



Clareville Pty Limited (ABN 42 003 038 668)

Modern Slavery Statement

1 July 2022 – 30 June 2023

Legislation: *Modern Slavery Act 2018 (Cth)* (Modern Slavery Act)

Reporting Year: 3

Reporting Period: 1 July 2022 – 30 June 2023 (Financial Year 2023)

27th November 2023

Foreword from the Chairman

Clareville Pty Limited (**Harrison**) is built on the values of **Integrity, Quality, Innovation, Safety and Success**. These values underpin all our business relationships and operations and help ground us on our journey as a leading supplier of high value finished products, ingredients, additives, and technical solutions. Moreover, these values ensure that we act ethically and mitigate modern slavery and human trafficking risks in our operations and supply chains.

Harrison acknowledges that modern slavery and human trafficking is a global and complex challenge faced by both governments and businesses. This is our third modern slavery statement under the *Modern Slavery Act 2018 (Cth)* (**Modern Slavery Act**), however for several years we have been making efforts to raise and address modern slavery risks arising in relation to our operations and business. Under the Modern Slavery Act, entities who meet the reporting threshold and do business in Australia must prepare and publish a modern slavery statement for each financial year. Harrison is committed to complying and supporting the aims of the Modern Slavery Act in identifying, mitigating and monitoring modern slavery risks. Harrison strives to ensure that both modern slavery and human trafficking do not occur in our business operations or supply chain.

We acknowledge that entities such as Harrison play a major role in combatting modern slavery in global supply chains. In this modern slavery statement (**Statement**), we discuss the ongoing efforts to ensure compliance with modern slavery regulations.

This is Harrison's third reporting period and we have made a number of significant gains in developing and implementing our indicative anti-modern slavery compliance roadmap for the Harrison Group (**Anti-Modern Slavery Compliance Roadmap**).

Our response to modern slavery has matured and we have taken this opportunity to update our group-wide Anti-Modern Slavery Compliance Roadmap that governs our actions and strategy for responding to modern slavery risks in the coming years.

During this third reporting period, we have progressed and achieved a number of items identified as goals in our Anti-Modern Slavery Compliance Roadmap to assess and address modern slavery risks in our operations and supply chains. These actions include:

- developing an Existing Supplier Checklist which is intended to assist us to better identify modern slavery risks within our existing supply chains;
- developing a detailed Supplier Survey aimed at medium to higher risk suppliers we have identified, including preparing guidance on how the Supplier Surveys will be administered and guidance for interpreting results of Supplier Surveys;
- workshops held with senior stakeholders from our operational entities A S Harrison & Co AU and Harrison Manufacturing to design the process for the implementation of the Supplier Surveys;
- following the workshops, developing a framework for the implementation and evaluation of our Supplier Surveys that is specific to each of A S Harrison & Co AU and Harrison Manufacturing; and
- furthered our existing and ongoing measures including updating our Supplier Code of Conduct, our training and education efforts with staff and issuing Onboarding Questionnaires for new suppliers.

We are also pleased to report that during this third reporting period we have continued to travel and conduct on-site audits of specific suppliers. In particular, Harrison Manufacturing Co has visited 7 suppliers and has continued to use modern slavery questions developed in previous reporting periods as part of the trip report process. A.S. Harrison has plans to commence supplier visits in the next reporting period. Connecting with our suppliers and their workers in person has underscored the

importance of our Anti-modern slavery compliance program and has allowed to engage in an even more meaningful way with our suppliers on this important issue.

This Statement outlines in detail the steps we have taken this third reporting period and our future plans as we move towards embedding and implementing systems and processes designed to provide us with greater visibility over modern slavery risks in our operations and supply chains. We remain deeply committed to continuous improvement as we work towards combatting modern slavery risks in accordance with our Anti-Modern Slavery Compliance Roadmap as it evolves and develops over time.

Harrison is committed to the actions it has set out to achieve in its updated Anti-Modern Slavery Compliance Roadmap and continuing to develop its approach to combat this complex and very important issue over the coming years.


We also acknowledge the Modern Slavery Act is under review and that the Attorney General's Department has taken over as regulator of the Act. We intend to monitor and follow regulatory developments with interest.

Principal Governing Body Approval

This Modern Slavery Statement was approved by the Board of Clareville Pty Limited (ABN 42 003 038 668) in their capacity as principal governing body of Clareville Pty Limited (in accordance with section 13 of the *Modern Slavery Act 2018* (Cth)) on 27th November 2023.

Signature of Responsible Member

This Modern Slavery Statement is signed by Geoffrey Charles Harrison in their role as the Chairman of Clareville Pty Limited (ABN 42 003 038 668) (in accordance with section 13 of the *Modern Slavery Act 2018* (Cth)) on 27th November 2023


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Geoffrey Charles Harrison
Chairman, Clareville Pty Limited
27th November 2023

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1. Criterion 1: Identify the reporting entity

- 1.1 This modern slavery statement (**Statement**) is made by Clareville Pty Limited, ABN 42 003 038 668, 75 Old Pittwater Road, Brookvale NSW 2100 (referred to as **we, us, our, Harrison** in this Statement).
- 1.2 Harrison is a reporting entity under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and this Statement is submitted and published for the financial year ending 30 June 2023.
- 1.3 This Statement is made on behalf of Harrison and its associated entities (referred to as **Harrison Group** in this Statement), and includes:
- Harrison Manufacturing Co Pty Limited ACN 000 080 946;
 - A S Harrison & Co Pty Limited ACN 000 030 437;
 - Harrison Investments Pty Limited ACN 000 085 674;
 - Harrison SPARC Pty Limited ACN 651 594 482; and
 - A S Harrison & Co Pty Limited (NZ) NZCN 530 8601.
- 1.4 Harrison makes this Statement in accordance with section 13 of the Modern Slavery Act as a single reporting entity.
- 1.5 Our Statement covers all of the 7 mandatory criteria for reporting as set out in section 16 of the Modern Slavery Act. In preparing this Statement, we have used the Commonwealth Guidance for Reporting Entities and additional Modern Slavery Act Supplementary Guidance to help inform and guide our approach.

2. Criterion 2: Describe the reporting entity's structure, operations and supply chains

2.1 Our Structure

- Harrison is an Australian unlisted company that is limited by shares incorporated in New South Wales, Australia.
- Harrison wholly owns and controls the following entities:

Entity	Description of entity
Harrison Manufacturing Co Pty Limited (ACN 000 080 946) (Harrison Manufacturing)	Harrison Manufacturing specialises in the development, manufacture and supply of high-performance grease, lubricants and advanced products and services (which include technical support).
A S Harrison & Co Pty Limited (ACN 000 030 437) (A S Harrison & Co AU)	A S Harrison & Co AU specialise in distributing manufactured chemical additives and providing associated services for certain industries (such as petroleum, oil and gas).

A S Harrison & Co Pty Limited (NZ) (NZCN 5308601) (A S Harrison & Co NZ)	A S Harrison & Co NZ distributes manufactured chemical additives and provides associated services for certain industries (such as petroleum, oil and gas).
Harrison Investments Pty Limited (ACN 000 085 674) (Harrison Investments)	Harrison Investments manages the strategic planning for the Harrison Group's facilities requirements (such as managing properties at which the various Harrison Group entities operate).
Harrison SPARC Pty Limited (ACN 651 594 482) (Harrison SPARC)	Harrison SPARC is used for research and development purposes, to develop IP for use by Harrison Manufacturing, or to sell to others.

2.2 Our Values

- Harrison's values of Integrity, Quality, Innovation, Safety and Success guide the Harrison Group to act ethically in all our business relationships, operations and supply chains. Our ethical practice is reflected by all our officers, directors, employees, and contractors to ensure we are providing the best services to our partners and customers.

2.3 Our Operations

- As per the Commonwealth Guidance, 'operations' refers to activities undertaken by the entity to pursue its business objectives and strategy in Australia or overseas. This includes the manufacturing, distribution and procurement of products and services. Whilst the Harrison Group is based in Australia and New Zealand, we also supply and service customers in the South Pacific, South East Asia, United Arab Emirates, United Kingdom, Papua New Guinea, Italy, China, India, North America and South America.
- Our key operations involve:
 - (a) importing chemical products from manufacturers of chemicals and representing those manufacturers to promote, sell and service their products. We import chemical additives for a range of industries such as the petroleum, lubricant, oil and gas, food, personal care and nutraceutical markets;
 - (b) offering a variety of services (including technical services) that assist in the transportation, storage, dosing, repackaging and use of chemical additives – for instance within the oil and gas sector we provide flow assurance additives, and associated engineering equipment;
 - (c) manufacturing and supplying grease and lubricant products to various industries such as the mining, construction, agricultural and marine industries; and
 - (d) providing additional services in relation to our manufactured goods that assist in the use of our products (such as testing services, grease bin management and training).

- As of the end of our third reporting period, Harrison has a total of 127 employees based in its offices, factories, warehouses, and working remotely in Australia and New Zealand.
- The Harrison Group entities employ their staff directly and via accredited employment agencies. A S Harrison & Co AU in particular have been awarded the HRD Employer Choice Award for the best companies to work for in Australia in 2020, 2021, 2022 and 2023 which considers companies initiatives and achievements in relation to leadership, learning and development, wellbeing, flexibility, diversity and inclusion, work-life balance and recruitment. Harrison Group entities may also employ student interns and casual staff. All interns and casual staff are paid in accordance with statutory requirements and managed by accredited employment agencies.
- Our headquarters are in Brookvale, NSW. We operate out of offices in Sydney and Auckland and utilise contract warehousing for distribution of products located in Sydney, Brisbane, Melbourne, Perth, Adelaide, Auckland, Christchurch, New Plymouth (NZ) and Singapore.
- Our manufacturing factory is located in Sydney on our Brookvale site at 75 Old Pittwater Road, Brookvale, NSW, 2100.

2.4 Our Supply Chains

- As part of the Harrison Group's operations, we procure raw materials for manufacturing purposes as well as chemical additives and equipment for distribution and use mainly in the Australian and New Zealand markets, as well as other developing export markets, to support our partners and customer base. We procure the following goods as part of our operations:

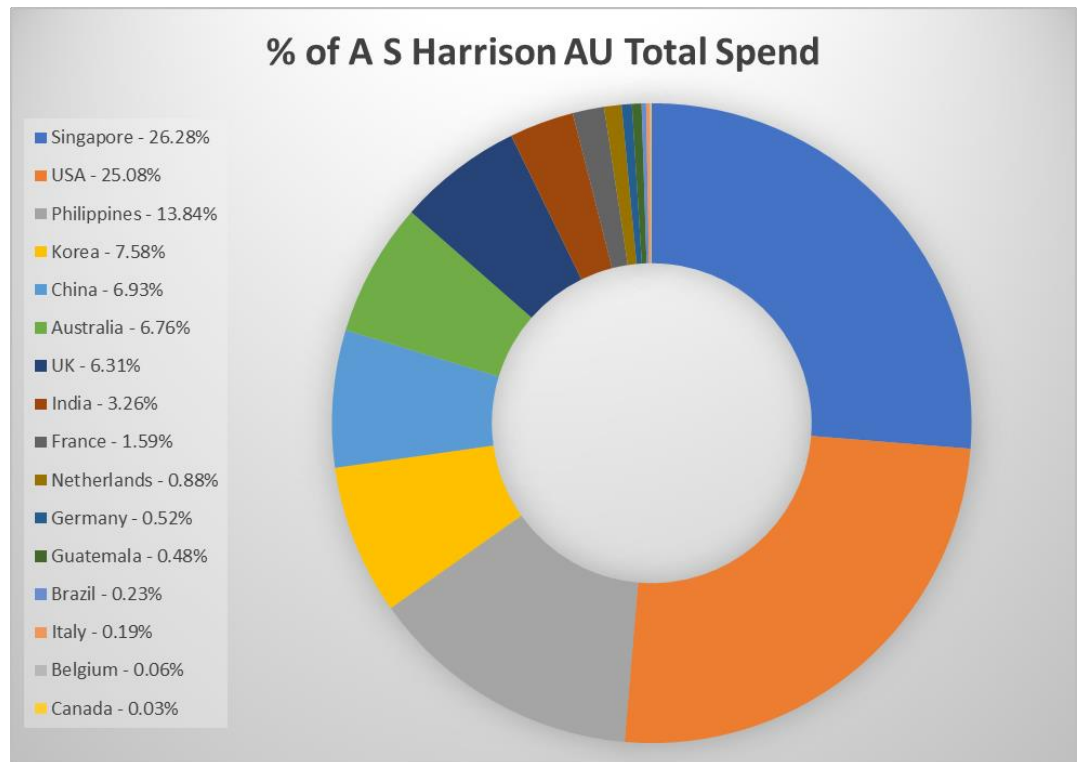
Goods	Country of Manufacture
Personal care additives	Canada, France, India, United Kingdom, United States of America, Taiwan, South Korea, China, Italy, Spain, Ghana
Food additives (such as meat powders, seafood powders and cheese and dairy powders)	China, Netherlands, Belgium, India
Botanical extracts and nutrition and health oils	France, China, Chile
Fuel additives	United States of America, United Kingdom, China, Germany, Philippines
Lubricant additives	United States of America, France, South Korea, Singapore, China, Brazil
Grease additives	United States of America, France, South Korea, Singapore, China, Brazil, India
Construction chemicals	Spain, Italy, France, United States of America

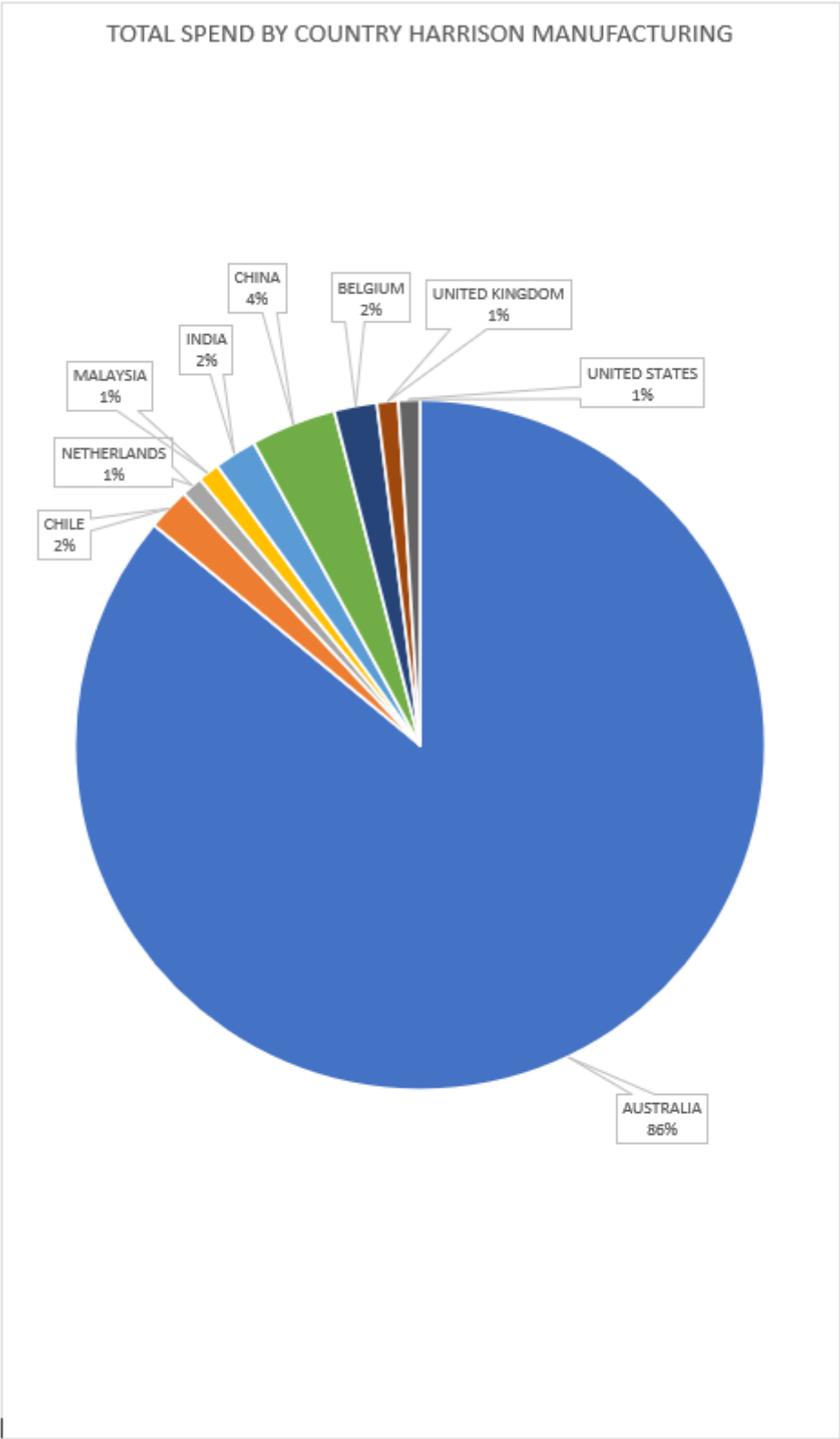
Goods	Country of Manufacture
Corrosion inhibitors	United States of America
Water treatment chemicals	United States of America
Suspending and dispersing agents for agriculture	United States of America
Surface coatings, paints and related products	United States of America
Chemical additives for the engineering sector	United States of America
Aviation and Military grade lubricating oils, greases and allied products	United States of America, United Kingdom
PTFE lubricants	United States of America
Lithium hydroxide	United States of America, Chile, China
Castor oil derivatives	India
Petroleum base oil	Manufactured by oil refineries in Asia Pacific, Europe and United States of America. Sourced through local and overseas traders.
Molybdenum disulphide	China and India

□ The majority of goods that we procure come from suppliers based in the countries shown below:



The break down of countries in which our raw material suppliers are based is shown below for A.S Harrison & Co AU and Harrison Manufacturing:





- The Harrison Group expects suppliers to comply with all labour laws in the various countries where they operate. This expectation is codified in our group wide Supplier Code of Conduct (see Section 4.1 – Actions taken to assess and address risks of Modern Slavery).

- The Harrison Group utilises intermediaries in our supply chain including shipping lines, airlines, road transport companies and financial institutions.
- The Harrison Group utilises contractors to provide professional cleaning services for our offices & the factory site at Brookvale.

3. **Criterion 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls**

- In our third reporting period, we did not identify any specific incidents of modern slavery in our operations or supply chains.
- However, in this Section 3, we identify the risks of modern slavery practices, meaning the potential for the Harrison Group to cause or contribute to modern slavery through our operations, or to be directly linked to modern slavery through our supply chains, as these concepts are defined in the UN Guiding Principles on Business and Human Rights.
- Harrison recognises that modern slavery risks are constantly evolving. This is because particular operations and particular supply-chains carry higher modern slavery risks than others. Not only do specific industries and products carry more risks but the geographical location of some suppliers as well as their supply chains and operations can impact the modern slavery risks involved. Furthermore, we lack visibility with the secondary levels of our chain of suppliers and source of materials used in producing our goods, however, we have taken a number of steps to improve our visibility within this secondary level of our supply chain.
- In this section we identify the 'risks of modern slavery practices', meaning the potential for the Harrison Group to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.
- In this context, 'risk' means to people, rather than the risks to the Harrison Group (such as reputational or financial damage).

Our operations – employment of direct / permanent workers

- We did not identify any significant risks in connection with the employment of direct/permanent workers nor any potential for the Harrison Group to cause or contribute to modern slavery risks through our employment practices. All of our employees are employed in either Australia or New Zealand which have both been identified in the Global Slavery Index 2023 as having among the least vulnerability towards modern slavery in the Asia Pacific region and globally. We regularly assess and ensure that our employment agreements and practices are compliant with all laws in the applicable jurisdictions. Section 4 sets out further information on the steps we take to assess and address operational risks in respect of our staff and employees.

Supply chain

- In our first reporting period we completed a high-level thematic review of our modern slavery risks in our supply chains using known modern slavery indicators. We identified the following key risks involved within operations and supply chain:
 - (a) **Sector and industry risks:** The Commonwealth Guidance for Reporting Entities identifies high risk industries globally. The Harrison Group engages with suppliers in the extractives, agriculture and cleaning sectors, all of which have been classified as high-risk industries. The extractives sector

includes mining and construction and is deemed high risk because suppliers may engage in unethical practices such as extracting conflict minerals. Both the agriculture and mining sector are deemed high risk as child labour is prevalent in these industries. The cleaning sector is also high risk because it tends to rely on the use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible because the work is undertaken at night time or in remote locations.

- (b) **Product and services risks:** Although we do not procure any raw materials from mines or other sources ourselves, further down our supply chain (i.e. sub-suppliers) may procure raw materials which may involve use of mines, smelters and refineries which could have higher modern slavery risks. Additionally, services such as cleaning are recognised as high risk. The majority of our products are made from petrochemicals and oleochemicals. Whilst we do not directly procure palm oil, this may be used to make the chemicals which we source for the production of our products. We recognise that these inputs may carry a higher modern slavery risk.
- (c) **Geographic risks:** Suppliers from certain countries have higher risks of modern slavery. We acknowledge that the Global Slavery Index 2018 to which we referred to in our previous statements was updated in the final month of our reporting period to the Global Slavery Index 2023 of the Walk Free Foundation (**Index**). The Index ranks countries based on the government response to modern slavery. The Index identifies 10 countries that have the highest prevalence of modern slavery and 10 countries that are taking the least action against modern slavery risks. A number of our suppliers are also based in countries with high risks of modern slavery such as China and India. We also have significant suppliers located in China in Jiangsu and Shaanxi provinces. Nevertheless, a majority of the countries that our suppliers operate in are considered to be taking the most action against modern slavery (e.g. United States, Netherlands, Spain and United Kingdom).

In previous reporting periods, A.S. Harrison & Co acquired a small amount of inputs from a supplier based in Russia.

The Harrison Group has ceased sourcing inputs from suppliers based in Russia since sanctions against Russia were announced by the Australian Government.

- (d) **Entity risks:** Our physical audits and inspections of our suppliers' factories and workspaces means we generally have good oversight in respect of the entities we work with. To date we have not identified any instances of a specific modern slavery incident or a poor track record of human rights violations. However, we acknowledge that there are some entities where we have less oversight. For example, the Harrison Group does not have complete oversight over where certain products are packaged (in the case that those products are manufactured or produced at a different location).

We acknowledge we have sub-suppliers in industries such as transportation (i.e. shipping) which are known to have higher risks of modern slavery and therefore there may be modern slavery risks that we have not identified yet.

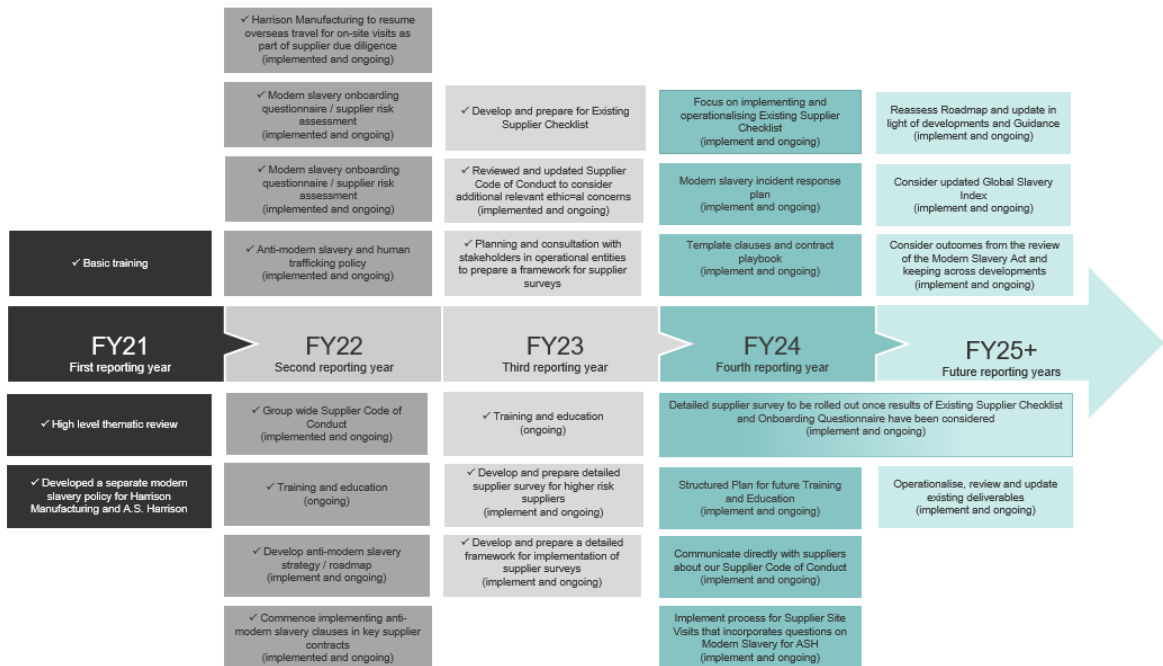
- In our third reporting period, Harrison has undertaken a number of additional actions to better assess and identify modern slavery risks in our operations and supply chains, more details regarding these actions are set out in Section 4.

- Harrison plans to take a prioritised risk-based approach to dealing with risks in our operations and supply chains, and in accordance with our Anti-Modern Slavery Compliance Roadmap Modern we intend to:
 - (a) identify our strategic priorities based on risk and informed by our risk mapping work to date; and
 - (b) focus on a more detailed modern slavery risk assessment, including issuing modern slavery surveys to higher risk suppliers identified as higher risk in our Supplier Onboarding Checklist and Existing Supplier Checklist.

4. Criterion 4: Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

In our third reporting period we have continued to progress actions identified in our group-wide Anti-Modern Slavery Compliance Roadmap and have also updated the Anti-Modern Slavery Compliance Roadmap to reflect our progress to date and extend beyond our fourth reporting year.

Our Anti-Modern Slavery Compliance Roadmap governs our actions and strategy for responding to modern slavery risks in the coming years and is depicted in the diagram below, including our indicative timeline for implementation:



Indicative Anti-Modern Slavery Roadmap for continuous improvement

In summary:

- Some of these measures — such as supplier onboarding questionnaires and our existing supplier questionnaires — are focused on assessing risks associated with specific suppliers;
- Other measures — such as our Anti-Modern Slavery Policy and the proposed modern slavery incident response plan — are focused on addressing risks once they have arisen; and

- Some measures — such as the detailed supplier survey developed during this reporting period — serve the dual purpose of allowing us to both assess and address identified risks.

While we are aiming to take a group-wide approach to modern slavery compliance with all entities in the Harrison Group required to comply with our policies and procedures in this space, certain actions and steps may be modified or customised to ensure they are “fit for purpose” based on specific business requirements and modern slavery risk profiles.

In particular, certain modifications or customisations have been made for A S Harrison & Co AU and Harrison Manufacturing. For example, we held workshops with senior stakeholders to customise the proposed approach for the implementation of the Supplier Surveys.

4.1 Actions taken in the reporting period to assess and address modern slavery risks

- The Table below sets out the new actions we have implemented in accordance with our Anti-Modern Slavery Compliance Roadmap during this third reporting period:

Actions	Description
<p>Supplier Code of Conduct</p>	<p>In our third reporting period, we reviewed and updated our Supplier Code of Conduct to address other ethical concerns around animal testing and labour.</p> <p>The Supplier Code of Conduct is an external facing policy that articulates the Harrison Group's expectations for suppliers and contracted sub-tier suppliers with respect to modern slavery and human trafficking, as well as several other labour, health and safety, and environmental standards. The Supplier Code of Conduct is published on our website and clearly sets expectations around:</p> <ul style="list-style-type: none"> - the standards that the Harrison Group expects from suppliers and sub-tier suppliers; - our preference to support suppliers to improve their standards over a reasonable period, rather than to terminate supplier relationships; - reporting channels within the Harrison Group; and - standards on specific issues such as child labour, working hours and wages, health and safety, environment and harassment and abuse among others.
<p>Developing Existing Supplier Questionnaire</p>	<p>We have developed a short form Existing Supplier Questionnaire to identify risks of modern slavery in the operations and supply chains for all existing suppliers.</p>

Actions	Description
	<p>The Existing Supplier Questionnaire has designed to enable the Harrison Group to:</p> <ul style="list-style-type: none"> - quickly gain an understanding of the existing supplier's management of modern slavery issues across our operational entities; - identify material gaps and risks; - assess the risk level of a supplier; and - communicate the Harrison Group's expectations, which are codified in our Supplier Code of Conduct. <p>Together with the Onboarding Questionnaire, the Existing Supplier Questionnaire will form an important part of our assessment of which suppliers require further investigation and will be sent our Supplier Surveys,</p> <p>We are aiming to finalise and roll out the Existing Supplier Questionnaire in our next reporting period.</p>
<p>Developing detailed Supplier Survey</p>	<p>In our third reporting period we have developed a Supplier Survey, Practical Guidance to administering the Supplier Survey and Practical Guidance for interpreting results of the Supplier Survey</p> <p><i>Guidance for administering the Supplier Survey</i></p> <p>In this reporting period we developed specific guidance for administering our Supplier Survey Guide. The purpose of the guide is to assist our operational entities to roll out Supplier Surveys in a manner that is relevant to their operations.</p> <p>This practical guidance is designed to operate as a 'living document' that is updated with lessons learned as supplier surveys are administered.</p> <p><i>Supplier Survey</i></p> <p>We have also developed our Supplier Survey to be issued to suppliers identified as higher risk in either our Onboarding Questionnaire or our Existing Supplier Questionnaire.</p>

Actions	Description
	<p>The types of questions the survey asks includes:</p> <ul style="list-style-type: none"> - if the supplier is required to report under any Modern Slavery Laws in any jurisdiction; - has the supplier conducted any internal investigations or reviews in relation to modern slavery issues within the supplier's organisation; - which countries does the supplier procure its goods from; - if the supplier has any relevant anti-modern slavery policies in place, for example a policy prohibiting the use of child labour; and - if the supplier's employees and workers are remunerated in accordance with applicable laws. <p><i>Practical Guide to Interpreting Results of Modern Slavery Survey for Suppliers</i></p> <p>This Practical Guide was developed to be used by the reviewer of the Modern Slavery Survey results to identify critical issues and determine what, if any, additional steps may need to be taken to assess and address risks of modern slavery in Harrison's Group's supply chain.</p> <p>Some of the matters included in the Practical Guide include:</p> <ul style="list-style-type: none"> - what red flags may look like when reviewing a survey response; and - what to do when red flags have been identified <p>We are aiming to finalise and implement our Supplier Surveys in a prioritised risk-based manners to suppliers identified as higher risk on the Onboarding Questionnaire and Existing Supplier Questionnaire. We expect to roll out our Supplier Surveys in coming reporting period once our Existing Supplier Questionnaire has been rolled out.</p>
<p>Workshop with key stakeholders and Process Flow Development for Supplier Surveys</p>	<p>During our third reporting period we developed supplier Survey Process Flows for A S Harrison & Co AU and Harrison Manufacturing to streamline the implementation of our Supplier Surveys.</p> <p>We engaged with experts and held workshops with senior stakeholders to consider how Supplier</p>

Actions	Description
	<p>Surveys would be implemented by our operational entities A S Harrison & Co AU and Harrison Manufacturing.</p> <p>These entities have different structures and operations (as outline in section 2.1), so it was important to map out what steps need to be taken within each entity when Supplier Surveys are implemented.</p> <p>This includes:</p> <ul style="list-style-type: none"> - the risk assessment that occurs to determine which suppliers will receive a detailed Supplier Survey; - internal stakeholders within each of A S Harrison & Co AU and Harrison Manufacturing that are responsible for sending out Supplier Surveys; - internal stakeholders within each of A S Harrison & Co AU and Harrison Manufacturing that are involved in reviewing Supplier Survey responses; - when clarification should be sought from suppliers on their responses and who internally should contact suppliers for clarification; - when external advice should be sought or further engagement with suppliers commenced; and - processes for updating Supplier Surveys based on learnings.
<p>Staff Training</p>	<p><i>Induction training</i></p> <p>Our induction materials provide our new staff with basic modern slavery training and education on the policies and procedures in place across the Harrison Group.</p> <p>In our second reporting period we created a recording of the specialised and customised training conducted by modern slavery experts. New starters throughout our third reporting period were required to undertake this training and sign off that they have read the Anti-Modern Slavery Policy as part of their induction process.</p> <p>This induction training allows us to ensure that all of our staff have received modern slavery training and have a strong awareness of modern slavery and</p>

Actions	Description
	<p>human trafficking risks and how they impact the Harrison Group.</p> <p>Other</p> <p>We have 3 procurement members in Harrison Manufacturing that have now completed a course on identifying modern slavery in the supply chain at the University of Technology Sydney. A.S Harrison & Co is planning to roll out further education in this area in future.</p>
<p>Executive and stakeholder awareness and training</p>	<p>In addition to the staff training, we conducted specific executive and stakeholder training. In accordance with the Commonwealth Guidance for Reporting Entities, we recognise that our leadership team play an important role in building support for our Anti-Modern Slavery compliance roadmap. The Commonwealth Government states: <i>“It is essential that senior management lead their entity’s response to modern slavery, drive meaningful change throughout their entity, and are accountable for the actions their entity takes. Senior management are also best placed to foster long-term cultural change within their entity.”</i></p> <p>Accordingly, part of the purpose of this training session was to ensure our executive leadership team were actively involved in the workshops held during the reporting period described above and all are aware of the important role they will play in executing our Anti-Modern Slavery Compliance Roadmap.</p>

- During our third reporting period we also continued to implement the following existing and ongoing measures:

Actions	Description
<p>Internal Assessment</p>	<p>A S Harrison & Co AUs has again been assessed by EcoVadis (which is a global provider of business sustainability ratings) and has been successful in attaining SILVER status.</p> <p>As part of this application, we conducted a sustainable procurement audit which included auditing our labour practices and human rights approach. Over the reporting period, the feedback from EcoVadis was used to direct future plans for dealing with modern slavery in our supply chain.</p> <p>During our next reporting year, A S Harrison & Co AU are seeking to attain GOLD status, or at a minimum maintain SILVER.</p>

Actions	Description
<p>Remuneration and recruiting</p>	<p>Harrison uses labour monitoring and payroll systems to check eligibility of employees in Australia before they are hired. We also ensure right to work at time of hiring – whether it be via particulars viewing and copying of valid documents – e.g. passports and/or visas. We observe the provisions of the The Workplace Relations Act 1996 (Cth) and Fair Work Act 2009 (Cth); regarding minimum wage requirements for which we fully comply (and are usually well above).</p> <p>Harrison Manufacturing have a number of employees covered by an Enterprise Agreement which has been agreed with a registered trade union and endorsed by the Fair Work Commission as being above the minimum requirement.</p> <p>Harrison, as holding company, lays down overarching policies for the group specifying fair pay standards for its employees.</p>
<p>Supplier vetting, monitoring and auditing</p>	<p>Over the reporting period, the Harrison Group used its desktop supplier audit form (which includes a modern slavery assessment), and undertook physical audits of our suppliers, to identify any modern slavery risks.</p> <p>Harrison Manufacturing uses a supplier assessment form for these supplier visits that integrates a number of questions to identify modern slavery risk factors while on the ground during site audits. This supplier assessment form is part of a formal Trip Report and ensures that we document any issues observed and actions to be taken.</p> <p>This has improved our visibility and in future reporting periods we are looking to apply a similar process for A S Harrison & Co AU, where possible.</p> <p>On site audits have reached at least 7Suppliers and have not identified any incidents of modern slavery.</p>
<p>Supplier Due Diligence</p>	<p>During our third reporting period, we continued to use ongoing management process to identify, prevent, mitigate and account for how we address actual and potential modern slavery risks in our operations and supply chains for all operational Harrison Group entities.</p> <p>A S Harrison & Co AU and Harrison Manufacturing provide any new suppliers with its 'New Supplier Risk Assessment'.</p> <p>From the information provided by the supplier on this Assessment, A S Harrison & Co AU assesses (before the supplier is onboarded):</p> <ul style="list-style-type: none"> - how their ethical sourcing policy is implemented; - whether they have in place documented training and re-training programs; - whether there are any evident child labour/ modern slavery practices used by the supplier; and

Actions	Description
	<ul style="list-style-type: none"> - whether the supplier has had any actual or suspected incidences of modern slavery and (if so) how these incidents were treated.
<p>Anti-Modern Slavery Policy</p>	<p>Our groupwide Anti-Modern Slavery Policy continued to apply for this reporting period.</p> <p>Our Anti-Modern Slavery Policy operates as a single, standalone policy that sets expectations of staff regarding modern slavery risks and reporting on modern slavery incidents. Our Anti-Modern Slavery Policy sets out clear internal reporting procedures as recommended by the Commonwealth Guidance for Reporting Entities.</p> <p>The Anti-Modern Slavery Policy:</p> <ul style="list-style-type: none"> - explains the concepts of modern slavery and human trafficking in plain English; - imposes a “zero tolerance” approach for modern slavery and human trafficking within the Harrison Group’s operations and supply chain; - requires Harrison Group directors, officers and employees to report actual or suspected modern slavery and human trafficking to specific escalation points; and - identifies several potential indicators of modern slavery and human trafficking to which Harrison Group directors, officers and employees should be alert, including restricted freedoms, poor working conditions or accommodation, improper financial arrangements, suspicious behaviours and appearances, and geographic, product and service and entity risk factors.
<p>Staff Training</p>	<p>General staff training</p> <p>In our third reporting period we continued to roll out recordings of modern slavery awareness training across the Harrison Group as part of our annual training program.</p> <p>This recorded training includes:</p> <ul style="list-style-type: none"> - general awareness of modern slavery risks and indicators; - hypothetical scenarios to illustrate key issues; - awareness of our Anti-Modern Slavery Compliance Roadmap, including the new Harrison Group’s Anti-

Actions	Description
	<p>Modern Slavery Policy and Supplier Code of Conduct.</p> <p>We continue to ensure that our staff are aware of modern slavery and human trafficking risks.</p>
<p>Supplier onboarding questionnaire</p>	<p>We have implemented a Supplier Onboarding Questionnaire for Harrison Manufacturing and A S Harrison & Co AU to identify and assess modern slavery risks as part of the onboarding process for new suppliers.</p> <p>Among other things, the questionnaire focuses on identifying:</p> <ul style="list-style-type: none"> - any enforcement actions or similar regulatory interventions relating to modern slavery that could indicate a material exposure to modern slavery risk and/or a deficient compliance framework; - any anti-modern slavery policies, procedures or training adopted by the supplier to ensure that their familiarity with these issues aligns with our expectations; and - if the supplier is likely to be higher risk. <p>The Supplier onboarding questionnaire was informed by the Commonwealth Government's procurement toolkit.</p>
<p>Clauses in Supplier Contracts</p>	<p>In our third reporting period, we have continued to implement specific modern slavery clause in a number of supplier agreements in a prioritised risk-based way.</p> <p>The modern slavery clause requires parties to take a number of steps to assess and address risks and take action if it finds an instance of modern slavery in its operations and supply chains.</p> <p>We have taken a risk-based approach preparing the contractual clause our supplier agreements and have prioritised contractual clauses in our supply agreement for the purchase of raw materials by Harrison Manufacturing.</p> <p>The modern slavery clauses were drafted with reference to the medium form clause in the Commonwealth Government procurement toolkit.</p> <p>In accordance with our Anti-Modern Slavery Roadmap, we will develop a 'contracting playbook' with a number of modern slavery clauses adapted for different risk scenarios for integration in a wider range of supplier agreements.</p>

5. Criterion 5: Describe how the reporting entity assesses the effectiveness of these actions

We achieved or progressed a number of action items as set out in our indicative Anti-Modern Slavery Roadmap.

In addition, the Harrison Group uses specific key performance indicators (**KPIs**) to measure how effective we have been in identifying and mitigating modern slavery risks in our business or supply chain. Based on the results of this assessment and our evolving strategy of responding to modern slavery risks, we will adapt and strengthen our actions to continually improve our response to modern slavery.

During the reporting period we progressed or achieved the following KPIs which were set out in our previous statement. We have also indicated the indicative KPIs we are working towards in future reporting periods in our efforts to commit to continuous improvement:

Description of KPI from FY22	Our progress during the reporting period during FY23	Indicative KPIs for FY24 and FY25
Number of staff trained on modern slavery issues.	130 number of staff received training on modern slavery issues, either through induction training, annual training or attendance at workshops.	Maintain
Number of supplier audits	At least 7 supplier audits were conducted on site with suppliers.	Maintain
Annual review questionnaire for existing suppliers to conduct a self-assessment of modern slavery issues, which allows us to identify these issues early on and track supplier's improvements with their data	During the reporting period we developed the Existing Supplier Questionnaire.	Finalise and commence rollout of Existing Supplier Questionnaire.
Collaboration with our suppliers to develop an improvement plan to address new and previously identified slavery and human tracking issues.	During the reporting period in addition to developing the Existing Supplier Questionnaire we developed the detailed Supplier Survey and process flows for intended implementation.	During FY24 our focus will be on communicating with suppliers regarding expectations and in FY25 implementation of Supplier Surveys to those suppliers who have been identified as higher risk through other steps taken.
N/A	N/A	During FY24 we intend to develop a modern slavery incident response guide to ensure we have clear processes for responding to a modern slavery incident.

- 5.1 The Harrison Group also considers qualitative measures to assess the effectiveness of measures implemented to respond to modern slavery, including staff feedback following training. The Australian Government also recognises the importance of supplier engagement. We are pleased to report positive interactions with our suppliers in respect of our Anti-Modern Slavery compliance program. Harrison Manufacturing Co staff that conduct

site visits of 7 suppliers in FY23 and have generally observed that suppliers have a positive attitude towards site visits and have welcomed site visits to their factories. Given the importance of qualitative measures to track effectiveness, we will aim to collate feedback from suppliers, where possible.

6. Criterion 6: Describe the process of consultation with any entities the reporting entity own or controls

- Harrison engaged and consulted with all Harrison Group entities to discuss the Modern Slavery Act's reporting requirements, as addressed in this Statement.
- Specifically, in November 2023 we held Board meetings in the respective operating companies in which all Harrison Group entities discussed this Statement (including the risks identified in this Statement and actions taken in the reporting period). In addition, we also discussed our strategic approach on how to reduce and mitigate modern slavery risks in the next reporting period.
- Consultation with all Harrison Group entities also occurred via the workshops held in accordance with our Anti-Modern Slavery Compliance Roadmap.
- Harrison has now updated its Anti-Modern Slavery Compliance Roadmap which gives the Harrison Group a clear framework to address modern slavery risks with a focus on continuous improvement.

6.2 The development of our Anti-Modern Slavery Compliance Roadmap involved executives from all Harrison Group entities, and they continue to play a critical role in the execution of the Anti-Modern Slavery Compliance Roadmap moving forward.

7. Criterion 7: Provide any other relevant information

7.1 Shea Butter project in Ghana

- Harrison recognises that a root cause of modern slavery is poverty and unfair pay in developing countries. We are addressing these issues in Ghana through our partnership with Deluxe Shea Butter Australia. Deluxe Shea Butter Australia supplies certified organic and fair for life shea butter directly from traditional communities in Ghana.
- In Ghana poverty is increasingly concentrated in rural regions where most low-income families rely on cocoa farming for their livelihoods. Our supplier works with women co-operative groups for the processing of our organic fair for life shea butter, respecting age-old traditions and supporting local communities and families. This partnership supports Ghanaian communities and gives them a fair go with a fair day's pay for a fair day's work.

7.2 Organic Rosehip Oil from Chile

- We source organic rosehip oil from Chile and our agreement with this supplier includes a "fair for life" clause. Under this clause the Harrison Group pays an extra 10% on all products marketed and sold as Certified Fair for Life. By paying the "fair for life" price Harrison Group allows our supplier to pay an extra 5% to its producers, which significantly improves their livelihood.

7.3 Looking ahead

- We have made significant progress in our third reporting period, including to taking actions in accordance with our Anti-Modern Slavery Compliance Roadmap and updating our Anti-Modern Slavery Compliance Roadmap for the coming years.
- In accordance with our Anti-Modern Slavery Compliance Roadmap over the coming reporting period, we are focused on the following measures in our commitment to continuous improvement:
 - developing and implementing template modern slavery contractual clauses and a supporting contractual Playbook to ensure we are applying appropriate contractual clauses on our suppliers in a prioritised way;
 - undertaking a more detailed risk mapping exercise of our operations and supply chains via the roll-out of the Existing Supplier Surveys;
 - roll-out a detailed modern slavery supplier survey to higher risk suppliers to better assess and address modern slavery risks once the necessary risk assessment has been conducted; and
 - develop and implement a modern slavery incident response plan to ensure we are able to respond to specific incidents.

In the coming reporting periods the Harrison Group will also focus on embedding, operationalising and implementing the new measures we have been developing during this reporting period.

We acknowledge that the Report on the review of the Modern Slavery Act has been released and that this space will continue to evolve and develop. We intend to consider the Report and monitor and review any changes to Modern Slavery Act.

We look forward to reporting on our progress in our next statement.

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of Clareville Pty Limited (ABN 42 003 038 668) as defined by the Modern Slavery Act 2018 (Cth) on 27th November 2023.

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of Clareville Pty Limited (ABN 42 003 038 668) as defined by the Act:



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Geoffrey Charles Harrison
Chairman, Clareville Pty Limited

Mandatory Criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory Criteria	Page number/s
a) Identify the reporting entity.	5
b) Describe the reporting entity's structure, operations and supply chains.	5 – 11
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	11 – 13
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	13 – 21
e) Describe how the reporting entity assesses the effectiveness of these actions	21 – 23
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	23
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	23 – 24