



Modern Slavery Statement

09/08/2023 |

Pax Australia Pty Ltd (Pax) is subject to the Modern Slavery Act 2018 (Cth) (Act) that commenced operation on 1 January 2019.

The following statement sets out the actions taken by Pax to address Modern Slavery risks in our business and supply chain for the financial year ending 30th June 2023.

Introduction

Pax recognises that Modern Slavery can occur in many forms, including slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour services.

We operate our business lawfully and ethically in both our operations and supply chain and collaborate with suppliers that are aligned to our values.

We are fully committed to the highest ethical standards across our business and will not tolerate or support any form of Modern Slavery within our operations or supply chain.

We are committed to continuous improvement in our processes to effectively identify and prevent the risk of Modern Slavery in our business and supply chain.

Reporting Entity

The entity covered by this statement is Pax Australia Pty Ltd (ABN 42 000 447 414)

Organisational Structure, Operation and Supply Chain

Pax is a privately owned contract Manufacturer with operations based in Sydney.

Pax specialises in the mixing and filling of Aerosol and Liquid products for use in personal care, therapeutic, industrial and household categories for the domestic and export market on behalf of global companies such as Unilever, Procter and Gamble, Beiersdorf, Henkel, etc.

We provide service to customers around the globe through our One Asia and ACOA network agreements. Where we work together to bring our considerable expertise and knowledge together to serve our worldwide customer base.

We have a large and diverse supply chain. Raw materials, components and packaging are sourced from Australian and International suppliers, most under long term contractual agreements, as directed and approved by our global customers.

All suppliers to Pax must comply with the Pax Supplier Code of Conduct which includes the Pax Social and Environmental Responsibility (SER) requirements.

Pax values and observes all laws regarding corporate social responsibility, environmental and workplace safety protection along with staff inclusion and diversity, this forms a definitive part of any supply contract with Pax.

Potential risks of Modern Slavery in the Operation and Supply Chain

All Pax employees are based in Australia.

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We consider the risk of modern slavery to be low within Pax as we have compliance frameworks tailored to applicable local industrial relations laws.

We comply with Australian Workplace laws, including the Fair Work Act 2009 (Cth), National Employment Standards (NES) and Work, Health and Safety legislation.

We compensate our workers with wages and benefits that meet or exceed the legally required minimum.

All Employees have free choice of employment. The use of forced, bonded or involuntary labour does not occur. Employees are free to leave their place of employment at the end of their shift.

Operations at Pax are supplemented by contract labour and services. Such arrangements are formed with established and reputable partners. We periodically review the contract labour and service providers performance in relation to safety, health, labour conditions and employee relations, anti-corruption and compliance to the law.

Pax regularly engages with the Australian Workers Union (AWU) who act in their capacity to represent the interest of their members.

We recognise we have lower visibility and control over working conditions for those who are engaged or contracted to supply raw materials, components and packaging. We have taken steps to assess and mitigate that risk by way of policies and procedures which set out clear expectations around the protection of labour rights.

We maintain a supplier list which outlines where our suppliers are located, we conduct due diligence on our suppliers before engaging them.

Actions taken to assess and address risks of Modern Slavery

We take ownership and responsibility for compliance with the Act.

To manage the risks of Modern Slavery in our supply chain, Pax adheres to our policies covering:

- Supply Chain Code of Conduct
- Human Rights and Labour Policy
- Business Ethics Policy and Procedure
- Whistle Blower Policy

These policies are available internally and relevant employees are trained. They are also available publicly on the Pax Australia website www.paxaus.com.

The Pax Supply Chain Code of Conduct requires the supplier to provide a signed declaration of their acceptance, in signing Pax expects all Suppliers to:

- Adopt sound human rights practices and treat workers with fairness, dignity and respect.
- Prohibit discrimination
- Provide a safe and healthy working environment for all Employees
- Meet or exceed the legally required minimum in respects to wages and conditions of employment
- Conduct business operations that both protects and sustains the environment
- Maintain management systems that measure, improve and communicate their companies labour, health and safety and environmental performance.
- Uphold the highest standard of ethics whilst operating or conducting their business.

Particular steps we undertake to assess and address risks include:

- Assessing the potential modern slavery risks in our operations and supply chains with emphasis on high-risk geographical locations and business transactions.
- Conducting regular due diligence checks on supply chains, in conjunction with support by our global customers.
- Ongoing review of company policies on Modern Slavery in operations and supply chain.

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- Reviewing supplier contracts to ensure they contain terms that are consistent with the Act, the Pax Supplier Code of Conduct, Pax Social and Environmental Responsibility (SER) requirements, Pax Human Rights and Labour Policy and Pax Business Ethics Policy and Procedure.
- Taking steps to address and remediate any potential Modern Slavery risks identified

Assessing effectiveness

Pax collaborates with internal and external stakeholders to prevent and address any issues that may have an impact on Modern Slavery.

Where we become aware of ethical issues within the supply chain we seek to engage with suppliers directly.

As a member of Ecovardis and SEDEX, Pax uses this platform to assess supplier performance as they do Pax.

We participate in annual online assessments through Ecovardis and SEDEX and subscribe to onsite external audits which encompass labour standards, health and safety, business ethics and environmental assessment.

Pax has a whistle blower policy along with a function to report ethics violation confidentially for our employees as well as our customers, consumers, suppliers and stakeholders.

We investigate any reports received that indicate the existence of Modern Slavery practices.

Pax raises awareness of the forms of Modern Slavery via policy training and sign off among our employees and suppliers whilst continuing to evolve our due diligence processes to aid in the identification of risks throughout our supply chain.

Disregard for the provisions of the Pax Supply Chain Code of Conduct by a supplier may directly impact the supplier's business relationship with Pax.

Process of Consultation

Our Modern Slavery Statement includes a comprehensive consultation process with input from all areas of our business.

We actively engage with our people, this builds internal alignment and is a fundamental component in developing robust programs and procedures.

All necessary consultation and engagement has occurred in relation to the detail within this statement.

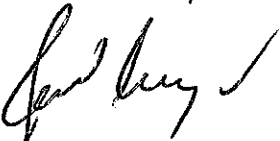
Approval for this statement

This statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth).

In accordance with section 13 of the Act this statement has been approved by the Board of Directors in their capacity as principal governing body of Pax Australia Pty Ltd.

This statement was approved by the Board of Directors on 9th of August 2023.

This statement is signed by Paul Curryer on 9th of August 2023 in his role as CEO, Director and Board Member of Pax Australia Pty Ltd.



Paul Curryer
CEO, Director and Member of the Board of Directors.
Pax Australia Pty Ltd