

MODERN SLAVERY STATEMENT 2024

Modern Slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. It is the severe exploitation of other people for personal or commercial gain. By working together and being responsible for the risks in our operations and supply chains, we can prevent all forms of Modern Slavery.

As a leading specialty and chemicals distribution partner, IMCD endeavours to improve society's health, welfare, and prosperity.

This statement outlines the steps that IMCD Australia Pty. Ltd. and IMCD New Zealand Limited (together "IMCD ANZ") have taken to address the risks of modern slavery and human trafficking in our business.

REPORTING ENTITIES

This Statement is a joint statement comprising the following reporting entities (together "IMCD ANZ"):

- IMCD Australia Pty. Ltd
- IMCD New Zealand Limited

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

IMCD ANZ is part of the IMCD Group ("IMCD").

IMCD is a global leader in distributing and formulating specialty chemicals and ingredients, providing solutions to its partners. IMCD continuously engages with its partners to build sustainable, transparent, and resilient supply chains.

IMCD ANZ offers a comprehensive and complementary product portfolio by partnering with globally reputable suppliers. We cover various industries including Advanced Materials, Beauty and Personal Care, Coatings & Construction, Food & Nutrition, Homecare and I&I, Industrial Solutions, Lubricants & Energy and Pharmaceuticals.

IMCD strives to be the global sales channel partner of choice to which customers of speciality chemicals and ingredients turn for first-class technical expertise, optimum logistics and solutions that help them innovate, simplify and sustainably grow their business.

IMCD ANZ operates throughout Australia and New Zealand with own operated and third-party warehouses. IMCD Australia's head office is in Melbourne.

RISK ASSESSMENT

Operations

At IMCD, we have several global policies and procedures promoting the safety of our working environment and our employees' health, safety and security. In turn, our business partners must adhere to the same guiding principles.

IMCD Group Human Rights Policy encapsulates IMCD's commitment to adhere to internationally recognised human rights standards. It outlines IMCD's approach to safeguarding human rights in its operations and supply chain.

IMCD supports the International Labour Organisation (ILO) 's aim to implement universally accepted labour standards and recognise and respect human rights. In addition, IMCD supports the United Nations "Guiding Principles on Business and Human Rights" and the ten principles of the United Nations Global Compact, to which IMCD is a signatory.

In addition to the existing group policies and procedures, to minimise the risk of Modern Slavery, IMCD ANZ complies with all local labour, employment and fair work laws of Australia.

Our internal auditing programs ensure the effectiveness of our risk control framework and compliance with our policies.

All these controls help IMCD ANZ to manage the risk of Modern Slavery in its operations effectively. However, we recognise there may be residual areas of vulnerability in our operations due to the nature of our service providers. For example, these could include outsourced services such as office and site cleaning, facilities management and the use of labour-hire contractors. IMCD's standard contracts consist of explicit prohibitions on slavery, forced labour and trafficking.

Supply Chain

The nature of our business means our supply chains are diverse and complex, so we must review, address and mitigate Modern Slavery in any form.

IMCD ANZ has identified potential Modern Slavery risks based on the geographic locations of suppliers in our supply chain, which are located in countries listed as higher risk by the Global Slavery Index 2023. China and India are the geographic areas posing higher risks in IMCD Australia's supply chain.

In addition, the construction industry, which IMCD ANZ services, is known to carry a higher risk of Modern Slavery practices.

IMCD ANZ distributes specialty chemicals to many market segments. Rubber products are known to have higher Modern Slavery risks because of how they are produced, provided, and used.

We also utilise an extensive network of Warehousing and Logistics suppliers to help facilitate the distribution of our imports from overseas.

IMCD identifies risks via supplier approval questionnaires, sourcing offices insights and risk matrix.

IMCD sourcing offices have been established in China and India, the countries listed as higher risk by the Global Slavery Index 2023. These offices ensure the complete traceability of the product source and perform an on-site audit to confirm suppliers' (ESG) compliance

KEY ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

IMCD Australia's Due Diligence Processes for Modern Slavery

Suppliers

IMCD's Code of Conduct and ESG standards for IMCD Business partners outline IMCD's zero tolerance for unethical business practices, including bribery, slavery, human trafficking and any other improper conduct. The IMCD Code of Conduct and ESG standards for IMCD Business partners are communicated to all current and new direct suppliers.

IMCD expects its business partners to promote compliance with applicable laws and principles outlined in the IMCD Code of Conduct. They believe that responsible management of our supply chains can only be achieved together.

IMCD has a policy and procedure to assess new and existing suppliers based on a risk-based approach, considering product characteristics, supply chain and industry developments. Suppliers who act as distributors are subject to additional checks to review the supply chain before goods are delivered to IMCD.

If a modern slavery situation is identified with a supplier, a root cause analysis is conducted to understand the factors that led to the situation. The supplier's progress in implementing the corrective action plan is regularly monitored. It may also result in terminating supplier relationships.

Employees

IMCD Australia's employees must review and agree to comply with the Company policies, IMCD Business principles, IMCD values and IMCD's Code of Conduct.

Rigorous training on the Code's content and application is mandatory for all employees, who must also periodically acknowledge their understanding and agreement to comply. IMCD takes any compliance issues seriously and conducts a thorough investigation fairly and confidentially. An Internal Alert Procedure and IMCD Ethics and Compliance Hotline are available for employees to seek guidance on any potential violation of our Code of Conduct or other standards or policies or any concern about unethical, illegal, or irresponsible activity.

EFFECTIVENESS ASSESSMENT

As part of IMCD's ESG reporting commitments, IMCD conducts regular reviews of our modern slavery risk management action plan and due diligence processes.

100% of IMCD suppliers are assessed compliance with the principles and requirements set out in part three of the IMCD ESG Standards with regards to labour standards and human rights.

All our employees are trained periodically on IMCD Code of Conduct that covers working environment including Forced labour and child labour set out in part two of the code.

In addition to internal reviews, IMCD measures its sustainability performance through third-party assessment programs such as EcoVadis. These reviews form the basis of how IMCD assesses and monitors the effectiveness of its actions towards combating modern slavery in its operations and supply chain.

The IMCD Group assessment for EcoVadis is representative of all IMCD companies. IMCD Australia and New Zealand are required to submit data for the IMCD Group assessment for EcoVadis.

The data from risk assessments, supplier performance reviews, incident reports, and other relevant sources is analysed to identify trends, patterns, and potential areas for improvement.

Sustainability reports published by IMCD Group annually are based on an analysis of social, environmental, and economic performance.

Sedex is one of the world's leading ethical trade membership organisations, working with businesses to improve working conditions in global supply chains. IMCD Australia and New Zealand are members of Sedex. Using Sedex tools and services, IMCD Australia and New Zealand work with its suppliers to ensure they uphold safe, ethical and sustainable business practices, helping protect the working conditions for people within its supply chain.

Our audit processes primarily rely on the practical implementation of supplier questionnaires, risk assessments and supplier review processes.

PATH FORWARD

IMCD ANZ will focus on ongoing vigilance and risk mitigation within our existing supplier network.

We will leverage our Supplier ESG program to effectively engage with suppliers and drive sustainable practices throughout our supply chain. This includes the utilization of third-party reporting platforms, EcoVadis and Together for Sustainability, with our suppliers to enhance data transparency and promote compliance with IMCD's policies and expectations around modern slavery.

THE PROCESS OF CONSULTATION ACROSS THE IMCD ANZ TEAM

IMCD ANZ is pleased to submit this Modern Slavery Statement under section 13 of the Modern Slavery Act 2018 (Commonwealth Act of Australia) for the financial year ending 31 December 2024. The consultation across the Aus and NZ teams occur via regular meetings and joint audits.

Both, IMCD Australia Pty Ltd and IMCD NZ Ltd have the same governing policies and share the same executive management.

This Modern Slavery Statement has been approved by the Board of Directors of IMCD Australia Pty Ltd and IMCD New Zealand Limited on June 28, 2025.



Ryan Harrison

Managing Director- Australia and New Zealand