

**Redox Group Pty Ltd.
Modern Slavery Statement
Reporting Year 2019**

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INTRODUCTORY STATEMENT

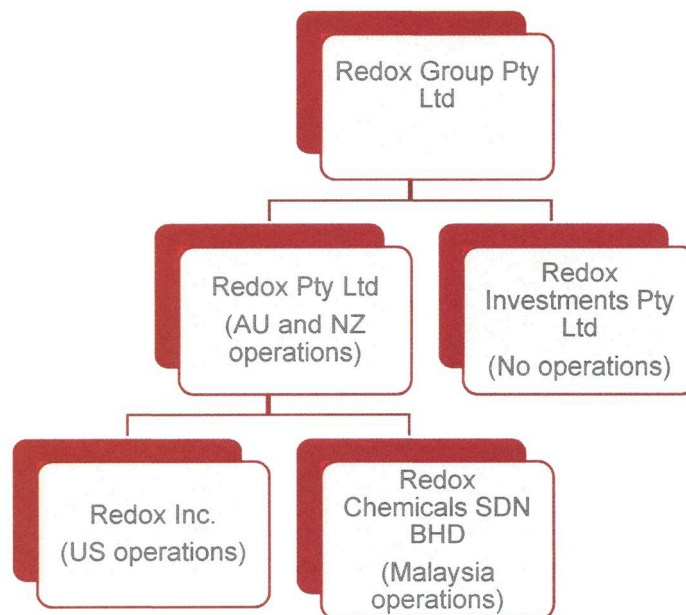
This Statement¹ is made by Redox² pursuant to the Modern Slavery Act 2018. This Statement is intended to extend to and cover all Redox wholly owned subsidiaries and operations.

The purpose of this Statement is to describe the steps Redox and all its wholly owned subsidiary businesses and divisions are taking, with the aim of minimising the risk of modern slavery across our business operations and supply chains.

At Redox we acknowledge our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices. We also recognise that human rights is an area of importance to our employees, shareholders, customers, and the communities where we operate. We are on a journey to improve our modern slavery risk identification and mitigation. At Redox we are dedicated to continuous improvement of our policies and procedures relating to the identification of modern slavery risk. Redox opposes slavery in all its forms and is fully committed to adhering to the highest ethical standards.

REDOX'S STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Redox, headquartered in Sydney (Australia)³, is a chemical distribution company established in 1965. Redox has operations in twelve (12) locations across four (4) countries, Australia, New Zealand, Malaysia and the United States. Since its establishment, Redox has been listed in the Top 100 Chemical Distributors as the 8th largest in Asia and 31st worldwide.



Redox is a privately held company, employing more than 350 people across Australia, New Zealand, Malaysia and the United States.

Our business directly sources products for resale from a range of locations from all over the world. Redox is proud to have more than 1,000 products serving over 140 industries; commodity and specialty chemicals; food ingredients; agricultural chemicals; household and personal care chemicals;

¹ "Statement" means the Modern Slavery Statement made by Redox pursuant to the Modern Slavery Act 2018 for the 2019/2020 financial year.

² "Redox" means Redox Group Pty Ltd (ACN 627 118 101) and its related bodies corporate, as defined in section 50 of the Corporations Act 2001 (Cth).

³ Redox registered office being 2 Swettenham Road, Minto, NSW, 2566, Sydney Australia.

mining chemicals; surface coatings; plastics additives; grease and lubricants; water treatment chemicals; building and construction chemicals and pharmaceutical ingredients.

While our operations and supply chains are complex, Redox's aim is to ensure that human rights are respected and that modern slavery is mitigated and where possible eradicated within our operations and supply chain. Redox has an expectation that all suppliers, partners and stakeholders will adhere to ethical business practices consistent with Redox's own practices. Redox has imposed a requirement on all suppliers, partners and stakeholders to operate in accordance with Redox's Minimum Workplace Practices Code of Conduct⁴, and are committed to working with them to fulfil this common goal.

Further information on our business, operations and supply chain is available on Redox's website, <https://redox.com/>

Our Approach

Redox has a zero tolerance stance on any form of slavery-like practices. In order to ensure that all relevant universally recognised human rights are respected, Redox has recently implemented the following Modern Slavery Governance Process:



Underpinning our modern slavery governance process are Redox's policies and procedures that are intended to ensure ethical conduct and legal compliance. These policies and procedures include our [Procedure: Code Of Conduct/Ethics \(2547\)](#), [Procedure: Ethical Sourcing Supplier Declaration \(21351\)](#) and [Procedure: Modern Slavery Procedure \(3126\)](#).

We are currently in the process of drafting standard Terms and Conditions of Purchase ("T&Cs") where a clause will be incorporated into the T&Cs requiring compliance with our above policies and

⁴ Redox's Minimum Workplace Practices Code of Conduct ("Work Place Practices"), is a document created by Redox, which outlines the manner in which we expect all suppliers to conduct themselves, and rights to be afforded to their employees. Redox requires that all suppliers comply at all times with the Workplace Practices and for all Suppliers to confirm such practices are being complied with by executing the Ethical Sourcing Supplier Declaration ("Declaration").

procedures. Further, the draft T&Cs require the supplier to comply with all legislation and laws with relation to the supply of goods, labour, employment and the environment. The implementation of these standard T&Cs will further embed and strengthen Redox's management of modern slavery.

Risk Assessment, Due Diligence and Mitigation Actions

Redox is at the beginning of its journey assessing potential risks within Redox's supply chain. For the purposes of commencing our modern slavery journey and for submission of our first Statement, Redox have taken a risk based approach, and focused initially on due diligence. We are setting out to undertake a more detailed risk assessment and mapping of our supply chain incrementally over the next few years. We have started our journey with the vision of undertaking the process in a staged approach over a series of steps:

	Step 1	Step 2	Step 3
Phase 1 Apr 2020- Jun 2020	<ul style="list-style-type: none"> • Create Supplier Declaration and Minimum Workplace Practices • Send the Declaration and Minimum Workplace Practices to all suppliers • Create internal modern slavery policies and procedures, undertake a review of current policies and procedures 	<ul style="list-style-type: none"> • Continue to monitor the number of suppliers that have returned signed Declarations evidencing compliance with standards • Follow up with suppliers that don't sign and return Declarations and Workplace Practices • Review and assess the returned Declarations to determine any possible areas of risk with the supplier 	<ul style="list-style-type: none"> • Finalise the financial year reporting on number of suppliers that have returned a Declaration by 30/6/20 • Assess risks in our supply chain from the supplier Declarations received • Create and file modern slavery Statement for 2019
Phase 2 Jul 2020- Dec 2020	<ul style="list-style-type: none"> • Undertake mapping of Redox supply chain • Identify highest risk suppliers based on industry products/services and location 	<ul style="list-style-type: none"> • Ensure high risk suppliers have returned a signed Declaration • Reach out to high risk suppliers that have not returned a Declaration • Undertake internal review of returned Declaration forms to check for non-conformity or possible risks with a supplier 	<ul style="list-style-type: none"> • Conduct internal training with all employees and Officers on modern slavery

	Step 1	Step 2	Step 3
Phase 3 Jan 2021- Apr 2021	<ul style="list-style-type: none"> Assess which suppliers have not provided a signed Declaration form and why? Conduct risk assessments around these suppliers & potential violations 	<ul style="list-style-type: none"> It will become mandatory for all new suppliers & current suppliers to have signed and returned a Declaration form evidencing compliance with the Workplace Practices Redox to consider to stop dealing with all suppliers that have not returned a signed Declaration 	<ul style="list-style-type: none"> Finalise and implement Redox standard T&Cs (incorporating modern slavery clause) Open up discussions with senior management on further actions that can be taken

Throughout the reporting period⁵ Redox has created an “Ethical Sourcing Supplier Declaration Form”⁶, this form details the Workplace Practices that Redox requires all supplier’s to comply with. It further allows Redox the ability to audit their suppliers, terminate any contracts with their supplier’s in the event of a breach of the Workplace Practices and requires all suppliers to put Redox on notice if any of the Workplace Practices are violated. The Declaration must be signed by the supplier and their signature is taken as evidence of their compliance. The Workplace Practices set out in the Declaration are consistent with Redox’s own policies and standards as well as with globally recognised principals relating to human rights and the environment.

The Declaration is a tool used by Redox to assess its’ suppliers, by checking whether any edits, comments, or other changes are made with relation to the Workplaces Practices. It also allows Redox with the ability to further assess its’ suppliers by giving us the right to undertake audits of the supplier’s premises, should Redox find this necessary.

Redox is also aware that the palm oil industry, which Redox deals in, has been the subject of environmental and human rights violations over the years. Redox has taken a proactive approach to minimising risk within its supply chains in the purchasing and distribution of palm oil, by becoming a member of RSPO. RSPO is a not-for –profit that unites stakeholders from seven sectors of the palm oil industry to develop and implement global standards of suitable palm oil. The RSPO has more than 4,000 members worldwide who represent all links along the palm oil supply chain, that have committed to produce, source and/or use sustainable palm oil certified by the RSPO.

In addition to undertaking due diligence and risk assessment of Redox’s supply chain, Redox is proud to be a Trusted Trader. Administered by Home Affairs with the Australian Boarder Force, Trusted Trader, is an accreditation given to Redox, certifying compliant trade practices and a secure supply chain.

Measuring Effectiveness

The Declaration has been the key performance indicator used by Redox this reporting year to measure the effectiveness of the goals we set out to undertake. By using the Declaration, within this reporting period, Redox has assessed 380 new and current suppliers, representing approximately 19.3% of our supply chain and equating to approximately 27.1% of our annual supplier spend.

⁵ Reporting period 30 June 2019 – 30 June 2020.

⁶ Ethical Sourcing Supplier Declaration Form (“Declaration”).



Stakeholder Engagement and Collaboration

All Redox entities are controlled by the same shareholder's and maintain six (6) out of seven (7) common directors and have the same company secretary. Further all Redox policies and procedures are shared by all entities and are easily accessible for all staff on our integrated ERP system. Accordingly, all Redox entities are aware of the policies and procedures around modern slavery, the actions being taken by Redox and the preparation of this Statement and have had an opportunity to participate in the Statement process.

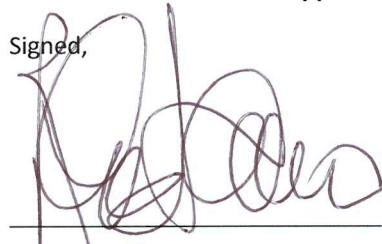
Way Forward

Over the next year, our key focus areas will be:

- Road mapping our supply chain and categorising the supply chain into low, medium and high risk suppliers;
- Placing more attention on our high risk suppliers and putting in places measures to provide assurances that all modern slavery principals/ Workplace Practices are being adhered to;
- Continue promoting awareness of modern slavery throughout our business and supply chain and delivering training to staff; and
- Begin stakeholder engagement on new actions that can be taken to continue to expand our efforts around ethical sourcing and the eradication of modern slavery in our supply chain.

This Statement has been approved by the Board of Directors of Redox on 30 of September 2020.

Signed,



Robert Coneliano
Managing Director/ Chairman of Directors