and supply chain. The table also summarises existing policies and processes we have in place which help us assess and address modern slavery risks.

Action	Purpose and Objective	Actions undertaken in the reporting period
Developed an Anti Modern Slavery Policy	<p>We developed an Anti Modern Slavery Policy which stipulates Haymes Paint's expectations regarding modern slavery risks and reporting on modern slavery incidents. The policy explains modern slavery and human trafficking; sets expectations; requires reporting of actual or suspected modern slavery; and identifies potential indicators.</p> <p>We intend to operationalise and make our staff aware of the policy in future reporting periods.</p>	<p>The Anti Modern Slavery Policy was developed and finalised in preparation for enactment across all operations under Haymes Paint's control.</p> <p>Anti Modern Slavery and Human Trafficking compliance is stated in our People & Culture Policy Book under responsibilities for team members. The Anti Modern Slavery and Human Trafficking Policy is now also listed as a source to reference.</p> <p>The policy was referenced to suppliers as part of the Supplier Partner Handbook for merchandise and goods suppliers and will be expanded to raw materials suppliers in 2026.</p> <p>With the Anti Modern Slavery Policy and Code of Conduct now finalised, these documents will be made available on our external website to required parties for future reporting periods.</p>
Developed a Supplier Code of Conduct and began work on a Supplier Handbook	<p>We developed a Supplier Code of Conduct which sets clear expectations with suppliers and sub-tier suppliers regarding modern slavery risks.</p> <p>The code details the anti modern slavery standards we require; our preference to support suppliers to lessen their modern slavery exposure; preferred reporting frameworks; as well as detail standards on specific issues such as child labour, working hours and wages, health and safety, environment and harassment.</p> <p>These documents will be made available on our external website to required parties for future reporting periods.</p>	<p>The Supplier Code of Conduct was enacted across all Haymes Paint operations under its control.</p> <p>Work has begun to develop a Supplier Handbook for all third party manufacturers, raw materials suppliers and other service providers (including cleaning/maintenance providers).</p>

Table 4: Actions taken to assess and address risks

Action	Purpose and Objective	Actions undertaken in the reporting period
Developed an Anti Modern Slavery Compliance Roadmap	<p>Work has begun to identify measures that aim to improve our ability to assess and address modern slavery risks in future reporting periods.</p> <p>The roadmap assigns responsibilities and specific actions to relevant internal stakeholders to ensure activities related to preventing our exposure to modern slavery are delivered within reasonable timeframes and achieve their intended outcome.</p>	Ongoing
Implementation of specific Anti Modern Slavery Initiatives	Review our key supplier list – this will help us to better assess the modern slavery risks in our key supply chains and inform our approach to Criteria 3 for future reporting periods.	Ongoing
	Modern slavery training for key staff – this will help key staff (including procurement staff) identify and understand how to escalate and deal with modern slavery risks and incidents.	Achieved
	The establishment of a Haymes Paint Anti Modern Slavery Working Group – we will aim to establish a working group to ensure ownership and responsibility within the organisation for driving our modern slavery journey	Achieved
	Review and Update our Employee Code of Conduct – this will supplement our Anti Modern Slavery Policy and inform our staff and team members of expectations regarding modern slavery risks and reporting modern slavery incidents to our staff	Achieved
	Review and update modern slavery contractual controls in key higher risk supplier agreements and trading terms – this will help ensure that our suppliers take the necessary steps to identify and reduce any risks of modern slavery and comply with local laws	Achieved
	Develop template modern slavery clauses – this will help us take a prioritised risk based approach to assessing and addressing modern slavery risks with our suppliers.	Achieved

Table 4: Actions taken to assess and address risks

CRITERION 5

Describe how the reporting entity assesses the effectiveness of these actions

Haymes Paint and entities within its operations uses key performance indicators (KPIs) to measure how effective we have been in identifying and mitigating modern slavery risks in our supply chain. We will base any assessment and required improvements to our modern slavery compliance framework on KPI achievements.

Key Objective	KPI	Status
Implement and approve the Anti Modern Slavery Policy	The Anti Modern Slavery Policy to be approved by the Haymes Paint Board of Directors in FY25.	Achieved
Communicate and operationalise to all staff the Anti Modern Slavery Policy and Supplier Code of Conduct	The Policy and Supplier Code of Conduct to be communicated (e.g. email or intranet) and any questions received by staff have been addressed.	Achieved The Haymes Paint Supplier Partner Handbook references our Modern Slavery Statement
Undertake training with relevant staff (eg procurement)	Training attendance rates and qualitative feedback from attendees.	Achieved Modern Slavery training modules have been rolled out across the workforce, with completion rates above 90 per cent
Reporting and remediation of issues raised through our reporting platform	The number of modern slavery risks or instances raised through our reporting channels and addressed by Haymes Paint.	Ongoing

Table 5: Key Performance Indicators

CRITERION 6

Describe the process of consultation with any entities the reporting entity own or controls

Haymes Paint is making a 'single statement' for the purposes of the Modern Slavery Act. While we do own or control one other entity, HH Tas Pty Ltd, this entity is dormant and non-operational. As such, it was not necessary to consult with this entity. In preparing our Statement, we involved members of our executive team and other internal stakeholders who contributed to the development of this Statement.

CRITERION 7

Looking Ahead

Our Indicative Future Roadmap

We have continued to progress our requirements and aspirations in the FY25 Reporting Period and understand that there is much more work to do. Over the next reporting periods (indicatively targeting a three year time frame), we will consider taking the following strategic actions to improve the way we assess and address modern slavery risks.

FIRST TRANCHE

- + **Supplier pre-screening questions for modern slavery** – to bolster our modern slavery due diligence process to better manage modern slavery risks in the supplier procurement process
- + **Development of a supplier survey for our key suppliers** – to bolster our modern slavery due diligence process to assist us in identifying existing modern slavery risks in our supply chain
- + **Build on our anti modern slavery training and education program** – this will involve considering any feedback received from the training rolled out in FY25 and the target audience for subsequent trainings to ensure they are 'fit for purpose'.

SECOND TRANCHE

- + **Develop a Modern Slavery Response guide** – to will detail how Haymes Paint deals with modern slavery risks and impacts internally. The response guide would detail clear, internal reporting channels for modern slavery risks and incidents, including mechanisms for continuous feedback, management oversight, escalation processes and accountability reporting to the Haymes Paint Leadership Team.
- + **Establishment of a grievance mechanism** – this will help establish a dedicated way for people to safely raise modern slavery concerns about the impact an entity (for example, our suppliers) to safely raise concern about the impact an entity is having on them).
- + **Sending out mandatory modern slavery questionnaires** to our key high-risk suppliers requiring them to certify their adherence to our Anti Modern Slavery Policy and Supplier Code of Conduct.

We are aware that the Modern Slavery Act is currently under review and the Australian Government has published its statutory review. We welcomed the appointment of the first federal Anti-Slavery Commissioner, and the publication of the Strategic Plan 2025-2028.

We will continue to monitor the progress of the Act's review and any recommendations implemented, and our roadmap and future Statements will be informed by the outcome of these regulatory reforms and developments.



Australia's first family of paint. SINCE 1935

Annexure – Mandatory criteria and page references

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

a) Identify the reporting entity.	Page 4
b) Describe the reporting entity's structure, operations and supply chain.	Page 4–7
c) Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities it owns or controls.	Page 8–11
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Page 12–13
e) Describe how the reporting entity assesses the effectiveness of these actions.	Page 14
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	Page 14
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	Page 15

* Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

** Section 4 of the Act defines a responsible member as:

- a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or
- b) if the entity is a trust administered by a sole trustee—that trustee; or
- c) if the entity is a corporation sole—the individual constituting the corporation;
- d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

For more information or to find your local distributor please visit haymespaint.com.au

Haymes Paint

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