



Modern Slavery

STATEMENT 2025





Ball & Doggett

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Message from the CEO



Luke Wilkinson

At Ball & Doggett Pty Ltd ("Ball & Doggett"), we recognise that responsible supply chains are built together. As Australia's leading distributor of printable materials, packaging substrates and industrial equipment, we understand that our role in the value chain carries both influence and responsibility.

Modern slavery has no place in our operations or in the supply chains we engage with. Addressing these risks requires ongoing vigilance, transparency and collaboration across suppliers, customers and industry partners.

During the 2025 reporting period, we strengthened our governance approach through the development of our 2030 ESG Strategy. This process included a materiality assessment that identified human rights and ethical sourcing as priority areas for action. As a result, we have committed to improving and protecting human rights and working conditions throughout our supply chain.

We have enhanced supplier oversight through updated due diligence processes, strengthened our Supplier Code of Conduct, and embedded modern slavery risk considerations within executive accountability structures. While we recognise that this is an ongoing journey, we are building the systems and governance necessary to progressively improve transparency and oversight.

Eliminating modern slavery requires collective action. We will continue to work with our suppliers and partners to strengthen standards, improve traceability and promote responsible business practices across the markets in which we operate.

We remain committed to contributing to a supply chain that upholds dignity, fairness and respect for all.

OUR VALUES:

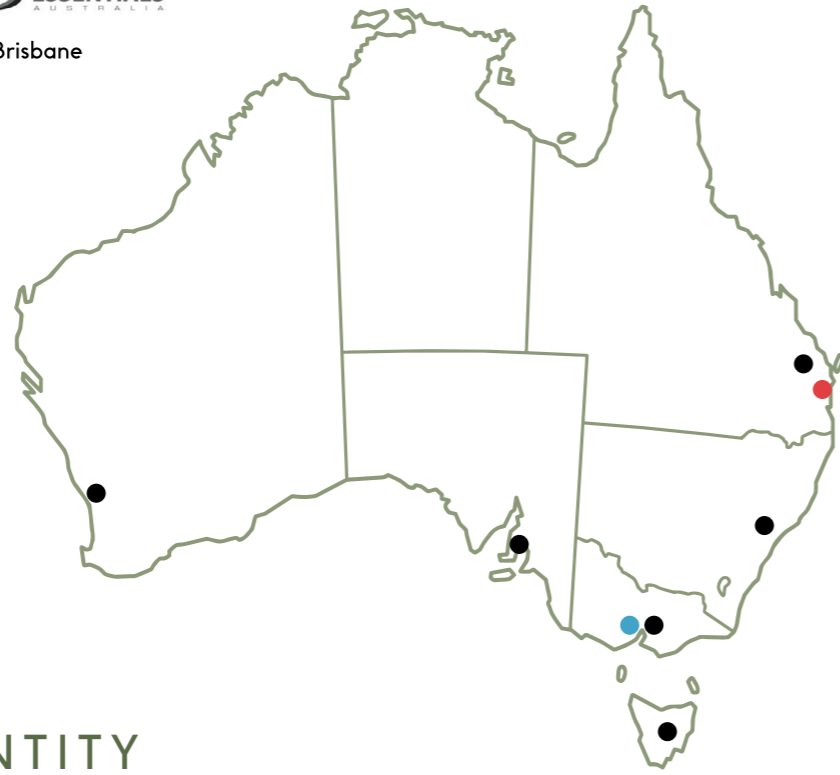


OUR LOCATIONS:

Ball & Doggett
Melbourne (Head Office)
Sydney
Brisbane
Adelaide
Perth
Tasmania

caspak
Melbourne

SIGN ESSENTIALS AUSTRALIA
Brisbane



1 REPORTING ENTITY

This Modern Slavery Statement is made pursuant to section 16 of the Modern Slavery Act 2018 (Cth) (the Act) by Ball & Doggett Pty Ltd (ACN 005 190 036) for the reporting period ending 31 December 2025.

This Statement describes the risks of modern slavery practices in Ball & Doggett's operations and supply chains, and the actions taken to assess and address those risks.

This Statement covers business activities conducted by Ball & Doggett Pty Ltd, including those carried out under the Caspak and IMPAK Films brands.

References to Caspak and IMPAK Films in this Statement relate to brands and business assets acquired by Ball & Doggett. Ball & Doggett did not acquire the legal entities previously operating under those names.

These operations are managed under common governance structures and share procurement systems, supplier networks, and corporate oversight within Ball & Doggett. Accordingly, this Statement has been prepared as a consolidated statement for Ball & Doggett Pty Ltd.

This Statement does not include New Zealand entities, as they are not owned or controlled by Ball & Doggett Pty Ltd for the purposes of the Act.



2 STRUCTURE, OPERATIONS AND SUPPLY CHAINS

2.1 Corporate Structure and Ownership

Ball & Doggett Pty Ltd (ACN 005 190 036) is an Australian proprietary company and is wholly owned by the OVOL Japan Pulp & Paper Group (OVOL Group), a global paper, packaging and materials business operating across multiple jurisdictions.

For the purposes of this Statement, references to Ball & Doggett Pty Ltd include the operations of Ball & Doggett and the business activities conducted under the Caspak and IMPAK Films brands.

These operations operate under common executive leadership and governance oversight within Australia. Corporate functions including procurement, finance, sustainability, compliance, and people and culture operate across these operations to ensure alignment of policy, risk management, and operational standards.

The Board of Directors of Ball & Doggett Group retains ultimate oversight of modern slavery risk governance for Ball & Doggett Pty Ltd.

2.2 Operations

Ball & Doggett is Australia's leading distributor of printable materials, packaging substrates, labels, consumables and industrial equipment.

- Across its core business operations, Ball & Doggett supplies a range of products including: Commercial print materials and consumables
- Sign, display and digital substrates
- Labels and packaging materials
- Flexible films and packaging products
- Industrial and specialty materials

Ball & Doggett directly employs approximately 352 employees across Australia.

Operations are conducted across:

- Support office located at 221 – 251 Discovery Road, Dandenong South, Victoria 3175
- Distribution centres in Victoria, New South Wales, Queensland, South Australia, Western Australia and Tasmania

Ball & Doggett's operational activities primarily involve:

- Importation of paper, board, films, plastics and specialty substrates
- Domestic distribution and warehousing
- Value-added services including cutting, finishing and conversion
- Sale and servicing of printing and industrial equipment

We do not undertake large-scale offshore manufacturing within our own operations. Instead, we rely on domestic and international suppliers to manufacture many of the products we distribute.

2.3 Supply Chains

Ball & Doggett engages approximately 330 suppliers across approximately 18 countries.

While a proportion of procurement spend is with Australian suppliers, we also source products internationally, including from regions in:

- Asia
- Europe
- North America
- Other jurisdictions as relevant to product categories

Key supply chain categories include:

- Paper and pulp-based products
- Packaging materials and substrates
- Flexible films and plastic materials
- Inks, coatings and print consumables
- Industrial equipment and components
- Logistics and freight services

Ball & Doggett's supply chains involve both:

- Direct manufacturing suppliers; and
- Indirect service providers, including freight, warehousing and labour-intensive services.

Certain product categories - particularly forestry-derived materials, packaging products manufactured in higher-risk jurisdictions, flexible films and complex multi-tier supply chains - present elevated inherent modern slavery risks. These risks are further described in Section 3 of this Statement.



3

RISKS OF MODERN SLAVERY PRACTICES

3.1 Risk Assessment Approach

During the Reporting Period, Ball & Doggett undertook a formal materiality assessment to inform the development of its five-year ESG Strategy (Sustain: 2030 and Beyond).

This assessment involved engagement with internal stakeholders and review of external risk drivers to identify priority environmental, social and governance risks across our operations and supply chain.

Human rights and working conditions throughout the supply chain were identified as a material ESG priority.

As part of this process, we are committed to:

Improving and protecting human rights and working conditions throughout our supply chain.

To support this commitment, initial supplier analysis was undertaken during the Reporting Period to:

- Identify key suppliers by spend and product category
- Map primary sourcing regions
- Assess inherent risk exposure based on geography, industry and product type
- Identify areas requiring deeper due diligence

This work has informed the business's modern slavery risk identification process and will underpin the development of a structured supplier risk assessment framework.

3.2 Own Operations

Ball & Doggett assesses the risk of modern slavery occurring within its own Australian operations as low. This assessment is based on:

- Direct employment of the majority of employees under Australian workplace laws
- Compliance with applicable industrial relations and employment legislation
- Oversight by People & Culture, Legal and Compliance functions
- Whistleblower and grievance mechanisms available to employees
- Executive and Board-level governance oversight

While inherent risk is assessed as low, we recognise that labour hire, contract service providers and logistics operations may present elevated exposure and are therefore considered within the broader risk assessment framework.



3.3 Supply Chain Risks

Ball & Doggett recognises that modern slavery risks are more likely to arise within its supply chains than within its own operations.

Based on the materiality assessment and supplier analysis undertaken, key inherent risk areas include:

Geographic Risk

Certain sourcing regions present elevated risk due to:

- Weaker labour law enforcement
- Higher prevalence of forced labour indicators
- Reliance on migrant or vulnerable labour cohorts

These risks are particularly relevant in parts of Asia and other emerging manufacturing regions from which paper, packaging, films and substrates may be sourced.

Product and Industry Risk

Elevated risk categories include:

- Forestry and pulp-derived products
- Packaging and plastic manufacturing
- Flexible films and substrates
- Labour-intensive conversion and manufacturing processes
- Sea freight and logistics services

These industries may involve complex, multi-tier supply chains with limited transparency beyond Tier 1 suppliers.

Supplier Risk

Risk factors identified include:

- Indirect suppliers with limited visibility into upstream manufacturing
- Suppliers operating in jurisdictions with limited regulatory oversight
- Service providers reliant on temporary or migrant labour

Our initial supplier analysis confirmed that a concentration of procurement spend sits with a defined group of key suppliers. This presents both risk exposure and opportunity for meaningful engagement and influence.

3.4 Business Activities Conducted Under Acquired Brands

Business activities conducted under the Caspak and IMPAK Films brands operate within packaging and materials supply chains that may involve:

- Polymer and resin manufacturing
- International sourcing of packaging inputs
- Multi-tier supply networks

These characteristics are considered as part of our consolidated modern slavery risk assessment across our operations and supply chains.

4 ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS



During the Reporting Period, Ball & Doggett implemented and strengthened governance, due diligence and supplier oversight measures to assess and address identified modern slavery risks. These actions are aligned to the risk categories described in Section 3.

4.1 Governance and Oversight

- To strengthen accountability and integration of human rights risk within our broader governance framework:
- A Sustainability & Compliance Manager was appointed during the Reporting Period.
- Oversight of modern slavery and broader ESG matters now sits within the expanded executive portfolio of the Head of People, Safety and Sustainability.
- Modern slavery risk considerations were formally integrated into our five-year ESG Strategy.
- We introduced a formal Supplier Modern Slavery Declaration as part of its enhanced supplier due diligence framework.

These measures enhance executive-level visibility of supply chain human rights risks and strengthen internal coordination across procurement, compliance and people functions.

4.2 Supplier Code of Conduct

To address supplier and industry risk exposure, Ball & Doggett revised and reissued its Supplier Code of Conduct during the Reporting Period.

The revised Code:

- Reinforces expectations regarding compliance with the Modern Slavery Act 2018 (Cth)
- Prohibits forced labour, child labour, debt bondage and human trafficking
- Requires suppliers to comply with applicable labour laws and international labour standards
- Applies to direct suppliers and, where possible, their subcontractors

The updated Code was communicated to suppliers and incorporated into procurement processes to strengthen contractual expectations and alignment.

4.3 Supplier Due Diligence and Risk Monitoring

SEDEX

To address geographic and supplier risk exposure, Ball & Doggett maintained and strengthened its membership with SEDEX (Supplier Ethical Data Exchange).

During the Reporting Period SEDEX monitoring was updated and aligned across all direct Australian distribution and operational sites.

This provides structured visibility and supports ongoing risk monitoring.

EcoVadis

We completed an EcoVadis sustainability assessment during the Reporting Period, achieving a 35% Bronze rating.

EcoVadis supports benchmarking across environmental, labour, human rights and governance dimensions and strengthens supplier ESG risk visibility. The assessment provides an external reference point to identify areas for improvement and supports enhanced due diligence across higher-risk categories.

4.4 Training and Awareness

During the Reporting Period, modern slavery awareness was incorporated into Ball & Doggett's annual compliance training program.

This training is delivered to relevant internal teams, including procurement, supply chain and operational personnel, and is designed to:

- Improve awareness of modern slavery risks;
- Support identification of potential risk indicators within supplier engagements;
- Reinforce our zero-tolerance position on forced labour, human trafficking and exploitative practices; and
- Clarify internal escalation and reporting pathways.

We recognise that strengthening awareness and capability across key functions is critical to the effective identification and management of supply chain risks.

4.5 Initial Supplier Risk Analysis

As part of the materiality assessment process underpinning the ESG Strategy, we undertook an initial supplier analysis to:

- Identify key suppliers by spend concentration
- Map primary sourcing regions
- Assess inherent geographic and product risk exposure
- Prioritise areas for deeper due diligence

This analysis informs the development of a structured supplier risk assessment framework, to be progressively implemented.

4.6 Remediation and Escalation Framework

Ball & Doggett maintains processes to respond to potential modern slavery risks, including:

- Escalation to executive leadership where material risks are identified
- Engagement with suppliers to seek clarification and corrective action
- Review of supplier relationships where non-compliance cannot be addressed
- Whistleblower and grievance mechanisms available to employees and stakeholders

No substantiated modern slavery incidents were identified within our operations during the Reporting Period.



5 ASSESSING EFFECTIVENESS

Ball & Doggett recognises that effective management of modern slavery risk requires ongoing monitoring, governance oversight and continuous improvement.

During the Reporting Period, we assessed the effectiveness of its actions through:

- Annual review of supplier data and risk indicators via the SEDEX platform;
- Executive-level oversight through the Sustainability & Compliance function;
- Monitoring of whistleblower and grievance channels; and
- Periodic internal review of procurement and supplier onboarding processes

In addition to ad-hoc reporting on modern slavery to the Board, modern slavery risk has been integrated into Ball & Doggett's five-year ESG Strategy (2030 and Beyond). Under this framework, modern slavery and broader human rights risk oversight will be reported to the Board on a quarterly basis from the 2026 reporting cycle onward.

Ball & Doggett acknowledges that, during the Reporting Period, formalised modern slavery-specific KPI's were not yet fully developed or tracked. As part of the ESG Strategy implementation, we are developing measurable indicators to strengthen monitoring and accountability. These are expected to include:

- Coverage of supplier due diligence processes;
- Supplier engagement and risk categorisation metrics;
- Monitoring of non-conformance or remediation actions;
- Training and awareness coverage across relevant functions.

The business considers the 2025 Reporting Period to represent a foundational year in strengthening governance structures and systems, with enhanced performance measurement to be progressively embedded from 2026.



6 CONSULTATION AND INTERNAL ENGAGEMENT

This Statement has been prepared through consultation with internal stakeholders responsible for governance, procurement, supply chain management and operational oversight across Ball & Doggett's business activities.

During the Reporting Period, consultation occurred through engagement with executive leadership and functional teams including Sustainability, Compliance, Legal, Finance, Procurement and People & Culture. This engagement informed the company's ESG materiality assessment, supplier risk review processes and the development of Ball & Doggett's modern slavery governance framework.

Business activities conducted under the Caspak and IMPAK Films brands were considered as part of the supplier analysis and risk identification processes undertaken during the Reporting Period.

Given the shared governance structures, procurement systems and executive oversight across our operations, Ball & Doggett considers that the risks and actions described in this Statement appropriately reflect our operations and supply chains.

7 CONTINUOUS IMPROVEMENT AND OTHER RELEVANT INFORMATION

Ball & Doggett recognises that addressing modern slavery risks requires ongoing system development, governance maturity and collaboration across the value chain.

During the Reporting Period, our modern slavery approach was strengthened through its broader ESG Strategy development process. The 2030 ESG Strategy identifies human rights and ethical sourcing as a core priority, with a commitment to improve and protect human rights and working conditions throughout the supply chain.

As part of this strategic uplift, Ball & Doggett is:

- Developing a structured supplier risk assessment framework to classify suppliers based on geographic, product and industry risk factors;
- Enhancing due diligence integration across procurement, onboarding and contract management processes;
- Strengthening oversight through the Head of People, Safety and Sustainability portfolio;
- Expanding supplier engagement through SEDEX and EcoVadis platforms to improve transparency and benchmarking;
- Aligning modern slavery risk management with broader regulatory obligations, including due diligence requirements under the Illegal Logging Prohibition Act 2012 (Cth) and associated supply chain risk frameworks.

Our business recognises that modern slavery risks are often systemic and may extend beyond Tier 1 suppliers. Accordingly, we intend to progressively improve traceability, supplier data collection and risk monitoring across higher-risk product categories over the next reporting cycles.

From 2026 onward, modern slavery governance and performance indicators will be embedded within quarterly ESG reporting to the Board, strengthening oversight, accountability and continuous improvement.

Ball & Doggett remains committed to building a supply chain that upholds dignity, fairness and respect for all workers.

8 DISCLOSURE INDEX

The table below sets out how this Statement addresses each mandatory reporting criterion under section 16(1) of the Modern Slavery Act 2018 (Cth).

Mandatory Criterion	Description	Location in this Statement
16(1)(a)	Identify the reporting entity	Section 1 – Reporting Entity
16(1)(b)	Describe the structure, operations and supply chains of the reporting entity and any entities it owns or controls	Section 2 – Structure, Operations and Supply Chains
16(1)(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	Section 3 – Risks of Modern Slavery Practices
16(1)(d)	Describe the actions taken to assess and address those risks, including due diligence and remediation processes	Section 4 – Actions Taken to Assess and Address Risks
16(1)(e)	Describe how the reporting entity assesses the effectiveness of those actions	Section 5 – Assessing Effectiveness
16(1)(f)	Describe the process of consultation and internal engagement undertaken in the preparation of this Statement.	Section 6 – Consultation and Internal Engagement
16(1)(g)	Include any other information considered relevant	Section 7 – Continuous Improvement and Other Relevant Information



9

APPROVAL AND SIGNATURE

This Modern Slavery Statement was approved by the Board of Directors of Ball & Doggett Pty Ltd on 19th March 2026 and signed by a responsible member of the principal governing body. It has been submitted to the Australian Border Force for publication on the Modern Slavery Statements Register in accordance with the Modern Slavery Act 2018 (Cth).



Luke Wilkinson
Chief Executive Officer
Ball & Doggett Pty Ltd



