



MODERN SLAVERY STATEMENT

REPORTING YEAR 2020

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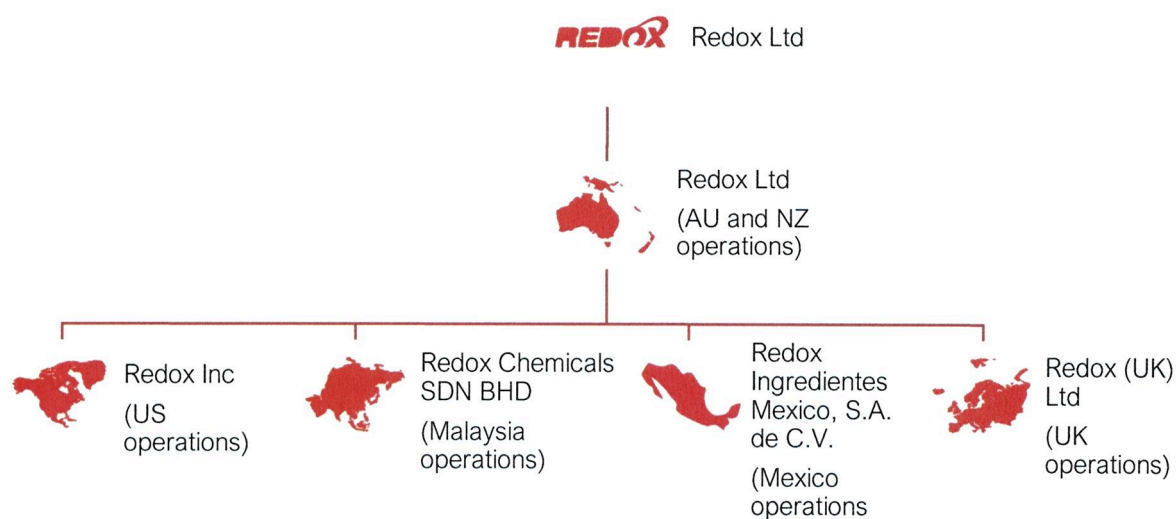
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REDOX MODERN SLAVERY STATEMENT

Redox Limited (Redox)¹ opposes slavery in all its forms and is committed to adhering to the highest ethical standards. This Modern Slavery Statement is made in accordance with the *Australian Modern Slavery Act 2018* (Cth). It applies to and describes the actions taken by Redox, during the reporting year commencing 1 July 2020 to 30 June 2021, with the aim of minimising the risk of modern slavery² occurring in our business operations or our supply chains.

This Statement³ is submitted as a joint statement intended to cover all wholly owned subsidiaries and operations within Redox including:



References to 'our' and 'we' in this Statement are references to Redox.

¹ "Redox" means Redox Ltd (ACN 000 762 345) and its related bodies corporate, as defined in section 50 of the Corporations Act 2001 (Cth).

² The term "modern slavery" is used to denote practices defined in the Modern Slavery Act 2018 (Cth) and includes eight types of serious exploitation: servitude, slavery, forced labour, forced marriage, the worst forms of child labour, debt bondage, deceptive recruiting for labour or services and trafficking.

³ "Statement" means this Modern Slavery Statement made by Redox pursuant to the Modern Slavery Act 2018 for the 2020/2021 financial year.



Redox acknowledges that modern slavery, which includes servitude, slavery, forced labour, forced marriage, the worst forms of child labour, debt bondage, deceptive recruiting for labour or services and trafficking, forms part of other complex challenges and systems, including discrimination, harassment, abuse, long working hours, low wages and benefits, and unsafe workplaces and work environments. Where possible, Redox seeks to work with our stakeholders and partners to promote a coordinated approach to tackle these complex issues.

To manage the risk of modern slavery in Redox's operations and supply chains and to identify emerging issues, Redox provides training to relevant team members and suppliers, collaborates with various organisations, embeds ethical sourcing and modern slavery policies into existing processes and conducts risk assessments on suppliers.

A consultation process with Redox's related bodies corporate was undertaken to develop this Statement. This Statement was also reviewed and approved by the Redox Board.

At Redox we acknowledge our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices. We also recognise that safeguarding human rights across our business and supply chains is an area of great importance to our employees, shareholders, customers, and the communities where we operate. We are on a journey to improve our modern slavery risk identification and mitigation and are constantly working to reinforce and communicate our values to our employees, shareholders, customers, suppliers, and the broader community.

At Redox we are dedicated to the continuous improvement of our policies and procedures relating to the identification of modern slavery risk.

Redox's structure, operations and supply chains



OUR STRUCTURE

Redox, headquartered in Sydney (Australia)⁴, is a chemical distribution company established in 1965. Redox has offices in fourteen (14) locations across four (4) countries, Australia, New Zealand, Malaysia, and the United States. Redox is also looking to expand its international presence even further by opening offices in another two (2) countries, Mexico and the United Kingdom. Since its establishment, Redox has been listed in the Top 100 Chemical Distributors as the 8th largest in Asia and 31st worldwide.

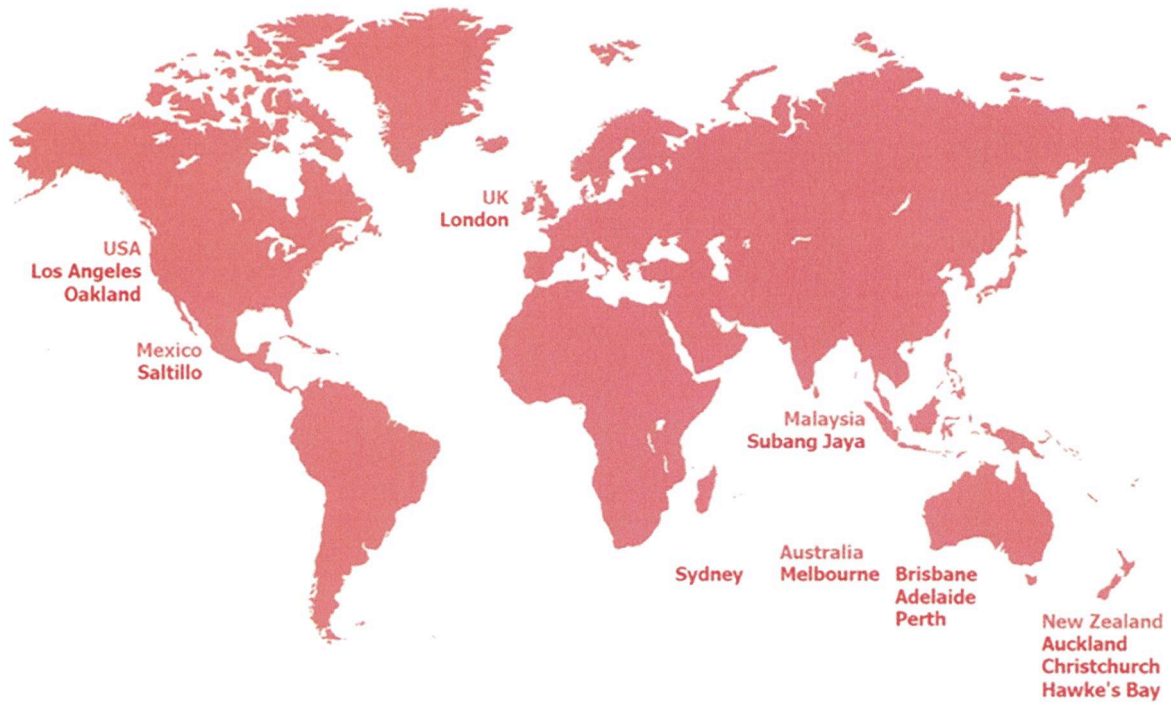
OUR OPERATIONS

Redox is a public company, employing more than three hundred and seventy (370) people across Australia, New Zealand, Malaysia, and the United States.

Our business has grown to become one of the leading chemical and ingredients distributors in the world. Redox is proud to have more than 1,000 speciality and commodity products serving over 140 industries; commodity and specialty chemicals; food ingredients; agricultural chemicals; household and personal care chemicals; mining chemicals; surface coatings; plastics additives; grease and lubricants; water treatment chemicals; building and construction chemicals and pharmaceutical ingredients.

Redox does not externally engage in financial lending activities however, intra-company lending forms part of Redox's operations.

⁴ Redox registered office being 2 Swettenham Road, Minto, NSW, 2566, Sydney Australia.



OUR SUPPLY CHAINS

Our businesses directly source products for resale and products for the business’s own consumption as well as services from a range of suppliers all over the world. Suppliers are fundamental to our business. Globally, we work with approximately 1911 suppliers of chemicals, logistics, and other supplies.

Goods for resale are a wide range of chemicals, ingredients, and raw materials such as sweeteners, stabilisers, emulsifiers, minerals, antioxidants, phosphates, vitamins, acids, fertilisers, salts and plasticisers, sourced from manufacturers.



Goods consumed by the business may include items such as IT equipment, warehouse tools and machinery and office supplies that support Redox’s operations.



Services that are procured by Redox include maintenance services, cleaning and transport logistics.



Redox sources goods and services from a range of geographical locations, with the largest volume of goods and services being sourced from Australia, China, India, Indonesia, Malaysia, New Zealand, Singapore, Taiwan and the United States. Redox’s approach to the management of modern slavery risk reflects an awareness of heightened risk of sourcing particular products from certain high-risk regions.

REDOX POLICIES AND WORKPLACE PRACTICES

The policies and frameworks that support Redox's day-to-day operations require that we respect, and safeguard universally recognised human rights and where possible eradicated modern slavery within our operations and supply chains.

Redox has an expectation that all suppliers, partners, and stakeholders adhere to ethical business practices and standards that are consistent with its own practices. Redox has imposed a requirement on all suppliers, partners, and stakeholders to comply with Redox's Minimum Workplace Practices Code of Conduct⁵, and are committed to working with them to fulfil this common goal. Redox's policies prohibit the use of suppliers who engage in any form of modern slavery and are aimed at establishing safe and healthy working conditions, which include the right to freedom of association, collective bargaining, lawful compensation, and fair work hours. It is Redox's expectation that its suppliers also adhere to and abide by these practices and our policies and promote the standards with their subcontractors and employees.

Redox's Modern Slavery Policy sets out the responsibilities and obligations of Redox, its employees and officers as a company with respects to modern slavery. The policy is updated regularly to ensure it remains aligned with international best practices.

IMPACT OF COVID-19 ON OPERATIONS

The disruption caused by COVID-19 presents emerging modern slavery risks including worker health and safety risks in key sourcing countries.

In response to COVID-19 international border closures and restricted movements enforced by many governments all over the world, our supply chains have suffered from shortages, supply interruptions, restricted internal movements in their workplaces as well as our own workplaces, and greater workloads to resolve issues which arise as a result of COVID-19. This in turn has limited the ability of Redox to receive supplier declarations or responses within the estimated timeframes and complete risk assessments for these suppliers.

As the risk of modern slavery increases due to COVID-19, Redox continue to focus on managing the unpredictable challenge COVID-19 presents to our supply chains.

⁵ Redox's Minimum Workplace Practices Code of Conduct ("Workplace Practices") is a document created by Redox, which outlines the way we expect all suppliers to conduct themselves, and rights to be afforded to their employees. Redox requires that all suppliers comply at all times with the Workplace Practices and for all Suppliers to confirm such practices are being complied with by executing the Ethical Sourcing Supplier Declaration ("Declaration Form").

Risks of modern slavery practices in Redox operations and supply chains

Redox is committed to responsible supply chain management and recognises the importance of protecting and respecting human rights.

RISKS IN REDOX OPERATIONS

Redox considers the residual risk of modern slavery in its operations as low. We monitor and address human rights issues in our operations under Redox’s Code of Conduct and Ethics, Harassment, Bullying and Discrimination Policy, Diversity Policy, Whistleblower Procedure and Modern Slavery Policy.

Redox’s workforce is either covered by modern awards or employed by individual employment agreements. The applicable modern awards and individual agreements confer minimum pay and entitlements, and typically set working hours and overtime arrangements. Redox recognises our employees’ rights to bargain or negotiate collectively, whether it is with or without the involvement of a bargaining representative.

RISKS IN REDOX SUPPLY CHAINS

While Redox considers its risk of modern slavery in its direct supply chains to be low risk and not to be susceptible to labour rights violations and modern slavery risks, Redox does recognise that there is some risk through indirect supplier and third-party relationships, as these relationships are not currently visible to our business.

The risk of exposure to modern slavery within our operations is primarily centred around:

Outsourcing: There is a greater risk of being exposed to practices of modern slavery when Redox suppliers outsource their services to others, and we are unable to trace the source of the product.

Labour hire: Engaging third-party labour hire companies or contractors to source workers increases the risk of worker exploitation and unfair working conditions by reducing our visibility over recruitment practices.

Product market: Redox have identified certain products we procure which carry a higher risk of modern slavery in its markets than others, such as palm oil.

Sourcing geographies: Sourcing goods or services from geographical locations which are more vulnerable to modern slavery practices increases the potential risk of modern slavery in our supply chains.

Country risk category (overall sustainability risk)⁶

| HIGH | | MEDIUM | LOW |
|-----------------|---------------------|-------------------------|--------------------------|
| CHINA 50.65% | MEXICO 57.31% | UNITED STATES 15.88% | AUSTRALIA 4.27% |
| INDIA 55.49% | PAKISTAN 74.12% | MALAYSIA 39.23% | NEW ZEALAND 1.91% |
| IRAN 63.30% | INDONESIA 50.45% | | UNITED KINGDOM 11.13% |

% Vulnerability to modern slavery

⁶ Country risk categories are based on the estimated prevalence of slavery by country data produced by the Global Slavery Index 2018 at <https://www.globallslaveryindex.org/2018/data/maps/#prevalence>

Actions taken to address key identified modern slavery risks

ETHICAL SOURCING DECLARATION PROGRAM

Redox works with suppliers to source goods and services in a manner that aligns with its ethical and sustainable business practices which safeguard human rights. Redox conducts due diligence on its current and new suppliers by requiring they comply with certain minimum workplace practices. Before Redox contracts with a new supplier, we require they complete our Ethical Sourcing Supplier Declaration Form or supply their own internal policies for assessment to ensure our workplace practices align and are consistent with globally recognised principals relating to human rights and the environment. Redox also require our suppliers who were onboarded before this practice was implemented to complete the same process retrospectively.

The Declaration Form provides Redox with rights of termination if the supplier is unable to or unwilling to comply with our Workplace Practices. It also provides Redox with the ability to further assess our suppliers by giving us the right to undertake further investigations of the supplier's business practices, should Redox find this necessary.

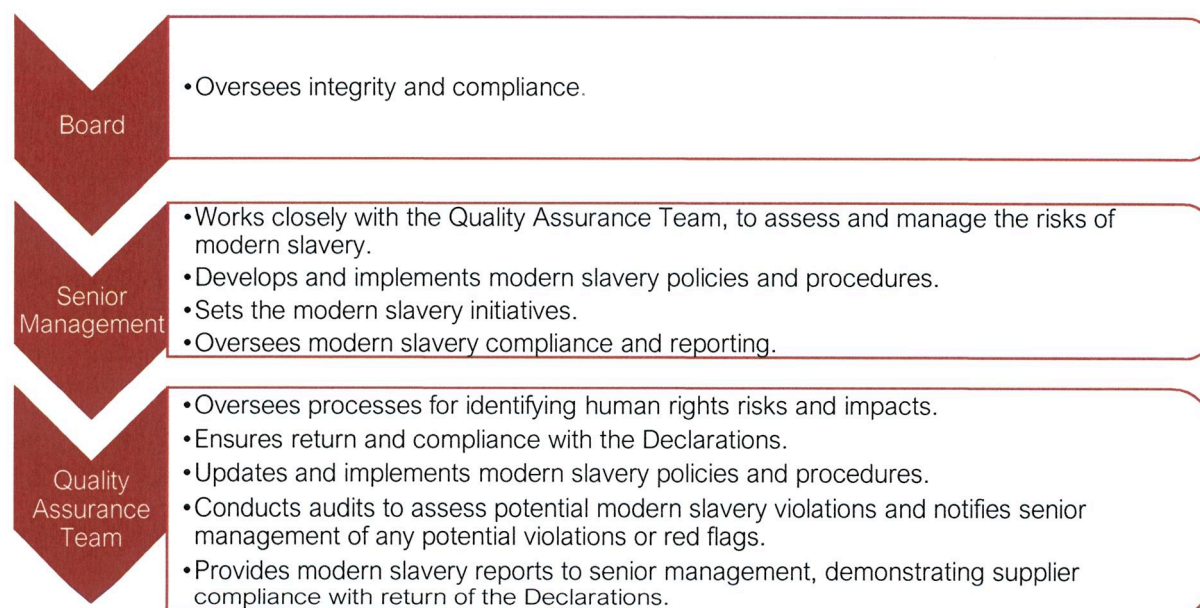
While not all the Workplace Practices are directly relevant to modern slavery, they are important to Redox's holistic approach to modern slavery and ethical sourcing.

MAPPING SUPPLY CHAINS

To manage the risk of modern slavery within the complex supply chains in which we operate, Redox is committed to continue to map high risk, medium risk and low risk suppliers based on their industry, the products, or services they supply and geographical location.

STAKEHOLDER INVOLVEMENT

Redox regularly engages with business stakeholders to understand their expectations about Redox's ethical sourcing and modern slavery commitments and performance. Our commitment to sustainable governance is led from the top, with clear accountabilities for oversight and implementation of our ethical sourcing commitments. At Redox we have adopted a collaborative modern slavery governance process to learn from each other in identifying and managing our modern slavery risks.



COLLABORATION WITH ORGANISATIONS

Redox collaborates with both government and non-government organisations in its day-to-day business operations to ensure we are maintaining the highest ethical standards.

For instance, Redox acknowledges that the palm oil industry in which we deal in is particularly vulnerable to modern slavery violations and unethical labour practices including excessive working hours, passport confiscation, induced indebtedness, contract substitution, underpayment of wages and child labour. Redox collaborates with Roundtable on Sustainable Palm Oil (RSPO) to reduce risks associated with the procurement and distribution of palm oil in our supply chains. RSPO have developed a set of environmental and social criteria which Redox suppliers of palm oil must comply with to ensure our supply chains produce Certified Sustainable Palm Oil.

Redox also partners with Australian Trusted Trader (ATT) to secure Australia’s borders and facilitate legitimate trade practices in our operations and supply chains. Redox is an accredited trusted trader by Australian Government Department of Home Affairs and the Australian Border Force with compliant trade practices and a secure supply chain.

LONG TERM PARTNERSHIPS

We look for long term partnerships with customers and suppliers where shared values and common goals align for mutual benefit. Maintaining long term relationships with our suppliers helps us to work together to safeguard human rights through shared ethical and sustainable business practices.

INTERNAL GOVERNANCE POLICIES

Redox adopts and shares consistent internal governance policies across each business and entity within its group of companies. We recognise our success in addressing and mitigating modern slavery risks in our operations and supply chains requires clear guidance and practices. Redox’s Modern Slavery Policy framework assists our employees and business partners to make ethical decisions and engage in ethical business practices and standards consistent with our values and expectations.

| Policy | Purpose |
|--|--|
| Modern Slavery Policy | Establishes the expectation that all employees enforce our commitment to human rights |
| Code of Conduct & Ethics | Sets out what we expect from our employees and provides a benchmark for professional behaviour throughout our company |
| Whistleblower Procedure | Reinforce our culture to encourage employees and others working with us to speak up and report potential misconduct or breaches of the law in our business |
| Diversity Policy | Describes the governing principles to drive an inclusive and diverse workplace culture |
| Harassment, Bullying & Discrimination Policy | Articulates our commitment to providing safe and respectful workplaces that are free from bullying harassment and discrimination |
| Minimum Workplace Practices Code of Conduct | Outlines Redox’s minimum ethical business practices and standards placed on suppliers and their supply chains |

TRAINING AND DEVELOPMENT

Redox maintains an ongoing focus on adequate training and development of our staff and acknowledges the vital role it plays in promoting modern slavery awareness throughout our businesses. Our sales, marketing and procurement teams remain informed about our commitment to upholding human rights and ethical sourcing practices. Our modern slavery training is periodically reviewed by senior management to ensure our employees continue to improve and develop their understanding of ethical sourcing and human rights. We are constantly working to reinforce and communicate our values and practices to our employees, shareholders, customers, suppliers, and the broader community.

GRIEVANCE REPORTING MECHANISMS

Redox has in place several mechanisms for employees and third parties to report grievances or violations of our policies or the law. Our reporting mechanisms facilitate open communication between our management and our workers, as well as between our business and our suppliers, which help to mitigate modern slavery risks.

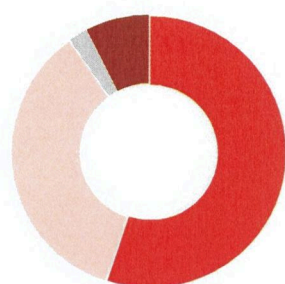
| Whistleblower Procedure | Code of Conduct | Minimum Workplace Practices Code of Conduct |
|---|--|--|
| <ul style="list-style-type: none">•The Redox Whistleblower Policy, sets minimum standards for its businesses and contains details of how to make a report under the policy. Reports of misconduct are to be made to the Whistleblower Protection Officer or the General Counsel | <ul style="list-style-type: none">•It is a requirement that any unlawful or unethical behaviour that does not comply with the code be reported in accordance with our whistleblower policy or to our human resources manager | <ul style="list-style-type: none">•Any contravention of the workplace practices in this code must be immediately reported to the suppliers internal Redox point of contact |

Assessing the effectiveness of actions being taken to assess and address modern slavery risks

ETHICAL SOURCING DECLARATION PROGRAM

Redox measures the coverage of its ethical sourcing supplier declaration program and its effectiveness by the total number of suppliers assessed and deemed to be an 'approved' supplier, holding a modern slavery permit and the number of suppliers with critical breaches categorised as high risk.

Ethical sourcing supplier declaration assessment numbers



2,029

NUMBER OF THE TOTAL ACTIVE SUPPLIERS TO BE ASSESSED

| | |
|--|------|
| ■ Suppliers part of the declaration program but not assessed | 1117 |
| ■ Chemical suppliers assessed and holding a permit | 712 |
| ■ Logistic suppliers assessed and holding a permit | 47 |
| ■ Other suppliers assessed and holding a permit | 153 |

At the end of the reporting period, Redox assessed and issued modern slavery permits to a total of 912 new and current suppliers, representing approximately 44.95% of our supply chain. Since the end of the previous reporting period, the number of suppliers that have been assessed and hold a modern slavery permit increased by 41%. Redox did not identify any suppliers as presenting a high risk during the reporting period. There were no breaches reported by Redox during this period of our Workplace Practices.

Redox performed due diligence on all new suppliers onboarded during the reporting period to determine its risk level in relation to ethical sourcing and modern slavery.

MODERN SLAVERY TRAINING

Redox understands that raising awareness is key in addressing the risk of modern slavery. We recognise the need to continue to build capacity among our employees to identify risks of modern slavery and the actions required to respond effectively.

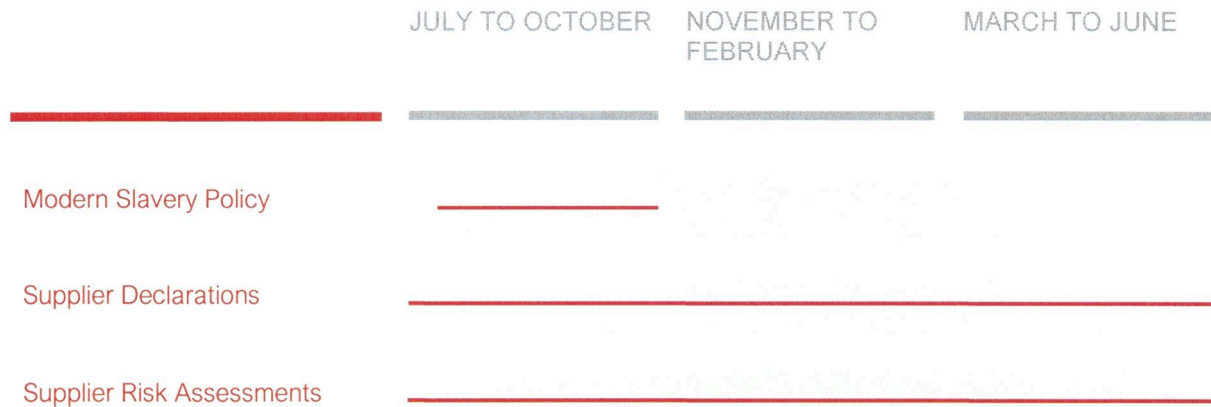
Redox employees received training on our modern slavery policy during the reporting period.

GRIEVANCE REPORTING MECHANISMS EFFECTIVENESS

Redox implements effective company-based grievance mechanisms to identify and escalate issues and concerns of misconduct, unethical and unlawful behaviour in our operations or supply chains. Redox continues to build human rights awareness and knowledge among its employees, encouraging them to voice their concerns in confidence (if required) and without fear of reprisal.

Redox focus for the next reporting period

Redox is committed to continuously improving strategies to identify and mitigate modern slavery and ethical sourcing risks within its operations and supply chains. During the next reporting period our focus will be on:



| | | |
|---|---|---|
| | | |
| <p>Modern Slavery Policy</p> | <p>Supplier Declarations</p> | <p>Supplier Risk Assessments</p> |
| <p>Redox will review the current Modern Slavery Policy effectiveness, update the policy to ensure its alignment with international best practices and rollout the updated policy across our business.</p> | <p>Redox continues to implement our ethical sourcing workplace practices and be committed to working with our suppliers to receive all declarations from any remaining suppliers that are not new or review their internal policies and ensure they align with our workplace practices.</p> | <p>Redox will be commencing risk assessments on suppliers. This process of conducting risk assessments is for Redox to have a better awareness of its suppliers. We will aim to categorise our supply chain vulnerability of modern slavery by low, medium, or high risk.</p> |

Redox 2020 Modern Slavery Statement

Redox is confident the actions and multifaceted approach we intend to take in the next reporting period will continue to drive progress and awareness on this global issue.

The Statement has been prepared in consultation with key stakeholders and teams that collaborate to deliver on our human rights commitments, including identifying modern slavery risk, assessment and management processes for our own operations and supply chains.

This Statement was also reviewed and approved by Redox Board of Directors.

We are pleased to publish this Redox 2020 Modern Slavery Statement and commit to continuing to track and publicly report on our progress.



Robert Coneliano
Managing Director

01 December 2021

