



# Modern Slavery Statement

Aliaxis Operations in  
Australia and New Zealand  
June 2023

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# Our Operations and Supply Chains

## Section 1: Introduction

Aliaxis is pleased to submit this Modern Slavery Statement for the reporting period of 1 January 2022 - 31 December 2022.

The content of this Statement is focussed on the Aliaxis Operations within Australia and New Zealand. This Statement also meets the requirements of Vinidex Pty Limited as a reporting entity for the purposes of the Australian Modern Slavery Act 2018 (Commonwealth). This Statement describes the actions taken and planned during the reporting period to assess and address any modern slavery risks in our operations and supply chain.

Aliaxis opposes slavery in all its forms. Aliaxis is committed to identifying and preventing any potential modern slavery risks within our operations and supply chains.

## Section 2: About Aliaxis



Aliaxis Group S.A. (BE) is privately owned, with our global headquarters in Brussels.

Aliaxis is a global leader in advanced piping systems for building, infrastructure, industrial and agricultural applications. We provide communities around the world with sustainable innovative solutions for water and energy, leading the industry in a way that anticipates the rapidly evolving needs of its customers and of society. Operating in over 40 countries, we design sustainable, easy to install, and innovative solutions. Thanks to our over 14,000 employees, our pipe and fittings systems meet our customer's most demanding needs for the building, infrastructure, industrial and agricultural sectors.

For more information on Aliaxis refer to: <https://aliaxis.com/>

For our latest Aliaxis Annual Report refer to: <https://annualreport.aliaxis.com/>



**€4.3**  
billion in  
Revenue



**14,000+**  
Employees



**100+**  
Distribution  
Centres



**75+**  
Manufacturing  
Sites



**40+** Countries

## Aliaxis Global Operations and Brands

Aliaxis has a strong brand portfolio, delivering high-quality products and integrated solutions. We have operations in over 40 countries. This includes Aliaxis branded operations and product lines, as well as valued and reputable local brands. Below is a map indicating which countries and additional markets we serve, by country.

For all our brands refer to: <https://aliaxis.com/our-brands/>



## Aliaxis Global Market Segments

Building	<p><i>High Performance and Durability</i></p> <p>At Aliaxis, we design high-quality sanitary, plumbing and building systems for a wide variety of residential and commercial applications. Our building products include drainage, sanitary solutions, rainwater management, electrical and telecom conduits.</p>
Industry	<p><i>Leading Range of Piping and Pressure Systems</i></p> <p>From managing water responsibly to processing chemicals or hazardous substances, there are complex requirements for industrial pipework. Aliaxis serves the chemical processing industry, industrial water, wastewater treatment, municipal water, marine, surface treatment, and swimming pool sectors.</p>
Infrastructure	<p><i>Focussed on today's and tomorrow's needs</i></p> <p>Our market leading and tailor-made solutions include pipework for leading infrastructure project around the world. This includes for major international waterways, highly complex gas networks, and transportation of cabling in megacities.</p>
Agriculture	<p><i>Enhancing efficient water management</i></p> <p>Greater food demand means pressure on precious water supplies, so making agriculture more efficient is essential for sustainability. At Aliaxis, we offer a range of product solutions that help farmers manage crop irrigation and provide drinking water for their animals.</p>

## Aliaxis Operations in Australia and New Zealand

In Australia, Aliaxis has Vinidex Pty Ltd, which includes trading brand Rodney Industries as well as owned registered businesses Yatala Plastics Pty Ltd and Zest Pty Ltd. In Australia, Aliaxis also has Philmac Pty Ltd. Within New Zealand Aliaxis has Marley New Zealand Ltd, Dynex Extrusions Ltd, Dux Industries Ltd and RX Plastics Ltd. These key operations are owned by Aliaxis, which is a group headquartered in Belgium.

## Section 3: Business Ethics and Compliance

### Aliaxis Global Framework

Aliaxis has a consistent Global Framework across critical areas including Human Resources, Health, Safety, and Environmental Sustainability.

Human Resources	<p><i>Every employee should be treated with dignity and respect:</i></p> <ul style="list-style-type: none"> <li>Committed to comply with applicable country regulations, including all working conditions &amp; labour laws</li> <li>Local HR Management ensuring compliance to government regulations, freedom of association, work life balance, the right to collective bargain, &amp; fair equitable remuneration</li> <li>HRIS Platform for all processes from recruitment to retirement</li> <li>Global Diversity, Equity &amp; Inclusion Initiatives &amp; ANZ Council</li> <li>Regional Local Heroes Program, for recognition &amp; celebration</li> </ul>
Health, Safety & Wellbeing	<p><i>Ambition to be recognized for world class safety performance:</i></p> <ul style="list-style-type: none"> <li>Eight "Go for ZERO" guiding principals</li> <li>Health and Safety Roadmap 2025 pillars include Culture &amp; Behaviour, Management of Key Risks, &amp; Ways of Working</li> <li>Performance of objectives and milestone targets</li> <li>Critical Risk Management through Global Standards</li> <li>Proactive GEMBA Walks and Hazards Made Safe</li> <li>Health and Wellbeing Programs</li> </ul>
Environmental Sustainability	<p><i>Bronze Medal Award from EcoVadis for Sustainability:</i></p> <ul style="list-style-type: none"> <li>External Audit of our Sustainability Framework and Performance</li> <li>Ecovadis Scorecard Improvements resulting in Bronze Medal</li> </ul> <p><i>Our "Creating Growth with Purpose" strategy includes:</i></p> <ul style="list-style-type: none"> <li>Focus to significantly decrease our carbon emissions by 2025</li> <li>Developing innovative solutions to Global water challenges</li> <li>Increasing our consumption of recycled material</li> <li>Transitioning our operations to 100% renewable electricity</li> </ul>
Best Practice Awards	<p><i>Aliaxis has a Global Best Practice Awards Program:</i></p> <ul style="list-style-type: none"> <li>280 submissions received in 2022 alone</li> <li>2023 Gold Sustainability Award for New Zealand's government grant and partnership with Waste Management to increase national plastics recycling capacity</li> <li>2023 Gold Customer Award for Marley New Zealand's ARMA ® &amp; FlaxBlack ® digital marketing campaigns</li> <li>2023 Silver People Award for ANZ's Local Heroes Program</li> <li>2023 Bronze Operations Awards for Vinidex's Line 23 Project</li> </ul>

## Section 4: Our Operations and Supply Chains

### Aliaxis Operations in Australia



#### Vinidex Pty Ltd

Vinidex is a leader in Australian manufacturing and supply of advanced pipe systems and solutions, connecting Australian people with water and energy from 1960. Vinidex manufactures and supplies quality PVC, polyethylene (PE), polypropylene (PP), ductile (DICTL) and industrial pipe systems.

<https://www.vinidex.com.au/> & ABN 42 000 664 942



#### Rodney Industries

(a trading brand of Vinidex Pty Ltd)  
Rodney supplies metal and plastic products.

<https://www.rodneyind.com.au/>



#### Yatala Plastics Pty Ltd

(Owned by Vinidex Pty Ltd)  
Yatala manufactures PE pipe systems.  
ABN 84 010 720 886



#### Zezt Pty Ltd

(Owned by Vinidex Pty Ltd)  
Zezt manufactures PE pipe systems.

<https://www.zezt.com.au/>

ABN 30 609 589 808



#### Philmac Pty Ltd

Established in 1929, Philmac is a world leader in the design and manufacture of high-performance mechanical compression fittings and valves to connect polyethylene pipelines.

<https://www.philmac.com.au/> & ABN 17 007 873 047

### Aliaxis Operations in New Zealand



#### Marley New Zealand Ltd

Marley has been a household brand in the New Zealand marketplace for over 50 years, specialising in PVC and PE pipe and fittings systems.

<https://www.marley.co.nz/> & NZBN 9429038863431



#### Dynex Extrusions Ltd

Dynex produces a range of Santoprene, Polypropylene, ASA, ASB and PVC accessories and profiles custom designed by application.

<https://dynex.co.nz/> & NZBN 9429040475813



#### Dux Industries Ltd

Dux is a well-known distributor of plumbing products within the hot and cold, wastewater traps, grease management, surface water drainage, and sanitary categories.

<https://www.dux.co.nz/> & NZBN 9429034239360



#### RX Plastics Ltd

Established in 1972, RX Plastics specialises in on-farm water management including PE and PVC pipes, fittings, and tanks.

<https://www.rxplastics.co.nz/> & NZBN 9429031867276

## Our Supply Chains

Our Aliaxis Operations in Australia and New Zealand are served by over 2000 active suppliers. Of these tier one suppliers, 95% are also based in either Australia or New Zealand. Wherever possible we strive to support local businesses based by our sites. We have also identified over 35 origin countries throughout our supply chains. We have partnered with international suppliers to secure key raw materials, manufacturing equipment, and specialised finished goods.

Aliaxis also has intercompany supply chains. The vast majority of our intercompany spend is amongst fellow Aliaxis ANZ business, with minor spend also with Aliaxis Europe and Aliaxis North America.

## Our Supplier Spend

Below is a snapshot of our CY 2022 top ten supplier spend categories:

	Resin & Compounds		Metal Parts
	Logistic Services		Plastic Parts
	Plant & Equipment		Facilities Management
	Professional Services		Energy
	Additives		Packaging



# Identifying, Assessing, and Addressing Modern Slavery Risks

## Section 5: Identifying Modern Slavery Risks

### Our Modern Slavery Framework

Our Aliaxis Operations within Australia and New Zealand are proud to have implemented a Modern Slavery Framework, including an ongoing program of Risk Assessment and Management. Below is an outline of our key Framework components.

Global Corporate Governance	<p><i>Comprehensive Global governance processes are implemented:</i></p> <ul style="list-style-type: none"> <li>• Ethics Alert Channel</li> <li>• Whistleblowing Policy</li> <li>• Trade Compliance Policy</li> <li>• Supplier Code of Conduct</li> <li>• Employee Code of Conduct</li> </ul>
Regional Corporate Governance	<p><i>Additional governance across Aliaxis in Australia and New Zealand:</i></p> <ul style="list-style-type: none"> <li>• Modern Slavery Policy</li> <li>• Modern Slavery Statements</li> <li>• Modern Slavery Intranet Page</li> <li>• Purchase Order Terms and Conditions</li> <li>• Supplier Contract Templates</li> <li>• Modern Slavery Response Management Process</li> <li>• Procurement Playbook and Modern Slavery Risk Guide</li> <li>• Trade Compliance Procedures and Reporting Structure</li> </ul>
Modern Slavery Risk Assessment	<p><i>Ongoing Modern Slavery Risk Assessments deepen our insights:</i></p> <ul style="list-style-type: none"> <li>• Annual Desktop Risk Assessments</li> <li>• Reviewing Supplier Modern Slavery Statements</li> <li>• Supplier Self-Assessment Modern Slavery Surveys</li> <li>• Supplier Engagement and Communications Plan</li> <li>• Procurement Playbook for Sourcing Risk Assessments</li> <li>• Resulting internal Results and Recommendations Report</li> </ul>
Modern Slavery Risk Management	<p><i>Annual Risk Management Action Plans are executed:</i></p> <ul style="list-style-type: none"> <li>• Supplier Collaboration</li> <li>• Supply Chain Investigations</li> <li>• Framework Effectiveness Reviews</li> <li>• Executive Team Progress Updates</li> <li>• Governance Continuous Improvement</li> <li>• Supporting Customer Modern Slavery Surveys</li> </ul>
Training and Education	<p><i>Investing into Training and Education is critical:</i></p> <ul style="list-style-type: none"> <li>• Modern Slavery Awareness Module</li> <li>• Modern Slavery Intensive Training Sessions</li> <li>• Engaging with external Modern Slavery Specialists</li> </ul>

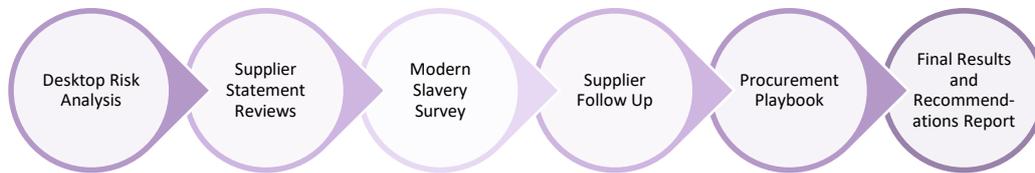
## Identified Potential Modern Slavery Risks

After reviewing our over 2000 active suppliers, we have identified the following potential risks of Modern Slavery Practices within our supply chains.

Domestic Geographic Risks	By count, 95% of our active tier one suppliers are also based in Australia and New Zealand. Although always a potential risk, the Modern Slavery Index confirms low prevalence, low vulnerability, and low percentages of both Australian and New Zealand's populations as potentially living in Modern Slavery.
International Geographic Risks	Although the minority of our tier one and tier two suppliers are based internationally, together they make up a significant portion of our total spend. We have identified over 35 origin countries within our supply chains. We have assessed the varying geographic risks for each known origin country utilising data from "The Modern Slavery Index" now published by the Walk Free Foundation. Over 92% of our spend was with Low-Risk countries, including Australia and New Zealand. All higher risk country sourcing is prioritised for deeper Risk Assessment, including our Modern Slavery Survey's and our Supply Chain Investigations.
Industry and Sector Specific Risks	Our taxonomy classifies our spend into 26 tier one industries. We identified 5 of these industries as having higher potential Modern Slavery Risks, based on findings from the "Global Slavery Index" now published by the Walk Free Foundation. <ul style="list-style-type: none"> <li>• Facilities Management</li> <li>• Factory Consumables</li> <li>• Human Resources</li> <li>• IT &amp; Telecom</li> <li>• Professional Services</li> </ul>
Product and Service Specific Risks	Our taxonomy classifies our spend into 155 tier two product and service types. Of these we identified 8 relevant spend categories as having higher potential Modern Slavery risks based on Guidance from the Department of Home Affairs. <ul style="list-style-type: none"> <li>• Cleaning and Gardening</li> <li>• Hand Tools</li> <li>• IT Software and Services</li> <li>• Maintenance</li> <li>• Packaging Equipment</li> <li>• Solar Panels</li> <li>• Temporary Labour</li> <li>• Workwear and Protective Clothing</li> </ul>
Supplier Specific Risks	We also acknowledge there are entity specific risks which our suppliers have the responsibility to manage through corporate governance, legal compliance, and effective risk management. Where warranted, we validate our Supplier Specific Risk levels by assessing their Modern Slavery Statements or using our Self-Assessment Survey.

## Section 6: Actions Taken to Assess and Address Modern Slavery Risks

### Modern Slavery Risk Assessment Actions

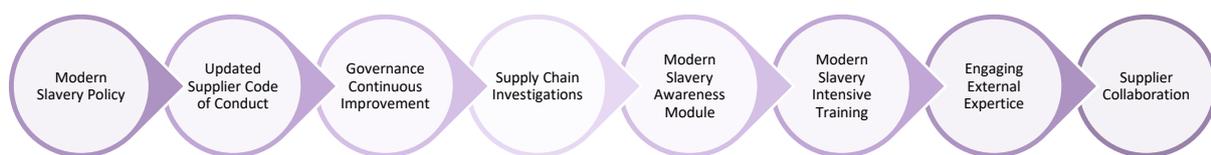


Our 2022 Modern Slavery Risk Assessment process included the following actions.

Desktop Risk Analysis	<p>We conduct an annual Desktop Risk Analysis, including all active suppliers within our Aliaxis ANZ supply chains. External Modern Slavery data from The Modern Slavery Index and local governments provides an objective and evidence-based methodology to calculate risks for greater focus and prioritization. Data is further enriched by our stakeholders.</p> <ul style="list-style-type: none"> <li>• Aliaxis Master Data (supplier countries, categories etc)</li> <li>• Aliaxis Supplier Specific risk data</li> <li>• External Geographic risk data</li> <li>• External Industry &amp; Sector risk data</li> <li>• External Product &amp; Service risk data</li> </ul>
Supplier Statement Reviews	<p>Of our active suppliers in CY 2022, we identified 175 who published Modern Slavery Statements into the Australian Register. We also identified 69 suppliers who published Modern Slavery Statements in the UK Register, instead of or in addition to those in the Australian Register. Where warranted by risk level, supplier Statements were reviewed.</p>
Modern Slavery Survey	<p>Our Supplier Sustainability Self-Assessment Survey is focussed on assessing Modern Slavery risks in our extended supply chains. Our Survey was sent to over 150 suppliers in 2022 and over 350 suppliers in 2021. Recipients were prioritised based on their desktop risk assessment levels. Survey focusses included:</p> <ul style="list-style-type: none"> <li>• Employment Conditions</li> <li>• Child Labour and Forced/Bonded Labour</li> <li>• Human Trafficking</li> <li>• Supplier Policies &amp; Controls</li> <li>• Supplier Supply Chain Risk Management</li> </ul>
Supplier Follow Up	<p>Our Survey was launched with a supporting communications plan. Our Procurement team also targeted suppliers to maximise Survey engagement and completion. All supplier responses indicating higher risks were individually followed up and validated. Suppliers were provided our Modern Slavery Statements, reminders of our latest Purchase Order Terms and Conditions, and insights on our Modern Slavery Framework.</p>

<p>Procurement Playbook</p>	<p>Our Procurement Playbook launched in July 2022, as our internal guide for undertaking Procurement activities within Aliaxis ANZ. It details process requirements across sourcing and conducting supplier modern slavery risk assessments. Our Playbook launched with stakeholder training and a supporting intranet page.</p> <p><b>Case Study: Proactive Risk Assessment</b> Stakeholders initiated proactive risk assessment of Solar Panel suppliers, based on their higher product and sourcing country risks as defined within our Procurement Playbook. The results informed who we entered commercial discussions with.</p>
<p>Risk Assessment Report</p>	<p>Our Risk Assessment process concluded with an internal Results and Recommendations Report, as shared with our Executive Management Stakeholders. This report details our specific findings, follow up, final results, and recommendations.</p>

### Modern Slavery Risk Management Actions



After identifying our potential Modern Slavery risks, we developed a Modern Slavery Risk Management Action Plan. Below is an overview of our actions within 2022.

<p>Modern Slavery Policy</p>	<p>We are very proud to share that Aliaxis ANZ launched a Modern Slavery Policy in late 2022. Our Policy condemns slavery in all its forms. We describe our collective responsibilities, our ultimate parties of responsibility, and our commitments which include ensuring effective Risk Management is implemented.</p>
<p>Updated Supplier Code of Conduct</p>	<p>In 2022 we Globally reviewed and relaunched our Supplier Code of Conduct. Key developments were to reaffirm Health and Safety as our top priority, and to ensure alignment with Global Labour Standards. By end of year, we had engaged with our top suppliers, representing over 60% of Regional spend acknowledging our updated Code.</p>
<p>Governance Continuous Improvement</p>	<p>Our Corporate Governance Framework are living resources we continue to utilise and review for improvement opportunities. New team members are trained, and new suppliers onboarded.</p> <ul style="list-style-type: none"> <li>• Ethics Alert Channel</li> <li>• Whistleblowing Policy</li> <li>• Employee Code of Conduct</li> <li>• Supplier Contract Templates</li> <li>• Purchase Order Terms and Conditions</li> </ul>

<p>Supply Chain Investigations</p>	<p>We completed a series of Supply Chain Investigations, based on higher potential geographic risks within our supply chains. This collaborative approach reviews our goods or services back to their origin inputs, manufacturing, and countries of origin. We re-evaluated our master data and risk assumptions. In most cases the original risk ratings remained the same or were downgraded.</p> <p><b>Case Study: Sourcing Process</b> We identified sourcing occurrences from higher risk countries, executed outside of Procurement. Our 2023 Playbook launch includes risk assessment process requirements. We also began strengthening our Global Trade Compliance Framework.</p>
<p>Modern Slavery Awareness Module</p>	<p><i>100% completion across &gt;75 participants:</i> We partnered with Allara Global to deliver our Modern Slavery Awareness Module. This introductory online course was completed across our Executive Management team and key stakeholders with potential exposures to Modern Slavery risks.</p> <p><b>Case Study: International Recruitment</b> An Australian recruitment company was using an offshore agency, against which a whistle blower raised concerns. We investigated these concerns. The risk was not adequately addressed, so we ceased progressing engagement.</p>
<p>Modern Slavery Intensive Training</p>	<p><i>100% completion across &gt;20 participants:</i> Our highest touchpoint stakeholders also participated in intensive half day Training Sessions hosted by ArcBlue. We conducted a deep dive on Modern Slavery today, identifying risks, supply chain red flags, our Australian legislation, and our internal Framework.</p>
<p>Trade Compliance Development</p>	<p>Aliaxis began a Global Review of our Trade Compliance Framework, with a focus on opportunities to strengthen our Governance. Within CY 2022 this included a preliminary review of our Global supply chain countries, establishing an APAC Trade Compliance Manager, and developing our procedures.</p>
<p>Engaging External Expertise</p>	<p>We have continued to engage external Modern Slavery expertise to support development and execution of our Framework. This included partnerships for our Training Program, consultations for our Policy development, and external educational webinars.</p>
<p>Supplier Collaboration</p>	<p>We worked alongside our suppliers to better understand their practices, Modern Slavery Statements, and Sustainability Survey responses. Where a potentially higher risk level was indicated; assessments and validations were carried out. We shared our Statements, learnings, and Action Plan progress.</p>



# Action Effectiveness, Consultations, and Approval

## Section 7: Assessing the Effectiveness of the Actions

The following is in place to assess the effectiveness of our Modern Slavery framework.

Program Reviews	Aliaxis undertakes regular reviews of our Risk Management Program, providing updates within weekly meeting forums. This includes assessing our progress against action items and the impact those actions have made. We utilise year-on-year data to assess the progress of ourselves and our suppliers.
Executive Management Governance	Our Aliaxis Asia Pacific Executive Team, Global Procurement Director, and Global Sustainability Director are regularly updated on our Modern Slavery initiatives. This process is led by our Asia Pacific Procurement Director and Procurement team.
Ongoing internal and external feedback	We have ongoing supplier engagement and communication plans throughout our Risk Assessment and Risk Management processes. We receive customer feedback following support of their Risk Assessment and Survey processes. We also engage with our Global Aliaxis colleagues, including in Aliaxis UK who are subject to their own local legislative modern slavery risk management requirements.

## Section 8: Our Consultation Process

### Consultation with Reporting Entities

During the development of this Modern Slavery Statement for CY 2022, we actively engaged and consulted with all our Aliaxis owned operations within Australia and New Zealand. As detailed within Section 4, these included review meetings with the Executive teams of each business. Dates of these meeting are below:

Entity	Date
Vinidex Pty Limited	10/05/2023
Yatala Plastics Pty Limited	10/05/2023
Zezt Pty Limited	10/05/2023
Philmac Pty Limited	10/05/2023
Marley New Zealand Limited	12/05/2023
Dynex Extrusions Limited	12/05/2023
Dux Industries Limited	12/05/2023
RX Plastics Limited	12/05/2023

During the consultation sessions with our entities, we discussed details of the Modern Slavery Act 2018, including our reporting requirements. We discussed our Risk Assessment process and results. We provided information on our Risk Management Action Plan to address the risks identified. We provided our entity stakeholders with relevant supporting materials and Framework updates.

## Consultation with the Entity giving this Statement

This Modern Slavery Statement is on behalf of our Aliaxis owned Operations in Australia and New Zealand. The issuing entity of this Statement is therefore Aliaxis.

As detailed within Section 2; Aliaxis Group S.A. (BE) is a privately owned business, with global headquarters in Brussels. Although Aliaxis is not a legally registered business within Australia or New Zealand, there is an overarching Aliaxis Asia Pacific Executive Management team.

Entity	Date
Aliaxis Asia Pacific Executive Management Team	15/05/2023

Post our consultation with each of our trading entities, we also held a consultation session with our Aliaxis Asia Pacific Executive Management team, we also discussed details of the Modern Slavery Act 2018, including our reporting requirements. We discussed our Risk Assessment process and results. We provided information on our Risk Management Action Plan to address the risks identified. We provided our entity stakeholders with relevant supporting materials and Framework updates.

## Section 9: Other Relevant Information

Our Aliaxis Operations within the UK have released annual Modern Slavery and Human Trafficking Statements since 2016, in alignment with the UK's Modern Slavery Act 2015. Their latest Statement can be viewed on their website, via the "Modern Slavery" link in the website footer at <https://www.aliaxis.co.uk/>.

There is no additional relevant information to be disclosed.

## Section 10: Statement Approval

In accordance with Section 14 of Modern Slavery Act 2018, it is confirmed that statements given by reporting entities included in this “Modern Slavery Statement for Aliaxis Operations in Australia and New Zealand” have been reviewed and approved by the principal governing body of each entity. For our Australian based businesses this was Board Approvals. For our New Zealand based businesses this was Executive Approvals. Our approval dates are below:

Entity	CY 2022 Modern Slavery Statement Approval Date
Vinindex Pty Limited	16/06/2023
Yatala Plastics Pty Limited	16/06/2023
Zezt Pty Limited	16/06/2023
Philmac Pty Limited	06/06/2023
Marley New Zealand Limited	19/06/2023
Dynex Extrusions Limited	19/06/2023
Dux Industries Limited	19/06/2023
RX Plastics Limited	19/06/2023

The signatory for this “Modern Slavery Statement for Aliaxis Operations in Australia and New Zealand” is Mark Nykiel, our CEO of Aliaxis Asia Pacific.

Signed: 21 June 2023



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**Mark Nykiel**  
CEO Aliaxis Asia Pacific

## Contact Details

If you have any queries, please contact us:

Aliaxis Procurement Team

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