



IXOM's Modern Slavery Statement (Statement), which meets the requirements of the Australian Modern Slavery Act 2018 (Cth) (Act), describes the steps taken by IX Infrastructure Pty Ltd and its subsidiaries (collectively, IXOM) to comply with its obligations under the Act.

For the purpose of this Statement IXOM's reporting period is 1 October 2022 to 30 September 2023.

This Statement is a joint statement comprising the following reporting entities under the Act (Reporting Entities):

- 1. IX Infrastructure Pty Ltd (ACN 629 750 401);
- 2. IXOM HoldCo Pty Ltd (ACN 602 722 547);
- 3. IXOM Pty Ltd (ACN 602 723 768);
- 4. IXOM Holdings Pty Ltd (ACN 131 367 112);
- 5. IXOM Operations Pty Ltd (ACN 600 546 512); and
- 6. IXOM International Holdings Pty Ltd (ACN 602 439 878).

Modern Slavery

Modern slavery describes situations of severe exploitation and deprivation of the freedom of its victims through force, coercion, threats or deception. Broadly, the term modern slavery extends to any situations of serious exploitation where a person cannot refuse to work or leave work due to intimidation, abuse of power or violence. Further, modern slavery is used to refer to other illicit activities that have adverse effects on human rights, such as human trafficking or corruption.

With more than 1,000 employees globally, IXOM is a market leader in chemical manufacture and distribution in Australia and New Zealand. IXOM also has a growing presence in Southeast Asia through our life sciences raw materials and ingredients distribution business, and in the USA and the United Kingdom through our source water technology businesses. IXOM recognises and condemns the existence of modern slavery practices in some industries around the world. We continue to take steps to increase the maturity of our activities aimed at raising suppliers' awareness of IXOM's expectations regarding respect for workers' human and legal rights. Consistent with our corporate principles of conducting our business safely and with integrity, IXOM continues to work to identify and mitigate any risks associated with modern slavery for all of our businesses globally, and to measure the effectiveness of our actions.

The Act requires IXOM to prepare a report providing information on:

- IXOM's structure, its operations and supply chains;
- the risks of modern slavery in IXOM's operations and supply chains;
- the actions taken to assess and address those risks, including due diligence and training;
- the effectiveness of those actions;
- how IXOM assesses the effectiveness of those actions; and
- the process of consultation between IXOM and its related entities in respect of modern slavery compliance.



2. Statement from the Chief Executive Officer

Opposing slavery. In all its forms.

IXOM is a proudly Australian company with a corporate heritage dating to 1919.

As a market leader in water treatment and chemical distribution, we are strongly focused on the health and safety of our people, our customers, and the communities in which we operate. That focus extends to everyone we work with, in every country, along all our supply chains.

IXOM has continued to proactively identify and manage modern slavery risks within our supply chains, focusing on products and geographies that carry a known higher risk of slavery practices or human rights abuses. IXOM has also continued to implement its modern slavery risk vetting processes to recently acquired businesses. During the 2023 reporting period, IXOM embarked on a program of maturing its modern slavery risk identification and assessment program, and this work will continue in the 2024 reporting period.

Specifically, during the 2023 reporting period, IXOM has:

- updated its Group Modern Slavery Avoidance Policy (MSA Policy);
- updated its modern slavery training presentation for staff in procurement-related roles; and
- developed a modern slavery vetting and onboarding process for new suppliers, which will form
 part of a new governance process that IXOM will be implementing in 2024 for new and
 prospective vendors of products and services.

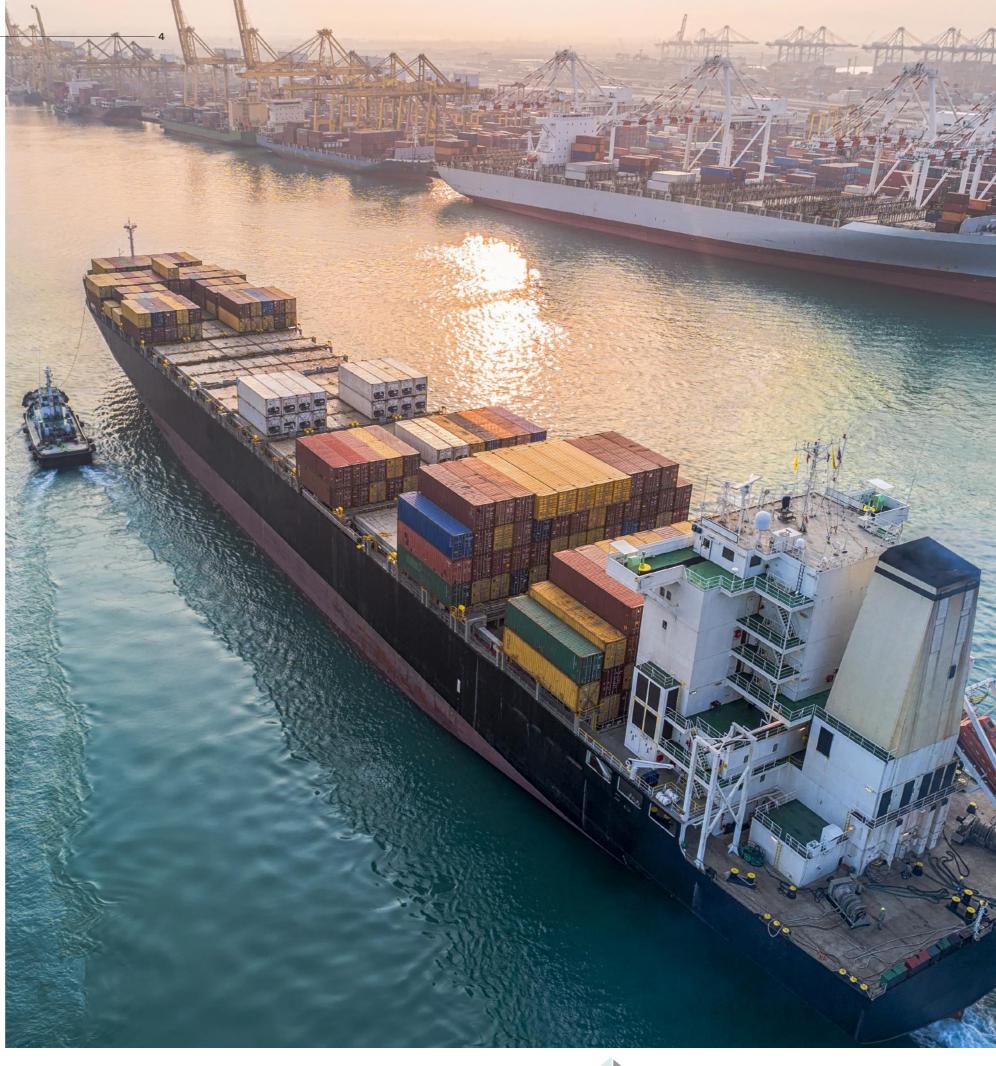
During the reporting period, IXOM has also considered third-party modern slavery risk mapping and vendor reporting tools. In the 2024 reporting period, IXOM will decide on the extent to which any of these products will be incorporated into our modern slavery risk due diligence processes.

IXOM does not tolerate modern slavery in any form. We are committed to continuing to seek transparency in our supply chains, identifying and assessing modern slavery risks, and uplifting the maturity of our processes to combat modern slavery.

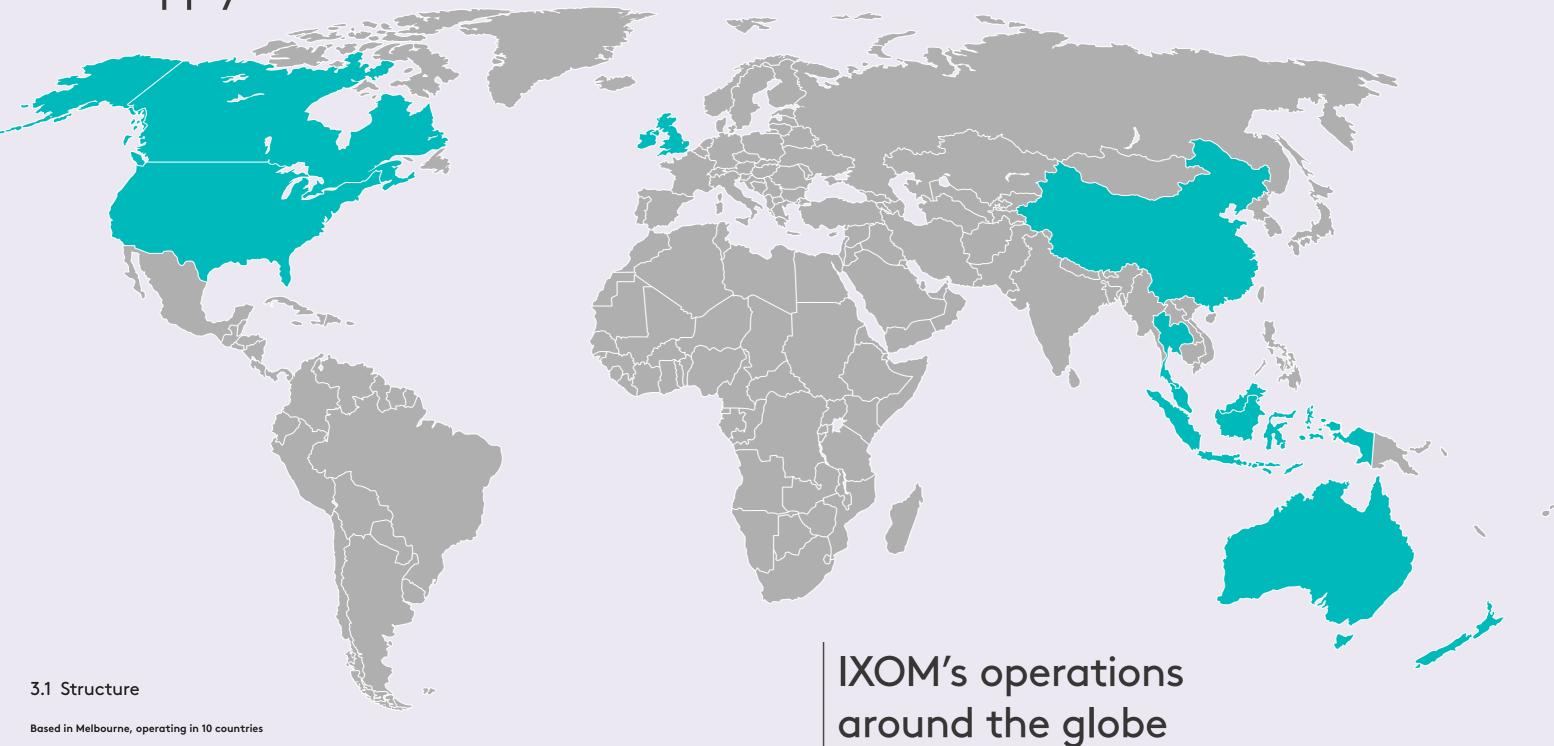
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Bryce Wolfe

Managing Director and CEO IXOM Group



Structure, operations and supply chain



IXOM is a private company headquartered in Melbourne, Australia. During the reporting period, IXOM consisted of 22 registered companies (including 2 entities not wholly owned by IXOM), incorporated and operating in 10 countries, as set out in Annexure A (page 18).

A number of IXOM entities do not have operations, such as holding companies.

3. Structure, operations and supply chain

Key Brands











- IXOM manufactures, processes and distributes a wide range of bulk and packaged chemicals and raw materials in Australia and New Zealand to numerous sectors including industrial, municipal, mining and energy.
- Keith Harris produces a range of flavours, fragrances and ingredients for use in food and beverages, laundry products, aerosols, detergents, candles, bathroom products and beauty products in Australia and New Zealand.
- ABP (Australian Botanical Products) manufactures and distributes essential oils and blended ingredients used by health, wellness and personal care brands in Australia and New Zealand.
- Bronson & Jacobs formulates and supplies raw materials across a range of industries in Australia, New Zealand and Southeast Asia, including food and beverage, personal care, pharmaceutical, cosmetics, nutrition and complementary health.
- MIEX is a division of IXOM dedicated to the development and support of ion exchange solutions for the removal of target contaminants from water and wastewater streams. MIEX plants are used by municipal potable water treatment plant operators in North America, Europe, East Asia, Australia and New Zealand.

- IXOM Waterare incorporating brands including Medora, MIEX, SolarBee, GridBee and Residual HQ supplies source water management equipment and services used by municipal water customers in North America.
- **SCR** processes and distributes Ad Blue, an emissions reduction solution, in New Zealand.
- Bituminous Products manufactures and supplies modified bitumen and associated products for road surfacing, road sealing and general industrial use in Australia.
- Logichem processes and supplies reagent chemicals used by the mining industry in Australia.
- **FarmGuard** supplies chemical solutions to the dairy farm and agricultural sectors in New Zealand.
- Pure Ingredients imports and distributes essential oils, fragrances and bulk cosmetic ingredients in New Zealand.

Our values



DRIVEN AND ACCOUNTABLE





ENERGISE AND EMBRACE



Suppliers

During the reporting period, IXOM conducted operations in the following countries:

• Australia • New Zealand • Singapore
• Canada • Indonesia • Thalland
• China • Malaysia • United Kingdom
• United States of America



3.2 Operations

Essential solutions across a range of industries

IXOM's industry segments are intertwined, supplying manufactured chemicals and services, traded chemical products and providing logistics solutions and products to a range of key industries. Chemicals and raw materials supplied by IXOM are commonly used across many industries and essential services from the food we eat, the water we drink, the essential oils and fragrances we enjoy, and the utilities that we rely on.

- IXOM supplies chemicals, raw materials, equipment and services solutions to industrial customers operating in the following end markets:
- Food, beverage, dairy and nutrition
- Process cleaning technologies
- Personal care, health & household
- Agriculture
- Municipal and industrial water treatment and management
- Waste treatment and management
- Pulp and paper
- Building and construction
- Industrial
- Plastics
- Mining and metals
- Refined fuels, oil and gas
- Modified bitumen for road surfaces
- Essential oils and fragrances

IXOM's chemicals and materials businesses manufacture chemical and personal care products as well as procuring chemicals and materials for resale, with IXOM acting as the distributor.

3.3 Supply chain

Safe, reliable and compliant supply chains

IXOM's supply chain for products and services focuses on safety, reliability, quality and functionality of products and services, regulatory compliance, and the ability to safely and reliably source and supply goods in the volumes that meet our customers' needs. IXOM's traded chemicals are sourced from manufacturers and resellers that meet our high standards, as are equipment components used in our manufacturing plants and water technology equipment.

In most cases, these products are imported into the country of resale via ocean shipping. IXOM's suppliers outside Australia and New Zealand are located predominantly in North America, Asia and Europe.

5. Key actions taken to assess and address risks

Modern slavery risks

4.1 Overview

Zero tolerance for slavery in all its forms

IXOM maintains zero tolerance for slavery in any of our or our suppliers' operations. IXOM is not aware of any modern slavery practices in our own operations or supply chains, and we constantly seek to ensure our suppliers continue to uphold the highest standards.

IXOM has continued to update our modern slavery compliance risk assessment with consideration of the supply chains that carry increased propensity for the occurrence of modern slavery practices. Based on this work, IXOM has continued to focus its modern slavery due diligence processes and workplan predominantly on a selected number of suppliers based in the higher-risk jurisdictions of China, India and Southeast Asia, which supply products to IXOM's Australian and New Zealand businesses and our joint venture operations

During this reporting period, IXOM has increased modern slavery due diligence activities for vendors that supply IXOM's Southeast Asian distribution businesses. We have also continued to increase the level of due diligence activities applied to vendors that supply businesses that IXOM has recently acquired.

4.2 Operations

Assessing third party susceptibility

As at the end of the 2023 reporting period, approximately 97% of IXOM's employees were based in Australia, New Zealand and the USA. IXOM takes compliance with labour laws extremely seriously, and we continued to maintain robust local labour law compliance systems in each country where we employed people during the reporting period.

The outcome of a 2020 modern slavery compliance risk assessment demonstrated that IXOM's operations may be susceptible to the presence of modern slavery risks through direct engagement of third-party suppliers, many of whom operate in countries outside Australia, and also indirectly through the companies that supply goods and services to IXOM's own suppliers. This continued to be the case during the 2023 reporting period. Based on publicly available information, including the Global Slavery Index, some of these third-party suppliers are more susceptible to modern slavery practices based on the countries or regions in which they are located and also based on the industries in which those suppliers operate.

4.3 Supply chain

Identifying risk across our supply chain

In the reporting period, IXOM concentrated the bulk of our workplan activities on supply chains associated with our Australian, New Zealand and Southeast Asian businesses. Those businesses are operated by IXOM Operations Pty Ltd, Australian Botanical Products Pty Ltd, Bituminous Products Pty Ltd, PT Bronson and Jacobs Indonesia, Bronson and Jacobs (S.E. Asia) Pty Ltd, Bronson and Jacobs (Malaysia) Sdn Bhd and Bronson and Jacobs International Company Itd. These entities represent about 95% of the IXOM Group's revenue and earnings, and also the majority of the IXOM Group's supply chain activities.

IXOM has identified the potential for modern slavery risks in the following elements of our supply chain:

- · raw materials procured to produce goods and finished products, including the growing and processing of food ingredients and foodstuffs;
- countries from which IXOM sources chemicals or materials that have little or no human rights or worker protections, poor law enforcement, or where modern slavery is widely practiced or
- particular industries in which modern slavery practices or violations have been uncovered by third parties and publicly documented.

The risks associated with modern slavery increase when these

IXOM acknowledges that risks may also be present deep in our supply chains, such as in the mining of certain minerals, the production of raw materials, and the growing or processing of some food products and ingredients that are sold or resold to IXOM.

During 2024, IXOM intends to implement a vendor risk assessment tool for all new product or service vendors.

Raw materials

The US Department of Labor's 2022 List of Goods Produced by Child Labor or Forced Labor¹ identifies materials in their raw form that are associated with industries that carry a higher risk of modern slavery practices, with this risk particular to specific countries of origin. Based on that list, the following raw materials are distributed by IXOM, often in a processed, extracted or refined form.

- Cumin

- Fish
- Vanilla
- Coffee

- Hazelnut
- Cocoa
- Mica
- Tomato products Palm Olein (derived from palm oil)

Geographic locations

IXOM recognises increased modern slavery risks in our supply chain associated with suppliers situated in countries identified as 'higher risk' by Transparency International and the Global Slavery Index. The geographic locations identified as posing a higher risk in connection with IXOM's supply chains are predominantly China, India, the Philippines, and Indonesia.

Industries

The Global Estimates of Modern Slavery as developed by International Labour Organization (ILO) and the Walk Free Foundation, in partnership with the International Organization for Migration², refers to industries that carry a higher risk of modern slavery practices. IXOM directly or indirectly procures from the following industries:

- Manufacturing Mining
- Commercial agriculture

Key actions undertaken by IXOM

During the reporting period, IXOM undertook a number of key actions to assess and address modern slavery risks.

5.1 Due diligence

Gathering and acting on information

IXOM continued the due diligence process used in prior reporting periods to assess suppliers of products or services. This due diligence process consists of:

- a modern slavery and human rights-specific questionnaire that IXOM sends to the supplier for completion,
- an internal questionnaire completed by the IXOM staff members who maintain the relationship with the supplier, and
- background checks undertaken by IXOM's legal team using the Dow Jones Risk Centre database and other online background checks.

IXOM saves this information in central systems that are only able to be accessed by our internal legal team.

The due diligence process includes initial information-gathering through to escalation and management of any identified modern slavery risks, and involves two stages:

Basic due diligence

IXOM applies basic modern slavery due diligence to a sample of suppliers of products or services that fit within the target categories of IXOM's modern slavery workplan. If there are any red flags following completion of that due diligence exercise and IXOM still wishes to transact with the relevant supplier, the supplier will be subject to advanced due diligence.

Advanced due diligence

In the reporting period, advanced due diligence was not required for any suppliers. There were no suppliers from the prior reporting period identified as requiring advanced due diligence.

Notwithstanding, during the reporting period, IXOM conducted a targeted advanced due diligence process for certain suppliers based on IXOM's assessment of inherent risk factors and publicly available information. This involved the internal and external audit processes detailed in sections 5.3 and 5.4 of this statement.

'Red flag' concept

IXOM has developed due diligence criteria which, if met by a supplier, would prompt a 'red flag' in relation to modern slavery non-compliance. These include the presence of illegal activity, lack of controls surrounding labour law compliance and slavery, servitude, underage labour and human trafficking, and the avoidance of, or failure to return or complete, IXOM's modern slavery questionnaire.

IXOM has completed modern slavery due diligence for a selection of suppliers identified as part of our modern slavery workplan.

As part of this process, IXOM's due diligence continued to focus on detecting issues that we categorise as representing a red flag from a modern slavery risk perspective. During the reporting period, we observed that suppliers were typically quick to complete IXOM's questionnaire and to provide any requested follow up information. IXOM also observed a growing trend for suppliers to have a modern slavery or human rights policy in place, as compared to four years earlier when IXOM first commenced its modern slavery due diligence program.

One unresolved red flag arose during the reporting period. This related to a supplier that initially agreed to IXOM appointing an external auditor to attend the supplier's site to undertake a 1-2 day modern slavery and social audit of its facility and operations. The supplier subsequently actively avoided permitting IXOM's nominated auditor to enter its site. IXOM provided the supplier with several opportunities to cooperate, to no avail. IXOM has located an alternate supply source and is in the process of trialling product from that alternate source, with the intention of transitioning away from procuring from the red-flagged supplier.

In the 2022 reporting period, IXOM stopped procuring goods from a product supplier as a result of that supplier refusing to meaningfully respond to requests for information related to IXOM's modern slavery basic due diligence process. Pleasingly, this supplier approached IXOM during the 2023 reporting period, offering to provide IXOM with all outstanding information. IXOM has now successfully completed our due diligence and removed the block on procuring from that supplier.

Commencing later in 2024 as part of IXOM's formal new vendor risk assessment tool, prospective suppliers who fail to meet IXOM's modern slavery requirements will require further assessment by IXOM's legal team before any decision relating to approval of the supplier can be made



 $^{^{1}\} https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/2022-TVPRA-List-of-Goods-v3.pdf.$

² Ilnternational Labour Organization, Walk Free Foundation and International Organization for Migration. Global estimates of modern slavery: Forced labour and forced marriage. Geneva, 2022. https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/#: -: text= The %202021%20Global %20Estimates %20 indicate, that %20 they %20 were %20 forced %20 into. The first of the firs



5.2 Training

Ensuring employees know what to look for

IXOM continues to train employees in our Australian and New Zealand entities who work with suppliers and/or work in supply chains, with a focus on ensuring comprehensive training of IXOM's product managers, account managers, and supply chain and procurement staff. During the reporting period, IXOM updated our training materials to include the key findings from the 2023 Global Slavery Index and the McMillan Modern Slavery Act review.

IXOM's modern slavery training program includes a particular focus on common indicators that might suggest the existence of modern slavery risks in a supplier's operations, or aspects of a supplier's operations that require further probing to assess whether modern slavery practices are present. This focus is deliberate and intended to equip staff with the skills and knowledge necessary to identify modern slavery risks in their dealings with suppliers and when conducting on-site audits.

5.3 Internal audits

Going direct to suppliers

During the reporting period, IXOM staff conducted audits of five suppliers based in China. No modern slavery risks were identified as a result of this internal audit process.

The audits were conducted by IXOM's China-based employees, who attended a range of supplier manufacturing sites in person, in the provinces of Shandong, Inner Mongolia, Jiangsu, and Hebei.

The five audited suppliers were selected by IXOM's legal team and China-based procurement team from a list of IXOM's China-based suppliers. Suppliers were selected on the basis of moderate to high expenditure by IXOM and not having been the subject of an internal audit (other than desktop due diligence) in prior reporting periods.

The audit process involved IXOM staff conducting site visits to suppliers' premises in China, assessing the suppliers' operations, and forming a view as to their modern slavery risks.

IXOM intends to continue with its internal modern slavery audits of a sample of suppliers in China.

5.4 Independent External Audits

Utilising an independent external auditor

During the reporting period, IXOM arranged an external audit of two suppliers based in China. The audit was conducted by a third-party provider approved by Sedex as an Affiliate Audit Company, with expertise in modern slavery audits. The audit process involved the external auditor conducting site visits and preparing a detailed findings report.

For each of the suppliers audited, the findings of the external audit were presented in a report outlining details of any non-compliance and suggested corrective actions. The audit reports did not find instances of modern slavery or human rights non-compliance, but raised several issues pertinent to compliance with local regulations and the safety of staff at suppliers' sites. Examples of these findings include the need for the following improvements - proper recording of hours of attendance of workers and wages paid, maintaining first aid kits at workstations, abandoning a policy of fining staff for late attendance or smoking in unauthorised areas, improved fire prevention measures, installation of fire exit signage, and having a food production permit in place.

As explained above in section 5.1, IXOM is preparing to transition our procurement away from a third-party supplier who refused to allow IXOM's nominated external auditor to attend the supplier's premises to conduct a modern slavery audit.

5.5 Improvements to Modern Slavery Avoidance Program

During the reporting period, IXOM progressed key elements of our Modern Slavery Avoidance Program. IXOM has:

- developed a questionnaire on modern slavery and human rights that prospective suppliers will be required to answer as part of a new vendor risk assessment tool, to be implemented by IXOM's procurement division in 2024;
- created a modern slavery acknowledgement form that IXOM will request prospective suppliers sign as part of an updated new supplier on-boarding process, also to be implemented by IXOM's procurement division in 2024;
- changed our processes such that modern slavery due diligence records for vendors from 2023 onwards are restricted to access by members of IXOM's internal legal team only;
- reviewed and updated IXOM's Modern Slavery Avoidance (MSA)
 Policy: and
- updated IXOM's systems to ensure that only IXOM's legal team can approve the lifting of any block put on vendors who have one or more unresolved modern slavery red flags.

The questionnaire and acknowledgement form for prospective suppliers will result in IXOM's modern slavery avoidance program extending to a higher number of suppliers.

IXOM has also spent time assessing modern slavery supply chain risk mapping tools offered by Givvable, Fair Supply and EcoVardis, as well as a vendor-specific ESG due diligence reporting product that Dow Jones produces. During the 2024 reporting period, IXOM will decide on the extent to which we incorporate the use of any of these products in into our modern slavery risk due diligence processes.

5.6 Further actions taken

During the reporting period, IXOM's human resources and industrial relations activities have supported our MSA Policy in a number of ways:

- IXOM continuously reviews our human resources policies, including
 in the areas of parental leave, personal leave, and family and
 domestic violence leave. IXOM has not only focused on enhanced
 employee wellbeing in reflection of modern corporate standards,
 but we have also ensured legal compliance in each jurisdiction
 where IXOM operates. This activity continues to be a priority for
 IXOM, including in relation to newly acquired businesses in Australia
 and overseas.
- In Australia, wages are regulated by modern award conditions. IXOM's employment and payroll arrangements have been audited by an independent global accounting firm to ensure that our remuneration and accrual or receipt of employment entitlements complies with applicable laws. IXOM also undertakes regular internal audits to ensure ongoing compliance.
- IXOM has renewed two industrial agreements during the reporting period through collective bargaining with employees and their union representatives.
- IXOM provided free sessions our people on work-life balance, physical health (exercise and nutrition), mental health (resilience, stress and mindfulness), financial health, and diversity and inclusion; these sessions were facilitated by independent third parties. IXOM continues to make a third-party operated employee assistance line available to all staff.

Our people are encouraged to report any suspected breaches of IXOM's Code of Conduct, including in relation to modern slavery, to their line manager, the legal team or Speak Up (an anonymous reporting hotline operated by an independent third party).



6. Improving the Effectiveness of IXOM's Actions on Modern Slavery

6.1 Overall assessment

Continuous improvement

- IXOM will seek to communicate our position on modern slavery and human rights to new suppliers at the outset of onboarding, as part of an update to our new supplier onboarding process that we intend to implement during 2024.
- IXOM measured its progress by tracking suppliers who were targeted for due diligence on a case by case basis during the reporting period. IXOM is able to track its progress in assessing the supplier's modern slavery risks from identifying any red flags noted in the completed due diligence through to any recommendations made to the business. For suppliers that IXOM identifies through desk top audits as operating in industries or regions that are assocaited with increased slavery risks, IXOM can seek to target on site visits by its staff, or external modern slavery and social audits, towards those suppliers.
- IXOM continues to successfully work with suppliers to encourage them to implement recommendations made by external auditors who undertook modern slavery and social audits for IXOM during the reporting period.
- IXOM continues to increase awareness of modern slavery risks among our people through communications and training programs. A dedicated modern slavery avoidance email inbox is being used effectively as a result of this increased awareness.
- IXOM has developed a formal ESG framework as part of our ESG Policy and is preparing to commence implementation of that framework. Our modern slavery risk identification and assessment program will form part of this framework.
- IXOM's internal and external supplier site audit process continues to prove effective, enabling us to critically analyse and validate the accuracy of our internal desktop due diligence of those suppliers.

6.2 Reporting and remediation

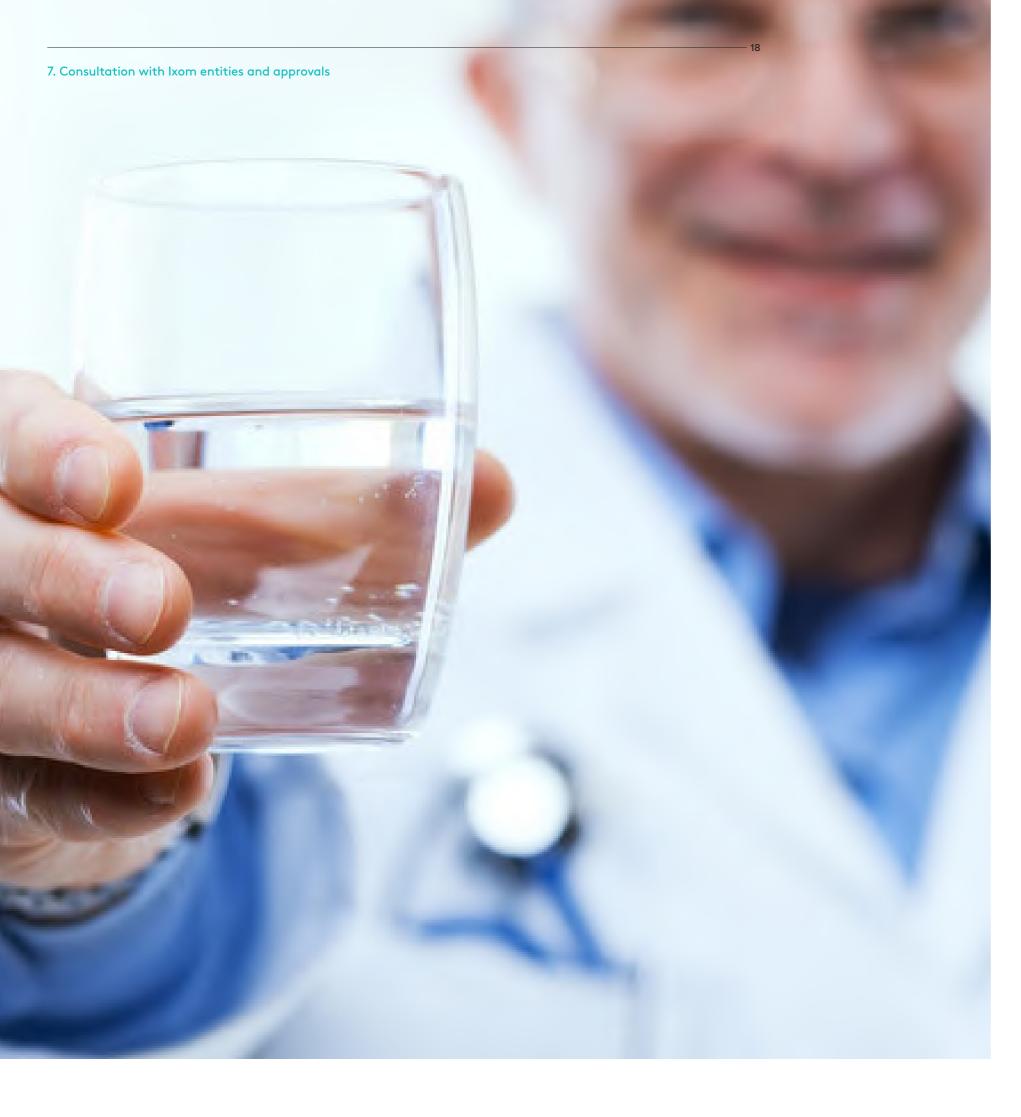
Raising and acting on red flags

If an IXOM employee, contractor or representative has any modern slavery concerns relating to a supplier, these concerns, along with information outlining the basis for these concerns, must immediately be reported to IXOM's Legal and Compliance Group or detailed through IXOM's relevant communication channels.

Where red flags are identified in relation to a supplier, these are addressed in accordance with the detailed procedure set out in IXOM's MSA Policy. IXOM has a track record of transitioning procurement away from suppliers where red flag issues remain unresolved.







Consultation with IXOM entities and approvals

Who our policy applies to

IXOM's MSA Policy applies to all Reporting Entities and their wholly-owned entities. IXOM has made the MSA Policy available to personnel in all wholly-owned entities of IXOM.

IXOM takes a global approach to tackling modern slavery risk. This statement reflects IXOM's global commitment and approach to human rights across our value chain. It has been prepared in joint consultation with the Reporting Entities and with other group subsidiaries, whose relevant representatives were provided with the opportunity to contribute to the statement process.

IXOM's consultation process included engagement with personnel and key stakeholders across IXOM to confirm alignment of policies, systems and processes across our businesses, including our human resources, procurement and sourcing teams, and business managers.

This Statement was endorsed and approved by the Board of IX Infrastructure Pty Ltd on 22 March 2024 on behalf of that company, IXOM Holdco Pty Ltd, IXOM Pty Ltd, IXOM Holdings Pty Ltd, IXOM Operations Pty Ltd and IXOM International Holdings Pty Ltd.

Keppel Infrastructure Trust, which is the ultimate owner of IX Infrastructure Pty Ltd, does not tolerate any form of child labour, forced labour, slavery, human trafficking or other unethical labour practices in any of its operations, and seeks to uphold and respect the fundamental principles in the United Nations Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principals and Rights at Work. Keppel Infrastructure Trust's position on modern slavery is also espoused in IXOM's MSA Policy. This Modern Slavery Statement is approved by Kevin Neo, Director, IX Infrastructure Pty Ltd.



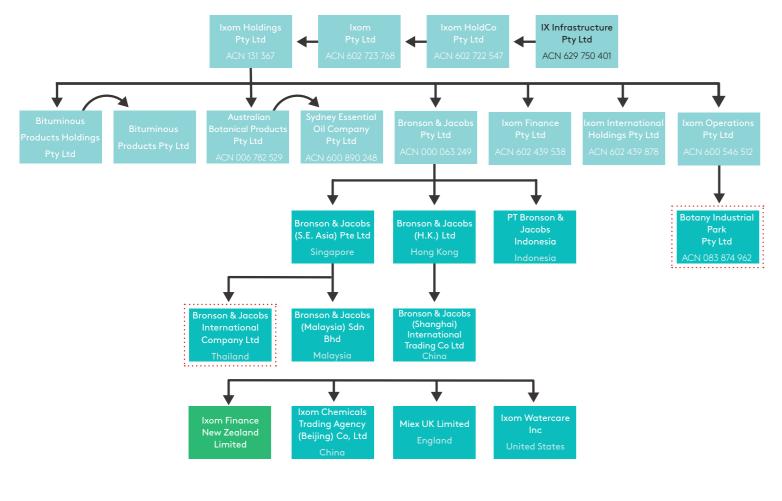
22 March 2024

Corporate Structure

Key

Australian entities

New Zealand entities



Foreign entities

Not wholly owned by an Ixom Group Member Ownership







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For specialist advice in an emergency, call lxom's 24 HOUR EMERGENCY RESPONSE SERVICE

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