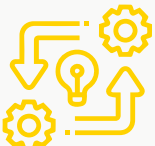



**DULUXGROUP
LIMITED -
MODERN SLAVERY
STATEMENT
2023**

imagine
a better place

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1. Introduction

This statement has been prepared by DuluxGroup Limited ABN 42 133 404 065 (DuluxGroup) in accordance with the Modern Slavery Act 2018 (Cth) (Act), and is the fourth modern slavery statement filed by DuluxGroup under the Act.

This statement describes our structure, operations and supply chain, the risks of modern slavery within our operations and throughout our supply chain, the actions taken to address those risks in the period from 01/01/2023 to 31/12/2023 (Reporting Period), and our assessment of the effectiveness of those actions.

Reporting Entities

This statement is made by DuluxGroup on its own behalf and on behalf of the entities specified below which had revenue exceeding \$100m in the Reporting Period (Reporting Entities).



Reporting Entity	ABN
DuluxGroup Limited	42 133 404 065
DuluxGroup (Investments) Pty Ltd	78 133 404 216
DuluxGroup (New Zealand) Pty Ltd	55 133 404 118
Dulux Group (Australia) Pty Ltd	67 000 049 427
DuluxGroup (Nominees) Pty Ltd	75 156 611 540
Alesco Corporation Pty Ltd	23 008 666 064
Parchem Construction Supplies Pty Ltd	80 069 961 968
Pargone Pty Ltd	71 004 364 710
Lincoln Sentry Group Pty Ltd	59 010 624 389
B&D Australia Pty Ltd	25 010 473 971

In this statement:

- A reference to “we,” “us” or “our” is a reference to DuluxGroup and its divisions.
- A reference to a division includes the Reporting Entities within that division and any subsidiary or business unit within that division.



1. Introduction



Key progress

Key progress in 2023 include the following:

- Ongoing application of our due-diligence process for suppliers.
- Rolled out an Employee Code of Conduct and made improvements to the Speak Up Program for the JUB business.
- Rolled out an Appropriate Workplace Behaviour Policy and human rights training for the JUB business.
- Rolled out a policy against harassment and discrimination for the Cromology business.
- Commenced rolling out a self-assessment questionnaire for the Cromology and JUB businesses.
- Rolled out a Sustainable Procurement Policy for the Maison Déco business.
- Developed a preliminary supplier risk evaluation tool in DGL Pacific and the Maison Déco business.

Consultation process

In preparing this statement, we have engaged with the leadership teams of businesses in DGL Pacific and DGL Europe to raise awareness, communicate commitments for future reporting periods, and invite feedback.

The governance framework to manage human rights aspects of our business, including modern slavery risks, is developed and monitored at a group level by our People, Culture and Change (PCC) function, our Safety & Sustainability (S&S) function and our group procurement team. Each business participates in the delivery of our policies, programs and training, and contributes valuable feedback to enable the continuous improvement and evolution of our approach.

Criteria No.	Criteria	Statement Page No.
1	Identify the reporting entity	3
2	Describe the reporting entity's structure, operations and supply chain	6
3	Describe the risks of modern slavery practices in the reporting entity's operations and supply chain	11
4	Describe the actions taken by the reporting entity and any entity that it owns or controls to address those risks, including due diligence and remediation processes	14
5	Describe how the reporting entity assesses the effectiveness of those actions	22
6	Describe the reporting entity's consultation process with any entity that it owns or controls	4
7	Include any other information that the reporting entity considers relevant	3, 4 & 5

Approval

This statement was approved by the board of DuluxGroup on 26/06/2024.

Feedback

We welcome any feedback and comments on this statement. Please forward any feedback or comments to sustainability@duluxgroup.com.au.

2. Chairman's Message



At DuluxGroup, we are committed to contributing to collective efforts to eliminate modern slavery by doing everything we can to identify, assess and address the modern slavery risks within our own operations and throughout our supply chain.

Our Safety & Sustainability Vision of 'A Future Without Harm' includes a rejection of modern slavery in all its forms. This is underpinned by our DuluxGroup Values & Behaviours, which include the fundamental human right of respect, valuing people and working safely.

This is DuluxGroup's fourth Modern Slavery Statement. Prepared in accordance with Australia's Modern Slavery Act 2018 (Cth), this statement outlines the way our business is structured, how we interact with suppliers and summarises the work we have undertaken over the course of the 2023 reporting period to identify, assess and address modern slavery risks.

In 2023, we saw a further increase in the size and complexity of our operations and supply chain due to the acquisition of new businesses in Australia and internationally. Our operations now span 26 countries, where we employ almost 9,000 people across more than 600 operating sites.

Critically, we are now working with more than 5,500 suppliers who provide goods and services from more than 30 countries. Our businesses seek to partner with suppliers that share our Values, including respect for human rights, and specifically, the right to be free from slavery. When engaging new suppliers, we assess a range of supplier risks including the risk of modern slavery.

Due diligence includes audits to ensure they meet our compliance standards and can include on-site inspections for those identified as particularly high risk.

During the year, we continued to make progress against key measures, including engagement with our suppliers and ongoing risk assessments, and implementation of risk controls in our own operations as well as across our supply chain – particularly in our more recently acquired European businesses where we strengthened our due diligence processes and undertook a number of on-site audits.

A key focus remains developing a deeper understanding of our suppliers' supply network, to enable better visibility and effective management of modern slavery risk through all levels of the supply chain.

Alongside ensuring we work with suppliers who share our Values and approach to ethical sourcing and human rights, we have continuous training and education in place for our own employees to ensure we all understand our role in reducing modern slavery risks.

With the knowledge to identify risks and the support to speak-up and have any issues addressed, our employees play an important role in helping to eliminate the scourge of modern slavery. I'm proud of their collective contribution to the health & wellbeing of the communities where we operate and the support our businesses provide to suppliers across our many sourcing locations.

I am pleased to present DuluxGroup's 2023 Modern Slavery Statement.

Patrick Houlihan
Chairman and Chief Executive Officer
12 June 2024



INTRODUCTION

CHAIRMAN'S MESSAGE

US

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EFFECTIVENESS

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3. Us

A — Our Structure

We are a leading manufacturer and marketer of premium branded products that enhance, protect and maintain the places and spaces in which people live and work. We manufacture & source, market & promote and sell & distribute a diverse range of products to trade and retail customers through our subsidiaries and business units globally.

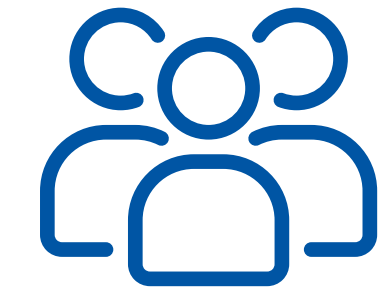
DuluxGroup is part of Nippon Paint Holdings Co Ltd, the fourth largest paint company globally and the largest in Asia Pacific.

Our operations are organised into two divisions – DGL Pacific and DGL Europe. DGL Pacific operates in Australia, China, Hong Kong, New Zealand, Papua New Guinea, Singapore and the United States. DGL Europe operates in central and western Europe, Morocco and the United Kingdom.

In the Reporting Period, the following acquisition activity took place:

- DGL Pacific acquired Seacol International (April 2023) and Pental Cleaning Products (November 2023)
- DGL Europe acquired an interest in NPT S.r.l (July 2023)

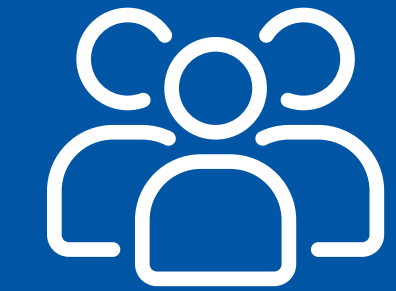
Given the recent nature of these acquisitions, the governance frameworks for these businesses have not been fully integrated within our divisions. Consequently throughout this statement, we have included relevant information where possible and indicated where data was either insufficient, inaccessible or unavailable.



3. Us

A — Our Structure

Below is a summary of each key subsidiary or business unit, the key products they supply and the key brands they own or are licensed to use (including our acquisitions in 2023):



DGL PACIFIC

Key subsidiary or business unit	Key products	Key brands owned or licensed
	Decorative paints, tools and accessories for decorative paints Decorative concrete products, texture coatings, powder coatings, protective coatings, construction chemicals and related equipment Woodcare coatings and tools and accessories for woodcare coatings	Berger, British Paints, Dulux, Dulux Avista, Porter's Paints, Spring, Walpamur Dulux Acratex, Dulux EnviroSolutions, Dulux Powder Coatings, Dulux Protective Coatings, Edencrete, Emer, Flextool, Fosroc, Hadrian, RotaCota Cabot's, Feast Watson, Intergrain
	Sealants, adhesives, fillers, paint preparation products and accessories Household cleaning products	Admil, Hillmark, Parfix, Poly, Polyfila, Polyglaze, Selleys, TurtleWax Aim, Country Life, Huggie, Janola, Jiffy, Softly, Sunlight, Velvet, White King
	Home garden products, including fertilisers, potting mix, pest and disease control, lawn care, seeds, pots, accessories, organic gardening, organic crop protection and nutritional products	Dynamic Lifter, Hortico, Munns, OCP, PowerFeed, Ratsak, Slasher, Sharp Shooter, Thrive, Yates, Yates Weed 'n' Feed, Watkins, Zero Seasol
	Garage doors, automatic openers	Automatic Technology, B&D, CSI, Dominator, Garador
	Cabinet and architectural hardware and related products	Assa Abloy, Breezway, Blum, Finista, Flypro, Hera, HexFix, Knight, Modar, Lockwood

DGL EUROPE

Key subsidiary or business unit	Key products	Key brands owned or licensed
	Decorative paints, woodcare coatings, metal and flooring coatings, plasters, tools and accessories for paints and coatings, flooring, wall coverings	Alp, Arcol, Baldini Vernici, Duco, Duraval, ICP, Jallut, Classidur, MaxMeyer, Mister Color, Montana, Palm, Plasdox, Reveton, Robbialac, Settef, Tinasvip, Tollens, Viero, Zolpan
	Decorative paints, concrete products, woodcare coatings, metal coatings, waterproofing, ceramic tiling plasters for facades, leveling compounds, expanded polystyrene (EPS), packaging, disinfectants, body care products, motor oils	JUB, JUBIZOL, JUPOL
	Decorative paints, tools and accessories for decorative paints	Maison Déco, Pure&Paint
	Decorative paints, tools and accessories for decorative paints	Craig & Rose, Maison Déco
	Sealants, adhesives	NPT





3. Us

B — Our Operations

DuluxGroup Pacific - Employees

3,500	Australia
546	New Zealand
166	Papua New Guinea
107	China
6	United States
3	Hong Kong
2	Singapore

4,330 Total

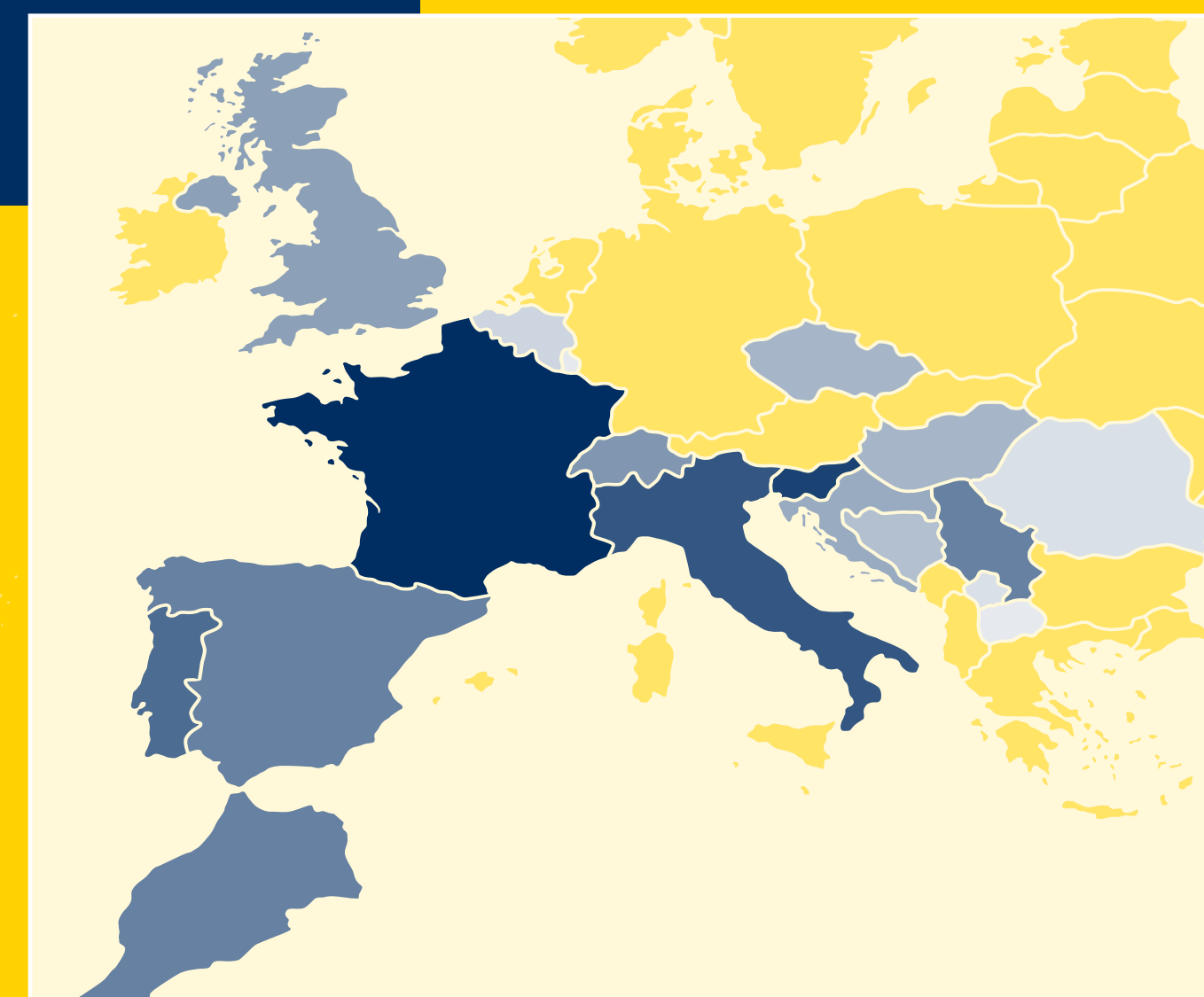
DuluxGroup Europe - Employees

2,189	France
445	Slovenia
280	Italy
265	Portugal
186	Morocco
186	Spain
173	Serbia
79	United Kingdom
71	Switzerland
31	Croatia
29	Czech Republic
28	Hungary
21	Bosnia & Herzegovina
10	Belgium
8	Monaco
5	Kosovo
3	Luxembourg
3	Republic of Northern Macedonia
2	Romania
1	Slovakia

4,015 Total

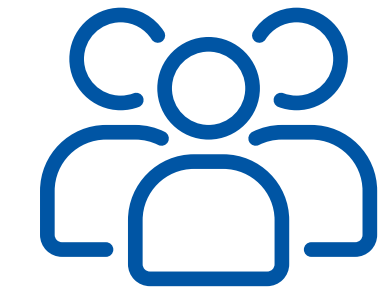
OUR OPERATIONS

As at the end of the Reporting Period, we had 8,345 employees globally. On this page is a summary of our employee locations in each division (including our acquisitions in 2023):



3. Us

C – Our Supply Chain



Our supply chain comprises suppliers and providers of both direct goods and indirect goods and services.

Direct goods are goods supplied to us for use in the products we manufacture, such as raw materials and packaging, as well as goods supplied to us as finished products for resale.

Indirect goods and services are those goods and services we procure to conduct our business, but which are not included in the products we ultimately sell & distribute to customers.

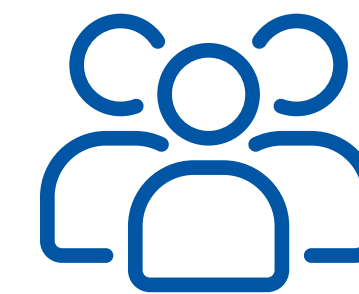
In the Reporting Period, we spent over AUD1.95b with over 5,500 suppliers. Below is a summary of the spend (by percentage) for direct and indirect goods and services in each division (including the NPT business, but excluding our other acquisitions in 2023):

DGL Pacific

Supplier or Provider Type	Spend %	Key Goods and Services Supplied
Direct goods - raw materials and packaging	45%	Latex, Minerals, Pigments, Tinters, Other Chemicals Metal, Plastic, Fibre Packaging
Direct goods - finished products	30%	Architectural Hardware, Cabinetry Hardware Aerosols, Paint Accessories, Waterproofing Systems, Fire Protective Coatings, Concrete Equipment Garage Door Components, Automatic Opener Components
Indirect goods and services	25%	Marketing and media, consulting services, it and telco, fleet vehicles, contract labour, waste management, utilities, recruitment services, warehouse consumables, facilities management
Total	100%	

DGL Europe

Supplier or Provider Type	Spend %	Key Goods and Services Supplied
Direct goods - raw materials and packaging	55%	Latex, Minerals, Pigments, Tinters, Other Chemicals Metal, Plastic, Fibre Packaging
Direct goods - finished products	31%	Architectural Hardware, Cabinetry Hardware Aerosols, Paint Accessories, Waterproofing Systems, Fire Protective Coatings, Concrete Equipment
Indirect goods and services	14%	Marketing and media, consulting services, it and telco, fleet vehicles, contract labour, waste management, utilities, recruitment services, warehouse consumables, facilities management
Total	100%	



3. Us

C – Our Supply Chain

Many of our direct goods and indirect goods and services are sourced from suppliers and providers located in the same locations that we operate in (where there is a lower risk of modern slavery).



Below is a summary of our supplier's or provider's location for indirect goods in each division (excluding our acquisitions in 2023):

Indirect goods and services

Division	Supplier or provider location by spend
DGL Pacific	<ul style="list-style-type: none"> • Australia - 95% • Other - 5%
DGL Europe	<ul style="list-style-type: none"> • European Union & United Kingdom >90% • Other <10%

Below is a summary of our supplier's source location for direct goods in each division (excluding our acquisitions in 2023):

Direct goods

Division	Supplier or provider location by spend
DGL Pacific	<ul style="list-style-type: none"> • Australia - 60% • Austria - 8% • China - 8% • New Zealand - 5% • Malaysia - 3% • Other - 16%
DGL Europe	<ul style="list-style-type: none"> • European Union & United Kingdom - 93% • North America - 1% • Serbia - 3% • China and India - 2% • North Africa - 1%

4. Risks



In identifying and assessing modern slavery risks, we use the SEDEX Radar risk tool to assist us. This tool captures modern slavery related risk factors in its labour standards assessment to evaluate risk within our operations and throughout our supply chain.



The inherent risk within our operations is dependent on the following key factors:

- Nature of operations
- Industry or sector of operations
- Geographical location of operations
- Employment arrangements for operations, such as direct hire, labour hire, contractor, and full time, part time or casual



The inherent risk throughout our supply chain is dependent on the following key factors:

- Industry or sector of goods sourced or supplied or services provided
- Geographical location of supplier or provider
- Geographical location of goods sourced or services provided
- Material or composition of goods, such as known safety hazards or modern slavery concerns
- Type of goods sourced and supplied, such as raw materials, packaging or finished goods



4. Risks

A – Risk Assessment Within Our Operations



On this page is a summary of our assessment of modern slavery risks within our operations for each division (including our acquisitions in 2023). The assessment includes the inherent risk (which is the risk before implementation of risk controls) and risk types based on operating location and key business activities. As a result of the implementing the risk controls specified in section 5 (actions), the actual risk will be lower than the inherent risk. However understanding inherent risk ensures we focus on, and prioritise efforts in, the areas that have a higher risk of modern slavery if left unmanaged.

DGL Pacific				DGL Europe			
Inherent Risk	Operating Location	Key Business Activities	Risk Types	Inherent Risk	Operating Location	Key Business Activities	Risk Types
High	<ul style="list-style-type: none"> China Papua New Guinea 	<ul style="list-style-type: none"> Research & develop Manufacture & source Market & promote Sell & distribute 	<ul style="list-style-type: none"> Working hours Freedom of association Regular employment Discrimination Wages Forced labour Health, safety and hygiene Children and young workers 	Medium	<ul style="list-style-type: none"> Bosnia & Herzegovina Croatia Czech Republic France Hungary Italy Kosovo Morocco Portugal Republic of North Macedonia Romania Serbia Slovakia Slovenia Spain Switzerland United Kingdom 	<ul style="list-style-type: none"> Manufacture & source Market & promote Sell & distribute 	<ul style="list-style-type: none"> Working hours Freedom of association Health, safety and hygiene Regular employment Discrimination Forced labour Wages
Medium	<ul style="list-style-type: none"> Australia New Zealand Hong Kong 	<ul style="list-style-type: none"> Research & develop Manufacture & source Market & promote Sell & distribute 	<ul style="list-style-type: none"> Freedom of association Health, safety and hygiene 	Low	<ul style="list-style-type: none"> Belgium Luxembourg Monaco 	<ul style="list-style-type: none"> Sell & distribute 	<ul style="list-style-type: none"> Working hours Freedom of association Regular employment
Low	<ul style="list-style-type: none"> United States Singapore 	<ul style="list-style-type: none"> Market & promote Sell & distribute 	<ul style="list-style-type: none"> Freedom of association 				

Based on the above risk assessment, we make the following key observations:

- The inherent risk rating tends to be higher in locations where local government regulation of working conditions is weaker or in operations that typically use labour hire workers, such as manufacturing and warehousing.
- Health, safety and hygiene risk tends to be higher in a manufacturing and warehousing environment.

- Research & development, marketing & promotion and sales & distribution environments typically carry a lower risk of modern slavery.

Based on the above observations, we apply a higher level of governance and more rigorous risk controls in operating locations where manufacturing and warehousing activities are undertaken.

4. Risks

B – Risk Assessment Throughout Our Supply Chain



While our direct goods are sourced from suppliers located in the same locations that we operate in (where there is a lower risk of modern slavery), many of those suppliers source their goods from other locations (where there is a higher risk of modern slavery). As a result, we have initially focused on assessing modern slavery risks within our supply chain for direct goods and initially prioritised efforts on assessing modern slavery risks in the location where those suppliers source their goods from.

On this page is a summary of our assessment of modern slavery risks throughout our supply chain for direct goods only based on the source location for those goods, the type of goods sourced and the industry for those goods (including the NPT business, but excluding our other acquisitions in 2023). The assessment relates to 99% of our supply chain (by spend on direct goods).

DGL Pacific				DGL Europe			
Inherent Risk	Direct goods source location	Direct goods sourced	Risk types	Inherent Risk	Direct goods source location	Direct goods sourced	Risk types
High	• China	Powder coating, latex, resins, pigments, painting accessories, concrete equipment, garage door components, opener components, architectural hardware, cabinetry hardware, other chemicals	<ul style="list-style-type: none"> Working hours Freedom of association Regular employment Discrimination Wages Forced labour Children and young worker Health, safety and hygiene 	High	• China • India	Pigments, painting tools and accessories	<ul style="list-style-type: none"> Freedom of association Working hours Health, safety and hygiene Forced labour Wages Children & young workers Regular employment Discrimination
Medium	• Indonesia • Italy • Japan • Malaysia • Romania • Saudi Arabia • South Korea • Taiwan • Thailand • United States	Latex, silicones, gap fillers, pigments, adhesives, speciality coatings, architectural hardware, cabinetry hardware, gardening products, waterproofing products, painting accessories, concrete equipment, other chemicals	<ul style="list-style-type: none"> Freedom of association Health, safety and hygiene Working hours Regular employment Children and young workers Forced labour Discrimination Wages 	Medium	• Andorra • Austria • Belgium • Czech Republic • France • Germany • Ireland, Republic Of • Italy • Liechtenstein • Monaco • Morocco • Netherlands • Serbia • Slovenia • Spain • Switzerland • United Kingdom • United States	Latex, pigments, sand, painting tools and accessories, expanded polystyrene, solvents, other chemicals	<ul style="list-style-type: none"> Working hours Freedom of association Health, safety and hygiene Forced labour Regular employment Wages
Low to Medium	• Australia • Germany	Latex, minerals, pigments, tinters, packaging, garage door components, silicone resins, other chemicals, aerosol paints, architectural hardware, cabinetry hardware	<ul style="list-style-type: none"> Freedom of association Health, safety and hygiene Discrimination 				
Low	• Austria • New Zealand • Singapore	Cabinetry hardware, latex, minerals, pigments, tinters, other chemicals, packaging, garage door components	<ul style="list-style-type: none"> Working hours Freedom of association Health, safety and hygiene Wages Children and young workers 	Low	• Luxembourg • Norway	Latex, packaging, pigments, solvents, other chemicals	<ul style="list-style-type: none"> Working hours Freedom of association Health, safety and hygiene Regular employment

Based on the above risk assessment, we make the following key observations:

- Our key suppliers are typically large, multinational corporations located within our operating locations, who are themselves assessing modern slavery risks in their own operations and throughout their own supply chains, and implementing risk controls to mitigate those risks.
- With established and direct relationships with our key suppliers, they have certainty and stability which, in turn, enables them to provide certainty and stability for workers within their operations and throughout their supply chains, providing some mitigation of modern slavery risks.

5. Actions

A – Governance Framework

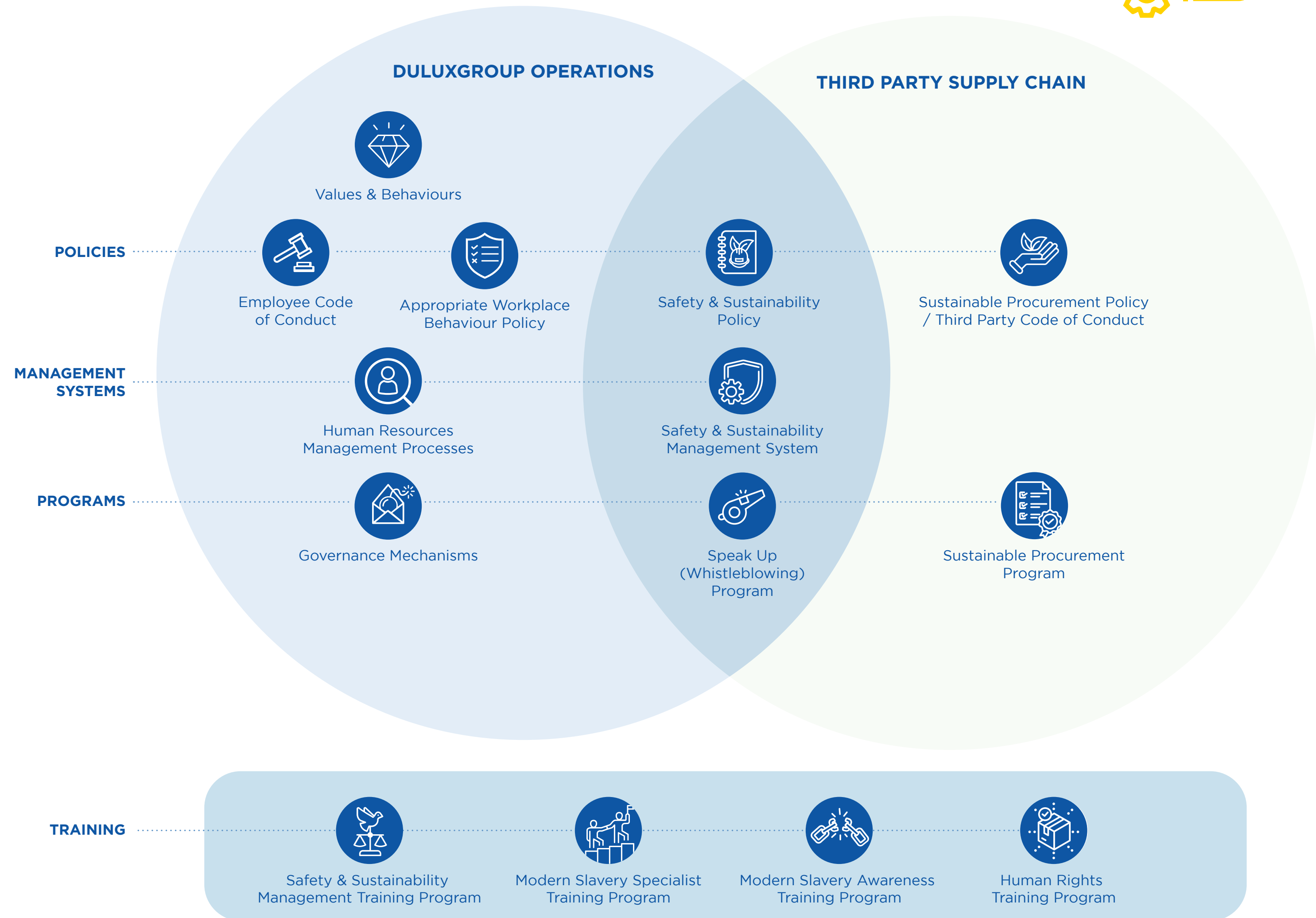
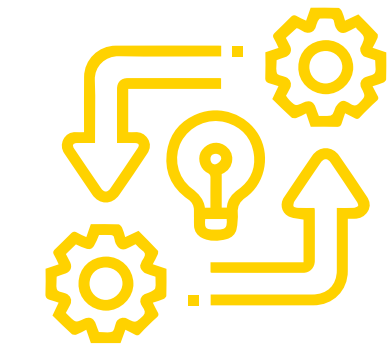
We have established a governance framework to manage human rights aspects of our business, including mitigating modern slavery risks within our operations and throughout our supply chain.

On this page is a summary of our policies, management systems, programs and training used to mitigate modern slavery risks both internally and externally to our business.

While we have an established governance framework in DGL Pacific and the Craig & Rose business in DGL Europe, it is continuing to evolve as we learn more about our supply chain.

Many elements of our governance framework are established in the Cromology, JUB and Maison Déco businesses, with others being developed or rolled out.

For our acquisitions in 2023, we are in the initial stages of understanding current governance frameworks, and identifying and assessing gaps. In future reporting periods, we will transition elements of our governance framework to address those gaps.



INTRODUCTION

CHAIRMAN'S MESSAGE

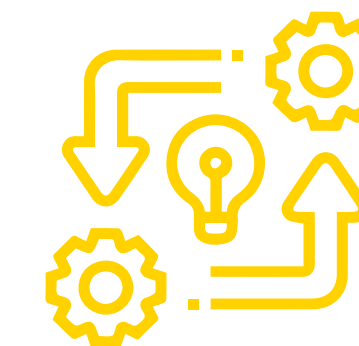
US

RISKS

ACTIONS

EFFECTIVENESS

5. Actions



B – Policies



• Values & Behaviours

Our Values & Behaviours guide our employees in how we deliver on our core purpose and achieve our strategic goals, while upholding principles like respect and safety. They empower our employees to “Imagine a Better Place”, while ensuring that we make fair, balanced and ethical decisions along the way.

Different forms of this guide apply to our employees in DGL Pacific and DGL Europe (excluding our acquisitions in 2023 and the Maison Déco business).

In the future reporting periods, we intend to roll out a similar guide to employees in the Maison Déco business.



• Employee Code of Conduct

Our Employee Code of Conduct requires our employees to adhere to ethical and legal standards, prohibiting discrimination, harassment, intimidation and violence in the workplace.

Different forms of this code apply to our employees in DGL Pacific and DGL Europe (excluding our acquisitions in 2023 and the Maison Déco business).

In future reporting periods, we intend to roll out a similar code to our employees in the Maison Déco business and review the current code for the Cromology and NPT businesses to specifically address modern slavery risks.



• Appropriate Workplace Behaviour Policy

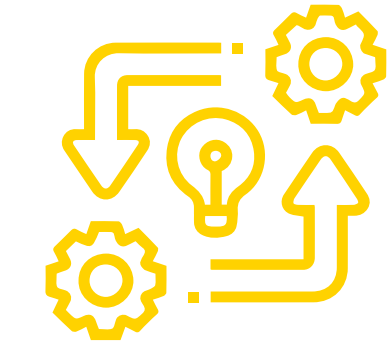
Our Appropriate Workplace Behaviour Policy defines what is acceptable behaviour within our operations and by law, and includes a complaint mechanism for the management of unacceptable behaviour complaints.

Different forms of this policy apply to our employees in DGL Pacific and the Craig and Rose business in DGL Europe.

In the Reporting Period, the JUB business rolled out an Appropriate Workplace Behaviour Policy that applies to our employees in Bosnia & Herzegovina, Croatia, Czech Republic, Hungary, Kosovo, Republic of Northern Macedonia, Romania, Serbia, Slovakia, and Slovenia, and the Cromology business rolled out a policy against harassment and discrimination that applies to our employees in France, Spain, Portugal and Italy.

In the future reporting periods, we intend to roll out a similar policy to our employees in the Maison Déco business.

5. Actions



B – Policies



• Safety & Sustainability Policy

Different forms of our Safety & Sustainability Policy are in place in DGL Pacific and DGL Europe (excluding our acquisitions in 2023).

For DGL Pacific and the Craig & Rose and Maison Déco businesses in DGL Europe, our Safety & Sustainability Policy describes our vision of “A Future Without Harm” and expresses our continuing commitment to improve the safety and sustainability of our businesses by identifying, understanding and minimising the health, environmental and community impacts associated with our activities.

For DGL Europe:

- The JUB business has committed to sustainable development principles, including responsibility to society and employees, environmental protection and circular economy.
- The Cromology business has developed a corporate social responsibility vision aligned with the five relevant United Nations Sustainable Development Goals, and has a health, safety and environment policy in place.



• Sustainable Procurement Policy

Different forms of our Sustainable Procurement Policy or Supplier Code of Conduct are in place in DGL Pacific and DGL Europe (excluding our acquisitions in 2023).

Each policy or code requires our suppliers to accept and comply with the policy or code as part of the supplier onboarding process.

DGL Pacific and the Craig & Rose business in DGL Europe have a Sustainable Procurement Policy in place which describes our commitment to understanding our supply chain and ensuring that environmental, health, safety, modern slavery, labour and human rights considerations are embedded into our sourcing processes and procedures. The policy specifies our expectations of suppliers, including that suppliers will cascade our requirements to the next tier of suppliers in their own supply chains, with the aim of impacting lower-tier suppliers over time.



For DGL Europe, the Cromology and JUB businesses have Supplier Codes of Conduct in place that specify our expectations of suppliers. The code for the JUB business requires suppliers to cascade our requirements to their own supply chains.

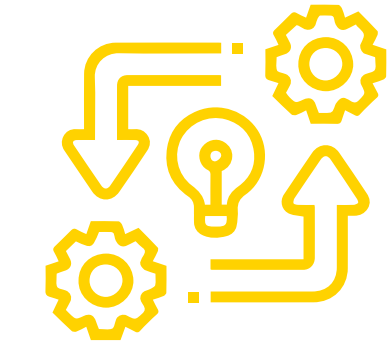
In the Reporting Period, we rolled out our Sustainable Procurement Policy to the Maison Déco business, with 85% of industrial and raw material suppliers having accepted the policy.

In future reporting periods, we intend to review the codes for the Cromology and Maison Déco businesses to require suppliers to cascade our requirements to the next tier of suppliers in their supply chain.

The Cromology business also has an Ethical Procurement Policy in place, which employees in procurement positions must accept and comply with, as part of the procurement onboarding process.



5. Actions



C – Management Systems



• Human Resource Management Processes

DGL Pacific (excluding our acquisitions in 2023) has group level and jurisdictionally specific management processes in place as a baseline for managers to lead their people. These management processes include policies, guidelines, templates, videos and training materials.

For our operations in China and Papua New Guinea, we have the following jurisdictionally specific risk controls in place to address a higher risk of modern slavery:

- Documented policies and procedures, such as employee recruitment, leave allowances, salary payment and working hours.
- Strict adherence to Chinese Labour Law, Labour Contract Law, Female Workers Protection Law and Minors Protection Law (China).
- Accommodation provided for rural employees provided at a reasonable price and facilities closely monitored to ensure health, safety and hygiene of



those employees (China).

- Direct employment in operational-based roles, with no use of labour-hire agencies (PNG).
- Casual employment does not extend beyond 3 months (PNG).
- Salaries based on Hay grade analysis which are above the minimum wages set by the Department of Labour (PNG).

While there is a lower risk of modern slavery in Australia, New Zealand and the United States, we have the following jurisdictionally specific risk controls in place to address the use of labour hire workers:

- Labour hire and recruitment service providers complete onboarding assessment for modern slavery risks (Australia and New Zealand).
- Direct employment in operational-based roles, with no use of labour-hire agencies (United States).



• Safety & Sustainability Management System

We maintain an integrated Safety & Sustainability Management System to enable delivery of our Safety & Sustainability Policy. The management system includes safety & sustainability standards, including the sustainable procurement standard and an audit program to assess and verify performance.

The management system applies to DGL Pacific and the Craig & Rose and Maison Déco businesses in DGL Europe.

In future reporting periods, we intend to align this management system with existing management systems of other businesses in DGL Europe and our acquisitions in 2023.



INTRODUCTION

CHAIRMAN'S MESSAGE

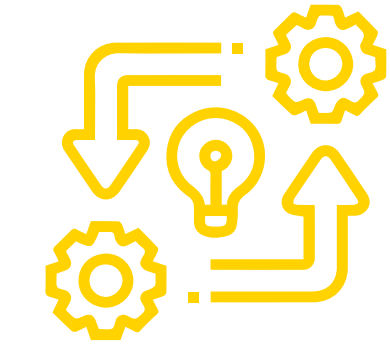
US

RISKS

ACTIONS

EFFECTIVENESS

5. Actions



D – Programs



• Speak Up Program

Different forms of a Speak Up Program or Whistleblower Policy are in place in DGL Pacific and the Craig & Rose, JUB and Cromology businesses in DGL Europe.

Each program or policy is designed to encourage reporting of policy breaches, including modern slavery or human rights breaches, via an independent channel that ensures confidentiality and anonymity for the discloser.

For DGL Pacific, the program is underpinned by a Speak Up Policy and Speak Up Line, and is overseen by a Speak Up Committee comprising of members of the executive team of DGL Pacific and select senior employees from group level functions.

The Speak Up Committee meets 3 times annually to review reports, identify patterns and implement improvement plans, and a report is tabled to the executive team of DGL Pacific annually.

The Speak Up Program in the Cromology business is underpinned by a Whistleblowing Procedure and



• Other grievance mechanisms

We have grievance mechanisms in place for DGL Pacific and DGL Europe, and we continue to monitor and report on the number of grievances relating to modern slavery risks.

In the Reporting Period, we finalised and rolled out a wellbeing dashboard to table to the executive team of DGL Pacific annually. The dashboard identifies trends, implications and improvements.

Integrity Line, and is administered externally and via Cromology’s human resources and legal teams. The Cromology business promotes awareness of the program via its company website, intranet and posters at its operating locations. The program is available to our employees in each jurisdiction in which Cromology operates, as well as external stakeholders.

The JUB business has a Whistleblowing Policy and external complaint channel in place.

In the Reporting Period, the JUB business developed and rolled out an online speak-up form which enables external stakeholders to submit reports in a user-friendly way. The online speak-up form is available in the language of each jurisdiction in which JUB operates and ensures anonymity for the disclosure, except if the discloser wishes to participate in the investigation.

A consolidated report for DGL Pacific and DGL Europe is tabled to the Speak Up Committee annually.

In the future reporting periods, we intend to roll out a similar program in the Maison Déco business.

5. Actions

D – Programs



• Sustainable Procurement Program

Different forms of a Sustainable Procurement Program are in place for DGL Pacific and DGL Europe.

Each program communicates our expectations to suppliers, assesses suppliers against relevant modern slavery criteria and, if required, verifies compliance via on-site audits of supplier facilities and business practices.

For DGL Pacific and the Craig & Rose business in DGL Europe, we currently undertake the following due diligence process for our suppliers:

1. Suppliers must agree to our Sustainable Procurement Policy.

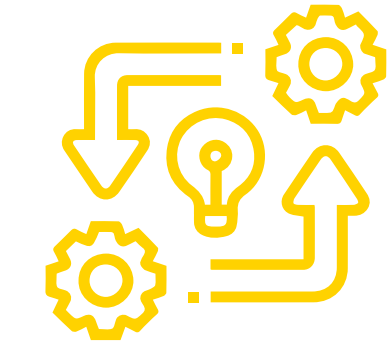
2. We assess whether the supplier requires further verification based on the following criteria:
The supplier is a contract manufacturer with whom we spend \$10,000 or more per annum or any other supplier with whom we spend \$100,000 or more per annum.

3. If the supplier is assessed as requiring further verification, we require the supplier to complete a self-assessment checklist. The self-assessment checklist is tailored to industry sector and designed to accord with standard global supply chain systems and guidance, including the International Labour Organisation conventions, Ethical Trading Initiative base code, ISO 14001 and SEDEX code. Under the self-assessment checklist, we require the supplier to provide information on labour practices, working conditions and safety and environmental management.

4. Based on the information provided in the self-assessment checklist, we identify high-risk suppliers and, if required, undertake an on-site audit to verify the information provided in the self-assessment checklist and adherence to the Sustainable Procurement Policy.



5. Actions



D – Programs



To better target our resources to assessing and verifying high-risk suppliers, we have developed a preliminary supplier risk evaluation tool for DGL Pacific.

The tool evaluates a supplier’s risk profile based on industry sector, activity, source country and known risks, such as hazardous materials, likely use of labour hire and regulated activities.



Based on the outcome of the evaluation, we propose to determine actions according to the supplier’s risk profile:

Risk level	Action
High	Complete detailed assessment Based on outcome of detailed assessment, undertake on-site audit
Medium	Complete standard self-assessment checklist Based on outcome of self-assessment checklist, undertake desktop audit
Low	Supplier must agree to our Sustainable Procurement Policy

In future reporting periods, we intend to roll out the preliminary supplier risk evaluation tool as part of our current due diligence process for our suppliers to prioritise our verification program for high-risk suppliers.

For the Cromology and JUB businesses, we undertake the following due diligence process for our suppliers:

- Suppliers must agree to our Supplier Code of Conduct.
- We identify significant or high-risk suppliers and, if required, undertake an on-site audit to verify the information provided and adherence to the Supplier Code of Conduct.

The Cromology and JUB businesses are in the process of rolling out a self-assessment questionnaire, as we have done for DGL Pacific and the Craig & Rose business in DGL Europe, to enable a more targeted approach to high-risk suppliers.

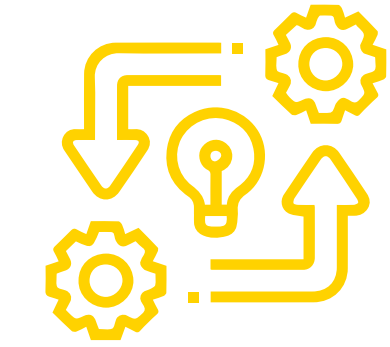
For the Maison Déco business, we undertake the following due diligence process for our suppliers:

- Suppliers must agree to our Sustainable Procurement Policy.
- We assess whether the supplier requires further verification based the following criteria: desktop assessment using the Ecovadis supplier assessment and rating program.
- If the supplier is assessed as requiring further verification, we undertake an on-site audit to verify adherence to the Supplier Code of Conduct.

In future reporting periods, we intend to roll out a preliminary supplier risk evaluation tool to the Maison Déco business, similar to that developed for the DGL Pacific and the Craig & Rose business in DGL Europe, to enable a more targeted approach to high risk suppliers.

5. Actions

E – Training



• Safety & sustainability management training program

Our safety & sustainability management training program includes a section dedicated to product stewardship. This section includes sustainable procurement and modern slavery awareness.

It is mandatory for senior managers in DGL Pacific to complete this training program as part of their onboarding process.

In future reporting periods, we intend to roll out a similar training program to senior managers in DGL Europe as part of their onboarding process.



• Modern slavery specialist training

In DGL Pacific, employees in procurement positions in Australia and New Zealand complete modern slavery specialist training every 3 years.

In the Reporting Period, employees in procurement positions in the JUB business completed modern slavery specialist training.

In future reporting periods, we intend to:

- repeat modern slavery specialist training for employees in procurement positions in the JUB business to complete every 3 years.
- roll out modern slavery specialist training to employees in procurement positions in other businesses in DGL Europe.



• Modern slavery awareness training program

It is mandatory for employees in key roles, such as executive management, human resources, procurement, key research and development, logistics, information technology and production positions in Australia and New Zealand to complete the modern slavery awareness e-learning module every 2 years.

In future reporting periods, we intend to roll out an awareness program to key employees in other jurisdictions in DGL Pacific to complete every 2 years.

In the Reporting Period, directors and key employees of the JUB business completed a modern slavery awareness training program. This training program included a general overview of modern slavery risks and details of measures and policies the JUB business has implemented to mitigate those risks.

In future reporting periods, we intend to roll out this training program to key employees in DGL Europe to complete every 2 years.



• Human rights training program

It is mandatory for employees in DGL Pacific to complete human rights training every 2 years.

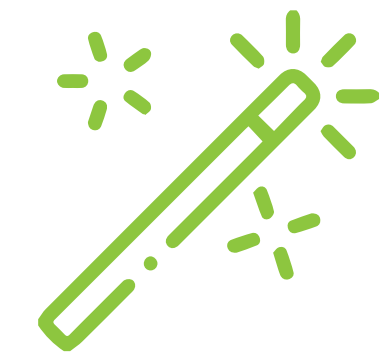
This training program includes modules on discrimination, harassment and bullying. Additional training on discrimination, harassment and bullying is provided to senior managers in DGL Pacific.

In the Reporting Period, directors and key employees of the JUB business completed human rights training.

In future reporting periods, we intend to roll out this training program to employees in DGL Europe to complete every 2 years.



6. Effectiveness



We are committed to continually improving our policies, management systems, programs and training to effectively identify, assess and address modern slavery risks.

While we have an established governance framework in place in DGL Pacific, we are continually improving our approach as we gain a deeper understanding of our supply chain.



In the Reporting Period, we commenced aligning the Cromology and JUB businesses with our framework. In future reporting periods, we intend to align our acquisitions in 2023 and the Maison Déco business with our framework.

While the Craig & Rose business continued to operate under the same governance framework as DGL Pacific in the Reporting Period, it did not report any metrics relating to supply chain at the end of the Reporting Period.

Given different businesses are at different stages of managing human rights aspects of our business, including mitigating modern slavery risks, our focus is on improving the existing framework and aligning our recently acquired businesses and the Maison Déco business with that framework through undertaking reviews to identify and address gaps in their existing frameworks.

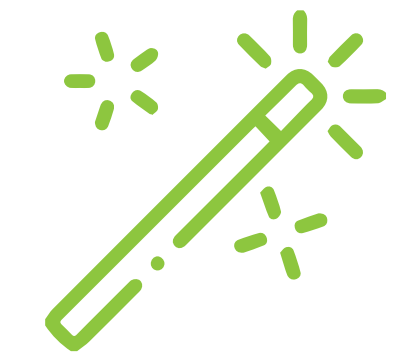
On the next few pages is a summary of actions taken in the Reporting Period to improve the existing framework and align businesses in DGL Europe with that framework, as well as our assessment of the effectiveness of those actions and our intended next steps in future reporting periods.

A – Governance Framework

Target	Aligned governance framework for all businesses
Effectiveness Measure	All businesses operating under aligned governance framework
Reporting Period	<ul style="list-style-type: none"> Ongoing review of governance framework for DGL Europe to identify and address gaps
Future Reporting Periods	<ul style="list-style-type: none"> Commence review of governance framework for Seasol, Pental and NPT businesses to identify and address gaps Complete review of governance framework for the Cromology and JUB businesses and continue to implement improvements to address gaps Complete review of governance framework relating to operations for the Maison Déco business and continue to implement improvements to address gaps

6. Effectiveness

B – Policies



Values and Behaviours

Target	Values & Behaviours (or equivalent) in place for all businesses
Effectiveness Measure	All businesses have guide in place
Future Reporting Periods	<ul style="list-style-type: none"> Roll out guide for the Maison Déco business in 2024

Employee Code of Conduct

Target	Aligned governance framework for all businesses
Effectiveness Measure	All businesses have codes in place
Reporting Period	<ul style="list-style-type: none"> Rolled out code for the JUB business
Future Reporting Periods	<ul style="list-style-type: none"> Review code to specifically address modern slavery risks for the Cromology business in 2024 Roll out code for the Maison Déco business in 2024 Review code to specifically address modern slavery risks for the NPT business in 2025

Appropriate Workplace Behaviour Policy

Target	Appropriate Workplace Behaviour Policy (or equivalent) in place for all businesses
Effectiveness Measure	All businesses have policy in place
Reporting Period	<ul style="list-style-type: none"> Rolled out a policy in the JUB business that applies to our employees in Bosnia & Herzegovina, Croatia, Czech Republic, Hungary, Kosovo, Republic of Northern Macedonia, Romania, Serbia, Slovakia, and Slovenia Rolled out a policy against harassment and discrimination for the Cromology business that applies to our employees in France, Spain, Portugal and Italy Updated existing ethical and professional alert system to align with new regulations for the Cromology business
Future Reporting Periods	<ul style="list-style-type: none"> Commence review of policies in the Seasol, Pental and NPT businesses to identify and address gaps Roll out a policy for the Maison Déco business in 2024

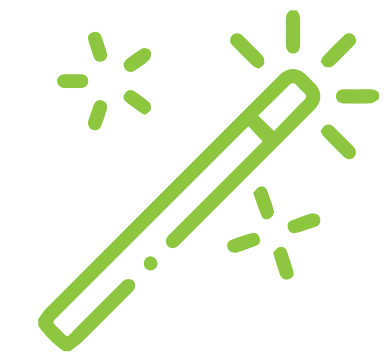
Sustainable Procurement Policy

Target	Sustainable Procurement Policy or Supplier Code of Conduct in place for all businesses and accepted by suppliers
Effectiveness Measure	All businesses have policy in place and policy accepted by suppliers
Reporting Period	<ul style="list-style-type: none"> 95% of contract manufacturers with whom we spend \$10,000 or more per annum or any other supplier with whom we spend \$100,000 or more per annum have accepted the policy or code in DGL Pacific 90% of suppliers have accepted the policy or code in the Cromology business 60% of suppliers have accepted the policy or code in the JUB business Rolled out a Sustainable Procurement Policy in the Maison Déco business, with 85% of industrial and raw material suppliers having accepted the policy
Future Reporting Periods	<ul style="list-style-type: none"> Review code to ensure modern slavery requirements are cascaded to the next tier of suppliers in the supply chain for the Cromology and Maison Déco businesses in 2024 Recommence reporting for the Craig & Rose business in 2024 Roll out code for the NPT business in 2025



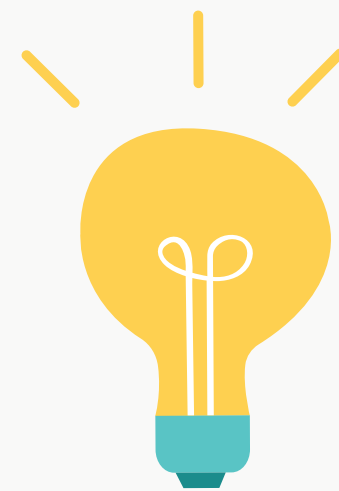
6. Effectiveness

C – Programs



Speak Up Program

Target	Ongoing monitoring and reporting for all businesses
Effectiveness Measure	Ongoing identification of trends, implications and improvements
Reporting Period	<ul style="list-style-type: none"> Roll out guide for the Maison Déco business in 2024
Future Reporting Periods	<ul style="list-style-type: none"> 0 suspected modern slavery breaches and 0 litigated matters relating to modern slavery under the Speak Up Program in DGL Pacific 0 suspected modern slavery breaches and 0 litigated matters relating to modern slavery under the Whistleblowing Program in DGL Europe (excluding the Maison Déco business)



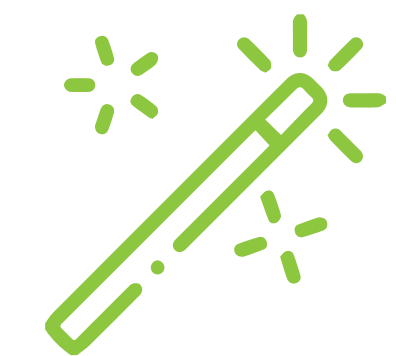
Target	Raise awareness and understanding of the Speak Up Program (or equivalent) in DGL Europe
Effectiveness Measure	Employees in DGL Europe aware of and understand the program
Reporting Period	<ul style="list-style-type: none"> Commenced knowledge sharing of program by legal professionals in DGL Pacific and DGL Europe
Future Reporting Periods	<ul style="list-style-type: none"> Continue knowledge sharing of program between legal professionals in DGL Pacific and DGL Europe Develop support tools tailored to the local context to improve understanding of the program for employees in China, France, Papua New Guinea, the UK and the US Roll out program for the Maison Déco business in 2024

Target	Speak Up Program (or equivalent) available to supplier workers in all businesses
Effectiveness Measure	Supplier workers are aware of, understand and can access the program
Reporting Period	<ul style="list-style-type: none"> Drafted updated Sustainable Procurement Policy for DGL Pacific to include information for suppliers to access the program Developed and rolled out online speak-up form for the JUB business
Future Reporting Periods	<ul style="list-style-type: none"> Enable supplier workers to access the program in DGL Pacific Assess applicability of online speak-up form for other businesses in DGL Pacific and DGL Europe



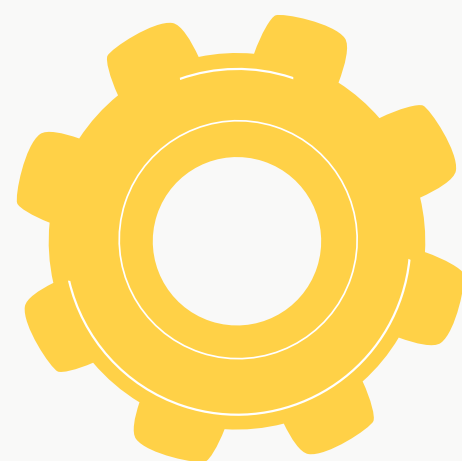
6. Effectiveness

C – Programs



Other grievance mechanisms

Target	Ongoing monitoring and reporting for all businesses
Effectiveness Measure	Ongoing identification of trends, implications and improvements
Reporting Period	<ul style="list-style-type: none"> 0 suspected modern slavery breaches under other grievance mechanisms in DGL Pacific and the Craig & Rose and Maison Déco businesses
Future Reporting Periods	<ul style="list-style-type: none"> Roll out reporting of suspected modern slavery breaches in the Cromology and JUB businesses



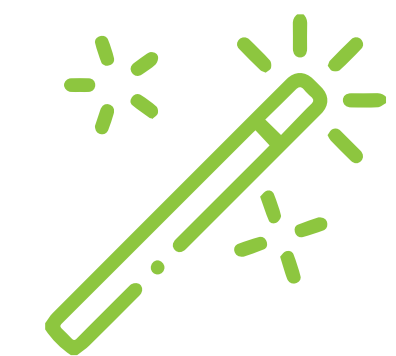
Sustainable Procurement Program

Target	Risk-based due diligence process for assessing and verifying suppliers in place for all businesses
Effectiveness Measure	Suppliers assessed and verified under risk-based due diligence process
Reporting Period	<ul style="list-style-type: none"> 86% of contract manufacturers with whom we spend \$10,000 or more per annum and other suppliers with whom we spend \$100,000 or more per annum assessed and verified in DGL Pacific 82% of suppliers assessed and verified in the Maison Déco business 3 on-site audits undertaken in DGL Pacific. Of the 3 on-site audits, 59 key improvement actions were identified, with 1 key improvement action relating to modern slavery risks and 58 key improvement actions related to suppliers without an adequate sustainable procurement program in place, leading to higher modern slavery risks in their supply chains 11 on-site audits undertaken in the Cromology, JUB and Maison Déco businesses. Of the 11 on-site audits, 4 key improvement actions were identified, 1 in the JUB business and 3 in the Maison Déco business and 1 supplier was rejected in the JUB business due to their failure to comply with the requirements of the Sustainable Procurement Program Developed a preliminary supplier risk evaluation tool in DGL Pacific and Maison Déco business in DGL Europe Commenced rolling out self-assessment questionnaire for the Cromology and JUB businesses
Future Reporting Periods	<ul style="list-style-type: none"> Recommence reporting for the Craig & Rose business in 2024 Roll out preliminary supplier risk evaluation tool as part of current due diligence process in DGL Pacific and the Maison Déco business, and commence reporting under that process Develop due diligence process for assessing and verifying independent contractors engaged directly by operating sites in DGL Pacific Continue rolling out self-assessment questionnaire for the Cromology and JUB businesses and commence reporting under that process



6. Effectiveness

D — Training



Safety & Sustainability Management Training Program

Target	Roll out safety & sustainability management training program for senior managers as part of onboarding process
Effectiveness Measure	Completion for senior managers as part of onboarding process
Reporting Period	<ul style="list-style-type: none"> 101 senior managers in DGL Pacific completed training
Future Reporting Periods	<ul style="list-style-type: none"> Continue training for senior managers in DGL Pacific in 2024 Roll out training to senior managers in DGL Europe in 2026

Modern Slavery Specialist Training Program

Target	Roll out modern slavery specialist training to employees in procurement positions to complete every 3 years
Effectiveness Measure	Completion for employees in procurement positions
Reporting Period	<ul style="list-style-type: none"> 28 employees in procurement positions in DGL Pacific completed training in 2022 10 employees in procurement position in the JUB business completed training in 2023
Future Reporting Periods	<ul style="list-style-type: none"> Roll out training to employees in procurement positions in the Craig & Rose, Cromology, Maison Déco and NPT businesses in 2025 Continue training for employees in procurement positions in DGL Pacific in 2025 Continue training for employees in procurement positions in the JUB business in 2026

Modern Slavery Awareness Training Program

Target	Roll out modern slavery awareness training to key employees every 2 years
Effectiveness Measure	80% completion rate for key employees
Reporting Period	<ul style="list-style-type: none"> 90% completion rate for key employees in Australia and New Zealand in DGL Pacific Approximately 95% completion rate for directors and key employees in the JUB business
Future Reporting Periods	<ul style="list-style-type: none"> Continue training for key employees in Australia and New Zealand in 2024 Continue training for key employees in the JUB business in 2024 Roll out training to key employees in other jurisdictions in DGL Pacific in 2025 Roll out training to key employees in the Craig & Rose, Cromology, Maison Déco and NPT businesses in 2026

Human Rights Training

Target	Roll out modern slavery awareness training to key employees every 2 years
Effectiveness Measure	80% completion rate for employees
Reporting Period	<ul style="list-style-type: none"> 77% completion rate for employees in DGL Pacific 100% completion rate for directors and key employees in the JUB business
Future Reporting Periods	<ul style="list-style-type: none"> Continue training for employees in DGL Pacific in 2024 Roll out training to employees in the in the Craig & Rose, Cromology, and Maison Déco businesses in 2025 Roll out training to other employees in the JUB business in 2025 Roll out training to employees in the NPT business in 2026

