



Zip Water Group

Modern Slavery Statement

1. REPORTING ENTITIES

This Modern Slavery Statement is made in compliance with the Modern Slavery Act 2018 (Cth) (“the Act”) on behalf of Zip Heaters (Aust) Pty Ltd (ACN 000 578 727) and its related entities, Zip Industries (Aust) Pty Ltd ACN 000 072 257, Vestal Water Pty Ltd (ACN136 540 460) and Zip Water Services (QLD) Pty Ltd (ACN 21 634 096 610), (collectively, “Zip”, “we”, “us”, or “our”).

The registered office and principal place of the Zip Water Group businesses is 77 Allingham St, Condell Park, NSW 2200.

2. OUR STRUCTURE AND OPERATIONS

Zip specialises in the design, development, manufacture, supply and service of instant boiling, cooling and filtration water systems and related products to wide range of residential and commercial customers primarily under the Zip brand.

We have a manufacturing and warehouse facility at our head office in Condell Park NSW and have sales offices and warehouses located throughout Australia. Our team of approximately 650 people which are located in Australia also support sales and distribution businesses in New Zealand and the United Kingdom. We also export our products to a wide range of countries through our distribution network and through our parent business Culligan Corporation. The Culligan Corporation is a global business operating across a wide range of sectors in the drinking water market.

3. GOVERNANCE AND POLICY FRAMEWORK

Zip is committed to compliance with all applicable laws and standards where we directly operate. We also expect our suppliers to do the same in the regions they operate in. We fully acknowledge that risks of modern slavery exist in any complex supply chain, particularly where raw materials are procured by our suppliers from one or more other companies that we have no direct interaction with, or knowledge of. In order to control this risk, we have implemented new policies into our procurement framework. These policies apply across the Zip Water Group.

4. OUR SUPPLY CHAIN

Zip Water produce the majority of the Zip products in Australia using a wide range of raw materials and componentry such as copper tubes, aluminium coils, steel, plastic components, fans, compressors, insulation and electrical components which are supplied by both Australian and overseas based suppliers and manufacturers. These overseas countries include China, Germany, USA, Taiwan, Brazil and the UK.

We have identified approximately 507 suppliers to our business. Over time we have been seeking to consolidate our key suppliers and have 17 major suppliers to our business where our average



annual spend over 3 years exceeds \$1 million dollars with each supplier. Of these suppliers we have applied a risk based approach to identify higher risk suppliers for the purposes of modern slavery compliance who will be required to answer modern slavery questions within our Supplier Manual questionnaire.

As a component of a strategic procurement program, since the publication of our 2023 Modern Slavery Statement, all of our suppliers who we have had a spend of over \$100,000 with have been required to demonstrate compliance with the requirements set out in our Zip Supplier Manual. The Supplier Manual makes it mandatory for suppliers to Zip to manage the risks of modern slavery in order to continue to be an approved supplier to Zip.

In 2024, a total of 71 suppliers were asked to respond to the latest version of the supplier questionnaire under the Supplier Manual, of which 59 suppliers responded.

5. DESCRIPTION OF MODERN SLAVERY RISK IN OUR SUPPLY CHAIN

Due to the manufacturing nature of our business the majority of our suppliers and their suppliers are based overseas.

The assessment of modern slavery risks undertaken by the Zip Operations team, which is overseen by the Zip Compliance, Quality and Risk Management committee, is done on the basis of expenditure, broken down into product and service type, provenance of supply and any issues and risks specific to the locality from or market within which each supplier operates.

6. ZIP SUPPLIER MANUAL

The Supplier Manual sets out the minimum expectations Zip has of current and prospective suppliers on a variety of matters ranging from quality standards and delivery expectations to ethics and legal compliance, of which modern slavery is a key component.

The Supplier Manual is updated periodically and its requirements are incorporated by reference into all new Supply Agreements entered into by Zip. It is also freely available on our website for any prospective supplier to review. The Supplier Manual is now also available in Mandarin to support our partners in China and surrounding markets.

7. SUPPLIER AUDITS

We periodically audit our suppliers to determine capability and identify any risks to supply, quality, compliance or cost. We also evaluate their business practices with respect to ethical practices and the effectiveness of their management structure and business systems to maintain and improve these going forward.

8. STAFF TRAINING

Since issuance of the last Modern Slavery Statement, Zip personnel in our Procurement team (responsible for managing supplier relationships) have received on-the-job training to expand their awareness of Zip's obligations under the Act entails and to highlight the importance of conducting thorough annual supplier reviews in order to identify any modern slavery present within Zip's supply chain.

9. ACTIONS TAKEN AND ASSESSMENT OF EFFECTIVENESS

We have assessed the practices of our suppliers in 2024 via our annual audit process and, where deemed appropriate, engaged the services of third-party certifiers to validate those assessments and resulting understandings.

Resulting from these processes, we identified no modern slavery practices occurring within our supply chain and the overall risk of such practices for our aggregated supplier cohort was maintained at the lower end of the scale.

The Zip Water Compliance, Quality and Risk Management committee has been actively monitoring and providing counsel and support to ensure the high reliability of these results.

10. CONTINUOUS IMPROVEMENT

Our commitment to continuous improvement of systems and processes have translated into very low risks of modern slavery in our supply chain with no known issues reported. As part of this commitment, Zip will continue:

- to provide relevant training to our staff;
- with the introduction of new supply agreements that entrenches compliance with the Act under our Supplier Manual; and
- to monitor closely any suppliers deemed to have a moderate to significant risk of modern slavery practices.

11. CONSULTATION

All of the entities listed in this statement have common directors and officers and are aligned across the Zip Water Group.

The Zip Water Compliance, Quality and Risk Management committee is constituted by senior members of the Zip business and is responsible for the activities of all members of the Zip Water Group.

12. APPROVAL

This statement was approved by the board of Zip Heaters (Aust) Pty Ltd on 2 December 2024 and is signed by John Doumani who is President of Zip International and director of each reporting entity that this Statement concerns and. This modern slavery statement has been adopted across the Zip Water Group.

Signed by John Doumani

A handwritten signature in blue ink, appearing to read "John Doumani".