

Australasian Solvents & Chemical Co Pty Ltd



Modern Slavery Statement

2024



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ABOUT THIS STATEMENT

This Modern Slavery statement is made on behalf of Australasian Solvents & Chemical Company, which is part of the ASCC Group of Companies.

It outlines our commitment, and the methodologies used in identifying and addressing any modern slavery risks within our supply chain and operations, including those of the entities we control in other countries. The ASCC Group of Companies are deeply committed to upholding human rights and ethical responsibility in all our operations. We acknowledge the key forms of modern slavery and exploitation, including human trafficking, forced labour, debt bondage, descent-based slavery, child slavery, forced and early marriage, and domestic servitude. Our dedication to combating these practices is unwavering, and we strive to ensure that our supply chains and operations are free from any form of modern slavery."

Australasian Solvents & Chemicals Company Pty Ltd (ASCC), which operates under Australian Business Number (ABN) 57 095 441 080, is a privately owned and operated chemical distribution business first founded back in 1997 as Solchem Pty Ltd. The company, which is the originating business of the ASCC Group, provides a wide range of raw materials to a diverse customer base which are predominantly involved in the manufacturing sector. Since 2016, the ASCC Group now includes operations across the Asia Pacific Region with offices in Brisbane, Australia, Auckland in New Zealand, Singapore and Indonesia, along with owning a majority shareholding in Global Chemie, a chemical distribution business based in Thailand. Our parent company, Marstel Services, also owns and operates a bulk chemical storage site as located in Altona, Melbourne. The entire group of companies employs approximately 170 personnel across all of the above locations.

The Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (Act), which includes the seven mandatory reporting criteria:

- 1. Identify the reporting entity (this page);*
- 2. Describe the structure, operations and supply chains of the reporting entity (pages 5 - 6);*
- 3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls (page 7);*
- 4. Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks (page 8);*
- 5. Describe how the reporting entity assesses the effectiveness of such actions (page 9);*
- 6. Describe the process of consultation with any entities the reporting entity owns or controls or is issuing a joint modern slavery statement with (page 10); and*
- 7. Provide any other information that the reporting entity, or the entity giving the statement, considers relevant (page 10-12).*

Message from our Chief Executive



As a rapidly growing group of companies, we are dedicated to the creation of a culture that not only drives profit and value for our shareholders but ensures our commitment to human rights and ethical responsibility is enshrined within everything we do.

Working towards the elimination of modern slavery is a goal that reflects our core values and defines the kind of company we strive to be. We are committed to due diligence, transparency, and ongoing assessment of our supply chain practices to identify and mitigate risks of modern slavery. This requires a collaborative effort across all levels of our organisation and with our suppliers, partners and stakeholders, as well as an ongoing investment in training, auditing, and monitoring processes.

During 2024, we have reassessed our vision & internal mission statements, and our organisational goals. The wellbeing of people factors heavily in these new mission statements and goals, and this includes people working within our supply chains.

Our commitment to tackling modern slavery risk goes beyond compliance; it's about creating meaningful change. By strengthening our policies, enhancing supplier relationships, engaging with experts and promoting fair labor practices, we aim to lead by example and contribute to an industry free of slavery risks.

Michael Frost

Michael Frost

ASCC Group Chief Executive Officer

15th November 2024

Who we are, our Structure, Operations & Supply Chains

Overview of the ASCC Group Structure

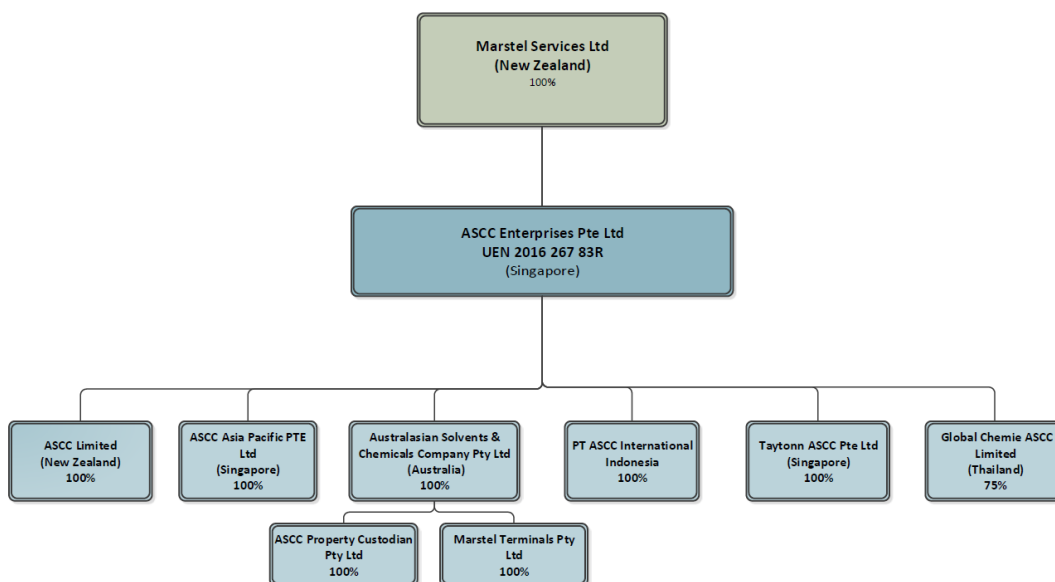
With its origins in Australia, Australasian Solvents and Chemical Company Pty Ltd (ASCC) is part of a larger group of six companies, which all operate under a parent company of ASCC Enterprises Pte Ltd, as based in Singapore.

The 100% shareholder of the Singapore based parent company is Marstel Services Ltd of New Zealand.

The ASCC Group of Companies consists of the following business entities.

- ❑ Australasian Solvents and Chemicals Company Pty Ltd (*Australia*)
- ❑ Marstel Terminals Pty Ltd (*Australia*)
- ❑ ASCC Ltd (*New Zealand*)
- ❑ ASCC Asia Pacific Pte Ltd (*Singapore*)
- ❑ PT ASCC International (*Indonesia*)
- ❑ Taytonn ASCC Pte Ltd (*Singapore*)
- ❑ Global Chemie ASCC Ltd (*75% shareholding, based in Thailand*)

ASCC Group Structure



Who we are, our Structure, Operations & Supply Chains

Our Operations

The ASCC Group of Companies are a raw chemical and materials distribution network located across Asia-Pacific which has no interest in, or ownership of, any actual manufacturing operations. The materials we distribute are predominantly sourced from chemical producers based in Asian countries such as South Korea, Taiwan, Singapore and China, with a smaller portfolio of products sourced from the USA and Europe.

As first reported in 2022, the ASCC Group engaged a Group Purchasing Manager based in Shanghai, China in a move designed to ensure greater connection to our supply sources located within the region. This appointment has led to better communications and more efficient procurement processes for the group.

The person employed in this position has been trained and is well informed about the risks and seriousness of Modern Slavery practices and thereby ensures our Supplier Evaluation Processes are followed.

Oversight of our supplier risk is managed by our recently appointed ANZ Supply Chain Manager Andrew Cumming. Andrew is responsible for Supply Chain activities for Australia and New Zealand, along with material procurement and supplier evaluation.



Our Supply Chains

The ASCC Group of Companies uses third-party suppliers who provide shipping, logistics, warehousing and storage. Each of our regional business entities source products from multiple suppliers from various regions and while these can be more difficult to map, the ASCC Group has accurately mapped our Tier 1 and Tier 2 suppliers.

Our higher volume distribution agreements are generally with larger, well-known producers and these are managed in a centralised model, with all procurement activities and supplier agreements overseen by our Supply Chain Manager. Our 2023 Modern Slavery Statement was devised in consultation with our Supply Chain Manager, along with each of our regional Purchasing staff and General Managers who are accountable for our business activities in each country of operation.



Our identifiable risks and controls to mitigate

ASCC has always aimed to partner only with highly reputable companies who demonstrate the highest ethical and legal standards. Senior representatives from our company often visit the manufacturing sites of our supply partners and therefore view first-hand the working conditions of their employees.

Our due diligence processes is underpinned by **Supplier Evaluation Assessment form**, which is a comprehensive questionnaire requesting all potential suppliers and contractors’ responses to a series of questions regarding their operations and additionally requests written confirmation that the company always complies with all regulatory and legislative requirements, including compliance with local employment laws. Furthermore, we request that the supplier has systems and processes in place to eliminate the risks associated with Modern Slavery. We ask that our suppliers notify ASCC of any breach with regards to compliance with legislation and regulations, immediately upon recognition. This Supplier Evaluation Assessment process has undergone further review in 2022, with additional questions and criteria regarding Modern Slavery risks added to the document. In a significant improvement to our actions, we are implementing two “non-negotiable sections” to our Supplier Evaluation Assessment, whereby any responses within these sections that aren’t congruent with best practices which seek to eliminate bonded or forced labour, will be escalated directly to our Chief Executive Officer for referral.

Section F: Compliance	
Acknowledgement/confirmation is required that all regulatory and legislative requirements are met and adhered to including but not limited to:	
*Modern Slavery Act: Acknowledgement that the supplier adheres to all legislation with regards to the Modern Slavery Act and supplies herewith a copy of their policies	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Is your organisation required to publicly disclose information on its efforts to address modern slavery practices under the Australian Modern Slavery Act (Cth) 2018 or any other similar regional legal requirement?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Does your organisation perform screening of all existing and prospective suppliers to assess the risks of Modern Slavery or other human rights harms that may occur in its operations and supply chains?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Have you received a copy of and read the latest version of the ASCC Group of Companies Modern Slavery Statement?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are staff in your organisation trained on how to identify, assess, and respond to Modern Slavery risks?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does your organisation have a Supplier Code of Conduct? (If yes, please provide a copy)	<input type="checkbox"/> Yes <input type="checkbox"/> No
How much visibility does your organisation have over your supply chain? (Please select one of the options):	<input type="checkbox"/> High: You have mapped the full supply chain for key products and services used by your organisation and have identified key suppliers at all levels of your supply chain. <input type="checkbox"/> Moderate: You have identified major Tier One suppliers and have partially or fully mapped the supply chains for key products and services of your supply chain. <input type="checkbox"/> Developing: You have identified major Tier One suppliers. You have very limited or no visibility of your supply chains below the Tier One level.

Extract from the ASCC Group Supplier Evaluation Assessment as implemented in 2022 which includes one of the “non-negotiable sections” covering Modern Slavery and our suppliers supply chains.

Our identifiable risks and controls to mitigate

To further strengthen our ability to adequately assess our supplier base, ASCC has partnered with Ecovadis, the world's largest and most trusted provider of business sustainability ratings for global supply chains for many years. The criteria used by Ecovadis covers four categories including environment, Labour and Human Rights, Ethics and Sustainable Procurement. They follow verifiable international Corporate Social Responsibility standards including Global Company Principles, International Labour Organisation (ILO) conventions, the Global Reporting Initiative Standard and ISO 26000. ASCC also partners with Avetta, a supply chain compliance solution for organisations who need assurance that their service providers conform to industry Health, Safety & Environment standards.



During the past financial year, all ASCC Group employees involved in sourcing, procurement and Supply Chain, along with all sales and marketing personnel, were assigned training on the topic of Modern Slavery Awareness. This training was delivered via a third-party digital training provider Safetrac, who were awarded Learn-X's Platinum Award for Best Compliance Training Program continually from 2011-2021. Our decision to partner with Safetrac was largely guided by their claim that during their 20-year history, none of their clients who have rolled out compliance training annually had ever been found by a regulator to have an inadequate compliance training program in place. This was the type of assurance ASCC was seeking in ensuring awareness for our employees around serious topics such as Modern Slavery Awareness, Whistleblowing Protections, Discrimination and Integrity and Compliance.

Our Evaluation of the Effectiveness of our Actions

Since implementation of the updated supplier assessment, the ASCC Group of Companies is satisfied that we only source products and services with reputable organisations who share our values with regards to slave or bonded labour. These assessments of effectiveness are made between our Supply Chain Manager, who has jurisdiction for all procurement activities and our Operational Excellence Manager in collaboration with each our Regional Directors and Country General Managers.

In general, the suppliers that the ASCC Group partner with are known to be reputable, ethical and are generally very well-known brands with a global presence, that operate under strict governance and compliance due to the highly regulated nature of petrochemical manufacturing.

Our well-established (Tier 1 & 2) suppliers include notable companies and brand names.

- ✓ **ExxonMobil Chemical Company (Singapore/Europe/USA)**
- ✓ **Eternal Chemical Company (Taiwan)**
- ✓ **Hanwha Total Chemical (South Korea)**
- ✓ **Nan Ya (South Korea)**
- ✓ **S-Oil (South Korea)**
- ✓ **Savita (India)**

In summary, the ASCC Group of Companies as a collective purchaser of chemical raw materials, are satisfied that we do not trade with any suppliers who fail to comply with the policies we have in place that cover human rights and the dignified treatment of people.

We are aware that the travel sector is an industry considered to be one of higher risk of modern slavery practices, and we acknowledge that we frequently have personnel travelling for the purpose of conducting business. We only ever utilise well-known hotel chains, airlines and travel agencies and trust their well-established branding and reputation means that like us, they are acting ethically and responsibly with regards to the elimination of Modern Slavery risks.

Our Consultation Process

This statement was prepared in consultation with all regional managers of our controlled entities, our Board of Directors, our Supply Chain Manager whose remit includes the procurement and sourcing of all distributed products, and all key stakeholders who are involved in our supply chain, logistics, operations and material sourcing, as these personnel are best positioned to support the delivery of our commitment to eliminate Modern Slavery risks from our entire supply chains.

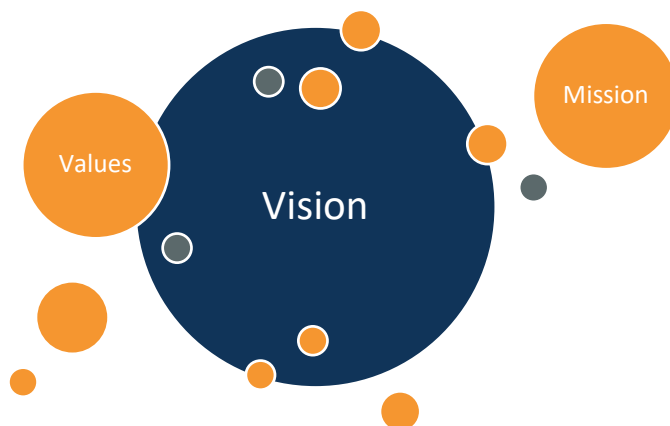
Our Vision, Mission & Values

Our Vision statement declares, ***“We Exist to Enhance Lives.”*** Whether it be our employees, their families, the people employed by our customers, our shareholders or those living within the communities in which we operate, our major priority is always on the safety and the wellbeing of people.

Our Mission states that, ***“We will outperform by exceeding expectations in our service and supply to the manufacturing industries.”*** We consider our dedication to outperformance to also apply to our compliance with regulations, and in our equitable treatment of people.

Our 6 Core Values also reflect our philosophy of genuine care for people. Mindfulness, for people’s welfare and our environment, is one of our guiding principles that helps to shape both our policies and our codes of conduct.

- Innovation
- Mindfulness
- Professionalism
- Accountability
- Communication
- Teamwork



Our Human Rights Related Policies

ASCC has a Code of Conduct Policy that sets the framework on how we, as an organisation will treat people and our expectations. This policy includes a section on Forced Labour which states, *“ASCC does not tolerate any form of forced labour, including bonded, slave or compulsory labour, or the hiring of child labour under any circumstances. The minimum age for all full-time employment must be 15 years of age, or the legal minimum age for employment, whichever is the greatest.”*

Aside from the Code of Conduct Policy, the ASCC Group also has the following policies in place to support our commitment to The Ten Principles of the United Nations Global Compact.

- Procurement & Supplier Risk Policy**
- Whistleblower Policy**
- Anti-Bribery and Anti-Corruption Policy**
- Code of Conduct for Suppliers**
- Anti-Discrimination Policy**

Our human rights policies are comprehensive and robust, reflecting our commitment to eliminating modern slavery in all its forms. We acknowledge the key forms of modern slavery and exploitation, including human trafficking, forced labour, debt bondage, descent-based slavery, child slavery, forced and early marriage, and domestic servitude. These policies guide our actions and decisions, ensuring that we uphold the highest standards of ethical conduct and human rights.

ASCC employees in all regions of operation are expected to strictly conform with these policies and mandatorily report any failures to comply. Disciplinary action, including written warnings or even termination of employment, are potential outcomes for any failure to comply.

Our Commitment to Continual Improvement

As an ISO 9001, 14001 & 45001 accredited business, ASCC is focused on continual operational improvement, and this includes our commitment to eliminating our risk of inadvertent support of modern slavery practices. We will therefore continue to review and develop our practices, our procurement procedures and our policies to assist in the elimination of human rights abuse globally.



Statement Approval

This statement was approved by the Board of Directors, after review by our internal stakeholders, the General Managers in each country where we operate, our Group Chief Financial Officer, our South-East Asia Regional Director, along with our Chief Executive Officer, who also signed this statement under instruction by the Board of Directors on the 4th of December 2024.

Michael Frost
ASCC Group Chief Executive Officer