

# Modern Slavery Act Statement



# Introduction

NSC (Australia) Pty Ltd and its wholly owned subsidiaries (Supagas) is committed to the recognition and safeguarding of human rights and opposes slavery in all its forms. In support of this commitment, we have established and maintain policies and programs to ensure that slavery or related human trafficking does not take place in our operations or our supply chain. We comply with all applicable national laws and international treaties concerning human rights, social rights, and labor rights, consistent with the principles of the Universal Declaration of Human Rights.

Supagas is made up of the following entities:

- NSC (Australia) Pty Ltd;
- Supagas Pty Limited;
- Sagapus Holdings Pty Ltd (in its own capacity and as trustee);
- Sagapus Pty Ltd



## Supagas' Business

Supagas is a leading supplier of LPG, industrial, medical, specialty and helium gases in Australia. We are a fast-growing nation-wide company and are rapidly building a reputation for growth and success based on an exceptional 'Yes we can' customer service offering and quality product in the highly competitive market.

Today, Supagas has multiple distribution centres, branches and agencies growing nation-wide and is able to provide a fast and reliable delivery along with personal responses to queries, ensuring quality service every time. Supagas' state-of-the-art facilities allows us to offer multiple gas types and gas products, as well as run specialised laboratories to mix and test specialty gas. This helps us to better service our customers' needs and requirements.

Supagas employees approximately 1000 employees nationally and is owned by Nippon Sanso Holdings Corporation one of the largest gas suppliers in the world.

# Supagas' Structure and Operations

Supagas' moto, 'Yes we can', extends to all that we do. The 'Yes we can' values are enshrined in Supagas' Code of Conduct.

The Code of Conduct sets forth the basic guidelines for the conduct and concepts to be observed by all employees working in Supagas, enabling them to act in accordance with relevant laws and corporate ethics. The Code of Conduct also sets out Supagas' corporate social responsibilities based on our belief that a relationship of mutual trust with customers or communities will be built through the continuous efforts in Supagas' day-to-day operations.

Supagas' code of conduct applies to all directors, officers and employees and its application is taken seriously. Failure to comply with the Code of Conduct could lead to disciplinary action.

The following are key principles of the Code of Conduct:

- Laws must be complied with;
- Child/forced labour is prohibited;
- Bribery and association with antisocial elements must be avoided;
- Product safety and quality control must be exercised;
- Anti-competitive behaviour must be avoided;
- Business is to be conducted with common decency and good faith;
- Human rights and work health and safety must supported and respected;
- Discrimination, harassment; and
- Proper and honest accounting practices must be followed.



In addition to the Code of Conduct, Supagas also has in place policies that provide more detail and direction in relation to the key principles set out in the Code of Conduct. A key policy is Supagas' Modern Slavery Policy which sets out Supagas' commitment to eradicating modern slavery and our strategy to do so.

Supagas also has in place a whistleblower policy and whistleblower window whereby Supagas officers, employees, contractors or members of the public can disclose infringement of laws, Code of Conduct or policies.

Supagas employees are required to make themselves familiar with Supagas' Code of Conduct, policies, and whistleblower policy. Supagas also carries out regular training.



# Supply Chains

Supagas utilises approximately 1,400 third-party suppliers.

Supagas' supply chain includes the following:

- Office consumables and promotional merchandise;
- Technology (hardware, software and cloud services);
- Utilities and professional services providers;
- Uniforms and work attire (safety vests and clothing, uniforms);
- Vehicles and parts (cars, utes, trucks, forklifts, tyres, fuel, and spare parts);
- Property leasing;
- Products that Supagas buys and then sells to customers (various gases, cylinders, and equipment);
- Contractors and sub-contractors that provide goods and services to Supagas customers (drivers);
- Accommodation services both domestically and internationally;
- Hospitality and catering services; and
- Landscaping and maintenance services



# Risks of Modern Slavery Practices

Supagas considers that operations and supply undertaken directly by Supagas employees are likely of low risk. Those activities undertaken by third-party suppliers could carry a higher risk (for example, migrant labour exploitation). Goods that are sourced from overseas likely carry the highest risk of modern slavery given that Supagas does not have direct oversight and is not present during manufacture and/or supply.



# Actions Taken by Supagas

Supagas has further included clauses into its supplier agreements whereby the supplier must comply with modern slavery legislation. Additionally, Supagas's national purchasing team ask questions in relation to modern slavery to suppliers assessed as medium to high risk.

Supagas has a national purchasing team that is responsible for reviewing each new supplier. Supagas has also implemented a delegation of authority, one objective of which, is to reduce the risk that the national purchasing team is circumvented in relation to the use of suppliers.

Supagas requires all driver contractor companies to complete and return a six-monthly declaration that they are complying with their employment and visa obligations.

# Assessment of the Effectiveness of These Actions

All Supagas employees are required to comply with Supagas's Code of Conduct surrounding child labour and forced labour. Supagas's Code of Conduct is available to all employees. All Supagas staff are trained on Supagas's Code of Conduct and Policies. Failure to comply may lead to disciplinary action and even termination.

All Supagas employees are required to report any suspected incidences of non-compliance either internally to Supagas's Chief Compliance Officer or externally. Supagas treats any such reports seriously.

Supagas has not found incidences of modern slavery since the actions described above were implemented and considers the actions taken to be effective. Notwithstanding this, Supagas believes in continual improvement and is continually looking at ways to further reduce the risk of any incidences of modern slavery in Supagas's supply chain.

## Year in Review

Supagas has continued to take modern slavery seriously. Since its 2021 Modern Slavery Statement, Supagas has continued to monitor its suppliers and review supplier answers to Supagas's on-boarding questionnaire. Those answers have not raised concerns in relation to modern slavery. Neither has Supagas received information that would give rise to modern slavery concerns in its supply chains. Supagas also continues to cooperate with customer modern slavery questionnaires.

As predicated in Supagas's 2022 Modern Slavery Statement, to further strengthen Supagas's stance towards modern slavery, Supagas has introduced its modern slavery policy.



## Consultation Process

Of the Supagas group, only Supagas Pty Limited trades., Sagapus Holdings Pty Limited (in its own capacity and as trustee), Sagapus Pty Limited do not trade, have employees, or contracts with suppliers.

Supagas Pty Limited has been directly involved in the preparation of this Statement.

This statement was approved by the boards of:

- NSC (Australia) Pty Ltd;
- Supagas Pty Limited;
- Sagapus Holdings Pty Ltd (in its own capacity and as trustee);
- Sagapus Pty Ltd.

## Other Relevant Information

Not applicable.

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*Erol Arican*  
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Erol Arican  
**Managing Director**

