# **Modern Slavery Statement**



#### Introduction

Transmutation is committed to preventing modern slavery in all its forms within its operations and supply chain. This statement is made pursuant to the Australian Commonwealth Modern Slavery Act 2018. Transmutation opposes modern slavery in all its forms. We support and respect the human rights and freedoms of workers within our organization and throughout our supply chain.

## **Organisation Structure**

Transmutation has a parent entity which is Transmutation Pty Ltd. The three operating entities are Transmutation Resources, Transmutation Recomposition and Transmutation Retail. Transmutation Resources makes high quality, 100% recycled plastic resin from waste plastic sourced within Australia. Transmutation Recomposition manufactures finished products using 100% recycled plastic that has been produced by the Resources business. Transmutation Retail sells products into a Circular Economy through a physical store in Robe, South Australia and via it's online store.

Our resources company works with Dulux Powder Coatings and Industrial business for Australia and New Zealand and Sustainable Plastic Solutions in Hamilton, Victoria.

## Policies

The company is currently still a small business that is transitioning into a medium sized business. Our full suite of policies is still being created and implemented. Due to the importance of the Modern Slavery Act 2018 and the synergies it has with the way Transmutation operates and wishes to operate we have started with this Statement. Modern slavery is a violation of basic human rights and can involve coercion, deception and threats to exploit a worker for commercial gain. The following ways are how we ensure that we are expanding the business in line with the principles of the Act:

- 1. During our recruitment process we ensure that our employees are over 18 years of age and view original documentation including visas if coming from overseas.
- 2. An awareness session on The Australian Commonwealth Modern Slavery Act 2018 is included in our staff training programme.
- 3. Due diligence is conducted on Suppliers to ensure they have an awareness and comply (as far as possible within our control) with the principles of the Act.

## **Risk Assessment**

The assessment was completed using Radar, a supplier risk assessment tool provided with the SEDEX supply chain sustainability management platform. The risk associated with a manufacturing operation in Australia was considered "Low to Medium" without any controls or policies in place. Risk is considered higher in manufacturing due to the higher use of labour hire workers and sources of materials being from a wide range of supply sources. This is mitigated by not using Labour Hire services but rather having a permanent and casual workforce as well as having due diligence conducted on the suppliers of raw materials. We also limit the procurement of our waste raw materials to Australia.

## **Due Diligence Processes**

The complexities of the due diligence processes will increase as further iterations of this Statement are made in coming years. The resources and size of the company at present mean that due diligence is limited to desktop auditing of suppliers to ensure they have a Modern Slavery Statement and are complying with the statement as can be determined by reporting and results released to the marketplace.

## **Training and Capacity Building**

The issuing of this Statement to all employees as well as a training session every 6 months are the current ways that Transmutation delivers awareness of the principles of the Modern Slavery Act to the company. All of our staff members at our Robe operation have been directly consulted with on the Transmutation Modern Slavery Act in our daily toolbox. Transmutation also send copies of this Statement to their suppliers to ensure that they are aware of the Act and Transmutation's compliance with it but also to encourage them to share their statements and actions with Transmutation. There are no other entities that are required to be consulted with in Transmutation's current structure.

Transmutation will build capacity in this area in the future by developing a Responsible Purchasing Charter and making sure all suppliers have signed this Charter before trading.

#### **Effectiveness and Key Performance Indicators**

Transmutation will increase the number of KPIs in the Modern Slavery area when the full ISO Integrated Management System is implemented in 2024. Presently the two key performance indicators are:

- 1. Senior management reviews pay and conditions of employees on an annual basis to confirm pay and conditions are above the Award settings.
- 2. Senior management ensures suppliers of raw materials have a Modern Slavery Statement as a pre-requisite to commencing trading with them.

#### **Future Steps**

Transmutation will increase Stakeholder Engagement in future iterations of the statement by providing reports to shareholders, customers and government as part of the ISO Integrated Management System. The ISO Integrated Management System will incorporate ISO 9001, ISO 14001 and ISO 45001 standards as well as the Modern Slavery Act and SA8000 Standard for social accountability.

This Statement is approved, authorised and signed by the sole Director of Transmutation Pty Ltd.

This Statement was approved and signed on 9 May 2024.

Bradley Scott Sole Director Transmutation Pty Ltd

