



MODERN SLAVERY STATEMENT FY 2023 - 2024



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1 PURPOSE

This Modern Slavery Statement is made on behalf of Chemiplas Australia Pty Ltd (ABN 29003056808), in pursuant to the Modern Slavery Act 2018 (Cth) (the Act). This Statement sets out the actions taken by Chemiplas¹ to identify, assess, and address modern slavery risks across our operations and supply chains and their relevant objectives in Financial Year 2023-2024.

1.1 COMPANY DETAILS

Company Name: Chemiplas Australia Pty Ltd
ABN: 29 003 056 808
Head Office Address: Level 1, 128 Jolimont Road, East Melbourne, 3002, Australia
Site: <https://chemiplas.com.au>

2 STRUCTURE, OPERATIONS & SUPPLY CHAIN

Chemiplas Australia Pty Ltd is a limited by shares Australian proprietary company. Our main office is in East Melbourne, Australia and we are a subsidiary of Chemiplas New Zealand Ltd. Azelis Pty Ltd has acquired us on 31st March 2023. We are now part of Azelis group of companies. However, we will continue to operate as a separate entity for some time to ensure a smooth transition.

Chemiplas' operations fall within the Wholesale Sector as a distributor of raw materials and ingredients to the following industry sectors. Internally we distinguish the below two segregations in sectors with the shorthand overarching allocations of 'IS' and 'FFF' – these will be used throughout this document.

Table 1: Industry Sectors - Chemiplas Australia

IS ²	FFF ³
Surface Coatings	Food
Resins	Nutrition
Paper	Nutraceutical
Mining	Therapeutic
Water	Pharmaceutical
Plastics	Personal Care
Agriculture	Home Care
Inks	Animal Feed
Construction	Animal Health
Rubber	Veterinary
Textiles	Fine Chemicals

¹ 'Chemiplas' is Chemiplas Australia Pty Ltd (29 003 056 808) as defined in Section 50 of the Corporations Act 2001 (Cth).

² 'IS' is shorthand for the sectors listed on the left-hand side in Table 1

³ 'FFF' is shorthand for the sectors listed on the right-hand side in Table 1



Chemiplas draws on services from global, national and regional entities. We employ approximately 50 staff throughout Australia, and we serve almost 3,000 customers. We source our products from a wide array of countries as outlined in Table 2.

Table 2: Source countries – Chemiplas Australia

Asia Pacific	Europe	Middle East	The Americas
Japan	Italy	Pakistan	Ecuador
Malaysia	Norway	Cyprus	USA
China	Germany		
Philippines	Netherlands		
India	Belgium		
New Zealand	Denmark		
Republic of Korea	Sweden		
Hong Kong	France		
Singapore	Finland		
Sri Lanka			
Thailand			
Australia			

Our company has an upstream global network currently made up of 189 suppliers and approximately 50 third-party service providers. Operational activities of our company include direct employment of workers, procurement of products, sales, and storage/delivery of these products through third-party service providers. We outsource some of these business processes to third-party service providers.

Chemiplas seeks to do business with suppliers and third -party service providers with aligned values, ethics, and sustainable business practices, including those related to human rights and modern slavery. However, we recognise that as a large purchaser of products the business performance and conduct of our suppliers can influence our impact and reputation within the communities in which we operate.

Chemiplas has established cross-functional representation in the fight against modern slavery. Key representatives include members from the Board of Directors, Operations, Finance, Quality and Regulatory Affairs. Zero tolerance for any actions, manners of interaction, explicit or implied, that compromise commonly understood human rights, animal rights and ethical standards has always been embedded within Chemiplas’ ethics and practices. The introduction of modern slavery legislation has enabled the business to realise this in a more tangible manner through implementation of framework that captures our values and provides an overarching governance of our daily interactions and procedures in this regard.



3 MODERN SLAVERY ADHERENCE

Our company **has not** been convicted for breaching any human rights, regulations, including in relation to modern slavery and/or labour standards.

Our company **has never** received any notice from any regulator or authority (including local authorities) alleging any breach of human rights.

Our company has policies and processes to identify, investigate and remedy any instances of modern slavery within our organization.

3.1 CHILD LABOUR

Our company complies with the United ILO Conventions that prohibit the worst forms of child labour, hazardous labour, and minimum age for work. At the time of writing the youngest worker in our company is 24 years old.

Our company does not undertake direct checks to ensure child labour is not being used by our suppliers. However, we have full transparency over direct employees and screen our supplier's compliance through signing a declaration of compliance associated with our Ethical Sourcing Policy.

3.2 FORCED LABOUR, BONDED LABOUR AND HUMAN TRAFFICKING

Our Ethical Sourcing Policy prohibits modern slavery including all forms of forced labour, bonded labour, and human trafficking in our operations and in our suppliers' operations.

We do not retain any original identity documents of workers such as passports, birth certificates and national identity cards.

We do not require our workers to lodge any 'security deposits' (e.g. monetary payment or personal property) or pay any recruitment fees, nor do we accept these.

We do not deduct wages, impose monetary fines (this includes fines for misconduct and poor production, and/or withhold pay or pay entitlements of workers).

3.3 EMPLOYMENT CONDITIONS

Chemiplas adheres to all applicable laws in relation to employment and fair work and the company does not employ children under the legal employment age in any country or local jurisdiction. Chemiplas do not use or allow any form of forced, bonded or involuntary labour.

Our company provides all our workers with a written contract in a language they understand, where terms of employment including wage rates and hours of work are clear.



We pay our workers their legal pay entitlements, on time and provide them with pay slips which clearly show how wages have been calculated and details of any deductions. Our workers are free to lawfully resign their employment without restriction or penalty.

Our company does not have a published policy defining hours. The company adheres to the Fair Work Act 2009 of maximum 38 ordinary hours for full-time employees and less than 38 ordinary hours for non-full-time employees or as otherwise agreed. Our company discourages working more than these requirements.

All our workers are either Australian citizens or residents and reside in their respective dwelling.

For further information on workplace rights and obligations in Australia, please visit the [Australian Government Fair Work Ombudsman](#) website.

3.4 GRIEVANCE AND REDRESS MECHANISMS

Our workers have mechanisms available to anonymously raise concerns related to labour conditions or workplace grievances and can access an appropriate remedy. A dedicated anonymous email contact is provided to all staff and suppliers which is consistently monitored by the Chemiplas Operation Director.

4 RISKS, DUE DILIGENCE & MITIGATION ACTIONS

Chemiplas is committed to manage the risks of modern slavery and any adverse human rights impact in our business operations and supply chains. Chemiplas supports the Ethical Trade Initiative (ETI), the International Labour Organisation (ILO) Conventions and the United Nations Guiding Principles on Business and Human Rights. As part of our corporate conduct and governance we promote a zero-tolerance approach for any human rights abuses and encourage openness, honesty and transparency as integral to all our practices. This is inherent not only within the workplace but in our external operations and dealings where employees and third-party persons alike feel comfortable to report any relevant concerns and suspicions for investigation and possible remediation.

Our supplier on-boarding process screens for their positioning in relation to ethical practices, business ethics, labour practices, environmental considerations, sustainability, and animal welfare. This enables more robust risk assessment and mitigation of risk as required within our procurement practices. We work collaboratively with our suppliers to ensure all parties adhere to our expectations and standards.

As a company with a professional workforce and having no direct employees outside Australia, we consider risks of modern slavery within our direct business operations to be low. For the 2020-2021 financial year the highest risks associated with human rights, modern slavery and labour standards are our Tier 1 suppliers that did not sign the Ethical Sourcing Policy Declaration (Q11F) in 2020. However, our company may be exposed to risks of modern slavery through supply chains and third-party service providers. Our company seek to increase visibility of our supply chain network to expose any potential or occurrences of modern slavery related breaches or abuses and to collaboratively work with the suppliers to mitigate the risks or resolve the issues.



Currently, our company does not require our suppliers to conduct due diligence for modern slavery risks on their suppliers. However, we are committed to incorporating this requirement to our suppliers in the future alongside increasing review of our upstream supply chains.

4.1 ACTIONS TAKEN BY THE COMPANY

In FY 2020- 2021, we distributed our Ethical Sourcing Policy to our suppliers and required them to sign a declaration to comply with our policy.

In FY 2021-2022, we trained our staff on Modern Slavery Awareness. We also participated in Ecovadis Sustainability Assessment. We received a Bronze Medal in recognition of Ecovadis Rating.

Below are our further responses to Modern Slavery.

4.1.1 ETHICAL SOURCING – DIRECT SUPPLIER COMMITMENT

Our company conducts due diligence for modern slavery risks on our suppliers. We distributed our Ethical Sourcing Policy throughout 2020-2021. The policy includes Chemiplas' standards on labour, environmental, and business ethics. Our ethical sourcing policy, in conjunction with our environmental and sustainability policy details key principles, criteria and guidelines for contractors and suppliers. It also includes a blueprint on grievances and whistleblowing. We require our suppliers to sign a declaration (Q11F) verifying compliance with our Ethical Sourcing Policy. We also accept equivalent documented assurance of compliance.

All direct input suppliers verified their compliance to obligations within our Ethical Sourcing Policy through signing of the accompanying declaration (Q11F) or by providing equivalent supportive evidence of their undertaking to address comparable ethical sourcing compliance. Through this process we have secured commitment of over 90% of our suppliers to the requirements stipulated within the policy.

In addition, we regularly conduct sweeps of certification status of our direct input suppliers in the environmental, OHS, conduct, sustainability, and social accountability arenas.

4.1.2 MODERN SLAVERY TRAINING

In FY2022-2023, our Management Team and staff were trained on Modern Slavery to foster a 'speak up culture to encourage reporting of any suspected occurrences of modern slavery abuses or human rights violations.

4.1.3 REMEDIATION

We have provided an anonymous platform for reporting of relevant concerns and whistleblowing as outlined and accessible within our Ethical Sourcing Policy. We incorporated a whistle-blowing framework into our Ethical Sourcing Policy and established an anonymous contact email. This has been communicated both internally and to our direct input suppliers. Our company's policy stipulates to contact the Australian Federal Police and/or Anti-Slavery Australia if modern slavery practices are suspected.



4.1.4 PALM OIL – ROUND TABLE ON SUSTAINABLE PALM OIL (RSPO)

For relevant industry sectors, we required our suppliers of palm oil products to comply with RSPO (Round Table on Sustainable Palm Oil) requirements or to be RSPO certified. We acknowledge that palm oil supply has been linked not only with animal welfare abuses but also associations with human rights breaches and child labour. Since 2018 we screen all of our suppliers at the point of product approval for presence of palm oil and corresponding RSPO status.

4.1.5 VINYL COUNCIL AUSTRALIA

Chemiplas Australia Pty Ltd are members of the Vinyl Council of Australia (VCA) and undertake their PVC Stewardship requirements each year. This incorporates high level accountability within the arena of modern slavery and sustainability. We have achieved the Gold Excellence standard since 2018.

4.1.6 ECOVADIS SUSTAINABILITY ASSESSMENT

In FY 2022, Chemiplas Australia Pty Ltd had participated in Ecovadis Sustainability Assessment. This assessment, which is a paid service to assess your company's material sustainability impacts based on documented evidence. We are proud to announce that it has been awarded the EcoVadis 2022 Bronze Medal for Sustainability. The certificate reflects our commitment to conduct our business in a socially responsible and ethical manner, to protect the health and safety of people, to care for the environment and its sustainability, to support human rights, and to engage and support communities. We are passionate to further strengthen these commitments.

4.1.7 SUPPLIER ETHICAL DATA EXCHANGE (SEDEX)

SEDEX is the world's leading ethical trade membership organisation. SEDEX is an ethical data platform whereby industry bodies (including buyers and sellers) can store share and report relevant supply chain information. Chemiplas are a SEDEX B member: We are registered on the ethical data platform known as SEDEX Advance. Our SEDEX presence enables greater visibility of our suppliers and enables us to comprehensively assess risks associated with our suppliers around the world. It also enables us to leverage the SEDEX platform to encourage current and prospective suppliers to sign on to SEDEX as appropriate to their industry operations. We have initiated utilising the SEDEX platform to adopt a more integrated approach to identification of potential risks in the areas of modern slavery and industry-based ethical practices.

4.1.8 DUE DILIGENCE FOR OUR CUSTOMERS

We continually work collaboratively with our customers by responding to questionnaires and enquiries in relation to our operations and supply chains to address any requirements or concerns they have.

5 MEASURING EFFECTIVENESS

We acknowledge ever-increasing reporting requirements and the administrative burden on suppliers, and hence, to date we have opted to streamline the attestation process by reducing questions and validating compliance to human rights, conduct, ethical business practices and environmental management through a signed declaration (Q11F).



ETHICAL SOURCING – DIRECT SUPPLIER COMMITMENT

IS Sectors:

51 suppliers were included in the review on the industrial side and 46 of those signed the Q11F Declaration after reviewing our Ethical Sourcing Policy. Most of the remainder provided social/corporate responsibility statements as alternative.

FFF Sectors:

138 supplying entities were assessed: 10% did not sign the declaration (Q11F), 70% of these were established in SEDEX and the remaining have a robust Code of Conduct in place with comprehensive and relevant policies.

MODERN SLAVERY TRAINING

100% of our staff participated in the Modern Slavery Training. All members of our Management Team also partaken in the training.

6 MOVING FORWARD

Our focus for FY 2023-2024 includes the following:

- To conduct Modern Slavery audit on the suppliers and third-party service providers to identify their risks.
- To comprehensively classify our suppliers and the third-party service providers into low, medium and high modern slavery risks.
- Modern Slavery Awareness training for all suppliers and third-party service
- Screening of prospective suppliers on modern slavery or other human rights harms.
- Modern Slavery Training as a part our onboarding process

Key performance indicators (KPIs) include the following:

- 100% completed Modern Slavery Supplier's Audit questionnaires by 31st March 2024.
- Categorisation List of Suppliers completed by 31st March 2024.
- 100% of suppliers completed training on Modern Slavery Awareness by 31st March 2024.
- Amended supplier assessment procedure and relevant forms to include the screening of prospective supplier to assess the risks of modern slavery or other human rights harms by 31st March 2024.
- 100% of our new staff are trained in Modern Slavery (ongoing).



This statement is approved by the Board of Directors of Chemiplas Australia Pty Ltd on 12 September 2023.

A handwritten signature in black ink, appearing to read "D.L. McIlraith", written over a horizontal line.

D.L. McIlraith
Managing Director
Chemiplas Australia Pty Ltd

A handwritten signature in blue ink, appearing to read "Laurelle Jackson", written over a horizontal line.

Laurelle Jackson
Director
Chemiplas Australia Pty Ltd