



Clareville Pty Limited (ABN 42 003 038 668)

Modern Slavery Statement

1 July 2023 – 30 June 2024

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

Reporting Year: 4

Reporting Period: 1 July 2023 – 30 June 2024 (Financial Year 2024)

16 December 2024

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 fourth 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 fourth 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 a number of steps to progress against our group-wide Anti-Modern Slavery Compliance Roadmap, which governs our actions and strategy for responding to modern slavery risks in the coming years.

During this fourth reporting period, we have progressed and achieved a number of items identified as goals in previous statements and our Anti-Modern Slavery Compliance Roadmap to assess and address modern slavery risks in our operations and supply chains. These actions are set out in more detail in Section 4 below but some highlights include:

- rolling out our Existing Supplier Checklist which is intended to assist us to better identify modern slavery risks within our existing supply chains;
- developing and approving a Contracting Playbook to assist staff to include appropriate modern slavery clauses in a range of agreements using a risk based approach;
- developing and implementing an Incident Response Plan that sets out procedures for how Harrison will deal a potential or actual modern slavery incident should one arise including guidance on remediation and documenting incidents; and
- furthered our existing and ongoing measures including updating our Supplier Code of Conduct, Anti-Modern Slavery Policy, our training and education efforts with staff and issuing Onboarding Questionnaires for new suppliers.

We recognise the importance of continuing to engage with our suppliers. We are also pleased to report that during this fourth reporting period we have continued to travel and conduct on-site audits of specific suppliers. In particular, Harrison Manufacturing has visited 10 suppliers and has continued to use modern slavery questions developed in previous reporting periods as part of the trip report process. A S Harrison & Co has also updated the form used at supplier visits to incorporate questions expressly directed at identifying and assessing modern slavery risks and 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 Roadmap 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 fourth 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 welcome the announcement of the appointment of the first Anti-Slavery Commissioner which occurred shortly before this Statement was finalised. . We are aware that the Anti-Slavery Commissioner's functions will include:

- promoting compliance with the Modern Slavery Act and supporting entities to address risks of modern slavery practices in their operations and supply chains;
- engaging with, and promoting engagement with, victims of modern slavery to inform measures for addressing modern slavery; and
- supporting, encouraging and conducting education and community awareness initiatives relating to modern slavery.

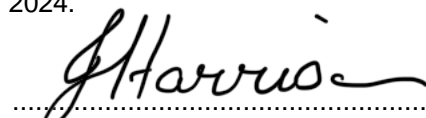
We intend to follow recommendations, monitor and consider key developments including guidance with interest.

Principal Governing Body Approval

This 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 16 December 2024.

Signature of Responsible Member

This Statement is signed by Julie Harrison in their role as Director of Clareville Pty Limited (ABN 42 003 038 668) (in accordance with section 13 of the *Modern Slavery Act 2018* (Cth)) on 16 December 2024.

A handwritten signature in black ink, appearing to read 'J Harrison', is written over a horizontal dotted line.

Julie Harrison
Director, Clareville Pty Limited
16 December 2024

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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 2024.
- 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 (**Government 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)	A S Harrison & Co specialise in importing and 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.
REAL Engineered Australian Lubricants Pty Ltd (A.C.N 676 298 221) (REAL)	This entity was incorporated during our fourth reporting period but did not commence operating. In the next reporting period, we anticipate this entity will operate as a direct to consumer business selling a small offering of Harrison Manufacturing grease and lubricants.

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 Government 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, South Korea, United Arab Emirates, United Kingdom, Papua New Guinea, Italy, China, India, North America, South America, Sudan, Denmark, Hong Kong and South Africa.
- 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 fourth reporting period, Harrison has a total of 140 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 in particular have been awarded the HRD Employer Choice Award for the best companies to work for in Australia in 2020, 2021, 2022, 2023 and 2024. Harrison Manufacturing received the HRD Employer Choice Award for the best companies to work for in Australia in 2024 and the Harrison Group also received an HRD Employer Choice excellence award in the category of HR manager of the year in 2024. The HRD Employer Choice Awards consider 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:

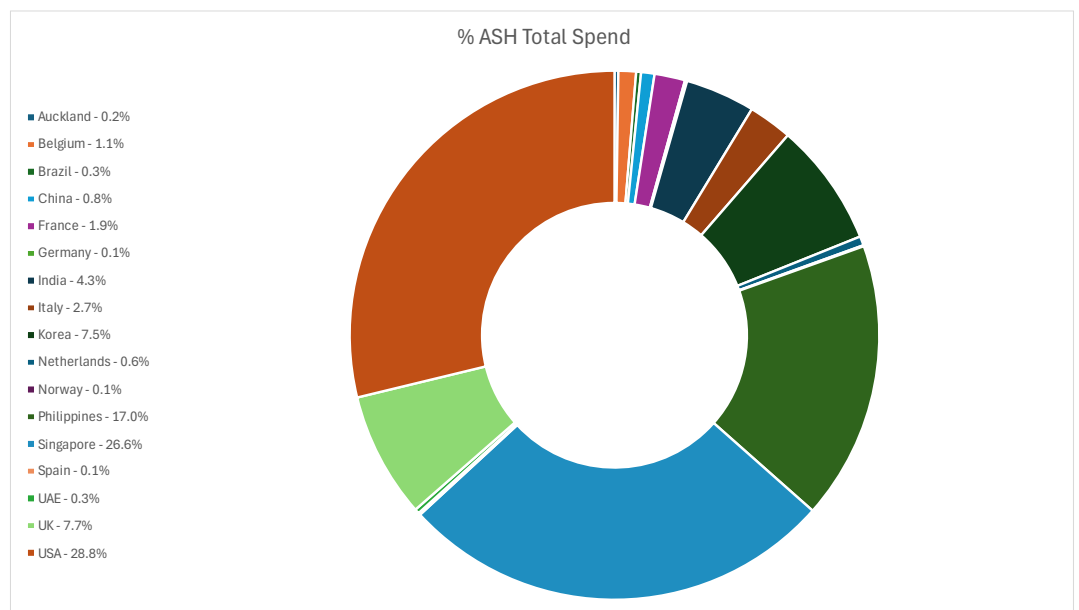
Goods	Country of Manufacture
Personal care additives	Canada, France, India, United Kingdom, United States of America, Taiwan, South Korea, China, Italy, Spain, Ghana, Israel
Food additives (such as meat powders, seafood powders and cheese and dairy powders)	China, Netherlands, Belgium, India

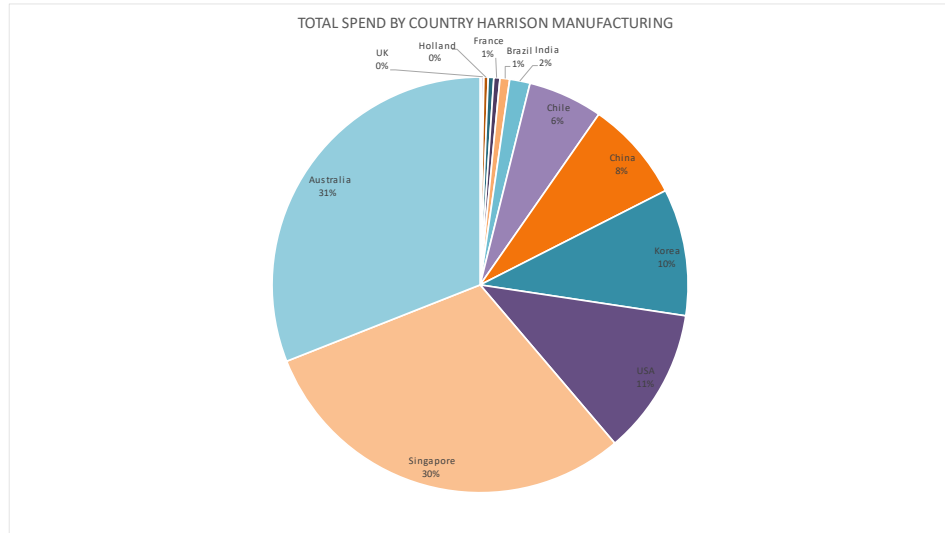
Goods	Country of Manufacture
Botanical extracts and nutrition and health oils	France, China, Chile
Fuel additives	United States of America, United Kingdom, China, Germany, Philippines
Lubricant additives	United States of America, France, South Korea, Singapore, China, Brazil
Grease additives	United States of America, France, South Korea, Singapore, China, Brazil, India, Holland
Construction chemicals	Spain, Italy, France, United States of America
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 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 fourth 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

- Across our previous reporting periods we have completed a high-level thematic review of our modern slavery risks in our supply chains using known modern slavery indicators.
- As our response to modern slavery has matured and our Anti-Modern Slavery Compliance Roadmap has progressed, 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. We have identified the following key risks involved within operations and supply chain:

Category of modern slavery risk indicators	Explanation and indicators	Supplier analysis
Sector and industry risks	<p>The Government Guidance identifies that certain industries may have high risk due to their characteristics, products and processes.</p> <p>A sector or industry has higher risks of modern slavery when it:</p> <ul style="list-style-type: none"> • makes use of unskilled, temporary or seasonal labour; • is reliant on short term contracts and outsourcing; • uses vulnerable workers to carry out less visible functions (such as functions carried out in remote locations); • low visibility over tiered and complex supply chains which 	<p>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.</p>

Category of modern slavery risk indicators	Explanation and indicators	Supplier analysis
	<p>interact with other high risk sectors;</p> <ul style="list-style-type: none"> • undergone a rapid increase in scale and complexity; and • a tendency to engage in manufacture of goods in high risk geographies. 	
Product and services risks	<p>Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.</p> <p>Government Guidance lists the following indicators:</p> <ul style="list-style-type: none"> • development of a product or delivery of a service may have been reported as involving labour exploitation by international organisations or non-governmental organisations; • involvement of children in production; and • provision of services in higher risk geographic locations. 	<p>Although we do procure raw materials from mines including Lithium, Moly and Graphite these raw materials are commonly procured through a distributor or other sub-suppliers that 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.</p>
Geographic risks	<p>Some jurisdictions have higher risks of modern slavery, due to poor governance, conflict, and socio economic factors like poverty.</p> <p>We refer to the Global Slavery Index 2023 of the Walk Free Foundation to assess geographic risks. The Global Slavery Index ranks countries based on estimated prevalence of modern slavery and the government response to modern slavery. The Global</p>	<p>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).</p>

Category of modern slavery risk indicators	Explanation and indicators	Supplier analysis
	<p>Slavery 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.</p>	<p>In previous reporting periods, A.S. Harrison & Co acquired a small amount of inputs from a supplier based in Russia. This supplier has not been engaged with since sanctions were implemented by the Government.</p> <p>The Harrison Group has ceased sourcing inputs from suppliers based in Russia since sanctions against Russia were announced by the Australian Government.</p>
<p>Entity risks</p>	<p>Some entities have higher modern slavery risks due to poor governance structures or a record of human rights violations.</p> <p>Government Guidance lists risk indicators, including for example:</p> <ul style="list-style-type: none"> • previous reports of non-compliance with human rights or labour laws by media or NGO sources; • poorly managed procurement processes; and • complex or opaque supply chains. 	<p>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).</p> <p>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.</p>

□ Going forward, Harrison plans to continue 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 we intend to:

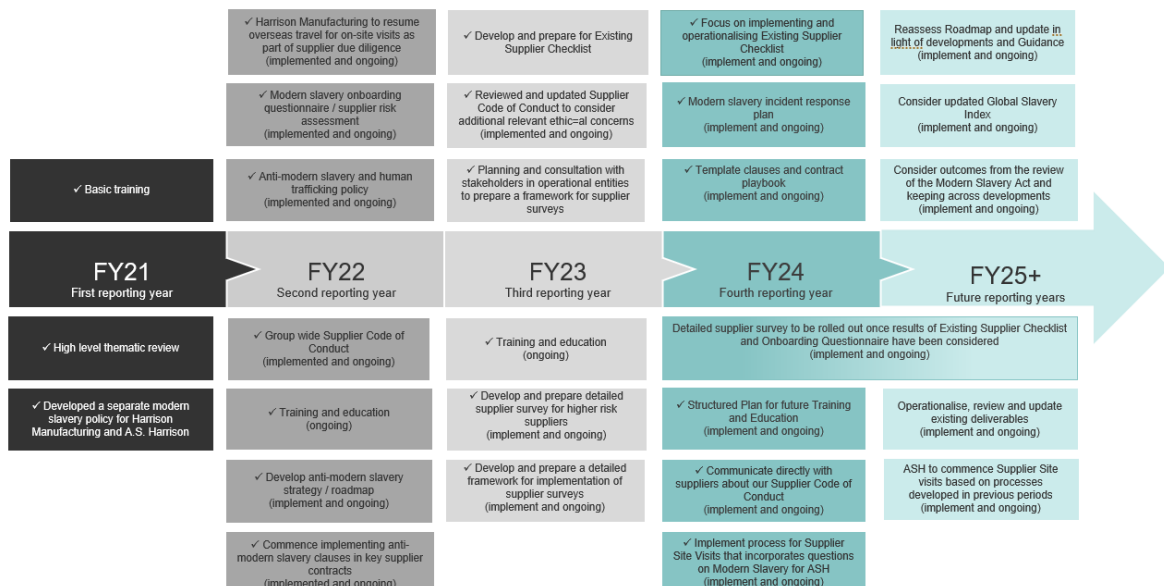
- (a) identify our strategic priorities based on risk and informed by our risk mapping work to date; and
- (b) focus on a more detailed modern slavery risk assessment, including issuing modern slavery surveys to higher risk suppliers identified as higher risk in our Supplier Onboarding Questionnaire 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 fourth 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.

However, we take a flexible and adaptable approach to our group-wide Anti-Modern Slavery Compliance Roadmap. For example, in the course of operating our business we may discover opportunities to improve our systems and processes for identifying, assessing and addressing modern slavery risks. If this is the case, we will consider and act on these opportunities as they arise and update our group-wide Anti-Modern Slavery Compliance Roadmap accordingly.



Indicative Anti-Modern Slavery Roadmap for continuous improvement

In summary:

- Some of these measures — such as new supplier Onboarding Questionnaires and our Existing Supplier Checklist — are focused on assessing risks associated with specific suppliers;
- Other measures — such as our Anti-Modern Slavery Policy and the Incident Response Plan — are focused on addressing risks once they have arisen; and
- Some measures — such as the detailed Supplier Survey — 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 and Harrison Manufacturing. For example, we have previously 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 our fourth reporting period:

Actions	Description
Supplier Code of Conduct	<p>In our fourth reporting period, we reviewed and updated our Supplier Code of Conduct to ensure it is up to date and aligns with other policies and procedures we have implemented.</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

Actions	Description
	<ul style="list-style-type: none"> - standards on specific issues such as child labour, working hours and wages, health and safety, environment and harassment and abuse among others.
Anti-Modern Slavery Policy	<p>In our fourth reporting period we updated our Anti-Modern Slavery Policy to ensure that it reflected developments in our Anti-Modern Slavery Compliance Roadmap, and linked to other relevant policies, including:</p> <ul style="list-style-type: none"> - Whistleblower Policy; - Employee Code of Conduct; - Supplier Code of Conduct; - Incident Response Plan; and - Contracting Playbook, <p>so that all employees can easily access other policies that they should be aware of.</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 Government Guidance.</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.

Actions	Description
Implementing Existing Supplier Checklist	<p>In our fourth reporting period we finalised and commenced the roll out the Existing Supplier Checklist.</p> <p>The Existing Supplier Checklist was developed as a short form document to identify risks of modern slavery in the operations and supply chains for all existing suppliers.</p> <p>The Existing Supplier Checklist has been 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 Checklist will form an important part of our assessment of which suppliers require further investigation and will be sent our Supplier Surveys.</p> <p>A S Harrison & Co and Harrison Manufacturing sent the Existing Supplier Checklist to approximately 200 suppliers that had not completed the Onboarding Questionnaire implemented in our second reporting period as these suppliers where not new and not being onboarded. Both A S Harrison & Co and Harrison Manufacturing have received a number of responses with positive feedback set out in more detail in 5 below.</p>
Supplier Communication	<p>We continued to focus on proactively engaging with our suppliers as recommend by the Government Guidance.</p> <p>As part of the implementation of the Existing Supplier Checklist A S Harrison & Co and Harrison Manufacturing used this opportunity to:</p>

Actions	Description
	<ul style="list-style-type: none"> - engage with suppliers and raise awareness of modern slavery issues; - remind suppliers of the expectations set out in the Supplier Code of Conduct; and - communicate instructions for completing the Existing Supplier Checklist and the importance of the process.
Staff Training	<p><i>Updated training</i></p> <p>In our fourth reporting period we have aligned on an outline of updated training to cover:</p> <ul style="list-style-type: none"> - the importance of modern slavery training; - developments since the previous training provided in our second reporting period; - Harrison's Anti-Modern Slavery Compliance Roadmap and progress; and - practical training exercises on the Incident Response Plan and Contracting Playbook. <p>This further training will be provided to all staff early in the next reporting period.</p> <p><i>Internal refresher training</i></p> <p>We provided internal refresher training to the A S Harrison & Co and Harrison Manufacturing supply teams and on the process of issuing the Existing Supplier Checklist in our fourth reporting period. This training was directed towards procurement and compliance teams in particular.</p>
Contracting Playbook	<p>In previous reporting periods, we implemented specific modern slavery clauses in a number of supplier agreements, outlined in more detail below.</p> <p>In our fourth reporting period, we expanded on this and developed and approved a Contracting Playbook.</p> <p>The Contracting Playbook:</p> <ul style="list-style-type: none"> - includes a number of modern slavery clauses adapted for different risk scenarios for integration in a wider range of agreements;

Actions	Description
	<ul style="list-style-type: none"> - uses practical guidance to assist the user in taking a risk based approach; - is informed by the Government's own model contract clauses but adapted to fit the Harrison Group's processes; and - considers scenarios in which Harrison is a customer and a supplier.
Incident Response Plan	<p>To further the policies and procedures implemented in previous reporting periods, in our fourth reporting period we prepared an Incident Response Plan. The Incident Response Plan is an internal facing document that sets out procedures for how Harrison will deal a modern slavery incident should one arise.</p> <p>The Incident Response Plan contains:</p> <ul style="list-style-type: none"> - agreed procedures for responding to an actual or suspected modern slavery incident; - remediation guidance to refer to when considering remediation actions for a specific incident; - roles and responsibilities in respect of an actual or suspected modern slavery incident; and - resources to assist with keeping records and ensure each step in the Incident Response Plan is followed.
Worked Examples of Incident Response Plan	<p>To support the implementation of the Incident Response Plan, we worked with experts to prepare a worked example of how the Incident Response Plan would operate in a hypothetical modern slavery incident.</p> <p>This point in time example sets out the known facts of a hypothetical modern slavery incident, example documentation and records of next steps.</p> <p>This resource is available so that relevant stakeholders can understand how to use the Incident Response Plan and the kind of information that should be recorded in the record keeping resources.</p>
Examples of Remediation Actions	<p>Another resource to support the implementation of Incident Response Plan was practical examples of remediation actions implemented by other entities.</p> <p>Harrison considered a number of statements that received an 'A' grade in the Monash Review or were</p>

Actions	Description
	<p>listed in the Walkfree Guidance. An 'A' grade from Monash indicate that the statement was assessed to fully address all reporting requirements and represent best practice. These statements included remediation examples and case studies that can inform Harrison's understanding of the operation of the Incident Response Plan.</p>
<p>Supplier Onboarding Questionnaire</p>	<p>We have implemented the Supplier Onboarding Questionnaire for Harrison Manufacturing and A S Harrison & Co 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>A S Harrison & Co Supplier Visit Form</p>	<p>In our fourth reporting period we commenced updating the form used by A S Harrison & Co to document supplier visit form to incorporate questions in order to identify modern slavery risk factors.</p> <p>This form now includes guidance notes so that staff can take the opportunity to verify information previously provided or follow up any issues raised in previous engagement with supplier. For example, the staff member is prompted to confirm whether the supplier has previously completed the Onboarding Questionnaire or the Existing Supplier Checklist.</p> <p>We expect that A S Harrison & Co will finalise the updates and implement this in our next reporting period.</p>

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

Actions	Description
Internal Assessment	<p>A S Harrison & Co has again been assessed by EcoVadis (which is a global provider of business sustainability ratings) and has been successful in attaining SILVER status for the third year running. We are pleased to report that our 2023 assessment was assessed in the 92nd percentile of all companies that were assessed.</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 are seeking to attain GOLD status, or at a minimum maintain SILVER.</p> <p>In future reporting periods, we will continue to consider feedback from EcoVadis which may be relevant for our Anti-Modern Slavery Compliance Roadmap.</p>
Remuneration and recruiting	<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 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>
Supplier vetting, monitoring and auditing	<p>Over the reporting period, Harrison has continued to use 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>

Actions	Description
	<p>Harrison Manufacturing on site audits have reached at least 10 suppliers and have not identified any incidents of modern slavery.</p>
<p>Supplier Due Diligence</p>	<p>During our fourth 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 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 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 - whether the supplier has had any actual or suspected incidences of modern slavery and (if so) how these incidents were treated.
<p>Staff Induction 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 fourth 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 human trafficking risks and how they impact the Harrison Group.</p>
<p>Executive and stakeholder awareness and workshops with key stakeholders</p>	<p>We prioritise engaging with executive and relevant stakeholders. We recognise that our leadership team play an important role in building support for our Anti-Modern Slavery Compliance Roadmap.</p> <p>In previous reporting periods we have:</p> <ul style="list-style-type: none"> - run specific training sessions to ensure our executive leadership team were actively involved in and all are aware of the important role they will play

Actions	Description
	<p>in executing our Anti-Modern Slavery Compliance Roadmap;</p> <ul style="list-style-type: none"> - developed Supplier Survey Process Flows for A S Harrison & Co and Harrison Manufacturing to streamline the implementation of our Supplier Surveys; and - held workshops with senior stakeholders to consider how Supplier Surveys would be implemented by our operational entities A S Harrison & Co and Harrison Manufacturing. <p>As A S Harrison & Co and Harrison Manufacturing have different structures and operations (as outlined in 2) this engagement it critical to ensure deliverables are operationalised effectively within both operational entities.</p>
Clauses in Supplier Contracts	<p>In our fourth 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 slavey clauses were drafted with reference to the medium form clause in the Commonwealth Government procurement toolkit.</p>
Detailed Supplier Survey	<p>In previous reporting period we 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>We have specific guidance for administering our Supplier Survey. 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>

Actions	Description
	<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 Checklist.</p> <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 Supplier 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>The Supplier Surveys can be rolled out quickly in response to any high risk suppliers identified as higher risk on the Onboarding Questionnaire and Existing Supplier Checklist</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 Compliance 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 our fourth 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 FY23	Our progress during the reporting period during FY24	Indicative KPIs for FY25 and FY26
Number of staff trained on modern slavery issues	<p>During the reporting period:</p> <ul style="list-style-type: none"> - 13 new employees completed induction training; - 6 staff attended training on the process of issuing modern slavery questionnaires; and - 6 procurement staff attended internal refresher training. 	Maintain
Number of supplier audits	At least 10 supplier audits were conducted on site with suppliers.	Maintain
Finalise and commence rollout of Existing Supplier Checklist	During the reporting period we sent out the Existing Supplier Checklist to approximately 200 suppliers. During the fourth reporting period A S Harrison & Co received 26 responses and Harrison Manufacturing has received 34 responses.	Maintain and improve based on qualitative feedback.
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	During the reporting period in addition to sending the Existing Supplier Checklist to approximately 200 suppliers we used this opportunity to communicate with suppliers about modern slavery issues and refresh expectations set out in the Supplier Code of Conduct.	During FY25 we will implement Supplier Surveys to any suppliers who have been identified as higher risk through other steps taken.

Develop a modern slavery Incident Response Plan to ensure we have clear processes for responding to a modern slavery incident	During the reporting period we developed the modern slavery Incident Response Plan and took steps to ensure staff are prepared to make use of this plan in the event an actual or suspected incident arises.	Going forward, we intend to learn from any incidents and update this plan as required.
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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 Roadmap, In particular:

- ☐ Harrison Manufacturing staff that conduct site visits of 10 suppliers in FY24 and have generally observed that suppliers have a positive attitude towards site visits and have welcomed site visits to their factories.
- ☐ A S Harrison & Co received positive feedback from a supplier based in the United States in response to the supplier communication including the Existing Supplier Checklist. This response stated that *"[the supplier] are very impressed to see that A S Harrison & Co is implementing an Anti-Modern Slavery Compliance Program, A S Harrison & Co is the first customer implementing such a program. [The supplier] thinks it is important not just to show our care for the labors but also for humanity"*.
- ☐ Harrison Manufacturing received positive feedback from a global logistics supplier outlining their own Humanitarian Logistics, ESG Capability, GPS training of shipments and policies and procedures around human rights. This supplier offered to assist Harrison Manufacturing with carbon emission data. A S Harrison & Co was pleased to see such a positive and cooperative response from a supplier in a sector assessed as higher risk.

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 December 2024 we held a Board meeting 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 fourth 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 periods, we are focused on the following measures in our commitment to continuous improvement:
 - reassessing our Anti-Modern Slavery Compliance Roadmap and updating it in light of developments and guidance;
 - ensuring that existing policies and procedures reflect the guidance contained in the most recent Global Slavery Index;
 - review outcomes from the Modern Slavery Act review and keep across relevant developments;
 - operationalise, review and update existing deliverables;
 - continuing to implement template modern slavery contractual clauses and using the Contracting Playbook to ensure we are applying appropriate contractual clauses on our suppliers in a prioritised way; and

- roll-out a detailed Supplier Survey to higher risk suppliers to better assess and address modern slavery risks once the necessary risk assessment has been conducted.

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

We acknowledge the announcement of the appointment of the first Anti-Slavery Commissioner shortly before this Statement was finalised. In the coming reporting periods, we intend to monitor and consider key regulatory developments, including any changes to the Modern Slavery Act or material guidance published by the regulator or the Anti-Slavery Commissioner with interest.

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 16 December 2024.

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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Julie Harrison
Director, 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 – 10
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.	10 – 14
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.	14 – 24
e) Describe how the reporting entity assesses the effectiveness of these actions	25 – 26
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).	26 – 27
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	27 – 28