

**SNF (Australia) Pty Ltd**  
**Modern Slavery Statement**  
**Reporting Year 2021**

## Table of Contents

1.0 Introduction .....	3
1.1 Managing Director’s Statement .....	3
2.0 Business Overview .....	4
2.1 Business Structure .....	4
2.2 Operations .....	4
2.3 SNF (Australia) Supply chain .....	4
3.0 Modern Slavery Risk Assessment .....	5
3.1 Overview .....	5
3.1.1 Low Risk Suppliers .....	5
3.1.2 Medium Risk Suppliers .....	5
3.1.3 High Risk Suppliers .....	5
3.1.4 Business Sector Risk Assessment .....	5
3.2 Staffing .....	6
3.3 Supply chains .....	6
4.0 Risk Reduction & Control Activities .....	7
4.1 Policy .....	7
4.2 Staff Training .....	7
4.3 Supplier Selection, Audit/Questionnaire .....	7
5.0 Effectiveness of Risk Reduction & Control Activities .....	8
5.1 Policy .....	8
5.2 Staff Training .....	8
5.3 Supplier Selection, Audit/Questionnaire .....	8

## 1.0 Introduction

This Modern Slavery Statement was prepared following the requirements of the Australian Modern Slavery Act 2018 (Cth). The statement details the steps SNF (Australia) has taken to address risks of modern slavery in its supply chain and operations. SNF (Australia) follows a calendar year reporting cycle and this report is for the year 2021.

In the Modern Slavery Act 2018, reference is made to the Criminal Code, divisions 270 & 271 for activities that constitute slavery. In the way of definition, slavery “is the condition of a person over whom any or all of the powers attaching to the right of ownership are exercised, including where such a condition results from a debt or contract made by the person,” Division 270.1 Criminal Code. The reader is referred to the Modern Slavery Act 2018 and the Criminal Code for full details about what constitutes slavery.

SNF (Australia) recognises that some industries do profit from slavery and seeks to operate with transparency as regards supply chains and how the company operates. This report gives an overview of the company’s organisational structure, operations, potential risks of modern slavery and how they are controlled and managed.

## 1.1 Managing Director’s Statement

SNF (Australia) is guided by the Anti-slavery and Human Trafficking Policy of the SNF Group.

As a company, we are opposed to any, and all forms, of slavery in our supply chains and operations. We give careful consideration to who we do business with and have put processes in place to ensure that our product brands are not tainted with illicit practices.

SNF (Australia) has systems in place to improve on identifying and resolving any modern slavery issues in our supply chains and operations.

This statement is approved by the SNF (Australia) Pty Ltd Board of Directors.



Russell Schroeter  
Managing Director - SNF (Australia) Pty Ltd

## 2.0 Business Overview

### 2.1 Business Structure

SNF (Australia) Pty Ltd is part of the SNF Group, the world's largest manufacturer of organic coagulants and flocculants. The SNF Group is headquartered in France with a global presence through subsidiaries. The subsidiaries are each led by a General Manager/Managing Director.

There is mutual dependence among the subsidiaries for the supply of raw material or finished product for manufacturing or sale, respectively. Other raw materials are sourced from external partners in Australia and overseas.

### 2.2 Operations

SNF (Australia) is headquartered in Lara, Victoria, Australia. At the Lara site is a manufacturing facility that produces liquid polymers used in various applications as detailed below. The company has Warehouses around Australia from which we supply our customers. During the reporting period, SNF Australia had a total of 74 employees (most of them permanent full time workers) located throughout Australia, with about half based at the Lara site. Some products are sold via resellers who specialise in certain niche markets.

SNF (Australia) sourced products and services during the year from the following countries:

India, China, United States of America, France, South Korea.

Our products were utilised in the following sectors of the economy:

- Personal care products
- Agriculture
- Municipal water treatment
- Pulp and paper
- Industrial applications
- Mining and ore processing applications
- Oil and gas.

### 2.3 SNF (Australia) Supply chain

SNF Australia sources the bulk of its raw materials and finished products from other subsidiaries of the SNF Group. Because of this, the exposure of our operations to modern slavery risks is significantly reduced. Products and services that are sourced from other companies not within the SNF Group have to meet our requirements for quality, reliability and capacity of supply, and regulatory compliance of the operations (Modern Slavery Act).

Products that are imported into Australia as raw materials or finished products for resale come by ocean shipping, and subsequently use rail and road transport to reach their intended destination. SNF (Australia) also sources personal protective clothing/equipment and packaging materials from local and international suppliers.

## 3.0 Modern Slavery Risk Assessment

### 3.1 Overview

The SNF Group posture is to not tolerate any slavery practices within its supply chain and operations. To ensure there are no such practices within the Group, policies and procedures (including whistle blowing) are in place to manage the risks.

During the reporting year, SNF (Australia) has not had any case of modern slavery identified. To keep up with a dynamic business environment, management regularly reviews company operations to ensure compliance activities are meeting the desired objectives.

SNF (Australia) assessed the size and reporting requirements of our major suppliers. These were rated according to geographical location and legal compliance requirements. The suppliers in the shipping, PPE and packaging business are our greatest exposure to modern slavery risks. Our suppliers in these categories are based in Australia, India, South Korea, and China. To arrive at the above assessment, SNF followed a categorisation method based on sectoral business conditions and geographical locations of the entities we do business with as follows:

#### 3.1.1 Low Risk Suppliers

SNF Group subsidiaries, suppliers in Australia of a size that obligates them to report on modern slavery, those that are below the reporting threshold in Australia, and are in low risk industries were deemed low risk.

#### 3.1.2 Medium Risk Suppliers

Suppliers in Australia in the shipping/transport and packaging business and are below the reporting threshold.

#### 3.1.3 High Risk Suppliers

International suppliers that are not part of the SNF Group and located in geographical regions with weak regulatory oversight. We are guided in making determinations by reports from international bodies such as the International Labour Organisation (ILO).

#### 3.1.4 Business Sector Risk Assessment

Industry	Risk	Comment
Chemical	Low	Specialist activity/area
Shipping/transport	Medium/High	Low skill activity
Packaging	Medium	Prone to exploitative labour depending on geographical location
PPE & PPC	Medium/High	Prone to exploitative labour depending on geographical location
Labour hire	Medium/High	Prone to exploitative labour depending on geographical location

SNF (Australia) focused its attention on those suppliers in the medium to high risk category. This approach ensures that resources are targeted in the right areas likely to have modern slavery in their operations.

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### 3.2 Staffing

SNF (Australia) employed a total of 74 staff in the reporting year. Of the 74 employees, 69 were permanent and 3 were casuals. An additional 2 workers were supplied by a local labour hire company in full compliance with local labour laws.

All contractors in the cleaning and other specialist services complied with relevant statutory requirements.

### 3.3 Supply chains

The bulk of SNF (Australia) raw material and finished product supply are within the SNF Group as we are vertically integrated. Many of our chemical raw material suppliers in Australia are members of Chemistry Australia and participate in the Responsible Care Program. The Responsible Care Program raises the bar in terms of commitments to responsible chemistry in all member operations. This significantly reduces exposure risk to modern slavery and other business malpractices.

Significant exposure to modern slavery risks lies in the shipping, packaging, and PPE supply chains. In order to reduce business exposure to slavery risks, SNF made the decision to source its packaging from local manufacturers where possible.

PPE is sourced from reputable local suppliers and further proactive action to reduce exposure to modern slavery risk is planned as detailed below.

## 4.0 Risk Reduction & Control Activities

### 4.1 Policy

SNF (Australia) operates under the SNF Group's Anti-slavery and human Trafficking Policy. This policy arrangement ensures that all SNF Group subsidiaries are operating in compliance with the policy regardless of the geographical location. All our suppliers within the SNF Group are therefore compliant with the Group's policy.

### 4.2 Staff Training

Senior management meets annually to review modern slavery risks in an expanding supply chain, and to identify training needs within the organisation.

All staff members involved in supply chains and labour hire undergo annual modern slavery awareness training to ensure they are aware of what to look out for in day to day operations. On completion of the course, attendees are awarded certificates that are then uploaded onto the staff HR profile. In the reporting year, a total of four staff members completed the modern slavery awareness training.

Awareness training ensures compliance processes start at the personal level. Staff are encouraged to report any issues identified during normal business operations so that appropriate action can be taken.

### 4.3 Supplier Selection, Audit/Questionnaire

Suppliers in identified high risk industries and jurisdictions are asked to complete a modern slavery questionnaire. The responses are reviewed on receipt and any issues identified are flagged for follow-up.

In the reporting year, a total of five major suppliers of chemical raw materials, filtration material, shipping, packaging and storage, completed the questionnaire. No issues have been flagged for follow-up.

Further work will be required to improve supplier surveillance, and this might include mandatory completion of the modern slavery questionnaire at the time of contract signing. Improved access to the questionnaire, for example via SNF's website will also be explored.

In the reporting year, PPE was sourced from a single supplier and they are to be formally audited for compliance in 2022 - 2023.

All packaging was sourced locally to avoid exposure to slavery risks arising from international suppliers in jurisdictions with weak regulatory oversight. Whenever possible, this will continue to be the approach the company takes as part of risk reduction measures.

## 5.0 Effectiveness of Risk Reduction & Control Activities

### 5.1 Policy

Policy formulation at the SNF Group level has ensured that all subsidiaries and relevant employees are aware of the potential risks to business operations and the need for compliance. Staff are fully aware of the requirements and are following all processes put in place to manage slavery risks. The policy, as currently configured, is effective.

### 5.2 Staff Training

All relevant staff are eager to participate in the modern slavery awareness training. Staff participation in training is 100%. Following on from the policy, all relevant staff are aware of the need to acquire the necessary competence to discharge their duties while complying with relevant legislation in the different jurisdictions.

### 5.3 Supplier Selection, Audit/Questionnaire

There has been general cooperation from the suppliers we contacted to complete the modern slavery questionnaire. Some of the suppliers already have modern slavery statements of their own.

About 30% of suppliers contacted did not respond to the questionnaire. These suppliers will be a focus in the coming year to ensure that there are no hidden risks.

SNF (Australia) will review the questionnaire based on verbal feedback and improve communication on the company's anti-slavery policy and conditions for doing business with third parties.

This statement was prepared by authorised representative



Dr Solomon Muganda  
HSE Manager - SNF (Australia) Pty Ltd

on Date: 13/04/2022

And was approved by



Russell Schroeter  
Managing Director - SNF (Australia) Pty Ltd

on Date: 14/04/2022