



HOUSEHOLD PRODUCTS
THAT ARE EFFICIENT AND
QUALITY-TESTED TO HELP
FAMILIES LIVE BETTER.

Pental Limited (“The Company”, “Pental”)

Modern Slavery Act Statement 2020



DURACELL



Introduction

This is Pental's first Statement made under the Australian Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2020 ("FY20"). Pental (including its 100% owned subsidiary Pental Products Pty Ltd) recognises the importance of protecting the human rights of all people impacted by its operations and supply chain and is committed to eradicating the risks of supporting or engaging with companies complicit in practices constituting modern slavery.

Modern Slavery refers to situations where one person has taken another person's freedom-inclusive of the following exploitation behaviours:

Trafficking in persons, Slavery, Servitude, Forced Marriage, Forced labour, Debt bondage, Deceptive recruitment of labour & services, Child labour.

About Pental, its operations and supply chains

Pental is a trusted manufacturer and distributor of personal, household, and commercial products across Australia, New Zealand, and Asia. The company is based in Australia and has approximately 140 employees.

The Company manages a portfolio of leading brands, which are household names in Australia and New Zealand - it is a branded market leader and the largest local manufacturer of bar soaps, liquid bleach, and firelighter cubes.

The Company also provides distributorship services to brands and products that are non-perishable and have a long shelf life.

For more than 60 years we have worked hard to stay true to our Australian heritage, investing in our manufacturing plant in Shepparton, Victoria.

The production plant at Shepparton facilities comprises of:

- Household Cleaning Liquids plant.
- Bar Soap plant.
- Laundry and Dishwashing Liquids plant.
- Firelighter's plant.
- Warehousing & Distribution

Across Australia and New Zealand, Pental's products are stocked in all major grocery retailers and convenience stores that sell personal care and household cleaning products.

Pental's supply chain consisted of approximately 270 suppliers in FY20 who supplied various raw materials, services, and finished goods to the Company. These suppliers are located in following regions and supply various categories of core goods and services:

- Australia – Packaging, perfumes, hypochlorite, surfactants & services
- New Zealand – contract manufacturing of dishwash liquids & services
- Asia (China, Malaysia, Singapore, South Korea, Thailand). – Batteries, Tallow, Soap noodles, some finished goods
- Europe (UK, Germany, Italy, Netherlands). Perfumes, machinery parts etc.
- North America (USA).- Batteries

- South America (Brazil); Emollient

Risks of modern slavery practices

Pental has not been made aware of any allegations of modern slavery activities against any of its suppliers.

Risk of causing modern slavery practices

Pental considers the risk of it causing modern slavery practices (i.e., the risk of Pental's operations directly resulting in modern slavery practices) to be extremely low. Pental's operations are based in Australia and Pental actively complies with all applicable workplace health and safety laws, immigration laws, whistle-blower laws and employment laws. Pental is not aware of any actions on its part which would cause modern slavery practices.

Supply chain risks

Pental acknowledges that there is a risk of it indirectly contributing to modern slavery practices (i.e., the risk of Pental's operations and/or actions in its supply chain facilitating or incentivising modern slavery) through its supply chain.

Actions taken to assess and address the risks

This statement outlines Pental's approach to ensuring our business has the framework and processes in place to identify potential Modern Slavery risk in our operations and Supply Chain.

Risk assessment

Due to limited travel options available through COVID-19 pandemic, Pental completed a desktop risk assessment in line with annual supplier reviews across Pental supplier base considering:

- The risk profile of individual countries based on the Global Slavery Index
- The presence of vulnerable demographic groups

These assessments assist in determining the Company's response and risk controls.

During FY20, Pental compiled and rolled out a Vendor Survey form which included Modern Slavery Declaration to its core suppliers that were identified as being in high-risk geographical regions.

The objective of this exercise was to build awareness and understanding of the risks of modern slavery within the supply chain and develop commitment and compliance.

Using data collected from this survey in FY21, Pental intends to refine its policies and procedures further to mitigate the risk of modern slavery through supply chains.

COVID-19 pandemic

Pental is aware that many businesses have been affected by the COVID-19 pandemic, and that these impacts may have flow-on effects that may increase the level of vulnerability experienced by workers within these businesses. These considerations will be considered in the risk analysis process.

The COVID-19 pandemic also had an impact on various aspects of Pental's business. However, the activities undertaken by Pental with respect to assessing and addressing the risks of modern slavery as set out in this statement have not been materially impacted by the pandemic.

Policies and procedures

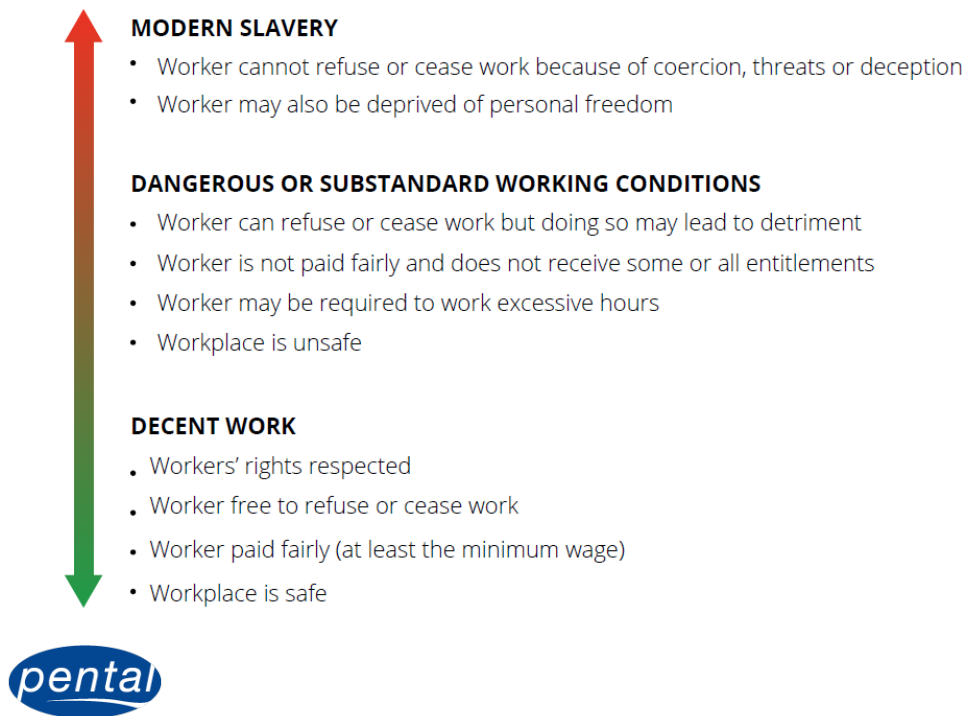
As a publicly listed company, Pental has sound experience in maintaining the highest standards of management surveillance and risk management. Pental has a strong and long-serving board and senior management team that is supported by an experienced compliance team.

Pental believes that a well-structured framework of policies and procedures, with sound management practices requiring high standards of compliance, creates a strong cultural foundation in which corrupt practices and the abuse of human rights will not flourish.

Pental operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- **Whistleblowing Policy** - we encourage all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- **Code of Conduct** - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- **Vendor Approval Process** - Vendor Approval Process makes explicit reference to slavery and human trafficking.

Pental's Ethical Commitment - Decent Worker Rights



Pental is committed to ethically conducting our business, requesting our business partners conduct their dealings with us in a fair, honest, and ethical manner. Pental has taken a zero-tolerance approach to modern slavery.

We establish a relationship of trust and integrity with all our suppliers.

Our supplier selection, procurement and supplier vendor assurance program includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety, environmental standards, and assurance that we do not engage directly or indirectly with slavery.

We ensure that we communicate respect for human rights, seeking suppliers to uphold these principles and we conduct due diligence to ensure that they have appropriate policies and procedures in place.

Supplier Due Diligence program

Pental conducts due diligence on all new suppliers during on-boarding/approval and on existing suppliers at regular intervals.

This includes:

Assessing risks in the provision of supplies through supplier surveys.

Documentation and sign off by supplier stakeholders on modern slavery.

We require all suppliers to attest that:

- *They don't use any form of forced, compulsory or slave labour.*
- *Their employees work voluntarily and are entitled to leave work.*

- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment.
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons.
- They don't require employees to surrender their passports or work permits as a condition of employment.

Performance Indicators

Pental periodically reviews suppliers to ensure they remain in line with our values and modern slavery laws; Inclusive of utilising the tools provided by Sedex.

Awareness

Pental has raised awareness of modern slavery issues by distribution of bulletins across our facilities specifically focussed on modern slavery.

Bulletin Coverage:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery.

Pental employees know that they have a role to play in the integrity of our supply chains and they all receive and have access to relevant policies. All employees are made aware of our whistleblowing policy and we encourage and support all of our employees to identify any suspected misconduct, including violations of labour laws or unethical labour practices.

Training

In addition to the awareness programme Pental has partnered with an e-learning course provider to rollout Modern Slavery training for all staff annually.

Approval of this Statement

This statement has been approved and signed by the Managing Director of Pental.

The Board has authorised the Managing Director to sign this Statement.

Signature 

Date: 25/03/2021