



**DDT**  
holdings

**Modern Slavery statement 2024-2025**

# DDT HOLDINGS PTY LTD

(ABN: 20 137 675 140)

Modern Slavery Statement FY 2024-25



**DDT**  
holdings

## Modern Slavery statement 2024-2025

### Message from the Director

At **DDT Holdings Pty Ltd** (hereinafter referred to as **DDT**) we acknowledge that modern slavery is a serious and a very prevalent issue in the global supply chain often hidden and not visible in plain sight, affecting millions of people around the world.

While no single business, government or individual can end modern slavery what is needed is that the government, civil society and business work collectively and mobilise their resources towards developing and implementing effective modern slavery identification and eradication mechanisms across all industry/ corporate sectors globally.

Towards this at DDT, a key principle is to operate ethically to the highest standard. We maintain a strong commitment towards upholding human rights and promoting ethical business practices in all aspects of our operations, including our buying and contract management.

Our policies and processes are designed to support and train our employees in identifying, addressing and preventing the occurrence of modern slavery across our supply chain.

In continuation of our efforts towards this in FY 2025 the top management at DDT has been undertaking physical site visits of our suppliers and customers with a view to gaining an insight into their operations and have collaborated with our counterparties to improve their and our visibility across the supply chain, improving our business practices and have further enhanced our mechanism for supplier due diligence.

We recognise that an ongoing effort is essential to address and action modern slavery practices in the global economy. We are committed to continuously updating and implementing mechanisms to ensure we are constantly handling all modern slavery risks in our operations and that of our supply chain in the most effective manner.

RAJEEV SARAFF

Director DDT Holdings Pty Ltd.



# Contents

## Contents

<b>Message from the Director</b> .....	<b>2</b>
1. Introduction.....	4
2. DDT’s Structure, Operations and Supply Chains .....	4
3. Our Supply Chain.....	4
4. Risk Identification and Assessment.....	6
4. Assessing Effectiveness.....	7
5. Roles and Responsibilities .....	8
6. Consultation.....	9
7. Further Steps and DDT’s Commitment.....	9
8. Approval .....	9



**DDT**  
holdings

## Modern Slavery statement 2024-2025

### 1. Introduction

Modern slavery as defined under the Modern Slavery Act of 2018 is a range of serious, coercive exploitative practices including human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and the worst forms of child labour where a person cannot refuse or leave work due to threats, violence, or deception conduct.

DDT has a zero-tolerance approach to modern slavery and is committed to addressing any modern slavery risks in its operations and supply chains

This Modern Slavery Statement is provided by DDT in accordance with the provisions of the *Modern Slavery Act 2018* Cth.

This Statement outlines-

- DDT's process for identifying potential modern slavery risks and our approach to managing and mitigating such risks throughout our supply chain including those that can potentially occur with both the internal and external stakeholders in the overall operation chain.
- DDT's commitment to upholding human rights and engaging in responsible business conduct.
- DDT's progress date and current and future commitments towards a business, free from any form of modern slavery.

### 2. DDT's Structure, Operations and Supply Chains

#### About DDT Holdings

DDT is a proprietary limited company which was established in 2009 and restructured from trust to company from 1 July 2022. Currently it is 100% owned by DDT Holdings Group Pty Ltd (ABN 68 661 209 114). DDT is a trading entity and has been in the wholesale commodities trading business of wastepaper, scrap metal and Agricultural commodities for 15 years.

Mr. Rajeev Saraff, the director of DDT has been instrumental in the development of this statement.

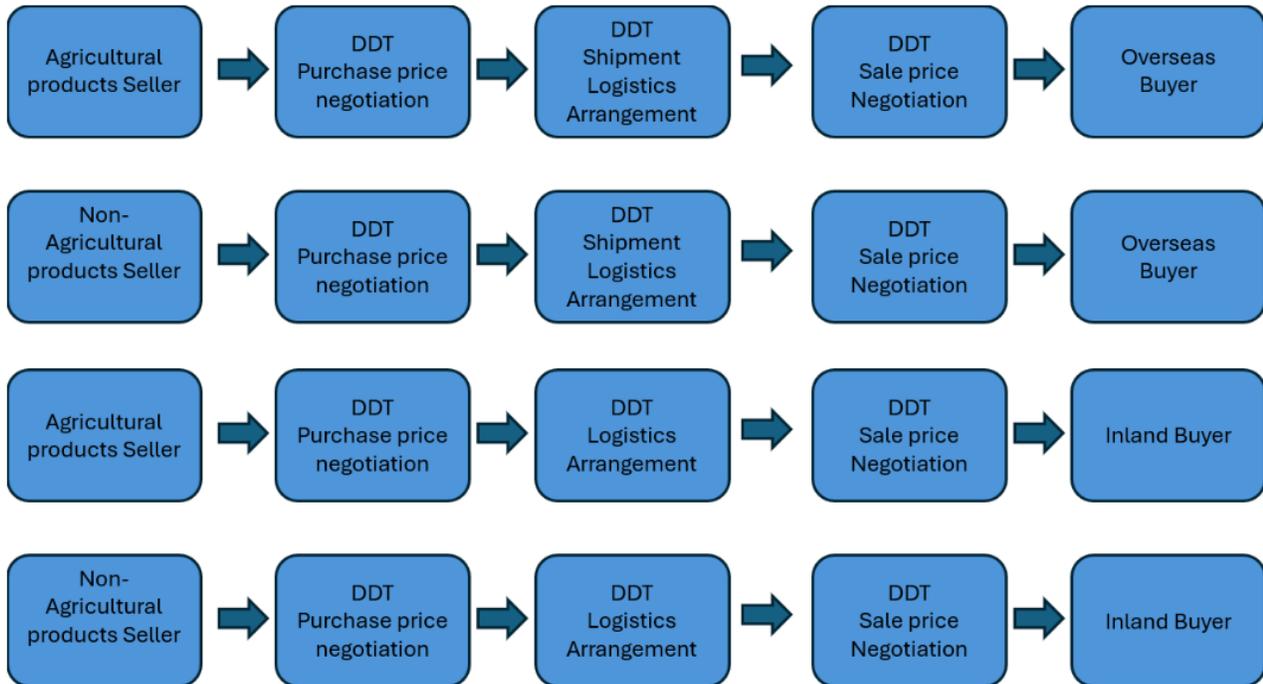
DDT has a zero-tolerance approach to modern slavery and is committed to addressing any modern slavery risks in its operations and supply chain.

### 3. Our Supply Chain

DDT has a diverse trading and supply relationship across global businesses. Our supply chain is a dynamic network where we source commodities from suppliers based primarily in Australia, New

## Modern Slavery statement 2024-2025

Zealand, South Africa, and Singapore for customers primarily based in China, India, Indonesia, Thailand, Singapore, Malaysia, South Korea, Vietnam, Japan, Canada, Hong Kong, Dubai, Republic of Korea in addition to customers within Australia.



DDT is a trading company and in the ordinary course of business, we procure goods from external third parties which include:

- Wastepaper :The supply chain visibility across the customer base is reported as MODERATE
- Scrap Metal : The supply chain visibility across the customer base is reported as HIGH
- Agricultural commodities: The supply chain visibility across the customer base is reported as DEVELOPING

DDT contracts and partners with global entities and where possible, supports leading local and regional Australian-domiciled companies that provide specialised services in the following areas:

- Containerized Shipping: Compliance with Modern slavery laws is reported as HIGH
- Road Transport: Compliance with Modern slavery laws is reported as HIGH
- Trading agent services: Compliance with Modern slavery laws is reported as MODERATE
- Contracted service providers: Compliance with Modern slavery laws is reported as DEVELOPING

## Modern Slavery statement 2024-2025

### 4. Risk Identification and Assessment

- Risk identification

DDT's approach to identifying the risks of modern slavery in its supply chain is through a risk mapping process. To identify the risk of modern slavery within the supply chain:

1. DDT conducts an annual sample modern slavery-survey. The information obtained in this survey is then assimilated by doing detailed questionnaire- based research. The questionnaires are designed keeping in mind the parameters as contained in *The Modern Slavery Act 2018 Cth.* and used to gather information on the stakeholders 'labour practices and operational standards'.
2. DDT has implemented a KYC (Know Your Counterparty) process to get an insight on our counterparties' approach to the risks of modern slavery in its own operations as well as that of its supply chain operations.
3. We through the research undertaken, seek to assess in respect to our counterparties if there are any local modern slavery legislations applicable in their geography of operations that they are required to be compliant with, the risks if any, that they encounter and how to they mitigate these risks, the procedures they adopt to identify and mitigate the risks identified in the operation.

#### Risk Assessment

1. The risk assessment has identified-
  - a. Our operations in Australia that are conducted by staff employed here and those entities operating in countries that are required to report under the Modern slavery legislation as the areas with the lowest risk.
  - b. Potential areas where the risk of modern slavery incidents would be present and plausible. These include-
    - i. The supply chain entities that operate in geographies where local laws do not mandate the businesses to screen their supply chains for modern slavery practices or conduct due diligence to identify such issues.
    - ii. The suppliers that procure / produce commodities from/in geographies where there is documented/ higher risk of modern slavery practices. Companies that lack supply chain transparency due to several reasons that may leave modern slavery incidents un- reported.
    - iii. The suppliers who do not fall under the criterion required under local modern slavery regulations to be met for reporting/ liable.

#### Risk Mitigation Within the organization

DDT is committed to preventing modern slavery and promoting a respectful and inclusive workplace.

## Modern Slavery statement 2024-2025

DDT has in place a Modern Slavery framework in place that includes the DDT Modern Slavery Policy that is practised in letter and spirit across all its operations.

The Modern Slavery Policy adopted by DDT provides employees with clear guidelines to identify and report existing/suspected and potential incidents of modern slavery within its operations and supply chains. In the event any such incident is reported to the top management, an investigation is undertaken to determine appropriate action.

### In the Supply Chain

The top management of DDT has commenced a program wide which they visit the sites of our suppliers and buyers to assess their operations and workings. These visits provide insight into the operational management and mechanisms at the existing and potential vendor and buyer facilities that DDT engages with.

DDT has incorporated anti-slavery clause into its supplier and customer contracts to address the modern slavery concerns that may be present within its supply chain. These clauses are reviewed regularly to track compliance requirements and identify areas that need any action. DDT's potential suppliers are provided with DDT's Modern Slavery Statement and the requirement that DDT requires adherence to it in its operations.

Where available DDT assesses and reviews suppliers' (both international and local) policies and requires them to declare their compliance with anti-modern-slavery practices and fair employment standards.

Additionally, DDT's customer onboarding process includes obtaining and perusing information about these entities to enable visibility across the supply chain.

## 4. Assessing Effectiveness

DDT remains committed to reviewing and evaluating the effectiveness of our actions for continuous improvements to assess and mitigate the risks of modern slavery across the operations of DDT and its supply chain members.

- DDT asks its supply chain members for information on the Anti Modern Slavery mechanisms that they may have in place. DDT also obtains KYC documentation on the supply chain members and requires them to declare affirmations in regards to their compliance with Anti-modern slavery laws. This process enables DDT to have accountable members as participants of its supply chain.
- DDT has successfully obtained confirmation of compliance with Anti Modern Slavery practices from global businesses incorporated in countries like India, Vietnam, Indonesia, Thailand, China, UAE, Hong Kong, Singapore, Pakistan, Republic of Korea amongst others.
- With in-built Anti-Modern Slavery clauses incorporated into DDT's supplier and customer contracts

## Modern Slavery statement 2024-2025

DDT has been effectively creating accountability on the part of the supply chain members.

- DDT's strengthened customer onboarding process with a policy that laid down guidelines for assessing potential customers ensures that DDT does not knowingly or unknowingly undertake transactions with customers that present any form of evidence of Modern Slavery Practices within their supply chain or business operations. This has been highly effective in partnering with businesses that comply with Modern slavery laws enhancing ethical business practices adoption.

DDT's Modern Slavery Policy, provides incoming employees with the necessary tools, including providing examples of modern slavery markers to identify and report instances of modern slavery incidents in supply chains. This has created an accessible mechanism within the operations at DDT.

## 5. Roles and Responsibilities

To effectively combat modern slavery there is assigned roles and responsibilities of the DDT holdings external and internal stakeholder groups. Each stakeholder has a pivotal role in effectively managing the operational risks at an operational level as stated:

### Employees:

- All employees are responsible for supporting the principles of the modern slavery policy and required to report any suspected activities.
- Identify and escalate any actual or perceived breaches of this Policy to the Director.

### Top Management:

- Ensure that the employees are conversant with the provision of DDT Holdings modern slavery policy and their role and responsibility under the policy.
- To ensure that any concern raised by the stakeholders is managed promptly and effectively.
- It has a responsibility to approve and implement the Modern Slavery Policy.
- To review and update the Modern Slavery Statement and its Modern Slavery Policy on an annual basis or earlier if deemed necessary

### Compliance Team:

- To ensure the Modern Slavery Statement aligns with the Modern Slavery Policy.
- Table for reviewing the Modern Slavery Risk Assessments on an annual basis or more regularly if deemed necessary.
- To carry out business and supplier risk assessments as and when instructed by the Top Management.



## Modern Slavery statement 2024-2025

### 6. Consultation

We do not own or control any other entities and therefore this criterion is not applicable.

### 7. Further Steps and DDT's Commitment

DDT continues to and is committed to further enhancing its governance to address the risks of modern slavery in its operations and supply chains through its existing Risk Management Program and internal policies, procedures, and management. These would include:

- Reviewing policies to mirror the dynamic operation and regulatory environment.
- Continuous engagement with supply chain members to work towards eliminating modern slavery incidents - both existing and potential.
- Improve and update mechanisms to aid the identification and reporting of any indicators of the presence of modern slavery.
- Continuous assessment of the effectiveness of mechanisms and actions.
- Encourage greater participation from the supply chain members that declare their compliance with the Modern Slavery Act.
- Review policies to mirror the dynamic operational environment.
- Continuous engagement with supply chain members to work towards eliminating modern slavery incidents.
- Improve and update mechanisms to aid identification and reporting of any indicators of presence of modern slavery.
- Continuous assessment of the effectiveness of our actions.

### 8. Approval

This statement has been approved by Mr. Rajeev Saraff as the sole director and the principal governing body of DDT Holdings Pty Ltd. on the 30<sup>th</sup> Day of December 2025.

---

Rajeev Saraff

Director DDT Holdings Pty Ltd

