

Kao Australia Pty. Limited, Bondi Sands Hold Co Pty. Limited and Bondi Sands Australia Pty. Limited

**Joint Statement Pursuant to Modern Slavery Act (Cth) 2018**

**REPORTING ENTITIES**

Kao Australia Pty. Limited (ABN 59 054 708 299), Bondi Sands Hold Co Pty. Limited (ABN 78 640 233 889) and Bondi Sands Australia Pty. Limited (ABN 98 613 297 813) (collectively referred to as "the Company").

**REPORTING PERIOD**

This Modern Slavery Statement covers the Company's reporting period of January 1, 2023 – December 31, 2023.

**STRUCTURE, OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITIES**

Kao Australia Pty. Limited is a subsidiary of Kao Corporation. Kao Corporation is headquartered in Japan and has many direct and indirect subsidiaries throughout the world (the "Kao Group").

Kao Australia Pty. Limited has a subsidiary in New Zealand, Kao New Zealand Limited.

Bondi Sands Australia Pty. Limited is wholly owned by Bondi Sands Hold Co Pty. Limited. Bondi Sands Hold Co Pty. Limited is wholly owned by Kao Australia Pty. Limited. Accordingly, Bondi Sands Hold Co Pty. Limited and Bondi Sands Australia Pty. Limited are subsidiaries of Kao Australia Pty. Limited. Bondi Sands Hold Co Pty. Limited and Bondi Sands Australia Pty. Limited became part of the Kao Group part way through 2023.

Kao Corporation, the Company's ultimate parent company, has achieved the distinction of being named one of the World's Most Ethical Companies as determined by Ethisphere Institute, a global leader in defining and advancing the standards of ethical business practices. Kao Corporation is one of only six companies in the world to have been named one of the World's Most Ethical Companies each year since the inception of the list – i.e., in each of the last 18 years.

The Company operates in the consumer products field. The Company has four distinct businesses: Cosmetics Business, Life Care Business, Health & Beauty Care Business and Hygiene & Living Care Business.

The Company does not perform manufacturing. The Company sells finished goods which it obtains from other Kao Group companies and the Company purchases and on-sells a small amount of finished goods directly from third party manufacturers which are licensed by Kao Group companies to manufacture the goods.

## **RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITIES AND ALL ENTITIES THAT THE REPORTING ENTITIES OWN OR CONTROL**

The Company and its subsidiary strive to provide their employees with a work environment that is both physically and emotionally safe, and we assess the modern slavery risk level within the operations of the Company and its subsidiary as low.

The Kao Group of companies, including the Company and its subsidiary, operate with the Kao Business Conduct Guidelines as their foundation. The Kao Business Conduct Guidelines set forth our guiding principles with regard to the conduct of our business and incorporate the Kao Human Rights Policy which can be found at <https://www.kao.com/content/dam/sites/kao/www-kao-com/global/en/sustainability/pdf/kao-humanrights-policy.pdf>

As noted above, the Company does not perform manufacturing. The Company sells finished goods which it obtains from other Kao Group companies and purchases and on-sells a small amount of finished goods from third party manufacturers. As such, the Company depends upon its Kao Group suppliers and third party manufacturers to maintain their supply chains in accordance with the principles set forth in the Kao Business Conduct Guidelines.

Kao Australia Pty. Limited's subsidiary, Kao New Zealand Limited, is in a similar situation as it performs no manufacturing and obtains the products it distributes from Kao Group companies.

In relation to these supply chains, the Company recognizes that human rights abuses may take many forms such as:

- involuntary servitude;
- forced marriage;
- forced labour;
- child labour;
- deceptive recruiting;
- trafficking in persons;
- debt bondage;
- organ trafficking; and
- offences involving non-citizens working in Australia without the correct visa.

## **ACTIONS TAKEN BY THE REPORTING ENTITIES AND ANY ENTITIES THAT THE REPORTING ENTITIES OWN OR CONTROL TO ASSESS AND ADDRESS MODERN SLAVERY RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES**

An area of focus for the Kao Group is the palm oil supply chain which is in the supply chain of many of its products. The goal is to check traceability to the place of origin.

The Kao Group desires to reduce the risks related to human rights abuses in the palm oil supply chain by purchasing palm oil only from traceable sources.

The Kao Group launched the SMILE program together with two companies, Apical Group, a global palm oil processor and exporter, and Asian Agri, a plantation and palm oil company, to engage in direct dialogue with small-scale palm farmers in Indonesia, and started providing training to independent smallholders in 2021. By 2030, a team of education specialists will enhance the living standards of approximately 5,000 farmers by providing technical training to increase productivity (target yield doubling) and education to obtain Roundtable on Sustainable Palm Oil (RSPO) certification (RSPO basic principles, safety education and yield management methods). The aim is to control the development of new plantations by increasing yields, support the acquisition of certification for sustainable palm oil and improve the lives of small-scale palm farmers. The Kao Group will purchase all the certification credits from these certified oil palm smallholders. Certification credits for oil palm smallholders enables those oil palm smallholders to receive certification premiums directly, thereby providing a steady income for the farmers. The Kao Group has supported a total of 3,083 farms in the province of Sumatra through this activity, and has contributed to the acquisition of RSPO Certification for a total of 839 farms by 2023. The Kao Group has purchased a total of 9,996 tons of independent oil palm smallholders' credits sold by the certified farms. Furthermore, the Kao Group introduced a Grievance Mechanism for independent oil palm smallholders as a means of swiftly responding to human rights issues. Under the Kao Grievance Mechanism (KGM), the Kao Group together with oil suppliers and plantation companies, receive complaints from independent oil palm smallholders (farmers) about matters such as human rights violations and land disputes, and inquiries about matters closely related to plantation operations (obtaining RSPO Certification, labour safety during plantation work, the timing of replacing oil palms, how to purchase fertilizer, etc.). The Kao Group investigates, addresses, resolves and follows up on the complaints received and reports them with regular disclosure of the grievance list. In 2023, a total of 212 farms in North Sumatra, Indonesia were covered by KGM and a total of 213 cases were received and responded to.

Although the Company is not directly involved, affiliate companies within the Kao Group that manufacture and provide the Company with products for distribution also engage in these or similar efforts globally.

The Kao Business Conduct Guidelines mentioned above and which can be found at <https://www.kao.com/global/en/about/policies/compliance/business-conduct-guideline/> apply to all Kao Group companies, including the Company, and include commitments to deal with any illegal or unethical conduct that we become aware of. The Business Conduct Guidelines also confirm our respect of all human rights and set out the Kao Group's position against child labour, human trafficking and forced labour. To deepen understanding of the Guidelines, which stresses respect for human rights, the Company conducts Integrity Workshops and employees are periodically presented with a Guidelines' refresher test and a compliance awareness survey to check the depth of understanding of the Kao Business Conduct Guidelines. Further, to cultivate employees' understanding, case studies are periodically posted on the intranet and

messages from the Chairperson of the Compliance Committee of Kao Corporation and a responsible person from the Compliance Division are also shared to develop employee awareness. In addition, to stimulate the employees' interest and raise awareness of the idea of respect for human rights, the Kao Group has produced a video to disseminate the importance of respecting human rights and posted it on the intranet for the World Human Rights Day in December. Furthermore, group training sessions addressing human rights issues for newly hired employees and newly appointed managers are held.

### **HOW THE REPORTING ENTITIES ASSESS THE EFFECTIVENESS OF SUCH ACTIONS TAKEN**

The efforts referenced above are devised and reviewed at the Kao Group global level and are assessed at least annually to determine their effectiveness and if modification is needed.

### **CONSULTATION WITH ENTITIES THAT THE REPORTING ENTITIES OWN OR CONTROL**

The management of each of the reporting entities were consulted about and approved this statement.

The management of Kao New Zealand Limited were also consulted about and approved this statement.

The Company's supply chain managers work with supply chain organizations of Company's affiliates within the Kao Group. The Kao Group works to engage in discussion and planning with regard to policies and efforts to be taken to monitor and assess the supply chain, including in relation to modern slavery risks. The Company adheres to decisions made at that level and has the opportunity to provide feedback.

### **STATEMENT APPROVAL**

This statement is made in accordance with section 14 of the *Modern Slavery Act 2018 (Cth)*.

This statement has been reviewed and approved by the Boards of Directors for Kao Australia Pty. Limited (on June 21, 2024), Bondi Sands Hold Co Pty. Limited (on June 21, 2024) and Bondi Sands Australia Pty. Limited (on June 21, 2024).

This statement is signed by Steve Nancarrow, Director of Kao Australia Pty. Limited.

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Steve Nancarrow  
Director – Kao Australia Pty. Limited

Date: 6/23/2024

This statement is signed by Stephen Cagle, Director of Bondi Sands Hold Co Pty. Limited.

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Stephen Cagle  
Director – Bondi Sands Hold Co Pty. Limited

Date: 6/25/2024

This statement is signed by Stephen Cagle, Director of Bondi Sands Australia Pty. Limited.

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Stephen Cagle  
Director – Bondi Sands Australia Pty. Limited

Date: 6/25/2024