



Ethical Sourcing Policy and Modern Slavery Statement

Gale Pacific Limited

ACN 082 263 778

(the Company)

(October 2023)

**Approved by the Board of Directors of Gale Pacific Limited on 6 October
2023**

A handwritten signature in blue ink, appearing to read "Sophie Karzis".

**Sophie Karzis
Company Secretary**

Ethical Sourcing and Modern Slavery Statement

Gale Pacific Limited (the Company)

1. Introduction

- 1.1 This is first Ethical Sourcing and Modern Slavery Statement for GALE Pacific Limited, ACN 082 263 778, (**GALE**) and its subsidiaries (the **Group**). The Statement articulates the Group's efforts to identify, manage and mitigate Modern Slavery risks in the Group's **Operations** and **Supply Chains**.
- 1.2 GALE Pacific's vision is to be the leading provider of innovative and practical products that protect and enhance the environments and lifestyles of its customers. GALE is committed to operating the Group's business in accordance with its core values: Integrity, Respect, Collaboration, People, Community and Innovation.
- 1.3 GALE supports the protection of human rights and opposes all forms of slavery or forced labour or abusive or unfair treatment in any part of the Group's own business, or in any of its supply chains. Preventing and addressing any involvement in Modern Slavery is central to GALE's ESG (Environmental, Social & Governance) approach including its commitment to running an ethical, safe and responsible business.
- 1.4 The Group has established a number of policies and procedures in relation to procurement, human resources and corporate responsibility in support of this objective.
- 1.5 The identification, review, and where required, escalation of high-risk suppliers for further investigation is a key process of the Group's procedures in relation to procurement, human resources and corporate responsibility.
- 1.6 GALE is committed to continuously improving the Group's **Supply Chain**.
- 1.7 This Modern Slavery Statement was approved by the Board of GALE Pacific Limited.

2. Modern Slavery

Modern slavery involves the most serious forms of human exploitation and takes many forms, including: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

The Company rejects any form of modern slavery such as slavery, servitude, human trafficking and forced labour. The Group is committed to implementing controls to ensure modern slavery does not occur in its Operations. The Company aims to identify and manage risks related to human rights across its business and through its Supply Chain management.

This Policy pursuant to the Australian Modern Slavery Act 2018 (Cth), sets out the actions taken by the Company to address ethical sourcing and modern slavery risks in its business operations and supply chain.

2.1 Terms and definitions

Suppliers is defined as factories, supplier sites and providers of goods or services to the Group.

Operations is defined as activity controlled by the Group.

Supply Chains is defined as suppliers and service providers to the Group.

2.2 Purpose

The purpose of this Policy is to ensure that the **Group**:

- complies with local, national and other applicable laws and regulations in the areas in which the Group's businesses operate;
- sources products and services in accordance with legal obligations and community expectations while working with suppliers; and
- act to prevent, mitigate and where appropriate, remedy modern slavery in their Operations and Supply Chains.

3. About Gale Pacific Limited

3.1 This statement is made by GALE Pacific Limited (ACN 082 263 778), for itself and its subsidiary companies. GALE was incorporated in Victoria Australia in April 1998 and its registered office is at **145 Woodlands Drive, BRAESIDE VICTORIA AUSTRALIA 3195**.

3.2 GALE is a public company listed on the Australian Securities Exchange (ASX: GAP).

3.3 GALE is a world leader in the research, development and manufacture of advanced polymer fabrics and a trusted leading global marketer and manufacturer of branded screening and shading products for domestic, commercial and industrial applications.

3.4 GALE invented high density polyethylene (**HDPE**) shade fabrics in the 1970s and is today a leading global manufacturer of advanced polymer fabrics including knitted HDPE outdoor fabrics, coated HDPE and PP (Polypropylene) waterproof fabrics and PP coated mesh fabrics.

3.5 The Company's outdoor retail products are currently marketed worldwide under the 'Coolaroo' brand. Major retail product lines include items such as shade fabrics, exterior window furnishings, gazebos, shade sails, screening, garden covers and shade umbrellas.

3.6 GALE products are sold to a range of consumer and industrial markets including the retail and home furnishing, architectural, construction, and agribusiness markets. The products are designed to:

- (a) Protect people and outdoor living environments from the harmful effects of UV rays, hail and other adverse weather conditions
- (b) Improve the efficiency and competitiveness of agribusiness through increased crop protection and improved water conservation
- (c) Enhance architectural designs and construction applications

3.7 GALE currently sells its products in Australasia, the Americas, Japan, Europe, the Middle East, and a number of other export markets. The Company's knitted and woven products are principally produced from its modern manufacturing facilities in Ningbo, China. The specialty coated range is designed and manufactured in Melbourne, Australia. Additionally, GALE produces a broad range of advanced polymer fabrics for commercial and industrial applications. These products are used for:

- (a) Building design; to shade car parks, sporting facilities, and school recreation areas
- (b) Construction purposes; such as barrier fencing

- (c) Agriculture and horticulture; to reduce UV damage and water loss, and to provide protection from birds, hail and insects
 - (d) Water conservation and aquaculture; such as dam and channel liners, tank liners, and pool covers, to prevent water seepage and / or evaporation
- 3.8 GALE employs over 500 people around the globe.
- 3.9 GALE operates globally with manufacturing and distribution operations in Australia, China, & the USA, and sales offices located in Australia, the USA, China and the UAE.
- 3.10 GALE'S subsidiaries are:
- (a) Gale Pacific (New Zealand) Limited (*incorporated in New Zealand*)
 - (b) Gale Pacific FZE (*incorporated in the United Arab Emirates*)
 - (c) Gale Pacific Special Textiles (Ningbo) Limited (*incorporated in China*)
 - (d) Gale Pacific Trading (Ningbo) Limited (*incorporated in China*)
 - (e) Gale Pacific USA, Inc (*incorporated in the USA*)
- All of the subsidiaries are 100% owned by GALE Pacific Limited.

4. Supply Chain

GALE operates globally with manufacturing and distribution operations in Australia, China and the USA.

GALE sources products and services for use in manufacturing, distribution, sale to customers and to support operations.

GALE has a procurement team in each operating region who manage the procurement of the products and services purchased.

5. Governance & Framework

GALE has a formal governance structure with Board-level oversight through an Audit & Risk Committee, which is responsible for managing and monitoring corporate compliance, including reporting for Modern Slavery.

GALE's Governance structure and this statement are supported by a suite of charters, policies and procedures. The policies outlined below are those most relevant to managing the risk related to Ethical Sourcing and Modern Slavery.

| Policy | Purpose |
|--|--|
| Corporate Governance Statement | GALE's Corporate Governance Statement outlines GALE's corporate governance policies and practices in line with the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations. |
| Code of Conduct | GALE's Code of Conduct commits the directors and all employees to adhere to high standards of business conduct and compliance with the law and articulates the principles and values that allow the directors and all employees to work in a positive, supportive environment. |
| Equal Employment Opportunity Policy and Diversity Policy | GALE's Equal Opportunity Policy and Diversity & Inclusion Policy recognise the importance of equal opportunity and diversity in the workplace. GALE values the contribution of all employees regardless of gender, age, ethnicity, disability, sexual orientation and cultural background. |
| Whistleblower Policy | GALE's Whistleblower Policy provides all employees the opportunity to raise concerns regarding improper conduct without fear of any adverse ramifications. These concerns can be raised internally with our human resources department or through an independent and confidential service. |
| Ethical Sourcing and Modern Slavery Policy | GALE's Ethical Sourcing and Modern Slavery Policy commits the Group to not engage in Modern Slavery and to verify that its suppliers do not engage in Modern Slavery. |

6. Risks of Modern Slavery in GALE's Operations and Supply Chain

6.1 Framework for Assessing Risks

The governance of sustainable procurement aligns with GALE's Risk Management Framework, which establishes the process for identifying, assessing, controlling, reviewing and reporting a risk.

The Group has commenced a process for assessing all of its major suppliers in relation to the risk of Modern Slavery. GALE recognises that the greatest risk of Modern Slavery is in its Supply Chain.

The Supply Chain risk focusses on Suppliers of goods and support services for GALE's manufacturing, assembly and distribution sites and Suppliers that may subject their staff and contract workers to conditions which might be considered to constitute Modern Slavery.

Risk assessment is prioritised according to a range of key factors including:

- Spend with Supplier
- Supplier location
- Supplier industry
- Workforce type

6.2 Actions Taken to Assess and Address Risks

Our risk assessment is ongoing; we have prioritised risk categories as follows:

- (f) **Suppliers of goods:** i.e., the suppliers of raw materials and finished goods used in our supply chain such as raw materials (e.g., resins, aluminium), consumables (e.g., personal protective equipment) and hired assets (e.g., forklifts, trucks), present a risk. In accordance with our risk methodology, those suppliers which manufacture overseas (e.g., Asia), have a history of Modern Slavery related risks, or those that have longer, indirect supply chains present a higher risk. In any event, all suppliers are required to comply with the Company's Modern Slavery Policy.

- (g) **Service providers:** i.e., the suppliers of services to enable our sites and office locations to operate such as catering, security and cleaning, as well as freight and travel service providers, in some instances present a risk and where they do, they have been advised that they are required to comply with the Company's Modern Slavery Policy. To date, no material risks or breaches have required remediation.
- (h) **Site, office and home locations:** i.e., the manufacturing, distribution and retail sites together with the offices and private homes from which the Group's personnel work present a low-risk as they are known to the Company, and because the Group ensures that all local laws are observed, including labour laws, with external counsel engaged to ensure compliance as and where necessary.
- (i) **Technology providers:** i.e., IT hardware and software and print services that support the Group's Operations are considered low risk given the maturity of the industry, strong supplier reputations and professional nature of the services rendered.

6.3 **Summary of Assessment**

The Company recognises that the greatest risk of Modern Slavery is in its Supply Chain. From a Modern Slavery perspective, the Company has taken the following actions to embed its policies and procedures:

- Introduced a Modern Slavery Policy which is used for both new and existing Suppliers operating in high-risk industries, geographies or otherwise identified as higher risk. The Policy requires Suppliers to comply with the Group's Minimum Standard in relation to Modern Slavery. The Minimum Standards expected of Suppliers are as follows:
 - No forced or bonded labour
 - No child labour
 - Comply with all laws regulating local wages, overtime compensation and legally mandated benefits
 - Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable International Labour Organisation standards
 - Suppliers must ensure that they provide a healthy and safe work environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour
 - Bribes, favours, benefits or other similar unlawful or improper payments, whether in cash or in kind, are strictly prohibited
 - Suppliers must have adequate processes in place for properly managing sub-contracting to ensure that subcontractors operate in a way that is aligned with this policy
 - Suppliers must ensure they comply with relevant local and national environmental protection laws
 - If applicable, suppliers must ensure animals are treated humanely and with respect

- If suppliers employ or engage migrant workers, they must ensure that such workers have the same entitlements as local workers as stipulated by local law
- Established a process to ensure the Company's Modern Slavery Policy has been communicated to all Suppliers, to review any identified non-compliance with this Policy and to report to the Company's Audit & Risk Committee.
- Established a Modern Slavery governance framework to identify, track, escalate and remediate Modern Slavery risks across the Group's Supply Chain; this includes physical site visits to Suppliers from to time. This is currently led by representatives from the Global Procurement team who report to the Global Supply Chain leader who reports directly to the CEO.
- Is in the process of incorporating in contracts with Suppliers that are identified as higher risk contracts terms that:
 - provide for a specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour;
 - require Suppliers to hold their own suppliers to the same standards; and
 - provide the Company with rights of termination if the Supplier is unable or unwilling to comply with these terms.
- Embarked on an awareness and information program across the Group with attendees from each of the key geographical and business units attending.

6.4 **Remediation**

When the Company identifies a failure by a Supplier to meet certain expectations, it will result in a warning being issued to the Supplier in question and working with the Supplier collaboratively to remediate any identified issues. Failure to resolve identified issues within a reasonable timeframe may result in termination of the Supplier relationship.

7. Other matters

7.1 Whistleblower Procedure

An individual can make an anonymous disclosure in accordance with the Company's Whistleblower Policy. This allows reporting of breaches of any law, regulation, or any Group Policy, including concerns relating to modern slavery. All reports pertaining to any breach of law, regulation or policy are taken very seriously and are assessed and investigated accordingly.