

**DULUXGROUP  
LIMITED -  
MODERN SLAVERY  
STATEMENT**

**2022**

*imagine*  
a better place

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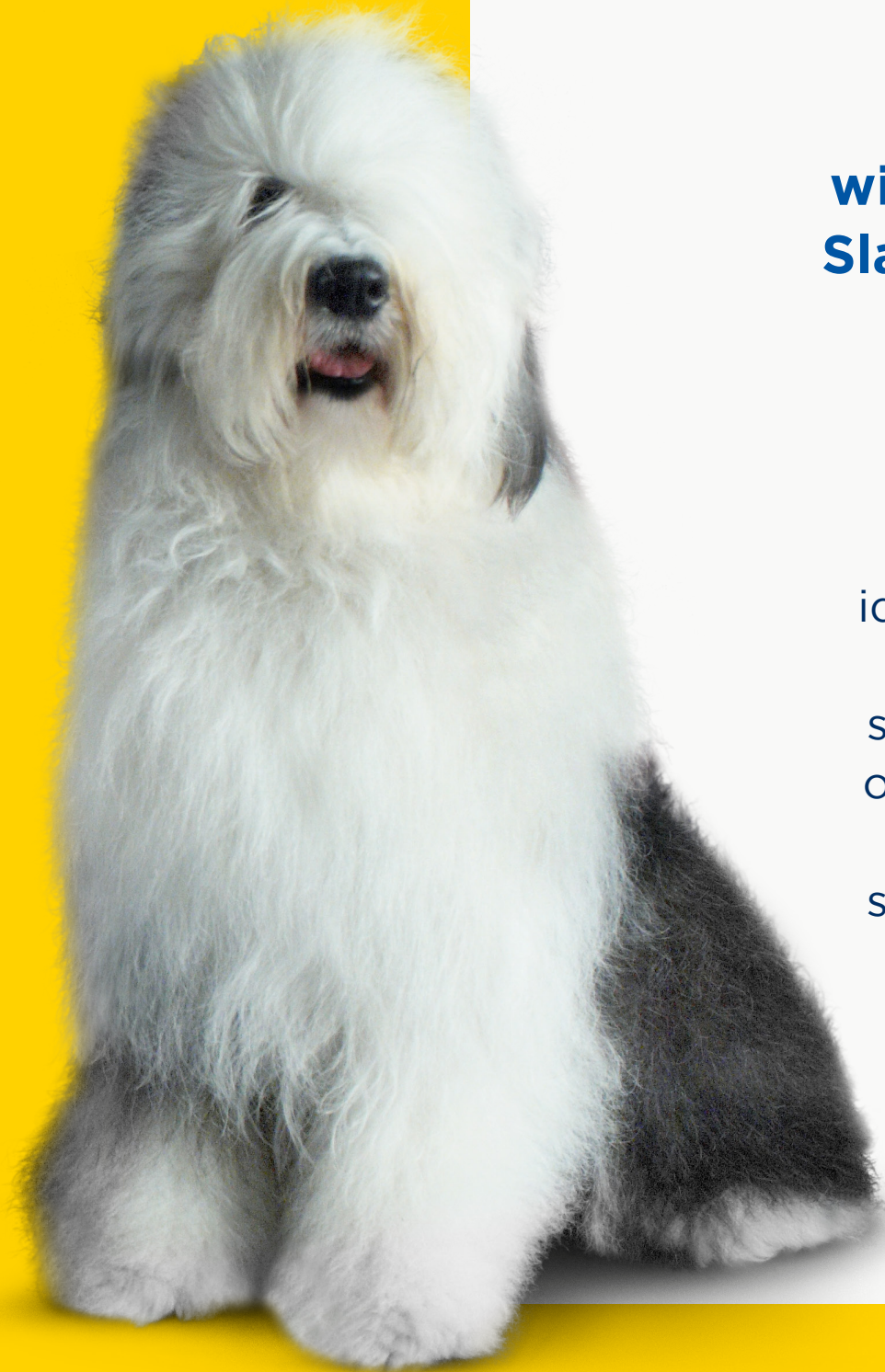
RISKS

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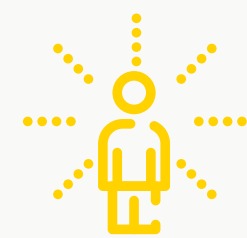
# Executive Summary



## This is our third modern slavery statement prepared in accordance with the Modern Slavery Act 2018 (Cth) (Act).

In this statement, we report on the actions taken to identify, assess and address modern slavery risks within our operations and throughout our supply chain in the reporting period from 01/01/2022 to 31/12/2022.

### KEY AREAS OF PROGRESS DURING 2022



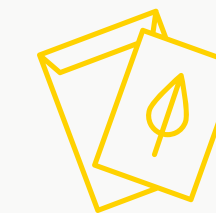
Implementation of 11 **awareness campaigns** to promote our Speak Up Program and Code of Conduct.



Initial assessment of current modern slavery **risk management for two key business acquisitions** that occurred during the reporting period.



Launch of a modern slavery awareness **e-learning module** and toolbox talk program.



Review and **update of the company sustainable procurement standard** to improve our profiling of supplier risk.



Introduction of a **tiered supplier assessment and qualification process** based on individual supplier risk.



Delivery of a specialised ethical procurement and **modern slavery training session** for procurement professionals.



**Evaluation of suppliers of indirect materials and service** against the new sustainable procurement standard.



Trial of the **SEDEX portal** to assess and onboard a newly introduced potentially high-risk supplier.



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This statement was approved by the board of DuluxGroup on 21 June 2023. The table below shows the location in this statement of our reporting against each mandatory criteria specified in the Act.

## MANDATORY REPORTING CRITERIA

<b>Criteria 1</b> .....	<b>p.4</b>
Identify the reporting entity	
<b>Criteria 2</b> .....	<b>pp.6-9</b>
Describe the reporting entity's structure, operations and supply chain	
<b>Criteria 3</b> .....	<b>pp.10-12</b>
Describe the risks of modern slavery practices in the reporting entity's operations and supply chain	
<b>Criteria 4</b> .....	<b>pp.14-21</b>
Describe the actions taken by the reporting entity and any entity that it owns or controls to address those risks, including due diligence and remediation processes	
<b>Criteria 5</b> .....	<b>pp.22-23</b>
Describe how the reporting entity assesses the effectiveness of those actions	
<b>Criteria 6</b> .....	<b>p.24</b>
Describe the reporting entity's consultation process with any entity that it owns or controls	
<b>Criteria 7</b> .....	<b>p.13</b>
Include any other information that the reporting entity considers relevant	

# About This Statement



**Our vision of “A Future Without Harm” expresses our continuing commitment to improve the safety and sustainability of our business by identifying and understanding the impacts that our products, operations and supply chain have on people and the planet.**

Our commitment includes identifying, assessing and addressing modern slavery risks both within our operations and throughout our supply chain. Modern slavery is a serious violation of a person's basic human rights. It involves using coercion, threats or deception to exploit a worker for commercial gain - undermining their freedom.

Modern slavery includes serious exploitation such as trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting, and child labour.

We oppose modern slavery in all its forms, and respect and support the human rights and freedoms of workers within our operations and throughout our supply chain.

This statement is prepared by DuluxGroup Limited ABN 42 133 404 065 (DuluxGroup) in accordance with the Modern Slavery Act 2018 (Cth) (Act), and is the 3rd modern slavery statement filed by DuluxGroup under the Act. This statement specifies the actions taken to identify, assess and address modern slavery risks in our operations and supply chain in the period from 01/01/2022 to 31/12/2022 (Reporting Period), and our subsequent assessment of the effectiveness of those actions. This statement is made on behalf of DuluxGroup on its own behalf and on behalf of the entities specified (right) which had revenue exceeding \$100m in the Reporting Period (Reporting Entities).

Reporting Entity	Inc. Jurisdiction
DuluxGroup (New Zealand) Pty Ltd .....	Australia
DuluxGroup (Australia) Pty Ltd .....	Australia
Lincoln Sentry Group Pty Ltd .....	Australia
Parchem Construction Supplies Pty Ltd .....	Australia
B&D Australia Pty Ltd .....	Australia
Cromology Holding SAS .....	France
DP JUB delniska druzba pooblascenta dd .....	Slovenia

### In this statement

A reference to “we”, “us” or “our” is a reference to DuluxGroup and its divisions.

A reference to a division includes the reporting entity specified in that division and any business unit within that division.

### Feedback

We welcome any feedback and comments on this statement. Please forward any feedback or comments to [sustainability@duluxgroup.com.au](mailto:sustainability@duluxgroup.com.au).



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# Chairman's Message



**Across DuluxGroup we are committed to contributing to collective efforts to eliminate modern slavery by ensuring that we do everything we can to identify, assess and address the modern slavery risks within both our own operations and throughout our supply chain.**

Our vision of 'A Future Without Harm' includes a rejection of modern slavery in all its forms. This is underpinned by our Values & Behaviours, which include the fundamental human right of respect, valuing people and working safely.

This is DuluxGroup's third Modern Slavery Statement, and 2022 saw significant changes in the size and complexity of our operations and supply chain, due to the acquisition of new businesses in Australia and internationally. In particular, the addition of two European market leading paints businesses – French based Cromology and Slovenian based JUB - has seen us more than double our number of employees to approximately 8,400, add almost 500 direct operating sites, and increase the number of geographic regions where we operate.

Critically, we are now working with more than 5,500 suppliers who provide goods and services from more than 30 countries. Our businesses seek to partner with suppliers that share our Values, including respect for human rights. When engaging new suppliers, we assess a range of supplier risks including the risk of modern slavery. Due diligence includes audits to ensure they meet our compliance standards and can include on-site inspections for those identified as particularly high risk.

A key focus during the year has been on seeking to ensure we fully understand the modern slavery risks in newly acquired businesses and the steps in place to address them.

Across all of DuluxGroup, our aim is to deepen our knowledge and understanding of our suppliers' supply network, to enable better visibility and effective management of modern slavery risk through all levels of the supply chain.

Alongside ensuring we work with suppliers who share our Values and approach to ethical sourcing and human rights, we have continuous training and education in place for our own employees to ensure we all understand our role in reducing modern slavery risks.

Fundamental to helping to eliminate the scourge of modern slavery is ensuring our own employees have the knowledge to identify risks and feel empowered to speak-up and have any issues addressed. I am proud of the role our employees play in contributing to the health & wellbeing of the communities where we operate and the support our businesses provide to suppliers and their teams across our many sourcing locations.

I am pleased to present DuluxGroup's third Modern Slavery Statement.

**Patrick Houlihan**

Chairman and CEO – DuluxGroup Limited  
21 June 2023



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# Who We Are

## OUR STRUCTURE

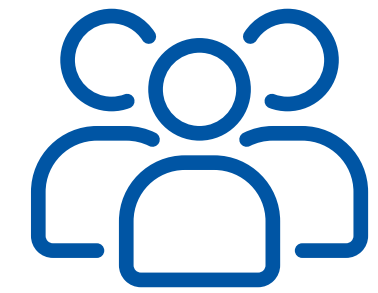
DuluxGroup is a diversified business that researches and develops, manufactures and sources, markets and promotes, and sells and distributes commercial, industrial and consumer products to trade customers and consumers through our subsidiaries and business divisions in Australia and globally. DuluxGroup is part of Nippon Paint Holdings, the fourth largest paint company globally and the largest in Asia Pacific.

During the reporting period, we acquired two material new businesses that are now Reporting Entities: Cromology joined DuluxGroup in January 2022 and JUB in June 2022. In this report, we have incorporated the available information on the operations and supply chain of these new DuluxGroup businesses.

With the acquisition of these two key businesses, DuluxGroup Limited is now organised into two business divisions – DuluxGroup Pacific and DuluxGroup Europe. Our DuluxGroup Pacific businesses largely operate in Australia, New Zealand and Papua New Guinea although we have some smaller operations in China, Singapore and the USA. The DuluxGroup Europe division comprises our two newly acquired partner companies, Cromology and JUB, along with our existing Maison Deco and Craig & Rose businesses.

Our model of partner company autonomy means that the Cromology and JUB businesses each have their own management team and are accountable for strategy development and implementation, as well as day to day operational performance, including managing its modern slavery risks and sustainable procurement processes.

Each partner company is overseen by a management board that includes members of the DuluxGroup executive team. The partner companies are guided by a group-wide operating cycle and must adhere to specific minimum criteria in setting their governance frameworks.



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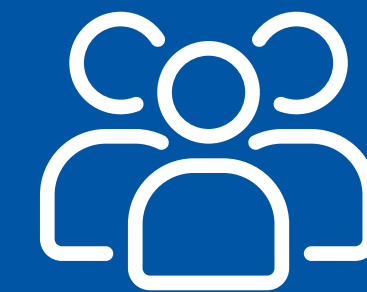
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# Our Structure

The table below summarises each key subsidiary or business division within the DuluxGroup Pacific and Europe businesses, the products they supply and the key owned and licensed brand names.



DuluxGroup Pacific	Products	Key owned and licensed brands	DuluxGroup Europe	Products	Key owned and licensed brands
	Decorative paints, decorative concrete products, woodcare coatings, texture coatings, powder coatings, protective coatings, tools and accessories for paints and coatings, construction chemicals and related equipment.	Dulux, British Paints, Berger, Walpamur, Porter's Paints, Dulux Avista, Spring Dulux Acratex, Dulux Powder Coatings, Dulux Protective Coatings, Dulux EnviroSolutions, Emer, Fosroc, Flextool, Edconcrete Cabot's, Feast Watson, Dryden, Intergrain, RotaCota		Decorative paints, tools and accessories for paints and coatings	Craig & Rose
	Sealants, adhesives, fillers, paint preparation products and accessories.	Selleys, Parfix, Poly, Polyfila, Polyglaze, TurtleWax, Hillmark, Admil		Decorative paints, woodcare coatings, metal and flooring coatings, plasters, tools and accessories for paints and coatings, flooring and wall coverings	Tollens, Zolpan, Plasdox, Monsieur Peinture, Palm, ICP, Duco, MaxMeyer, Settef, Viero, Baldini Vernici, Mister Color, Robbialac, Tinasvip, Arcol, Alp, Duraval, Reveton, Jallut, Classidur, Montana
	Garage doors, automatic openers.	B&D, Automatic Technology, Garador, Dominator		Decorative paints, concrete products, woodcare coatings, metal coatings, waterproofing, ceramic tiling plasters for facades, leveling compounds, expanded polystyrene (EPS), packaging, disinfectants & body care products, motor oils.	JUPOL, JUBIZOL, JUB
	Cabinet and architectural hardware and related products.	Lincoln Sentry, Blum, Finista, Lockwood, Assa Abloy, Breezway, HexFix, Hera		Decorative paints, tools and accessories for paints and coatings	Maison Déco, Pure&Paint
	Home garden products, including fertilisers, potting mix, pest and disease control, lawn care, seeds, accessories, organic gardening, organic crop protection and nutritional products.	Yates, Hortico, Watkins, Dynamic Lifter, Thrive, Zero, Munns, Ratsak, OCP, Slasher, Yates Weed 'n' Feed			

TABLE 1



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# Our Operations



## DuluxGroup Pacific - Employees

- 3459 Australia
- 583 New Zealand
- 125 PNG
- 111 China
- 5 USA
- 3 Hong Kong
- 2 Singapore

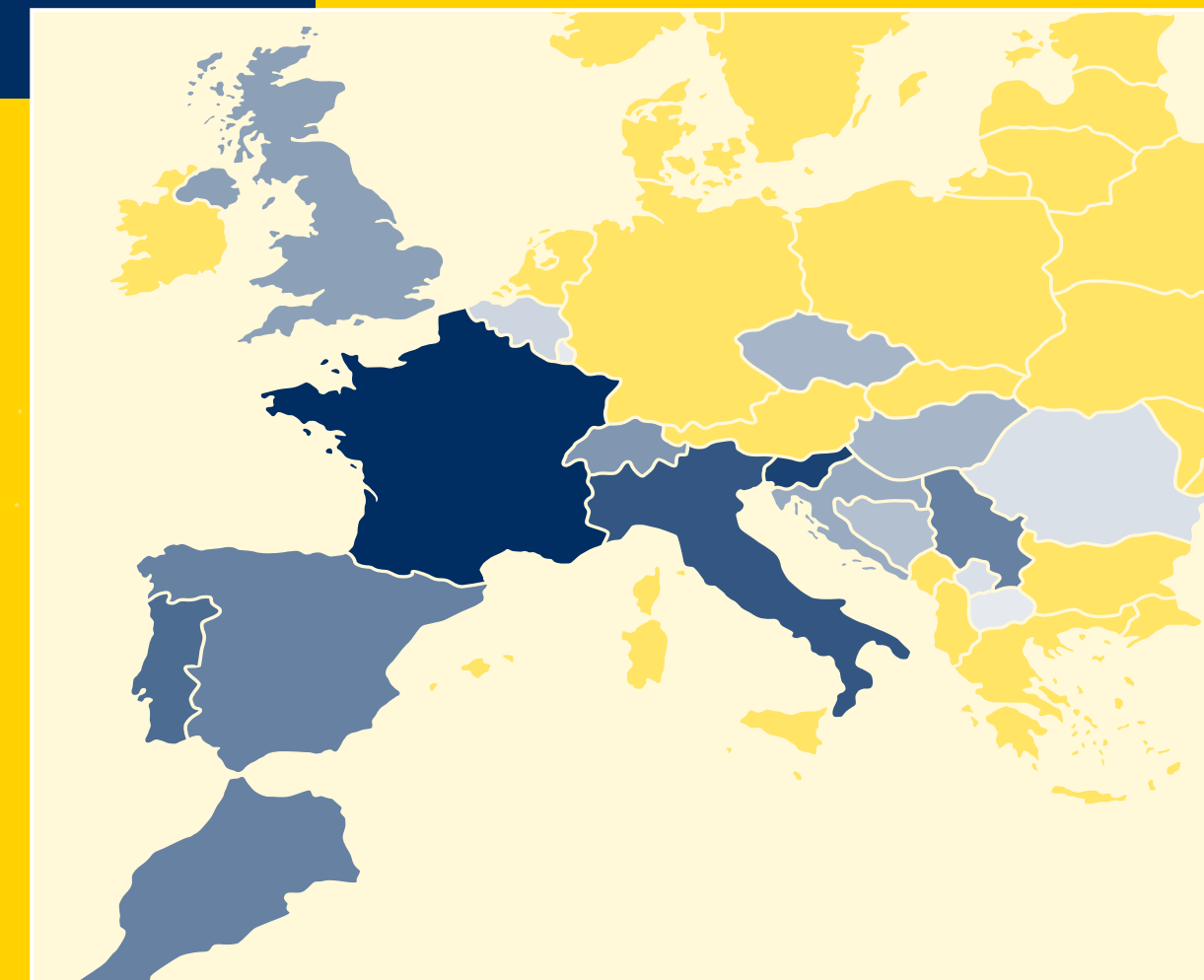
## DuluxGroup Europe - Employees

- 2,162 France
- 482 Slovenia
- 283 Italy
- 268 Portugal
- 220 Serbia
- 191 Spain
- 190 Morocco
- 88 Switzerland
- 60 United Kingdom
- 32 Croatia
- 28 Czech Republic
- 28 Hungary
- 23 Bosnia & Herzegovina
- 10 Belgium
- 5 Kosova
- 4 Romania
- 3 Luxembourg
- 3 Republic of Northern Macedonia

### OUR OPERATIONS

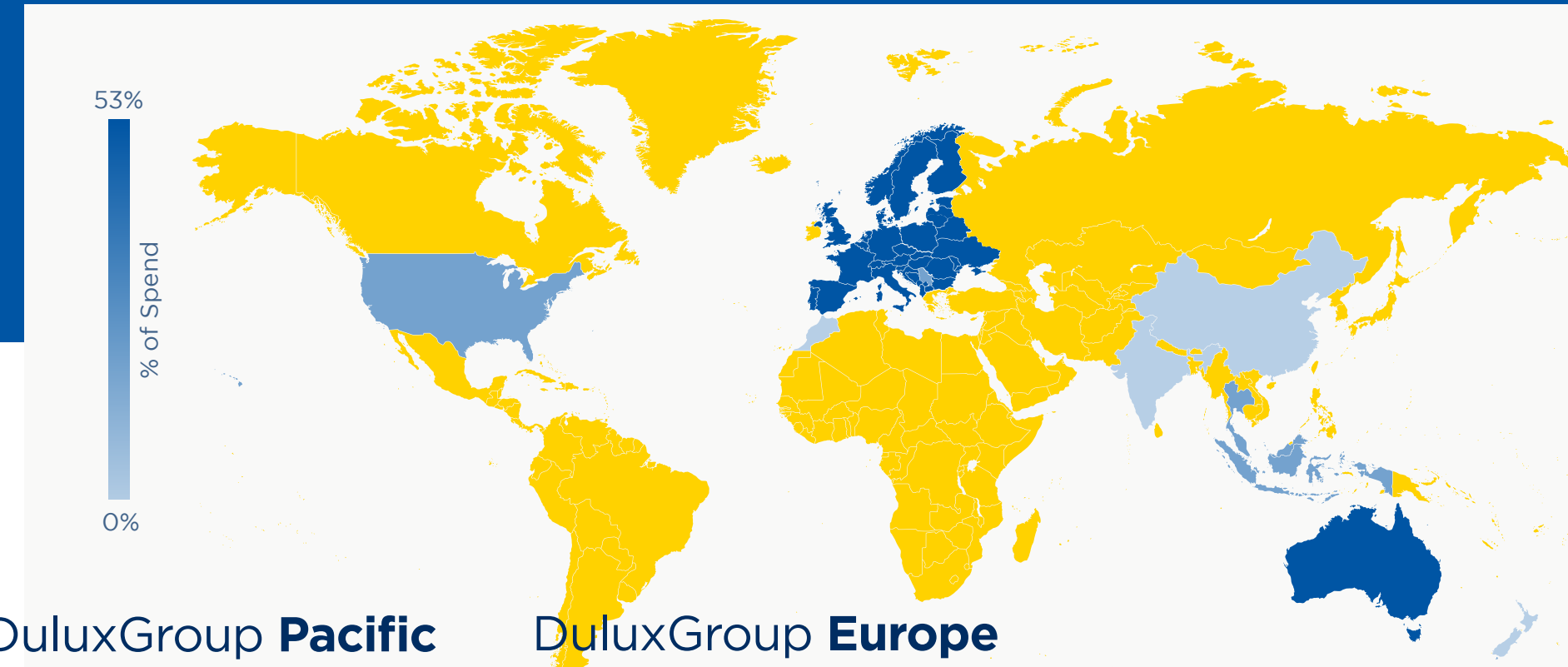
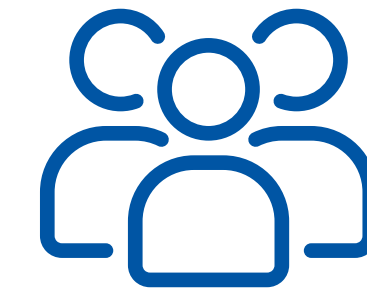
As at the end of the reporting period, we had 8,377 employees employed in the DuluxGroup Pacific and Europe businesses.

This data illustrates the number of employees by location.





# Our Supply Chain



**Our supply chain comprises suppliers and providers of both direct goods and indirect goods and services.**

Direct goods are goods supplied to us for use in the products we manufacture and ultimately sell to customers, such as raw materials and packaging, as well as goods supplied to us as finished product for resale to customers.

Indirect goods and services are those goods and services we procure to conduct our business, but which are not included in the products we ultimately sell to customers.

Indirect goods suppliers are typically located within our own operating regions, where the risk of modern slavery is relatively lower. Our direct goods suppliers, while also located within our own regions, often import materials from other countries where the risk of modern slavery is higher. We therefore focus our supply chain risk assessment not solely on the supplier location, but also on our understanding on the source country in which the material is manufactured (source location).

This data outlines the supplier or provider type by DuluxGroup spend, supplier or provider number and the key goods and services they supply or provide.

Our goal is to deepen our knowledge and understanding of our suppliers' supply network, to enable better visibility and effective management of modern slavery risk through all levels of the supply chain.

Supplier Type	DuluxGroup Pacific			DuluxGroup Europe			Key goods and services supplied or provided
	Spend %	Suppliers %	Source Location	Spend %	Suppliers %	Source Location	
<b>Direct goods</b> <i>Raw materials and packaging</i>	45%	15%	Australia ..... 60%	53%	42%	EU & UK ..... 90%	Latex, minerals, pigments, tinters and other chemicals
			China ..... 8%			North America · 4%	
<b>Direct goods</b> <i>Finished Products</i>	30%	24%	Austria ..... 8%	30%	10%	Serbia ..... 3%	Hardware, aerosols, painting accessories, waterproofing systems, fire protective coatings, concreting equipment and garage door and automatic opener components
			New Zealand · 6%			China & India · 3%	
<b>Indirect goods and services</b>	25%	61%	United States · 2%	17%	48%	Morocco ..... 1%	Marketing and media, consulting services, IT and telco, fleet vehicles, contract labour, waste management, utilities, recruitment services, warehouse consumables and facilities management
			Other ..... 16%			Other ..... <10%	

During the reporting period, we spent approximately:

**DuluxGroup Pacific**  
**\$1.25**  
 Billion  
 with approximately 3,400 suppliers and providers of both direct and indirect goods and services.

**DuluxGroup Europe**  
**€481**  
 Million  
 (\$0.76 billion AUD) with over 2,200 suppliers estimated for the DGL Europe business.

# Risks



During the Reporting Period, we updated our assessment of modern slavery risks within our operations and throughout our supply chain to capture the impacts of the newly acquired Cromology and JUB businesses.



The assessment was completed using Radar, a supplier risk assessment tool provided with the Sedex supply chain sustainability management platform.

Radar assesses the inherent risk rating for overall labour standards, including modern slavery risks such as forced labour and child labour, based on location and sector.

Tables 2 and 3 summarise the outcomes of the labour standards risk assessment for our operations and supply chain. Note that the inherent modern slavery risk level shown in these tables is the level of risk prior to implementation of controls such as policies, procedures and verification processes. Actual risk will be lower than the inherent risk, due to the impact of the policies and due-diligence procedures that our businesses have in place. However, understanding inherent risk allows us to prioritise our efforts toward those areas of the supply chain or our own operations that have the highest likelihood of modern slavery issues if left unmanaged.

The level of inherent risk varies across our operations and supply chain depending on some key factors including:

### For operations

- Nature of business operations (e.g. manufacturing, sales) & industry/sector
- Geographical location
- Employment arrangements (e.g. direct hire, labour hire, contractors, full time, part time, casual)

### For supply chain

- Industry sector from which goods are sourced
- Geographical location
- Material/composition (known safety hazards or specific modern slavery concerns)
- Supply type (raw material, packaging, tolled goods)

# Risks

## ASSESSMENTS OF MODERN SLAVERY RISKS WITHIN OUR OPERATIONS



This data outlines our assessment of inherent labour standards and modern slavery risks within our operations and details the controls we have in place to address those risks.

DuluxGroup Pacific					DuluxGroup Europe				
Inherent Risk	Location	Key Business Activities	Risk Types	Risk Controls	Inherent Risk	Location	Key Business Activities	Risk Types	Risk Controls
High	China	Manufacture Sourcing	Working hours Freedom of association Regular employment Discrimination Wages Forced labour Children and young workers	DuluxGroup workplace policies and safety and sustainability management system Documented policies and procedures (employee recruitment, leave allowances, salary payment and working hours) Strict adherence to Chinese Labour Law, Labour Contract Law, Female Workers Protection Law, Minors Protection Law Accommodation provided for rural employees provided at a reasonable price Facilities closely monitored to ensure health, safety and hygiene of those employees.	Medium	Bosnia and Herzegovina Hungary Morocco North Macedonia Republic of Kosovo Romania Serbia Slovakia Spain	Manufacture Distribution and sales Sourcing Marketing and promotion	Working hours Freedom of association Health, safety and hygiene Regular employment Discrimination Forced labour Wages	Employment policies (e.g. onboarding right-to-work checks) Employee code of conduct Appropriate workplace behaviour policies
Medium	Papua New Guinea	Research and development Manufacture Sourcing Marketing and promotion Distribution and sales	Regular employment Health, safety and hygiene Wages Freedom of association Children and young workers Forced labour	DuluxGroup workplace policies and safety and sustainability management system Direct employment in operational-based roles - no use of labour-hire agencies Casual employment does not extend beyond 3 months Salaries based on Hay grade analysis and are above the minimum wages set by the Department of Labour.	Low to Medium	Czech Republic France Italy Portugal Slovenia United Kingdom	Manufacture Distribution and sales Sourcing Marketing and promotion	Working hours Forced labour	Employment policies (e.g. onboarding right-to-work checks) Employee code of conduct Appropriate workplace behaviour policies (JUB)
Low to Medium	Australia	Research and development Manufacture Sourcing Marketing and promotion Distribution and sales	Freedom of association Health, safety and hygiene	DuluxGroup workplace policies and safety and sustainability management system Labour hire and recruitment service provider onboarding assessment for Modern Slavery risks	Low	New Zealand Singapore United States	Research and development (NZ only) Manufacture (NZ only) Sourcing Marketing and promotion	Freedom of association Health, safety and hygiene	DuluxGroup workplace policies and safety and sustainability management system Labour hire and recruitment service provider onboarding assessment for Modern Slavery risks All US and Singapore employees are in office-based roles and are directly employed by DuluxGroup, with no use of labour-hire agencies

The inherent risk rating tends to be higher in locations where local government regulation of working conditions is weaker. Risk is also higher in locations where we have manufacturing operations. This is because manufacturing, especially manufacturing involving chemical processing or use of labour hire workers, carries a higher inherent risk of modern slavery. Additionally, labour standard, safety and hygiene risks can be higher in a manufacturing setting. Distribution and sales, marketing and promotion and research and development are activities that typically carry a lower risk of modern slavery. We therefore recognise the importance of applying a higher level of governance to manufacturing operations in geographies where modern slavery is more prevalent and implementing rigorous controls to reduce risk.

TABLE 2



# Risks

## ASSESSMENTS OF MODERN SLAVERY RISKS THROUGHOUT OUR SUPPLY CHAIN



This table outlines our assessment of inherent modern slavery risks throughout our supply chain based on manufacturing locations and manufactured products, where the manufacturing locations account for approximately 99% of our spend on direct goods.

DuluxGroup Pacific				DuluxGroup Europe			
Inherent Risk	Location	Key Materials Sourced	Risk Types	Inherent Risk	Location	Key Materials Sourced	Risk Types
High	China Indonesia Saudi Arabia	Powder coating, latex, resins, pigments, painting accessories, concreting equipment, garage door & opener components, cabinet and architectural hardware and other chemicals	Working hours Freedom of association Regular employment Discrimination Wages Forced labour Children and young workers Health, safety and hygiene	High	India China	Pigments, painting tools and accessories	Freedom of association Working hours Health, safety and hygiene Forced labour Wages Child labour
Medium	United States Taiwan Malaysia Italy Thailand Japan Romania South Korea	Latex, silicones, gap fillers, pigments, adhesives, speciality coatings, cabinet and architectural hardware, gardening products, waterproofing products, painting accessories, concreting equipment, hardware and other chemicals.	Freedom of association Health, safety and hygiene Working hours Regular employment Children and young workers Forced labour Discrimination Wages	Medium	Andorra Croatia Czech Republic Hungary Republic of Kosovo Morocco North Macedonia Romania Serbia Slovakia Slovenia United Kingdom United States	Latex, pigments, sand, painting tools and accessories, solvents and other chemicals	Working hours Freedom of association Health, safety and hygiene Forced labour Regular employment Wages
Low to Medium	Australia Germany	Latex, minerals, pigments, tinters, packaging, garage door components, silicone resins, other chemicals, aerosol paints, cabinet and architectural hardware.	Freedom of association Health, safety and hygiene Discrimination	Low to Medium	Austria Belgium France Germany Republic of Ireland Italy Liechtenstein Luxembourg Monaco Netherlands	Packaging, pigments, painting tools and accessories, expanded polystyrene, solvents and other chemicals	Working hours Freedom of association Health, safety and hygiene
Low	Austria New Zealand Singapore	Cabinet hardware, latex, minerals, pigments, tinters and other chemicals, packaging and garage door components.	Working hours Freedom of association Health, safety and hygiene Wages Children and young workers	Low	Norway Switzerland	Latex, packaging, pigments, solvents and other chemicals	Working hours Freedom of association Health, safety and hygiene

Many of our key suppliers in the Pacific and Europe businesses are large, multi-national organisations located within our own regions of operation, and they are themselves assessing and addressing modern slavery risks in their own operations and supply chains.

We have long-term and direct relationships with many of our key suppliers, which increases certainty and efficiency for those suppliers and, in turn, increases stability for workers and reduces modern slavery risk.

TABLE 3

# Risks

## CASE STUDY SUPPLIER SUSTAINABLE PROCUREMENT PROCESS

**The DuluxGroup Pacific supply chain is highly complex. Raw materials are typically purchased through local distributors, but often originate from manufacturing facilities in Asia, Europe and the United States.**

Working with our suppliers to manage risks in the lower tiers of our supply chain is therefore important to ensuring that manufacture and supply of our raw materials is free from modern slavery.

While many of our suppliers are large, multi-national organisations, with well established modern slavery risk assessment and management processes, others are smaller businesses with limited capacity to develop sustainable procurement management processes. Through our supplier sustainable procurement on-boarding process, we identified that a lack of rigorous sustainable procurement management policies and processes was a common gap for suppliers.

DuluxGroup has developed guidance materials to support suppliers to develop and implement effective sustainable procurement policies and processes in their own business and supply chain.

The guidance educates suppliers on the need for sustainable procurement processes and directs them to resources, templates and training to enable development of risk management processes in their own businesses.



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# Actions

## Governance framework

We have established a governance framework for managing modern slavery risks within our operations and supply chain across the jurisdictions as shown in Figure 1. The maturity level of that operating model varies depending on the length of time we have operated the entity. Within the DuluxGroup Pacific businesses, the management framework is well established, but it is also evolving as we learn more about managing modern slavery risks.

With the recent purchases of the Cromology and JUB partner companies, we are in the process of assessing the level of modern slavery risk, assessing existing controls and identifying opportunities for improvement. Cromology and JUB both have various existing mechanisms in place to manage modern slavery risks in operations and supply chains, but not all elements of the management framework are established. Identifying opportunities to strengthen risk management, where needed, will be a focus for the DGL Europe business in future reporting periods.

Our parent company, Nippon Paint Holdings, has also developed a modern slavery risk management framework, that aligns with the DuluxGroup approach. We continually monitor developments across the Nippon Paint Group, to identify any initiatives that we can adopt to improve the effectiveness of our own risk management program.

## ACTIONS TO MANAGE MODERN SLAVERY RISKS WITHIN OUR OPERATIONS & SUPPLY CHAIN

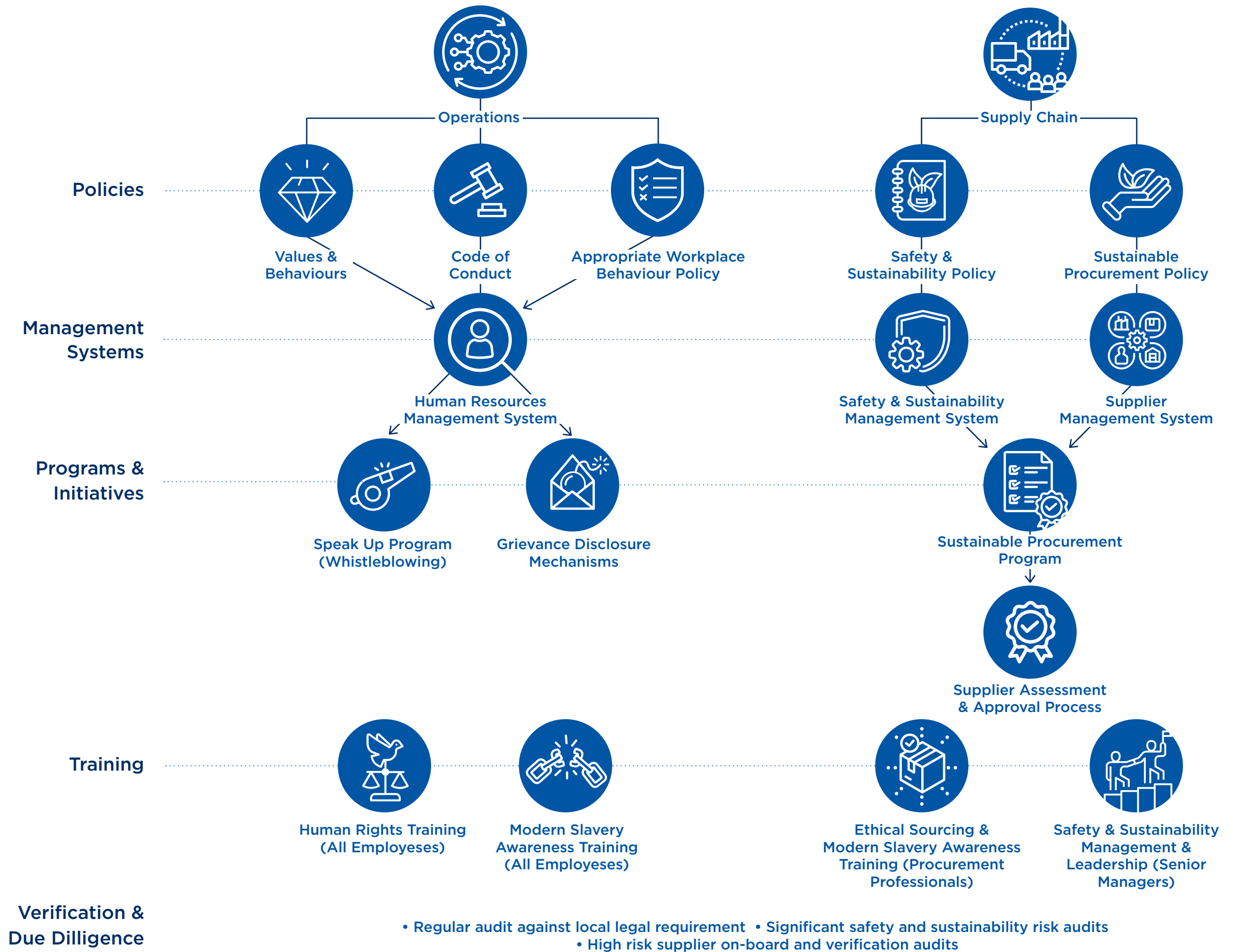
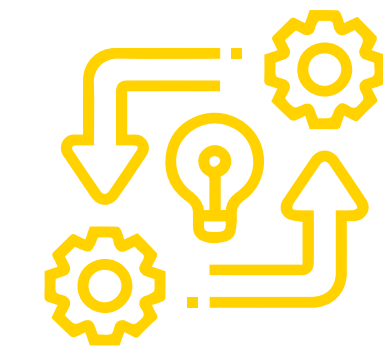
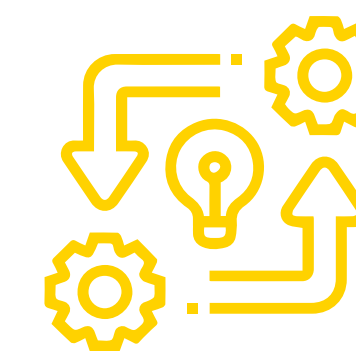


Figure 1: DuluxGroup Modern Slavery Risk Management

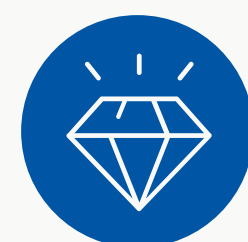


# Actions

To embed a framework and culture of treating workers with dignity and respect and to ensure we meet our ongoing commitment to improving safety and sustainability performance, DuluxGroup has formulated and implemented, and continues to manage and monitor, the following key policies:



## DULUXGROUP PACIFIC KEY POLICIES - OPERATIONS



### Values and Behaviours

Our Values and Behaviours are the primary principles that guide our employees in how we deliver on our core purpose and achieve our strategic goals. Our Values and Behaviours include key principles, such as the fundamental human right of respect, valuing people and working safely.

As part of the employee onboarding process, every employee receives training on our Values and Behaviours, and this is updated with regular refreshers throughout their employment term.



### Code of Conduct

Our Code of Conduct helps to ensure that the way our employees behave and the decisions they make are true to our Values and Behaviours and consistent with our legal and ethical obligations. It embodies a worker's human right to freedom from discrimination, intimidation, harassment and violence in the workplace.

This code applies to workers employed within our operations and those engaged as contractors, consultants and individuals from labour hire providers, and is available in English, Chinese and French.

In the prior reporting period, we revised and relaunched our Code of Conduct to ensure relevancy. In the reporting period, we launched a series of 11 awareness campaigns on key Code of Conduct topics including a campaign on respect for others.



### Appropriate Workplace Behaviour Policy

Our Appropriate Workplace Behaviour Policy is one of many policies that underpin our Values and Behaviours and Code of Conduct. It defines what is acceptable behaviour within our operations and by law, and embodies freedom from discrimination, intimidation and harassment. This policy includes a complaint mechanism for the management of complaints about unacceptable behaviour, and is available in English, Chinese and French.



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RISKS

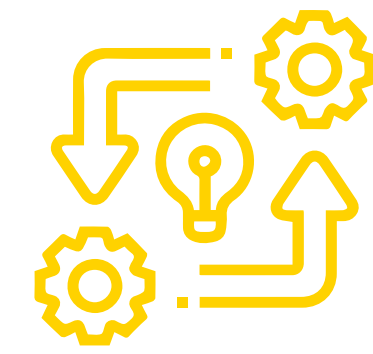
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# Actions

To embed a framework and culture of treating workers with dignity and respect and to ensure we meet our ongoing commitment to improving safety and sustainability performance, DuluxGroup has formulated and implemented, and continues to manage and monitor, the following key policies:



## DULUXGROUP PACIFIC KEY POLICIES - SUPPLY CHAIN



### Safety and Sustainability Policy

Our Safety and Sustainability Policy describes our vision of “A Future Without Harm” and expresses our continuing commitment to improve the safety and sustainability of our business by identifying, understanding and minimising the health, environmental and community impacts associated with our business activities. This policy embodies a rigorous and consistent risk-based management approach to fully understanding those impacts associated with our products, operations and supply chain.



### Sustainable Procurement Policy

Our Sustainable Procurement Policy embodies our commitment to understanding our supply chain and ensuring that environmental, health, safety, modern slavery, labour and human rights considerations are embedded into our sourcing processes and procedures. This policy specifies our expectations and requires suppliers to cascade those requirements to their own supply chain, with the aim of impacting lower tier suppliers over time. This policy is currently available in English, Chinese, Italian and French.

Our goal is for all our suppliers to understand and comply with this policy. In future reporting periods, we intend to measure our suppliers’ compliance with this policy by developing a sustainable procurement scorecard to track and monitor suppliers and ensure corrective actions are managed for conditionally approved suppliers.



As part of the supplier onboarding process, we require new suppliers to accept and agree to comply with the requirements specified in this policy. As our existing supply agreements come up for renewal, we require these suppliers to accept and agree to comply with the obligations specified in this policy.



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## Speak Up Program (Whistleblowing)

Our Speak Up Program is underpinned by the Speak Up Policy and Speak Up Line, and overseen by the Speak Up Committee. The Speak Up Policy provides a framework for reporting any breaches of our Values and Behaviours, Code of Conduct and other relevant policies, including modern slavery and human rights breaches, and contains whistleblowing protections. This policy is available in English, Chinese and French.

The Speak Up Line provides an avenue for workers to make confidential and anonymous complaints related to potential policy breaches. The Speak Up Line operates 24 hours a day, 7 days a week in English, Chinese, French, Pidgin English, Hindi, Bahasa and Melayu.

The Speak Up Committee comprises members of the executive team and select senior workers from group functions and meets on a quarterly basis to manage and monitor complaints and grievances arising from potential policy breaches.



## Safety and Sustainability Management System

We maintain an integrated Safety and Sustainability Management Framework to enable delivery of our Safety and Sustainability Policy. The framework is implemented across all key subsidiaries and business divisions and comprises safety and sustainability standards, tools and systems, including the Sustainable Procurement Standard, as well as an audit program to assess and verify performance.

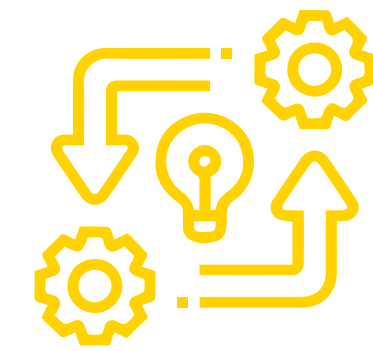


## Sustainable Procurement Program

We manage modern slavery risks throughout our supply chain through our Sustainable Procurement Standard. The program is designed to accord with standard global supply chain systems and guidance, including International Labour Organisation (ILO) conventions, the Ethical Trading Initiative (ETI) base code, ISO 14001 and the SEDEX code, with the aim of identifying and addressing modern slavery risks and maintaining a responsible and transparent supply chain.

## DULUXGROUP PACIFIC KEY PROGRAMS AND PROCEDURES

To effectively identify and manage modern slavery risks within our operations and supply chain, we've formulated and implemented the following programs and initiatives:



The program is being progressively rolled out to our suppliers as part of a broader supplier management platform. The program includes communicating our Sustainable Procurement Policy to suppliers, assessing suppliers based on our Sustainable Procurement Standard and, where warranted, undertaking on-site audits of suppliers (and their facilities) to verify compliance with this standard and identify any required improvement actions.

During the reporting period, the Sustainable Procurement Standard was reviewed and updated to strengthen the supplier risk categorisation and management process. The supplier assessment process has been updated to include a preliminary risk evaluation using the SEDEX tool, which considers at a high level the industry sector, activities, and source country. Known risks associated with specific activities (e.g. handling of hazardous materials, likely use of labour hire, regulated activities) are overlaid on the SEDEX assessment to determine the supplier risk level. The supplier risk level determines the level of assessment required as follows:

HIGH	MEDIUM	LOW
SEDEX supplier checklist completion and / or onsite audit	DuluxGroup supplier checklist completion and desktop assessment	No detailed assessment, but suppliers must agree to our sustainable procurement policy



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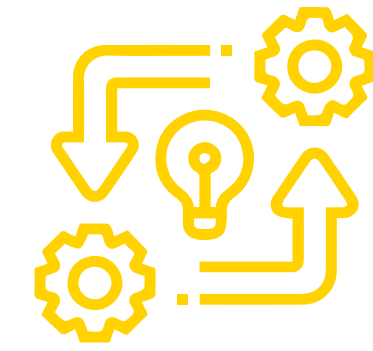
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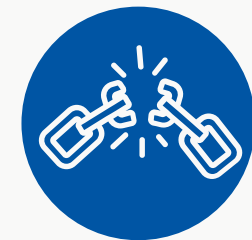
## DULUXGROUP PACIFIC TRAINING



### Human Rights Training

Every two years, each employee is required to undertake training delivered by an e-learning module or in person. This training includes modules relating to human rights, such as discrimination, harassment and bullying. At management level, employees are also required to undertake manager-specific training on these topics including managing complaints, with the training delivered to managers by an e-learning module.

> All Employees



### Modern Slavery Awareness

In the reporting period, we implemented a modern slavery awareness learning program for all employees across Australia and New Zealand. The program educates our people on what modern slavery is, how to recognise modern slavery risks, and how to ensure we do not engage in modern slavery practices (either directly or indirectly). The learning program comprises an e-learning module and a toolbox talk for those employees without computer access. The module must be completed by all employees every two years.



### Sustainable Procurement & Modern Slavery Awareness Training

Procurement professionals completed ethical procurement and modern slavery training in 2022. The program was delivered in workshop format at the annual procurement conference by Robin Mellon, CEO of Better Sydney and one of Australia's experts on supply chain sustainability.

> Procurement Professionals



### Safety & Sustainability Management

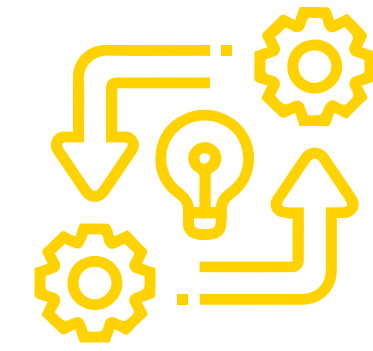
As part of the safety and sustainability management training program, senior managers undertake a component on product stewardship including sustainable procurement and modern slavery awareness.

> Senior Managers

# Actions - DuluxGroup Europe

The processes in place to manage sustainable procurement and modern slavery risk are outlined below. As noted previously, our focus to-date has been on identifying and understanding the effectiveness of existing sustainable procurement processes in the Cromology and JUB businesses. In future reporting periods we will work to identify where there are opportunities to adopt elements of the DuluxGroup Pacific framework in the European businesses to strengthen risk management. Equally, aspects of the DuluxGroup Europe management approach may be adopted into the DuluxGroup Pacific framework where these will add benefit.

As previously noted, the DuluxGroup Europe business is a newly created division comprised of the Cromology and JUB businesses, along with the existing Maison Deco and Craig & Rose businesses.



## Cromology

**Cromology was acquired in January 2022 and since that time work has been underway to assess the current state, gaps and improvement areas related to modern slavery.**



### Key policies

Cromology has in place Business Conduct Guidelines that set expectations around how its employees should conduct themselves and engage, including minimising the risk of modern slavery occurring in both its operations and supply chain.

Additionally, a Code of Conduct for Third Parties is in place and is signed and approved by each supplier upon engagement.

Cromology has an Ethical Procurement Policy in place which is signed by each member of the procurement team on commencement in their roles.



### Key programs

Cromology has a speak up/whistleblowing framework which is comprised of a Whistleblowing Procedure and Integrity Line that provides an avenue for employees in all jurisdictions to make confidential and anonymous complaints related to potential policy breaches. The program is administered externally and also via Cromology's HR and legal teams. As part of ensuring awareness of the program, Cromology promotes the program on its intranet and also with posters located at all of its locations.



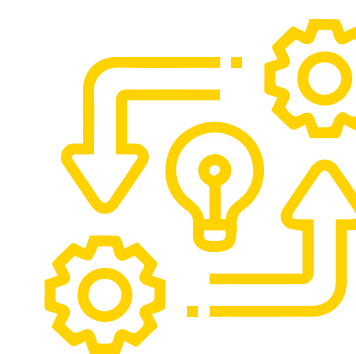
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## JUB

**JUB was acquired in June 2022 and, as with Cromology above, work is underway to assess the current state, gaps and improvement areas as it relates to modern slavery.**



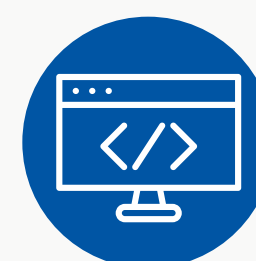
### Key policies

In 2022, JUB established an Appropriate Workplace Behaviour Policy, which is similar to the DuluxGroup Pacific policy but tailored for the local context.

JUB has also adopted the Ethical Trading Initiative (ETI) base code and has an established business values policy that requires the following in all business dealings:

- Consistent respect of human dignity
- Respect for the principle of justice and applicable local regulations
- Concern for the long-term protection and strengthening of the good name and reputation of JUB group and its brands

In the next reporting period, JUB will be implementing a Code of Conduct that clarifies expected standards of conduct.



### Key programs

In the next reporting period, JUB will be implementing a whistleblowing program that enables employees to anonymously disclose concerns associated with ethical standards or policy breaches.

JUB also plans to develop policies, programs and training specifically focused on safety, sustainable procurement and modern slavery. This will be a multi-year program requiring co-ordination between internal procurement, production, logistics and research departments and engagement with suppliers.

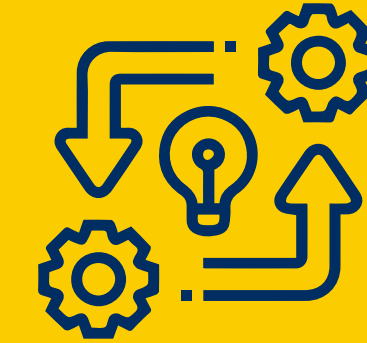
### Maison Deco and Craig & Rose

Maison Deco and Craig & Rose currently operate under the DuluxGroup Pacific policy framework.



# Actions

## ACTIONS TAKEN IN LAST REPORTING PERIOD AND FUTURE PLANS



**DuluxGroup is committed to continually improving our policies, programs and initiatives to effectively identify, assess and address modern slavery risks.**

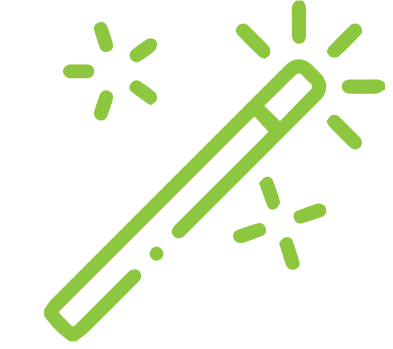
This table shows the actions we planned to take in the reporting period to further develop and strengthen our modern slavery risk management processes.

It summarises progress made and details the next steps we will be taking in future reporting periods to further improve our processes.

Focus area	Action	Progress	Next Steps	Focus area	Action	Progress	Next Steps			
Human Rights Training	Rolling out revised compulsory training modules relating to human rights, such as bullying, harassment and discrimination	The human rights training program was implemented in 2022.	Extend human rights training to DuluxGroup Europe businesses (2024 reporting period) Human rights training to be repeated by employees every 2 years	Operations risk management	Carrying out a high-level review of our workplace practices in locations identified as medium to high risk, such as China and Papua New Guinea.	In 2022, we reviewed the PNG Employee Loan Program and developed an alternative approach that provides financial support to employees while eliminating any potential for misuse of the scheme. An initial assessment was completed of current modern slavery risks and management practices for the Cromology and JUB businesses, which were acquired during the reporting period.	Implementation of a Code of Conduct in the JUB business. Review and update of Cromology Code of Conduct to refer specifically to modern slavery risk. Review process for engaging independent contractors to ensure that modern slavery risk controls are in place and effective. Continue to support the establishment and improvement in modern slavery controls for the Cromology and JUB partner companies in Europe.			
Modern Slavery Awareness Training	Rolling out a new modern slavery awareness e-learning module to employees	The modern slavery awareness program was implemented for all Australian and New Zealand employees. The program comprises an e-learning module and a toolbox talk for those employees without computer access. The module has been integrated into our Learning Management System and must be completed by all employees every two years. Specialist ethical procurement and modern slavery training for procurement professionals was also conducted in the reporting period.	Continue roll-out of modern slavery training in DuluxGroup Pacific region (2023). Undertake modern slavery awareness training in DuluxGroup Europe businesses (2023-2025 reporting period). Re-run specialist training for procurement professionals (2025)							
Speak up Program Awareness	Developing and rolling out awareness campaigns for our Code of Conduct and Speak Up program	Through our engagement survey completed in the prior reporting period, we garnered that 91% of workers are aware of the Speak Up program and feel comfortable accessing it. Notwithstanding this we concluded that there were further steps we could take to maintain and build awareness. In the reporting period, we therefore launched 11 awareness campaigns on key Code of Conduct topics including a campaign on respect for others. All of these campaigns reminded employees of the Speak Up program	Support the local initiatives to lift awareness of the whistleblowing framework in Cromology and JUB (2023/24)	Supplier risk management	Review and update our Sustainable Procurement Standard to include a risk framework that better assesses and classifies supplier risk by location, industry and products supplied Establish a 3-tier qualification process based on assessed supplier risk.	The Sustainable Procurement Standard was reviewed and updated with a new supplier pre-screen based on SEDEX risk categorisation, overlaid with known risks associated with specific materials, geographies and supply arrangements. A 3-tier supplier assessment process, based on the pre-screen risk assessment, has been established. Business indirect suppliers were evaluated against the new risk categorisation process.	Evaluate suppliers of direct materials, including contract manufacturers, using the new risk categorisation and assessment process. Establish a review process for suppliers assessed under previous Sustainable Procurement Standard.			
	Developing and rolling out support tools to improve understanding of the Speak Up program for workers in France, UK, China, Papua New Guinea and US	With the acquisitions of JUB and Cromology, our approach to increasing awareness of the Speak Up program in France and the UK has been delayed while we finalise the DGL Europe operating model. More work remains underway on improving the supports for China and PNG.	Implement Speak Up/Whistleblowing program in the JUB business.					Utilise the SEDEX platform to undertake a more detailed risk assessment of higher risk suppliers and develop a broader verification program	We have continued to utilise the SEDEX platform to review our operational and supply chain risk profile. During 2022, we trialled the use of SEDEX to evaluate a newly introduced high-risk supplier as part of the onboarding process.	Embed the 3-tier qualification process and establish additional verification processes for high-risk suppliers.
	Embedding the Speak Up program into the supplier onboarding process	Options for providing supplier access to our Speak Up program are under review and will be implemented in the next reporting period.	Implement Speak Up program into supplier onboarding process (2023).					Develop a sustainable procurement scorecard to track and monitor suppliers and ensure corrective actions are managed for conditionally approved suppliers	In the reporting period, we commenced development of the sustainable procurement scorecard with implementation planned for 2023. Corrective actions for conditionally approved suppliers are being managed via the safety and sustainability action management system.	Implement the reporting scorecard

TABLE 4

# Effectiveness



This data outlines the performance measures used to assess the effectiveness of our modern slavery mitigation actions in the DuluxGroup Pacific business and the details the outcomes achieved in the reporting period.

## DuluxGroup Pacific

Actions	Measure	Outcome for reporting period	Actions	Measure	Outcome for reporting period
Employee complaints and grievances - modern slavery	Ongoing monitoring and reporting of reported modern slavery breaches. Well-being dashboard tabled to executive team at least once a year used to identify group trends, implications and improvements	0 suspected modern slavery breaches	Sustainable Procurement Program - supplier assessment and approval	Percentage of suppliers being assessed, approved and monitored under the Sustainable Procurement Standard year-on-year	604 suppliers identified as meeting the assessment threshold <sup>1</sup> 462 (76%) suppliers fully assessed and qualified (up from 66% in the preceding reporting period).
Speak Up Program (Whistle blowing) - modern slavery	Ongoing monitoring and reporting of reported modern slavery breaches. Formal report tabled to executive team at least once a year and disclosures discussed as a Committee 3 times a year to identify patterns and implement group-wide improvement plans	0 suspected modern slavery breaches	Sustainable Procurement Program - supplier audit	Number of on-site verification audits of suppliers under the Sustainable Procurement Standard	2 on-site verification audits completed (same as in the preceding reporting period)
Human rights training (discrimination, harassment and bullying) - all employees	Completion rate. Employees must complete training every two years. We aim to keep completion rates above 80%. If the rate falls below this level, we undertake focused work with the relevant subsidiary or business division. In considering the effectiveness of the training, we look at the completion rates, the internal human rights grievance rates and the number of litigated matters	83% completion rate 0 human rights grievances 0 litigated matters	Sustainable Procurement Program - suppliers rejected	Measure and monitor the number of suppliers rejected due to failure to comply with the minimum requirements of the Sustainable Procurement Standard	0 suppliers rejected
Safety and Sustainability Management Framework	The number of key improvement actions identified related to modern slavery risks and sustainable procurement	57 improvement actions identified: <ul style="list-style-type: none"> <li>• 2 related to specific modern slavery risks</li> <li>• 55 related to suppliers not having adequately established their own sustainable procurement program (leading to increased modern slavery risks in lower tiers of the supply chain)</li> </ul> 9 actions (16%) addressed with suppliers, and 18 suppliers were identified for follow up verification audit over the next 3 years	Sustainable procurement and modern slavery awareness training program	Number of: <ul style="list-style-type: none"> <li>- Employees who complete general Modern Slavery Awareness training</li> <li>- Senior managers who complete Safety &amp; Sustainability Management training (including Modern Slavery awareness)</li> <li>- Procurement professionals who complete specialised ethical procurement and modern slavery training</li> </ul>	1900 employees (47% of all Australian and NZ employees) completed Modern Slavery Awareness training, 80 senior managers completed Safety & Sustainability Management training (up from 68 in the preceding reporting period) and 28 procurement professionals completed specialised Modern Slavery training

<sup>1</sup>Currently suppliers exceeding the following spend thresholds complete the supplier assessment and approval process 1/ Contract manufacture suppliers with whom we spend \$10,000 p.a. or more and 2/All other suppliers with whom we spend \$100,000 p.a. or more. These spend thresholds will be replaced by the 3 tier risk profile approach described in section 5, as part of the implementation of our new risk framework.

TABLE 5

# Effectiveness

Relevant measures of modern slavery risk management processes are monitored in the Cromology, JUB, Maison Deco and Craig & Rose businesses as detailed in this table.



## DuluxGroup Europe

Actions	Measure	Outcome for reporting period
<b>Cromology</b>		
Sustainable Procurement Program – supplier agreement to Responsible Purchasing charter	Percentage of purchased materials volume covered by suppliers who have signed the Responsible Purchasing charter	84% of raw materials supply volume 95% of packaging supply volume 98% of trade purchase value (goods for resale)
<b>JUB</b>		
Supplier improvement actions	Measure and monitor the number of suppliers rejected due to failure to comply with the minimum requirements of the Sustainable Procurement Standard	1 supplier rejected due to unwillingness to address legal requirements for permitting of agency workers (Note that this breach was isolated to securing the correct legal documentation and workers were not deprived of payment or other rights)

Given the acquisition of Cromology and JUB are still recent, our primary focus to-date has been on ensuring the framework to minimise the risk of modern slavery is in place. In future reporting periods, we will review measures for testing effectiveness and establish new measures where warranted.

Actions	Measure	Outcome for reporting period
<b>Maison Deco &amp; Craig &amp; Rose</b>		
Sustainable Procurement Program – supplier improvement actions	The number of key improvement actions identified related to modern slavery risks and sustainable procurement.	1 (6%) supplier rejected
Sustainable Procurement Program – supplier assessment and approval	Percentage of suppliers being assessed, approved and monitored under the Sustainable Procurement Standard year-on-year	30 (79%) suppliers fully assessed and qualified
Sustainable Procurement Program – supplier audit	Number of on-site verification audits of suppliers under the Sustainable Procurement Standard	3 on-site verification audits completed (8% of suppliers)
Sustainable Procurement Program – suppliers rejected	Measure and monitor the number of suppliers rejected due to failure to comply with the minimum requirements of the Sustainable Procurement Standard	0 suppliers rejected

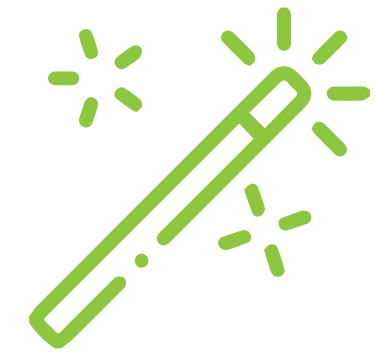


TABLE 6



# Consultation and Engagement



**All DuluxGroup Pacific and DuluxGroup Europe divisions, including the newly acquired JUB and Cromology businesses, have provided information and data to enable preparation of this Modern Slavery Statement.**

In the process of preparing this statement, we have presented draft versions of this statement to our executive team and the senior leadership teams of each key subsidiary and business division, including the newly acquired Cromology and JUB businesses, to encourage discussion and invite feedback.

In an ongoing sense, our central business functions, including our People, Culture and Change (PCC), Safety & Sustainability, and our Procurement teams, manage the systems, processes and tools that underpin our risk management approach and enable us to monitor effectiveness. All businesses participate in the delivery of our risk management processes and contribute valuable feedback to enable the continuous improvement and evolution of our approach.



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