



SNF AUSTRALIA

SNF Australia Pty Ltd
Modern Slavery Statement
Reporting Year 2019





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Structure, Business, Supply Chain

SNF (Australia) Pty Ltd is part of the SNF Group, the world's largest manufacturer of organic coagulants and synthetic flocculants. The SNF Group is headquartered in France with a global presence through subsidiaries. Water Soluble Polymers are manufactured in Emulsion, Liquid and Powder / Bead grades to treat all aspects of water, effluent and sludge. We also manufacture a range of specialty chemicals and polymers that support our core polymer business. They include polyDADMACS, polyamines, superabsorbent and scale inhibitors for use in solid liquid separation, colour removal, water retention and scale control.

Our brand is part of our identity and so is our commitment to corporate social responsibility. We believe transparency is the best way we can assure the public that we are doing our best as an ethical business entity. In that spirit, we have published our annual statement for modern slavery, prepared in compliance with sections 13 & 16 of the Modern Slavery Act (Cth) 2018, in which we explain how slavery can affect our business and the steps we are taking in the fight against it. Our efforts against slavery complement our broader supply chain management and our commitment to ethical trading.

SNF Australia sells its products throughout Australia, New Zealand, and Papua New Guinea. Our product range is both locally manufactured and imported from subsidiaries of the SNF Group in China and South Korea. Locally manufactured products are made from inputs sourced from Australia, China, France, South Korea and the United States of America. Our Influence therefore spans over suppliers in this niche market in different geographic regions. We have about 65 employees within our Australian operations, in addition to over 300 workers who are engaged through our supply chain. Where possible, we engage suppliers who have relationships with our existing suppliers so that we can manage our supplier network and improve consistency in ethical practices throughout the supply chain. The management of our supply chain is still evolving, establishing mutual checks with customers and suppliers, and incorporation into our normal business risk management. For more details on our supply chain, please contact us.

This modern slavery statement will allow us to share our efforts against slavery and human trafficking and improve and measure our success each financial year. This is our first report, and covers the activities for the financial year ending 30 June 2020. We took the following steps to ensure slavery and human trafficking did not occur within our organisation or supply chain.

Slavery and Human Trafficking Policies

SNF Australia developed our modern slavery statement within the framework of the SNF Group modern slavery policy. We will also be updating our Supplier Code of Conduct. It sets out clear objectives for slavery and human trafficking plans around the following themes:

- Relationships: building and strengthening our supplier engagement process
- Feedback: Establishing grievance mechanisms and channels for individual worker feedback, and the use of questionnaires to capture important aspects of our business relationships.



- Knowledge: Improving our knowledge base by collecting relevant data and improving product traceability
- Third party engagement: Building strategic alliances with independent auditors.
- Measurable change: Developing verifiable KPIs to measure progress
- Supplier collaboration: Encouraging suppliers to collaborate to address modern slavery issues.
- Accountability: Establishing a framework for organisational accountability to allow for raising issues, making suggestions, voicing grievances and reporting slavery practices.

Due Diligence Procedures

We understand that our biggest exposure to Modern Slavery is in our raw material and product supply chains, where we have undertaken activity over the last decade to minimise the risk of modern slavery. Within these areas, new suppliers and factories/sites are subject to due diligence checks in the form of ethical/compliance audits. Such audits are also regularly conducted for existing suppliers and factories/sites. These audits assess compliance with the best practice sourcing principles and are, amongst other things, intended to identify any modern slavery practices. If issues are identified, appropriate investigative and remedial actions will be taken.

Identifying, Assessing and Managing Risk

We set out to identify the extent of any slavery and human trafficking in our supply chains by:

- asking third party suppliers to complete a questionnaire for their self-assessment.
- Requesting a statement from suppliers about their working conditions.
- Collaborating with our suppliers to develop an improvement plan to address new and previously identified slavery and human trafficking issues.

We currently have not identified any incidence of slavery or human trafficking in our supply chains and will continue to monitor this issue in the next financial year.

Key Performance Indicators

In order to assess the effectiveness of our modern slavery measures, we will be establishing the following key performance indicators:



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- Staff training levels
- Number of slavery incidents reported in the supply chain.
- Number of social audits conducted

Training Available to Staff

A key part of our slavery and human trafficking strategy is to promote awareness through training.

We plan to do the following:

- Conduct awareness training for our staff.
- Establish minimum standards to be met throughout our supply chain.
- Establish reporting mechanisms for any identified breaches of our modern slavery policies.

This statement has been approved by the Board of SNF (Australia) Pty Ltd on 08 January 2021

Signed,

Russell Schroeter

Managing Director