



## Modern Slavery Statement

This Statement is made voluntarily by Koh Australia Pty Ltd (ABN 12 139 768 219) to demonstrate the Company's commitment to addressing the risk of modern slavery practices in its operations and supply chains. While Koh is not required to report under the Australian Modern Slavery Act 2018, this Statement has been prepared in alignment with the seven mandatory reporting criteria under the Act.

### 1. Identity of the Reporting Entity

This Statement is made by Koh Australia Pty Ltd (ABN 12 139 768 219) and covers Koh's operations in Australia, New Zealand, the United Kingdom, Indonesia and the Philippines. In the UK, operations are conducted through a separate entity, Koh Europe Ltd, which is included within the scope of this Statement.

### 2. Structure, Operations and Supply Chains

Koh is a manufacturer and retailer of cleaning products, headquartered at 2501 Westfield Tower 2, 99-101 Graton Street, Bondi Junction, NSW, 2022, Australia. Koh employs approximately 16 staff across Australia, New Zealand and the United Kingdom.

Koh's products are manufactured both domestically and internationally, with supply partners located in Australia, China, Korea, Germany, Sweden, Indonesia and the Philippines.

Koh's supply chain includes:

- Cleaning liquids and cleaning tools - manufactured domestically and overseas.
- Packaging - primarily produced in Australia.
- Logistics and warehousing - managed with global providers including Kuehne+Nagel.
- Customer service - provided through a global outsourcing company based in Indonesia, supplying customer service agents.
- Website development and IT support - provided through a contracted partner in the Philippines.
- IT/software, e-commerce platforms, and digital services - including hosting, email platforms, and performance marketing contractors.

### 3. Risks of Modern Slavery Practices

Koh recognises that its direct operations in Australia, New Zealand and the United Kingdom present a low risk of modern slavery, as employees are engaged under fair labour laws and protections.

However, higher risks are identified within the supply chain, particularly:

- Suppliers in China and Korea manufacturing cleaning tools, where risks of forced labour and poor working conditions are more prevalent.
- Suppliers sourced outside Koh's primary sourcing agent in Hong Kong, where Koh does not currently have visibility through on-the-ground inspections.
- Customer service outsourcing in Indonesia, where industry-wide risks of insecure work and underpayment exist, although Koh's use of a large global provider is considered lower risk compared to smaller local contractors.

- Website development partner in the Philippines, where outsourcing arrangements can carry risks of insecure work and underpayment. Koh addresses this by requiring compliance with local labour laws and fair working conditions.

Packaging is sourced domestically in Australia, and logistics are managed by global providers, which are considered low risk.

#### **4. Actions Taken to Assess and Address Risks**

Koh has implemented the following measures to assess and address modern slavery risks:

- Supplier Code of Conduct (SCoC) – Requires compliance with international labour standards, including the prohibition of child labour, forced labour, and exploitative practices. Currently, the SCoC applies to product suppliers and manufacturers, but Koh is committed to extending its application to service providers over time.
- Vendor Onboarding Form – All product suppliers and manufacturers must complete onboarding, which captures information on ownership, labour practices, compliance with human rights laws, and certifications. At present, this process does not cover service-based partners (e.g., logistics, customer service, IT contractors), but Koh intends to adapt and expand its due diligence approach to ensure greater consistency across all suppliers.
- Supplier Monitoring – Koh management will undertake site visits to a selection of China-based suppliers in October 2025 to verify compliance and working conditions. Future visits will be conducted on an ad hoc basis as the supplier base grows.
- Contractor Oversight – Service partners in Indonesia and the Philippines are managed through contractual arrangements requiring compliance with local labour laws and fair treatment of workers. Koh will strengthen this oversight by exploring ways to integrate service partners into its formal supplier due diligence framework.
- Remediation and Enforcement – To date, Koh has not rejected a supplier for modern slavery concerns. However, if breaches are identified, Koh will work with suppliers to remediate the issue. Where remediation is not possible, the Company reserves the right to terminate the relationship.

#### **5. Assessing Effectiveness**

Koh monitors supplier compliance through an internal tracking document, which records the completion of onboarding requirements by product suppliers. This enables Koh to continuously monitor compliance rather than relying solely on initial onboarding. While formal KPIs are not yet in place, Koh is committed to strengthening its monitoring framework by:

- Establishing KPIs to measure compliance with the Supplier Code of Conduct and onboarding.
- Setting goals such as achieving 100% of suppliers formally committed to Koh's SCoC.
- Conducting periodic reviews of high-risk suppliers.

Koh will review these measures annually and implement improvements to enhance effectiveness.

#### **6. Consultation**

Koh Australia Pty Ltd undertook internal consultation in the development of this Modern Slavery Statement.

Consultation occurred between senior management, procurement, operations, and finance personnel within Koh Australia Pty Ltd to identify modern slavery risks across the business and supply chains, assess existing controls, and determine future actions.

Koh Australia Pty Ltd currently does not own or control any other entities for the purposes of the Modern Slavery Act 2018. While Koh operates in multiple jurisdictions, all entities and operations covered by this Statement are managed and controlled by Koh Australia Pty Ltd.

Should Koh establish or acquire controlled entities in the future, it will implement formal consultation processes with those entities in the preparation of future Modern Slavery Statements.

## 7. Any Other Relevant Information

Koh is committed to embedding respect for human rights across its business. Supporting policies include the Human Rights Policy, Equal Employment Opportunity and Anti-Discrimination Policy, and Workplace Health & Safety Policy.

Koh is working toward certification under the GECA Cleaning Products Standard and is a participant in the United Nations Global Compact, demonstrating its commitment to responsible business practices

While Koh is not required to publish this Statement under legislation, it will review and update it annually if required, to reflect improvements in practices and procedures. Koh is committed to continuous improvement in addressing modern slavery risks across its supply chains.

### Approved by:

This Modern Slavery Statement was approved by the principal governing body of Koh Australia Pty Ltd, being the Board of Directors, on 17th December 2025.

Signed on behalf of the Board of Directors:



Justin Alexander

Director  
Koh Australia Pty Ltd  
Date: 17th December 2025

