

DDT HOLDINGS PTY LTD

Address: Suite 5, Level 3, 173-179 Broadway, Ultimo, NSW 2007

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Modern Slavery Statement FY2022-23

1. INTRODUCTION

This Modern Slavery Statement is provided by **DDT Holdings Pty Ltd (hereinafter as DDT)** in accordance with the Modern Slavery Act 2018 (Cth). This Statement outlines DDT's process for identifying potential modern slavery risks, and our approach to mitigating such risks. This Statement applies to the financial-year July 2022 to 30 June 2023 pursuant to its obligations under the Modern Slavery Act 2018 (Cth).

DDT has a zero-tolerance approach to modern slavery and is committed to addressing any modern slavery risks in its operations and supply chains. We have undertaken an initial risk assessment of modern slavery in DDT's operations and supply chains. This statement outlines DDT's progress to date and the current and future commitments. Our commitment to human rights and responsible business conduct remains strong. We recognize the crucial importance of actively addressing modern slavery risks within our operations and supply chains.

2. DDT's STRUCTURE, OPERATIONS AND SUPPLY CHAINS

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. The directors of DDT were consulted in the development of this statement.

DDT has been in the wholesale commodities trading business of wastepaper, scrap metal and Agricultural commodities for 14 years.

DDT sources these products from suppliers based primarily in Australia, New Zealand, South Africa, Singapore for customers primarily based in China, India, Indonesia, Thailand, Singapore, Malaysia, South Korea, Vietnam in addition to customers within Australia.

During the reporting period we undertook transactions with, but not limited to approximately 40 customers, 80 suppliers, 30 shipping lines and transport service providers.

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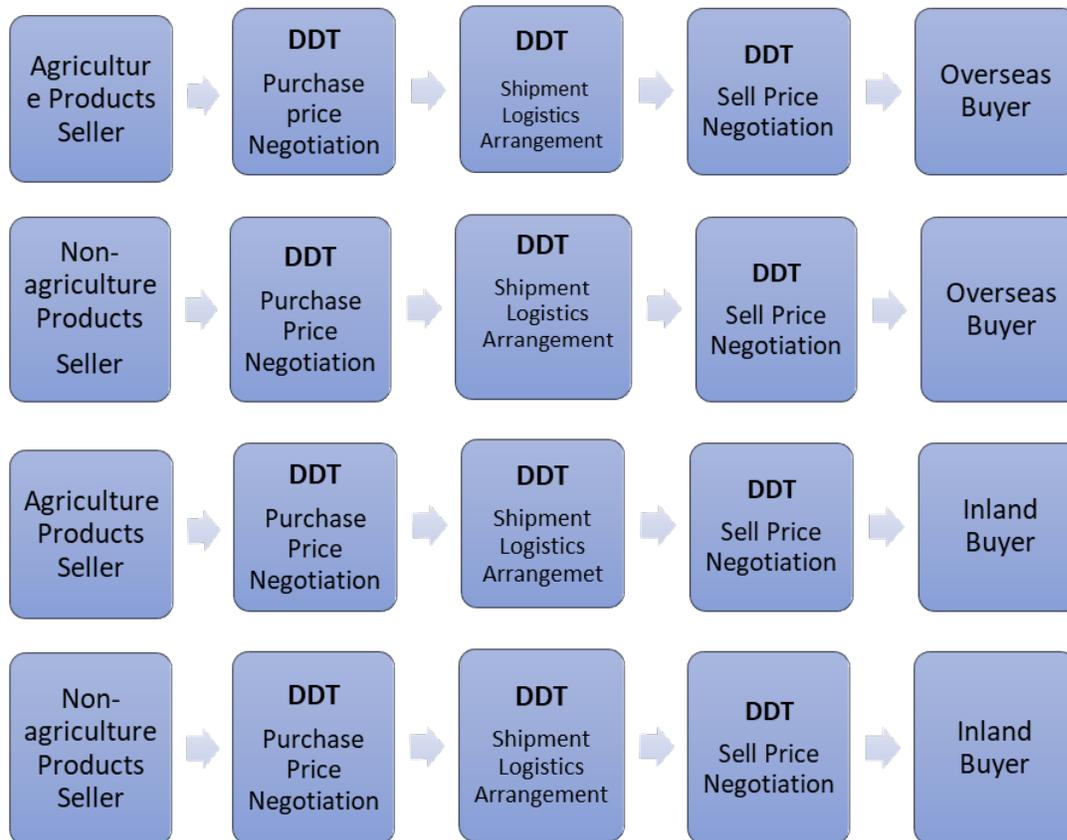
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While DDT is a trading company, in the ordinary course of business, we procure goods from external third parties which include;

1. Wastepaper
2. Scrap Metal
3. Agricultural commodities

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

1. Containerised Shipping
2. Road Transport
3. Trading agent services
4. Contracted service providers

3. RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

An initial risk assessment of modern slavery in our operations and supply chains identified potential areas where there may be a risk of modern slavery incidents.

- Suppliers who may use products purchased or manufactured in high-risk countries.
- Where DDT uses third party service providers to provide equipment/services and other ad hoc services.

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During the assessment process, our operations in Australia that are conducted by staff employed here, were identified as the areas with the lowest risk.

We acknowledge that the risks of modern slavery may be heightened in some of our group's supply chains and operations because of the geographical location of some suppliers like those based in China, India, Nepal and Indonesia.

Some of our supply chain members' areas of operation, and the source of materials used in products supplied to us from industries could be prone to an elevated risk of modern slavery incidents. Viz, the agricultural productions dependent on seasonal migrant labour.

Our risk assessment has identified the following areas of concern in respect of Modern Slavery practices.

1. The dealing in and sourcing of products from countries like China, Indonesia, Vietnam.
2. Agriculture production that uses seasonal migrant labour.
3. Suppliers that are based in areas and countries, where they are not required under the local law to screen their supply chains for Modern slavery practices or practice due diligence for such identification.

4. ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

DDT has Modern Slavery Framework including the development and periodic review of our Anti-Modern Slavery Policy. Management and the Board of DDT understand that it can better identify and reduce the risks of modern slavery by ensuring all its employees understand such risks. The employees at DDT have been provided with guidelines to equip them with the tools to identify and report the present or potential or suspected incidents of Modern Slavery in the inhouse or supply chains and escalate them within the organisation.

All our major and new suppliers are required to answer our anti modern slavery questionnaire. Our analysis of responses from supplier questionnaires has instilled confidence in our ongoing business relationships. This thorough approach demonstrates our commitment to continuously mitigate potential modern slavery risks in our operations.

We have also reviewed our supply contracts and added anti modern slavery clauses in our supplier and customer contracts. All our potential suppliers are provided with a copy of the DDT's Anti-Modern Slavery Policy and are required to undertake to comply with that policy. We collect and review the Anti-Modern Slavery policies of those suppliers who have such a policy.

5. ASSESSING EFFECTIVENESS

DDT remains committed to reviewing the effectiveness of our actions to assess and mitigate the risks of modern slavery.

- We have built in an Anti-Modern Slavery clause in our supplier and customer contracts to incorporate the modern slavery obligations into our contractual relationships with

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our supply chain members. This creates accountability on the part of the supply chain members. We can with the aid of such clauses keep track of compliance as a part of our regular contractual reviews. Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery.

- We have also strengthened our customer onboarding process and created a policy which lays down guidelines for assessing potential customers and amongst other things, ensure that we do not undertake transactions with customers which present evidence of Modern Slavery Practices within their supply chain or own business operations.
- The incoming employees at DDT are provided with the necessary tools, including providing examples of modern slavery markers, to identify and report instances of modern slavery incidents in our supply chains. This enables us to assess the effectiveness of our anti modern slavery policy, and procedures in place.

6. CONSULTATION

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

7. FURTHER STEPS AND OTHER RELEVANT INFORMATION

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

- Review of our policies to mirror the dynamic environment we work in.
- Continuous engagement with our 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 the Board of DDT Holdings Pty Ltd on the 27th day of December 2023.

Rajeev Saraff
Director of DDT Holdings Pty Ltd