



## KOPPERS CARBON MATERIALS & CHEMICALS PTY LTD

### MODERN SLAVERY STATEMENT

This Modern Slavery Statement (Statement) is made by Koppers Carbon Materials & Chemicals Pty Ltd (KCMC) for the reporting period 1 January 2022 to 31 December 2022. KCMC understands the need to address the issue of modern slavery and has prepared this Statement pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) (the Act).

KCMC recognises that modern slavery includes situations where coercion, threats or deception are used to exploit people and undermine or deprive them of their freedom and this can occur in many forms which includes: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour. The company further acknowledges that it has an obligation to protect human rights, starting from the way it conducts its business and is committed to ensuring there is transparency in its operations and approach to tackling modern slavery.

In the preparation of this Statement, KCMC has had regard to various pieces of literature including the "Guidance for Reporting Entities" provided by the Commonwealth Government and the new Global Slavery Index 2023 updates<sup>1</sup>. We understand the Global Slavery Index has updated the estimated numbers of modern slavery around the world to be 50 million people, an increase of 10 million since the 2016 estimates. As such, we know it is more important than ever to continue progressing our approach to modern slavery risks. This Statement seeks to address each of the seven mandatory reporting criteria in the Act.

#### **1. Reporting Entity**

KCMC is an Australian company (ACN 003 947 699).

#### **2. Structure, Operations and Supply Chains**

##### **2.1 Structure**

KCMC is a proprietary limited company, incorporated in Australia with a registered office in Sydney and does not own or control any other entities. The company is a wholly owned subsidiary of Koppers Australia Pty Ltd (ABN 60 000 566 629), which is not a reporting entity under the Act, and is ultimately owned by Koppers Holdings Inc, a publicly listed company on the New York Stock Exchange whose head office is in Pennsylvania, United States.

KCMC is a leading diversified manufacturer of coal tar pitch, carbon black feedstock, naphthalene and creosote oil for Australian and international customers. KCMC proudly supports Australian manufacturing jobs and operates from its facility in Mayfield, New South Wales, consisting of a

---

<sup>1</sup> <https://www.walkfree.org/global-slavery-index/>

workforce of approximately 60 employees who are engaged under contract, award, or enterprise agreements. We do not have any staff engaged under a visa that ties them to our business, nor do we employ any seasonal workers.

## **2.2 Operations**

The key operating activities conducted by KCMC are its:

- tar distillation refining process which beneficially reuses coal tar to manufacture and distribute quality carbon materials and chemicals vital to a range of industries in Australia and overseas;
- logistics distribution via a charter vessel. The ship is operated by a third party that directly employs the crew and ensures that Australian cabotage obligations are met with regards to employment of the crew;
- storage of pitch at a terminal facility in Australia, operated by a third party to deliver pitch to customers.

Product is delivered to customers either by sea or road freight. Most delivery functions are outsourced to third party carriers or are collected from KCMC's Mayfield facility by the customer's nominated freight carrier. KCMC works closely with third party freight carriers to ensure safety of all equipment and processes.

## **2.3 Supply Chains**

KCMC seeks to do business with suppliers that have similar values and ethical and sustainable business practices as KCMC, including in relation to human rights.

KCMC engaged approximately 300 - 400 suppliers directly in the last reporting period, its supply chains have not greatly changed since the prior reporting period. We acknowledge that our supply chain extends beyond these direct contractual relationships. The company engages a diverse range of suppliers directly, including but not limited to suppliers of: raw materials; batteries; telecommunications; insurance; IT hardware, software and services; road, rail and sea freight and shipping; professional services such as legal, accounting and payroll; electrical products and services; construction, engineering and maintenance services; waste management and drainage; pipes, valves and other construction and engineering products; medical and health equipment and services; inspection, environmental and safety services; recruitment services; laboratory products and services; machinery and equipment hire; cleaning and security services; postage services; stationery; PPE and uniforms.

Of KCMC's direct suppliers, over 98.04% are located in Australia. The remaining 1.9% are located in the United States, Denmark, Japan and Taiwan. However, we know that a number of products purchased from Australian suppliers are in fact distributors who source the products from overseas, including from the United States, Europe, China and Taiwan.

## **3. Risks of Modern Slavery Practices in KCMC's Operations and Supply Chain**

### **3.1. Risk Identification**

This Statement sets out KCMC's actions towards ensuring that slavery and human trafficking are not taking place in our own operations or in our supply chains. We understand that in order to take a more effective approach to doing so, we must continue to identify where the potential risks of modern slavery are in our business. KCMC understands that because of the prevalence and widespread nature of modern slavery, every entity has risks of modern slavery in its operations and supply chains. KCMC



is also aware that risks in this space are fluid and change as the world does, requiring re-examination each reporting period.

### **3.2. Operations**

KCMC's operations involve manufacturing which is identified in available literature as a higher risk industry for modern slavery. Generally speaking, we understand that often manufacturing can involve a high degree of out-sourcing and sub-contracting – both reduce control and visibility an entity has over its operations. These strategies are often taken by organisations for cost-saving reasons, but this kind of expense-management can place vulnerable workers at risk as budgetary pressures are forced down an entity's supply chain.

We acknowledge that we manufacture with raw materials such as tar and soft pitch – derivatives of coal. Coal is often mined in particularly remote areas involving reliance on contracted and low-skilled labour. Whilst our coal suppliers are indirect suppliers, KCMC understands that these factors all raise the risk that vulnerable workers may be exposed to higher risk of exploitation.

### **3.3. Supply Chains**

KCMC understands that the risks relating to suppliers will vary depending on their industry, geographic location, company size and various other factors.

KCMC's supply chains have not changed significantly since its last reporting period. Of KCMC's direct suppliers, over 98.04% are still located in Australia, an increase from the former reporting period. Utilising the updated Global Slavery Index, all overseas suppliers (1.9% of our tier 1 suppliers) are located in the lower-risk locations of Denmark, Japan, Taiwan, Hong Kong and the United States of America (listed here in order of lowest prevalence to highest). These countries have a prevalence rate of 3.5 people or under per 1,000 people for modern slavery.

KCMC procures goods and services that are in the following higher risk categories: various raw materials, batteries, security services, information and technology hardware and software, maintenance and cleaning services, postage, printing and stationery, food and groceries, and uniforms and PPE for its employees.

We have conducted a risk analysis and identified the 15 suppliers that we believe to pose the highest risk in tier 1 of our supply chain. This analysis is based upon geographic location as well as types of goods and services procured. We have a particular focus on shipping/export vendors and raw material suppliers, especially those based overseas. KCMC does consider that these suppliers have demonstrated high levels of integrity in all dealings to date, but understands that it needs to seek further modern slavery specific information to better understand any risks that may be present or not.

Our Supplier relationships can range from long term arrangements, typically, for raw materials and utility products to shorter term arrangements for maintenance, consumable products and one-off services and products. We understand that shorter term arrangements can pose a greater risk of modern slavery as we will often have reduced visibility, knowledge, and control over those suppliers compared with our longer term arrangements.

## **4. Actions Taken to Assess and Address Modern Slavery Risks and Due Diligence**

In response to the potential risks identified above, KCMC has been working to build upon the different policies and processes it has put in place to reduce those risks in an effective way.

#### **4.1. Our Corporate Values**

KCMC is committed to conducting business in accordance with our Corporate Values, which we publish on our website. We expect every employee, manager, executive, and director of the company to uphold the highest standards of ethics, compliance, and transparency. Our goal is to act with honesty and integrity in all business and community dealings. These expectations are set forth in KCMC's Code of Conduct and reflected in our sustainability efforts<sup>2</sup>.

#### **4.2. Our Code of Conduct**

Our Code of Conduct<sup>3</sup> requires employees, managers, executives, and directors of the company to obey the law and to assist the company in doing business in full compliance with the law, including laws related to labour and worker health and safety and the elimination of modern slavery. We provide all employees with the opportunity and means to raise concerns about potential violations of our Code of Conduct or the law by reporting such violations to the Compliance Officer or management or through an anonymous phone and email compliance line. Violations of the Code of Conduct or the law are not tolerated or condoned and can be grounds for suspension or termination of employment.

KCMC expects the same ethical conduct from its suppliers and remains committed to safety in our supply chain as we strive to be the most valued supplier of quality products and services in the industries we serve. KCMC is committed to conducting business in an ethical and responsible manner that supports and respects the protection of human rights and we desire to do business with partners who aspire to conduct their business in a similar manner. KCMC upholds high ethical standards and values, which include prohibiting illegal or unethical employment or business practices, including child labour, forced labour, or other forms of slavery or human trafficking.

#### **4.3. Responsible Care Standards**

The American Chemistry Council has created a Responsible Care Standard for chemical companies and their suppliers referred to as RC 14001. KCMC has established RC 14001 compliant policies, processes, and procedures that start from the premise that full compliance with all applicable legal requirements is the minimum level of performance. KCMC utilises a third party to perform its verification processes to ensure it satisfies the requirements of RC 14001.

This standard requires that KCMC, commensurate with risk, has systems to qualify and periodically review carriers, suppliers, distributors, customers, contractors, and third-party providers based on, among other things, health and safety. Qualification of our "high-risk" carriers, suppliers, distributors, customers, contractors, and third-party partners provides KCMC with a method to review our business partners' commitment to health and safety. This process involves reviewing a third party partner's management system, workers compensation loss history, incident rates, job related fatalities, recent regulatory citations, insurance policies and other items by region such as whether the third party has a written safety policy, proof of competency (including employee training records), method statements relevant to the work to be carried out, risk assessments on the proposed project, and a review of other regulatory requirements applicable to the third-party.

This management system also requires these business partners certify to regulatory compliance and provide KCMC with a right to audit compliance with our requirements. While RC 14001 directs a

---

<sup>2</sup> Available on our website.

<sup>3</sup> Available on our website.



certain level of regulatory compliance, which includes compliance with applicable labour laws, it does not contain requirements relating to human trafficking or slave labour specifically. However, it does enable KCMC to obtain a large degree of visibility over the operations of our suppliers and into various factors that may still indicate the presence or absence of modern slavery risks.

#### **4.4. Our Modern Slavery Policy**

Our Modern Slavery Policy remains in place, applying to all of our staff and specifically addressing modern slavery risks in our operations and supply chains. Our Modern Slavery Policy has been provided to all staff and placed on noticeboards also. We have noted a considerable increase in awareness as a result of the implementation of this policy.

The Policy educates staff in relation to modern slavery but also advises them of our expectations of our staff in this regard. The Policy references a number of local and international laws and instruments related to modern slavery and highlights to staff the areas in which KCMC may be exposed to risks of modern slavery. The Policy also provides for reporting mechanisms and the ramifications of a breach of the Policy.

KCMC's corporate governance framework seeks to address the complex risks associated with modern slavery not only by its Modern Slavery Policy but by the number of workplace policies it has in place to ensure performance in accordance with the principle of best practice and continuous improvement. The policies include: Anti-Corruption, Code of Conduct, Conflicts of Interest, Ethics and Compliance Program, General Rules of Conduct on the Job, Reporting Non-Compliance and Wrongdoing, Investigations of Non-Compliance and Wrongdoing, and Risk Management.

#### **4.5. Our Modern Slavery Supplier Code of Conduct**

In 2022, KCMC undertook a considered consultation process and finalised the contents of a specific Modern Slavery Supplier Code of Conduct. This document was prepared and emailed to all suppliers in 2023.

This Code applies to all suppliers and articulates the standards of practice we expect of our suppliers and their representatives. The Code references a number of local and international laws and instruments related to modern slavery as well as defining modern slavery for educational purposes. We enshrine within the Code the multiple risk assessment and due diligence processes that we expect our suppliers to have in place.

#### **4.6. Suppliers**

We have also taken several steps that will allow us to embark on a productive journey with our suppliers in relation to building our modern slavery approach, with a specific focus on those suppliers identified in 3.3 above, including:

- (a) In early 2023, KCMC sent initial correspondence to all suppliers to start a dialogue around awareness of modern slavery and what we can all do to mitigate the risks in this area;
- (b) KCMC has created a spreadsheet of all direct suppliers, which we update every reporting period. The spreadsheet contains supplier location, product and or service supplied and expenditure. We have undertaken a risk analysis of this full list and have given each supplier a risk rating. A shortlist of 15 suppliers with the highest risk ratings has been created to inform our next steps. This spreadsheet and rating system will enable us to continue the supply chain mapping process detailed in 3.3 above in future reporting periods;

- (c) In 2022, KCMC finalised the contents of a supplier questionnaire and covering letter to be sent to selected high risk suppliers as identified above, to enable KCMC to better understand the risks of modern slavery within suppliers' operations and supply chains. These questionnaires were sent in 2023;
- (d) KCMC has finalised written standard contract terms and conditions for procurement contracts that have strong modern slavery clauses, reviewed by experts.

#### **4.7. Training and Reporting**

In our recent reporting period, we found we received increased requests for more training in this space by our staff, following the rolling out of our Modern Slavery Policy. Staff also reported receiving enquiries from external parties in the modern slavery space. We looked upon these requests as demonstrating an increasing awareness by our staff as to the importance of this topic, as well as eagerness to learn more following the introduction of our Modern Slavery Policy. As such, we arranged for a tailored workshop held by external experts which proceeded after the close of our recent reporting period in March 2023 and as such will be discussed in depth in our next statement.

Previous training included two training modules in our 2020 Code of Conduct training on Modern Slavery and spotting human trafficking victims. KCMC, in partnership with external modern slavery experts, held a specific modern slavery workshop in 2021 with key staff internally to raise awareness regarding the nature and prevalence of modern slavery and to educate these staff on KCMC's approach to modern slavery risks.

Koppers Holdings Inc regularly circulates safety-awareness emails to all staff. Koppers Holdings Inc has circulated Modern Slavery specific safety-awareness email to all staff detailing the "Truckers Against Trafficking" training that its drivers completed. In January 2022, the Commercial Vehicle Safety Alliance (CVSA) conducted a three-day initiative throughout the US and Canada intended to combat human trafficking. The CVSA have indicated the initiative will be an annual effort moving forward. Koppers Holdings Inc email was circulated to all staff in Australia which contained the CVSA program details on how to recognise the signs of human trafficking and report on same.

Our *Reporting Non-Compliance and Wrongdoing* and *Investigations of Non-Compliance and Wrongdoing* Policies encourage employees and others working for KCMC to report incidents or concerns and assist us in tackling non-compliance with law or KCMC's policies including issues relating to modern slavery.

#### **5. Describe how KCMC assesses the effectiveness of actions taken**

KCMC wants to ensure the actions it is implementing in this space are productive and effective. We also understand that risks of modern slavery can change over time and require continued reassessment. In particular, we are aware of the 2023 updates to the Global Slavery Index which provide a more current overview of risks in this space around the world. We have continued to engage the services of an independent expert to provide advice and consultation on our framework to address modern slavery risks and obligations under the Act, to ensure the current effectiveness of same. We are already discussing our approach for future reporting periods.

The RC 14001 management system provides KCMC with a method to review our business partners' commitment to health and safety and requires our business partners to provide KCMC with a right to audit compliance with our requirements. On a periodic basis, our third-party partners are to provide a summary of their ongoing health and safety performance, including an evaluation of health and



safety incident history and a description of corrective actions taken. Our policies also require that, on a periodic basis, we audit a sample of third-party partners to review representations and documentation reported by the third-party partner. While these assessment methodologies include an evaluation of health and safety performance and regulatory compliance, including with applicable labour laws, the above mentioned audits do not include specific human trafficking and slavery assessments but do provide a mechanism through which modern slavery risks can be identified. Because this audit is required on a periodic basis, KCMC will be regularly checking for risks and incidents and therefore obtaining up to date information as to the effectiveness of our approach.

The RC 14001 management system requires, commensurate with risk, the qualification and periodic review of our third-party partners, including requiring our direct business partners to certify to regulatory compliance with a focus on employee safety and health and environmental compliance. The results of same will provide some insight into modern slavery risks and therefore the effectiveness of our approach.

We also have reporting mechanisms as detailed above and within our Modern Slavery Policy. The feedback received through these avenues will be reviewed as it is received and will assist us in better understanding the nature and prevalence of any risks within our operations and supply chains, allowing us to adjust our approach accordingly to ensure effectiveness. KCMC considers that staff requests for more training indicates that our actions to increase staff awareness have been effective.

#### **6. Describe the process of consultation with any entities that KCMC owns or controls**

As described in section 2.1 above, KCMC does not own or control any other entities.

#### **7. Provide any other information that KCMC considers relevant**

KCMC does not consider that any additional information needs to be included in this Statement.

#### **Approval**

This Statement was approved by the board of directors of KCMC, our Principal Governing Body on 29<sup>th</sup> June 2023.

Duly signed by:



Richard Lyons,

Director, Koppers Carbon Materials & Chemicals Pty Ltd

Responsible Member of KCMC's Principal Governing Body

Date: 29<sup>th</sup> JUNE, 2023.