

# MODERN SLAVERY STATEMENT

2022

## 1. Introduction

- 1.1. This Modern Slavery Statement is a joint statement made pursuant to sections 14 and 16 of the Modern Slavery Act 2018 (the "Act") for the reporting period 1 January 2021 to 31 December 2021 (this "Statement"). This Statement has been approved by the relevant boards of each reporting entity in compliance with section 14(2)(d) of the Act.

## 2. Reporting Entities

- 2.1. This Statement is a joint statement comprising of the following reporting entities (collectively, "Allnex Australia") under the Act:

- a) Company Name: Allnex Resins Australia Pty Ltd ("**Allnex Resins**")  
Registration Number: ACN 000 045 572
- b) Company Name: Allnex Australia Holding Pty Ltd  
Registration Number: ACN 614 712 364
- c) Company Name: Allnex Australia Pty Ltd  
Registration Number: ACN 160 397 768

- 2.2. The corporate structure of the reporting entities is set out in section 3.1 below.

- 2.3. Allnex Australia is part of the Allnex group ("Allnex Group"), a global company with EUR€2.4 billion revenue per annum and a leading producer of resins and additives. Allnex Resins is the principal operating entity in Australia; most of its operations are conducted through Allnex Resins, and employees are hired by Allnex Resins. Allnex Australia Pty Ltd acts as a distribution entity while Allnex Australia Holding Pty Ltd is a holding company, with no employees. Allnex Australia and other Allnex companies in the Allnex Group's global structure operate under the same policies and share the same commitments as set out in this Statement. More information of our operation can be found in section 3.2.

2.4 Allnex Australia is committed to doing business ethically and responsibly, and is striving to consciously improve its implementation of the Act with the ultimate objective of eliminating and preventing any modern slavery risks within its operations and supply chains.



€2B in Sales



Leader in  
Green Chemistries



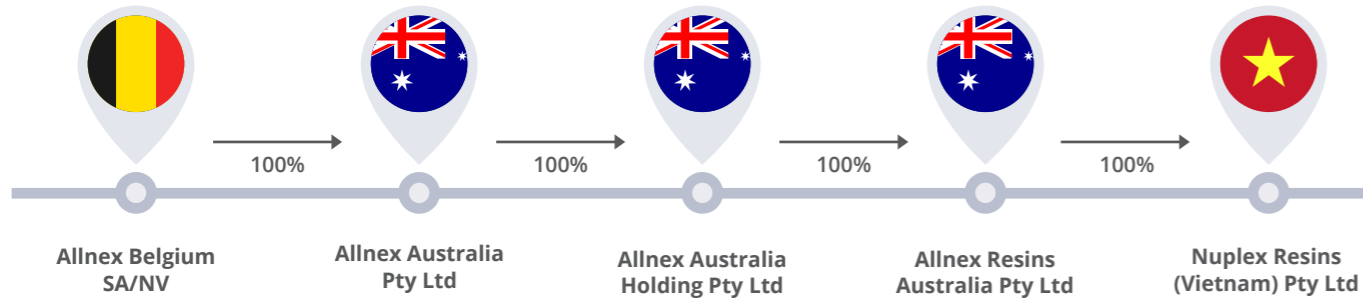
75 Years of Innovation



### 3. Structure, Operations and Supply Chain

#### 3.1. Structure

Allnex Australia is a group of private companies. Its parent company, Allnex Belgium, is managing and overseeing the global operation of the Allnex Group. Nuplex Resins (Vietnam) Pty Ltd (“Nuplex Resins”) is controlled by Allnex Resins within the meaning of the Act. Nuplex Resins operates independently in Bien Hoa City, Dong Nai Province, Vietnam, following the same global policies and compliance framework as Allnex Australia. In summary, our corporate structure is as following:



Allnex Resins employs approximately 250 employees, operates in Australia, and is primarily administered from its head office in Botany, New South Wales. The employees are working in the different offices, manufacturing sites, and warehouses.

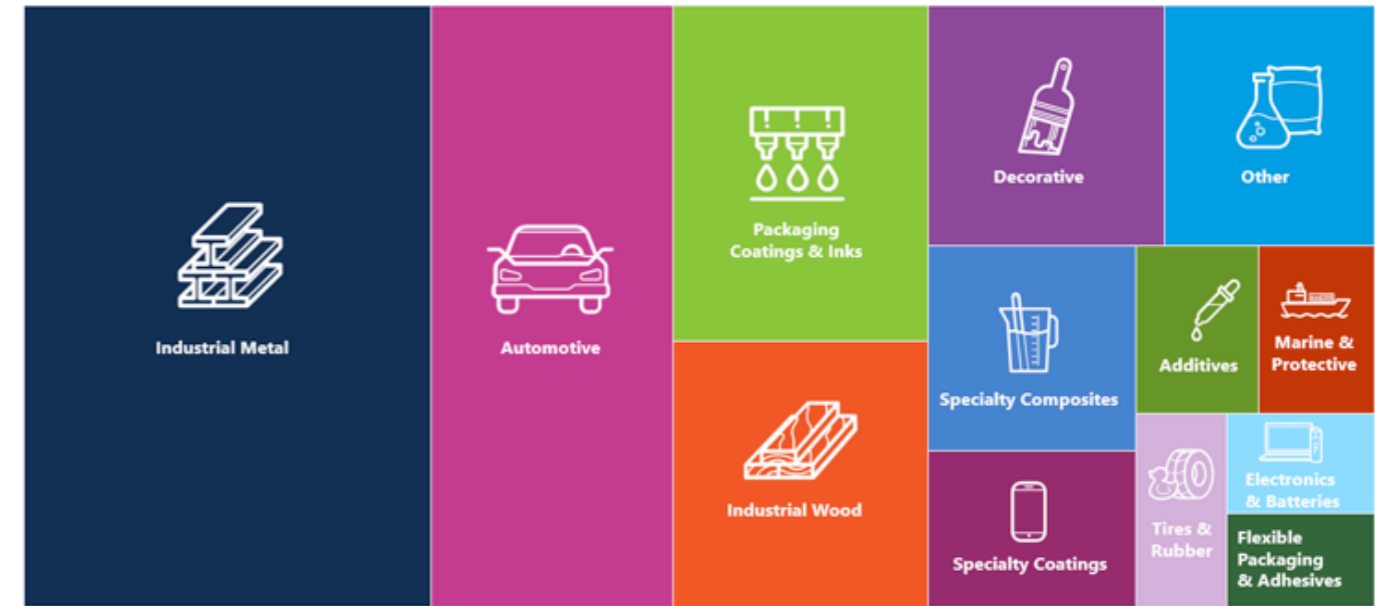
Allnex Group recognises that its employees are its most valuable asset; they are the lifeline of our business and what it accomplishes. The diversity of the Allnex Group’s workforce (including a diversified demographic profile across all regions and leadership levels, etc.) is an asset, bringing fresh ideas, perspectives and experiences that support its values and will continue to enhance its performance and services to its customers. Allnex Group utilizes an equal opportunity employment policy to guide its hiring process in facilitating diversity.

#### 3.2. Operations

Allnex Group is the leading industrial coating resins company globally. It is a specialty chemicals pioneer in green chemistry, offering an extensive range of products including innovative polyesters, alkyd, acrylic, epoxy and urethane polymers used as key ingredients for coatings, i.e. resins, crosslinkers and additives. We know our strengths and use them well. Our key technologies and segments are:

	LIQUID RESINS & ADDITIVES	PERFORMANCE RESINS		
		Radiation Curable Resins	Powder Coating Resins	Crosslinkers
Key Technologies	<ul style="list-style-type: none"> <li>Waterborne</li> <li>Solventborne</li> <li>Additives</li> <li>Urethane Specialties</li> <li>Composites/Gelcoats</li> </ul>	<ul style="list-style-type: none"> <li>Specialty Acrylated Resins</li> <li>Specialty Oligomers</li> <li>Water-based UV-curable Resins</li> <li>Glass Lamination</li> <li>Acrylics</li> </ul>	<ul style="list-style-type: none"> <li>Polyester Resins <i>Hybrid, standard durable, super durable</i></li> <li>UV Powder Resins</li> <li>Acrylics</li> <li>Additives</li> </ul>	<ul style="list-style-type: none"> <li>Amino Crosslinkers</li> <li>Phenolic Crosslinkers</li> <li>Technical Phenolic Resins</li> <li>Acid Catalysts</li> </ul>
	<ul style="list-style-type: none"> <li>Auto OEM and Refinish</li> </ul>	<ul style="list-style-type: none"> <li>Inks &amp; Overprint Varnishes</li> </ul>	<ul style="list-style-type: none"> <li>Architectural Extrusions</li> </ul>	<ul style="list-style-type: none"> <li>Metal Packaging</li> </ul>
	<ul style="list-style-type: none"> <li>Industrial Metal</li> </ul>	<ul style="list-style-type: none"> <li>Industrial Wood</li> </ul>	<ul style="list-style-type: none"> <li>Domestic Appliances</li> </ul>	<ul style="list-style-type: none"> <li>Coil</li> </ul>
	<ul style="list-style-type: none"> <li>Industrial Wood</li> </ul>	<ul style="list-style-type: none"> <li>Industrial Metal</li> </ul>	<ul style="list-style-type: none"> <li>ACE</li> </ul>	<ul style="list-style-type: none"> <li>Automotive OEM</li> </ul>
	<ul style="list-style-type: none"> <li>Marine &amp; Protective</li> </ul>	<ul style="list-style-type: none"> <li>Electronics</li> </ul>	<ul style="list-style-type: none"> <li>General Metal</li> </ul>	<ul style="list-style-type: none"> <li>Tires &amp; Rubber Products</li> </ul>
	<ul style="list-style-type: none"> <li>Decorative</li> </ul>	<ul style="list-style-type: none"> <li>Plastic</li> </ul>		<ul style="list-style-type: none"> <li>Industrial Metal</li> </ul>
Key Segments	<ul style="list-style-type: none"> <li>Auto and Industrial Plastics</li> </ul>			<ul style="list-style-type: none"> <li>Industrial Wood</li> </ul>

#### Weighted view of our portfolio



The success of the Allnex Group is based on a global network of research and development centres and manufacturing facilities. Allnex Group’s research teams work in close cooperation with our clients to develop coating solutions and meet some of the most stringent sustainability requirements.

The majority of Allnex Resin’s operations are in the liquid resins and additives division. We operate at two manufacturing sites located at Wacol, Queensland and Botany, New South Wales.

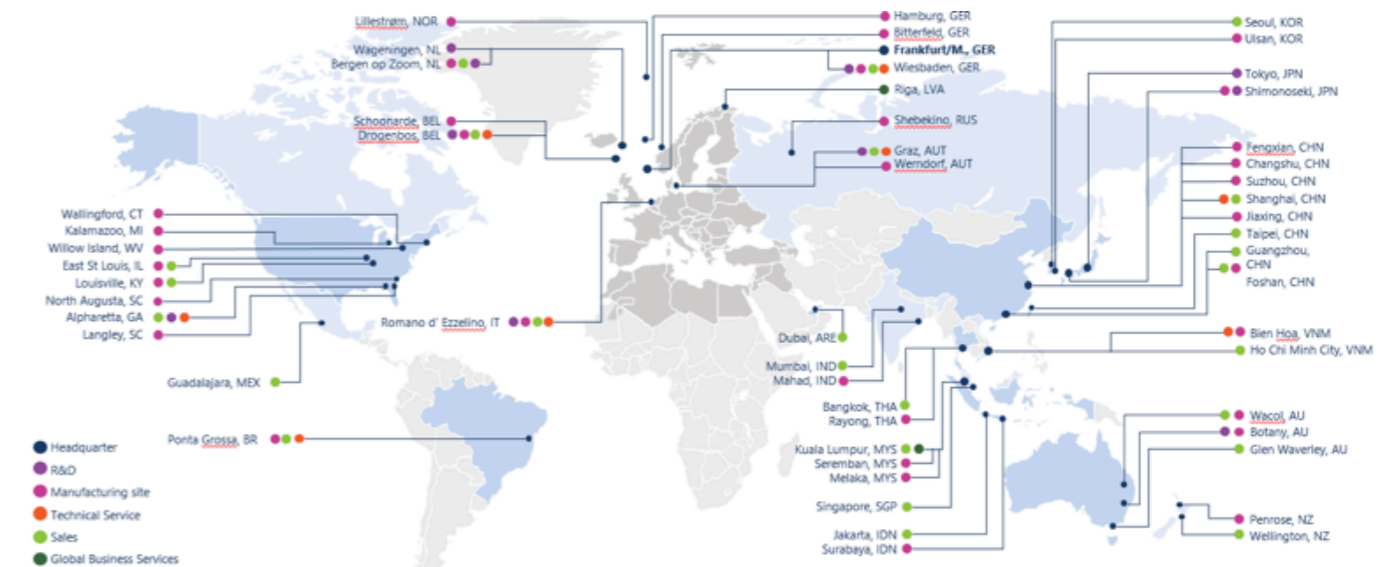
Allnex Resins also has non-production sites, used for warehousing and distribution, sales and/

or administration in Queensland, New South Wales, Victoria, South Australia and Western Australia.

Allnex Resins’ business model involves sales direct to our customer base. Most of our customers are located within Australia and New Zealand.

Allnex Resins produces polymer resins from a diverse base of chemical raw materials. We have hundreds of finished resins, all of which require reacting in our reactors at our manufacturing plants. Our produced resins represent by far the majority of our revenue, but we do also buy and re-sell various ancillary products to support our customers in the composites industry.

#### Our Global Footprint





### 3.3. Supply Chain

The procurement strategy in Australia flows down from the Allnex Group's Global Procurement Team. Largely, the Allnex Group seeks long-term relationships with respected producers and distributors. Allnex Australia seeks to align and leverage global positions where appropriate on large volume items used in multiple global sites.

The chemical raw materials required for our production are bought through multiple supply channels, with our primary aim being to transact with the producer directly, if possible and practicable. Where a direct relationship with a manufacturer is not practical or possible, we transact with distributors and traders to source the products. Our purchases, therefore, include a mixture of direct imported product and locally supplied product.

The majority of the raw material product purchased comes from Asia, with major countries/regions of manufacture being Singapore, Korea, China, Taiwan, Malaysia, Indonesia, Thailand and Japan. Allnex Resins also sources from the United States of America, Europe, the Middle East, Africa and other locations globally, as well as significant volumes from Australian local suppliers. Where possible, it is also our policy to support local manufacturing in Australia. For example, Allnex Resins' packaging suppliers are all locally based, and the

vast majority of Allnex Resins' logistic service suppliers, such as freight, storage and other logistical activities, are based in Australia.

While Allnex Resins aims to transact directly with suppliers, for a variety of reasons, it is sometimes necessary to transact through traders and distributors. This may be due to the need for specialty products or due to the trading terms, volume, simplicity, characteristics of different markets or industries, etc. Nevertheless, Allnex Resins is actively engaging with third parties to share the same compliance commitments referred to in this Statement.

Allnex Group produces resins globally in other sites. When goods are purchased from another Allnex Group entity, the purchase and sale is treated as an inter-company transaction. The Allnex Group producers are bound by the same compliance policies and procedures that Allnex Australia follows.

Allnex Group and Allnex Resins manages supplier performance at both the local and global level, in line with our International Organization for Standardization (ISO) accreditation. There is an annual review of supplier performance with the main suppliers. Assessing the risks of modern slavery within the supplier and its supply chain forms part of that review, together with our global corporate social responsibility (CSR) evaluation.

## 4. Potential Modern Slavery Risks in Operations and Supply Chain

Considering the complexity of the supply chain, to better analyse the risks of modern slavery existing in our operations, Allnex Resins engaged a professional consulting firm, Intertek, who has deep experience and insights in modern slavery, to provide expertise services on assessment, analysis and management of modern slavery risks in our supply chain and operations.

As detailed further in section 5.2 below, Allnex Resins has identified that the risk of modern slavery in its operations and supply chain in Australia are low due to the legislative and regulatory framework to protect workers and the civil and criminal enforcement of the relevant provisions. Conversely, Allnex Resins has identified that the risks of modern slavery in its supply chain are likely to be relatively higher in relation to direct suppliers of raw materials. Such assessment is based primarily on the country of origin of the supplier, combined with the type of product the supplier is providing or producing.

Allnex Resins' raw materials largely derive from three major sources: petrochemical-based materials, bio-based materials and mineral-based materials. Allnex

Resins has identified that these sectors could expose people to certain modern slavery risks, such as forced labour, child labour, excessive working hours, low wages and benefits, inadequate working conditions and unequal treatment, etc. Risks are considered to be higher in under-developed or developing countries than developed countries due to, for example, poor governance, weak rule of law, conflict, weak or corrupt institutions or socio-economic factors.

Indirect suppliers to Allnex Resins are predominantly based in Australia and are therefore largely considered to be lower risk for the same reasons that Allnex Resins' Australian operations are considered to be low risk. The main suppliers in this category include providers of utilities, professional services, transport, warehousing, packaging and waste management.

Nuplex Resins, Allnex Resins' controlled entity, has many of the same major suppliers as Allnex Resins and operates within the same compliance framework. These common major suppliers are, therefore, covered by the Allnex Group's supplier performance review on CSR. Thus, the identification of modern slavery risks and assessment in relation to Allnex Resins also largely applies to Nuplex Resins.



## 5. Assessing and Addressing Modern Slavery Risks

Allnex Australia is committed to working with its stakeholders and business partners to assess and address the risks of modern slavery in its operations and supply chain, and to incorporate its approach of managing modern slavery risks into its overall corporate governance and compliance framework.

### 5.1. Policies and Procedures

Allnex Group operates a comprehensive global corporate compliance program in order to guide its decision-making and to promote ethical, legally compliant and socially responsible business conduct. Amongst others, the policies set out below, contribute to Allnex Australia's (and indeed the Allnex Group's) commitment to respect of human rights and addressing modern slavery risks:

Policy/Procedure	Objective and purpose
<b>Code of Conduct</b>	Builds on company values and formulates guidelines for daily activities; the code is not only applicable to all our employees, but also to contractors and consultants
<b>Supplier Code of Conduct</b>	Outlines how suppliers of goods and services are expected to respect and adhere to required principles of lawful and ethical business.
<b>Labour and Human Rights Policy</b>	Communicates expectations with respect to human rights and labour practices and the high standard of conduct expected of our employees worldwide.
<b>Hotline to report compliance violations</b>	Confidential reporting of any known or suspected violation of the Code of Conduct via a hotline
<b>Australian Whistle-blower Policy</b>	Provides a reporting and investigative process that is objective, confidential and protects employees from any repercussions or adverse impact as a result of raising a concern.
<b>Anti-Bribery; Anti-Corruption Policy; and Export Controls</b>	Compliance with the laws of the countries in which it operates, particularly with respect to laws covering corruption and anti-competitive behaviour. This applies whether The Allnex Group entity is acting directly in a country through employees, or indirectly through agents, distributors or other intermediaries.
<b>Procurement Sustainability Manual</b>	Outlines the increasing efforts of The Allnex Group and Allnex Resins to uncover sustainable market offerings in terms of raw materials, goods and services, as well as best practice sustainable procurement principles to mitigate risks in its supply chain.

The policies can be found at: <https://allnex.com/en/info-hub/compliance>.

Allnex Group's Code of Conduct applies to every director, officer and employee and is available in 14 languages. Any alleged violations of policies and procedures in relation to ethical business behaviour are reviewed and investigated by a dedicated team comprising senior managers. New training package on the Code of Conduct was prepared for class room training, with special emphasis on our valued principles of labour and human rights. In the early part of the third quarter of 2022 we will launch a company-wide online training and certification on the Allnex Code of Conduct.

The Supplier Code of Conduct is incorporated into Allnex Australia's general terms of purchase and in respective purchase agreements for existing suppliers. The Supplier Code of Conduct requires that suppliers are to (amongst other things) act in compliance with the applicable laws of the countries where they operate, conduct business ethically, respect fundamental human rights and provide a safe working environment. Moreover, Allnex Australia reserves the right to terminate any agreement with any supplier that cannot demonstrate compliance with the Supplier Code of Conduct.

New or renewed contracts have specific contract terms on suppliers identifying and eliminating modern

slavery risks in their operations and all major suppliers are required to complete a CSR questionnaire and participate in performance reviews.

The Procurement Sustainability Manual embeds CSR considerations into the various steps of Allnex Group purchasing processes, the dedicated team of procurement professionals works to ensure responsible partnerships with suppliers.

Refresher training on modern slavery was provided by Intertek to key employees and senior management in Australia in December 2021, including those from the senior leadership team, which represents all the key functions in the business.

In February 2022, comprehensive training on modern slavery was provided by Dentons, a prestigious law firm well recognized in the corporate social responsibility and compliance field, to Allnex global management team, including those from senior leaders and function heads.

We strictly adhere to the following principles according to internationally recognised and accepted standards: We embrace diversity and are committed to creating an equitable and inclusive work environment for all employees. We value each of them based on talents, aspirations and competence.

At allnex, we believe diversity is a strength. We strive to create an environment in which personal **uniqueness is celebrated** and everyone's contribution is recognized and valued.



## 5.2 Risk Assessment and Due Diligence

Allnex Group depends on its supply chain to obtain thousands of different raw materials from a large number of suppliers. The strategic importance of procurement is therefore also a lever to drive social and environmental improvements across our supply chain. This growing focus on CSR translates in many ways into our procurement practices.

Allnex Australia strictly implements Allnex Group's sustainable strategy, and require suppliers to follow the strategy, as contained in its purchasing terms and conditions, contract templates and Supplier Code of Conduct. Through these standardized and mandatory documents and procedures, we can ensure that business is done in compliance with applicable laws, regulations, industry standards and high sustainability standards, as well as prevention of modern slavery.

The supplier selection process includes an assessment of economic, environmental and social impacts, based on our proprietary checklists, which are included in some key procurement processes, such as: supplier approval process, complaint management system, supplier evaluation process, Management of Change process, and CSR assessment questionnaire in accordance with our Procurement Sustainability Manual.

The evaluation of suppliers includes social and environmental drivers that impact the final scoring, such as certificates or ratings from external agencies or auditors, internal sustainability programs, etc. The weight of such social and environmental criteria will continue to grow in importance in our supplier evaluation process.

To assess the extent of CSR of its suppliers, including modern slavery risks, Allnex Group has in place a screening of its suppliers on a series of relevant topics. This is a top down approach by which suppliers are ranked based on their importance to Allnex Group. This ensures that our most important raw material categories are purchased from vendors who are conducting business in a responsible way.

Intertek was engaged to conduct a further assessment to analyse and manage modern slavery risks in our supply chain and operations, such as services in relation to supplier mapping, summarizing; inherent risk screening; supplier self-assessment; supplier profiling; risk mitigation, supplier analytics and supplier audit. In the last year, we have approved Intertek to perform the first full audits of the highest risk suppliers, with full results anticipated by second half of 2022.

The Steering Committee of Allnex Australia is responsible to review the supplier assessment and oversee our responses to this important initiative, as further outlined on the next page.



## 5.3 Supplier Engagement

The procurement of our raw materials is of strategic importance in driving our sustainability initiative and responding to our environmental and social responsibilities as a global company. We strive to establish positive long-term relationships with our suppliers and to foster a culture of true transparency, effective communication and continuous improvement in our procurement practices.

One of the major milestones in 2021 was the implementation of the allnex Supplier Evaluation Program to gain comprehensive insight into the commercial, environmental and social impacts of our key suppliers. The program is based on 3 pillars:

 Global Direct Supplier Evaluation	 Corporate Social Responsibility Self-assessment	 On-site Audit
a. Assesses business relationships with over 250 key direct suppliers using a consistent and objective methodology  b. The 5 evaluation criteria, gauged using both quantitative and qualitative data, are: <ul style="list-style-type: none"> <li>• Strategic partnership</li> <li>• Commercial factors</li> <li>• SHE quality</li> <li>• Sustainability</li> <li>• Delivery service</li> </ul>	a. Assesses the sustainability maturity of a large range of suppliers  b. With the support of a third party service provider, the suppliers were assessed on 7 themes: <ul style="list-style-type: none"> <li>• CSR maturity</li> <li>• Supply continuity</li> <li>• Sustainable procurement</li> <li>• Respect of human rights</li> <li>• Working conditions</li> <li>• Business ethics</li> <li>• Environmental protection</li> </ul>	a. The EMEA procurement team has drawn up a supplier audit plan for 2021 to 2023 to deepen insights on some critical suppliers.  b. The plan aims to cover 66 suppliers in 3 years.  c. Allnex Australia launched additional plan for its suppliers, see 5.2



## 5.4 Remediation

As outlined in section 5.1 above, Allnex Groups has a number of policies and procedures aimed at respecting human rights and addressing modern slavery risks in its operations and supply chains. Some of the policies and procedures are aimed at remediation processes, including the hotline to report Code of Conduct violations and the Australian Whistle-blower Policy.

The Australian Whistle-blower Policy was reviewed and updated in early 2022, to ensure a clear channel of reporting, the protection of the whistle-blower and investigation in the allegations with due diligence.

There is an ongoing review of policies and procedures generally to ensure that they meet Allnex Group's commitment to human rights and the prevention and elimination of modern slavery risks.

In addition to these measures, modern slavery provisions were added to new procurement agreements. Allnex Resins plans to modify and implement such provisions to more standard contract templates and general terms and conditions, as well as individual agreements.

Allnex Resins also expanded the level of service from Intertek to provide further bespoke data analysis and follow-up remedial action with suppliers. This would include a three-way meeting between Intertek, Allnex and Identified Risk suppliers to enhance the understanding of the legislations on modern slavery, to promote the awareness and different prevention measures of modern slavery risks, and encourage for improvement of modern slavery risk management.

If anyone has any concern that any supplier may be involved in modern slavery practices or any potential modern slavery risks may lie in our operations, these concerns can be reported to the Steering Committee, Allnex Legal & Compliance team, senior managers in Australia, or the compliance hotline. This has been incorporated as inherent sections into different internal and external policies which must be followed and implemented by Allnex employees or suppliers.

The Steering Committee and Legal & Compliance team will then conduct comprehensive investigation, initiate third party audit (if necessary) and remediate properly (if it is found true).

## 5.5. Modern Slavery Management Steering Committee

The Modern Slavery Management Steering Committee of Allnex Australia consists of local senior management and personnel from relevant departments including Procurement, Planning and Logistics, Finance, Legal, Compliance, Human Resources and Manufacturing.

The remit of the Committee is to assist with assessing and addressing modern slavery risks and implementing our approach to eliminating modern slavery risks in our operations and supply chains. Two of the directors of all three entities of Allnex Australia sit on the Committee. Other directors are updated, and consulted with, on these issues on a regular basis.

Global level management from Finance, Legal, Compliance and other relevant department, as well as the key team members from our controlled entity, Nuplex Resins will continue to be involved in monitoring and managing the risk of modern slavery.



## 5.6 Additional Developments

Allnex Australia is committed to keep improving its modern slavery risk control management in various manners. In addition to the foregoing:

1. Allnex Australia contributed to our global key achievements in operational excellence in 2021-2022: ECOVADIS Gold status awarded for outstanding performance in terms of sustainability and operational reliability.
2. Allnex Group joined the Diversity & Inclusion ("D&I") sessions organized by the United Nations Global Compact to further strengthen adoption of Sustainable Development Goals (SDGs). D&I networks created, D&I awareness training launched, and will be further implemented to Australia in future.

## 5.7 Our Controlled Entity

The same compliance framework and risk assessments under this section 5 also apply to Nuplex Resins.

## 6. Assessing the Effectiveness of Our Actions

The Steering Committee meet regularly to review, discuss, and assess the effectiveness of the implemented measures, any necessary adjustment on the annual and quarterly plans, and the progresses made during each period.

The Steering Committee also tracks the status of supplier risk assessment, screening, and any potential target for third party due diligence on a case by case basis.

Allnex Australia keeps increasing the awareness of modern slavery risks amongst its employees by communications and training, and consciously promotes and urges suppliers to develop, improve and effectively enforce their own modern slavery risk management framework.





This joint Modern Slavery Statement 2022 was approved on the date shown on the below electronic signatures by:

**The board of Allnex Resins Australia Pty Ltd**

*Zel Medak*

**Zeljan Nikola Medak**  
Director

*[Signature]*

**David Jeremy Bert**  
Director

*[Signature]*

**Marie Van In**  
Director

**The board of Allnex Australia Holding Pty Ltd**

*[Signature]*

**Duncan Adrian Taylor**  
Director

*Zel Medak*

**Zeljan Nikola Medak**  
Director

*[Signature]*

**David Jeremy Bert**  
Director

**The board of Allnex Australia Pty Ltd**

*[Signature]*

**Duncan Adrian Taylor**  
Director

*Zel Medak*

**Zeljan Nikola Medak**  
Director

*[Signature]*

**David Jeremy Bert**  
Director

## 7. Consultation with Controlled Entities

Allnex Australia and Nuplex Resins operate under, and are bound to comply with, the Allnex Group's policies, procedures and systems. Allnex Australia has consulted with its controlled entity, Nuplex Resins, with respect to considerations of the modern slavery risks that may be present in our global and domestic operations and supply chains, for the purpose of preparing this Statement.





[www.allnex.com](http://www.allnex.com)