



**DULUXGROUP
LIMITED -
MODERN SLAVERY
STATEMENT
2025**

imagine
a better place

Contents

	1. Introduction	3
	2. Chairman’s Message	5
	3. About DuluxGroup	6
	A — Our structure	6
	B — Our operations	8
	C — Our supply chain	9
	4. Risks	10
	A — Risk assessment within our operations	11
	B — Risk assessment throughout our supply chain	12

	5. Actions	13
	A — Governance framework	13
	B — Policies	14
	C — Management systems.....	16
	D — Training	19
	6. Effectiveness	21
	A — Governance framework	21
	B — Policies	22
	C — Programs	23
	D — Training	25



1. Introduction

This statement has been prepared by DuluxGroup Limited ABN 42 133 404 065 (DuluxGroup) in accordance with the *Modern Slavery Act 2018 (Cth) (Act)* and is the sixth modern slavery statement filed by DuluxGroup under the Act.

This statement describes our structure, operations and supply chain, the risks of modern slavery within our operations and our supply chain, the actions taken to address those risks in the period from 01/01/2025 to 31/12/2025 (Reporting Period), and our assessment of the effectiveness of those actions.

Reporting Entities

This statement is made by DuluxGroup on its own behalf and on behalf of the entities specified below which had revenue exceeding \$100m in the Reporting Period (Reporting Entities).



Reporting Entity	ABN
DuluxGroup Limited	42 133 404 065
DuluxGroup (Investments) Pty Ltd	78 133 404 216
DuluxGroup (New Zealand) Pty Ltd	55 133 404 118
DuluxGroup (Australia) Pty Ltd	67 000 049 427
DuluxGroup (Nominees) Pty Ltd	75 156 611 540
Alesco Corporation Pty Ltd	23 008 666 064
Parchem Construction Supplies Pty Ltd	80 069 961 968
Pargone Pty Ltd	71 004 364 710
Lincoln Sentry Group Pty Ltd	59 010 624 389
B&D Australia Pty Ltd	25 010 473 971

In this statement:

- A reference to “we,” “us”, “our”, “DuluxGroup” or “Group” is a reference to DuluxGroup and its divisions.
- A reference to a division includes the Reporting Entities within that division and any subsidiary or business unit within that division.



1. Introduction



Key progress

Key progress in 2025 included the following:

- Continued application of a riskbased due diligence process to assess and verify suppliers.
- Strengthened governance arrangements through the establishment of a Modern Slavery Working Group to support increased consistency, coordination and capability across the Group.
- Reviewed and updated the supplier due diligence standards to support a more aligned approach across DuluxGroup Pacific and DGL Europe.
- Delivered targeted modern slavery and sustainable procurement training to employees in procurement roles.

Consultation process

In preparing this statement, we have engaged with the leadership teams across the DuluxGroup businesses to raise awareness of modern slavery risks, communicate commitments for future reporting periods and invite feedback. The governance framework to manage human rights aspects of our business, including modern slavery risks, is developed and monitored at a Group level by our People, Culture and Change (PCC) function, our Safety & Sustainability (S&S) function and our group procurement team. Each business participates in the delivery of our policies, programs and training, and contributes valuable feedback to enable the continuous improvement and evolution of our approach.

Mandatory reporting criteria

The table below shows the location in this statement of our reporting against each mandatory criteria specified in the Act.

Criteria No.	Criteria	Statement Page No.
1	Identify the reporting entity	3
2	Describe the reporting entity's structure, operations and supply chain	6
3	Describe the risks of modern slavery practices in the reporting entity's operations and supply chain	10
4	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	13
5	Describe how the reporting entity assesses the effectiveness of those actions	21
6	Describe the reporting entity's consultation process with any entity that it owns or controls	4
7	Include any other information that the reporting entity considers relevant	-

Approval

This statement was approved by the board of DuluxGroup on 18 May 2026.

Feedback

We welcome feedback on this statement. Please direct any comments or questions to sustainability@duluxgroup.com.au.



2. Chairman's Message



At DuluxGroup we are committed to doing everything we can to identify, assess and address the modern slavery risks within our own operations and throughout our supply chain.

Our Safety & Sustainability Vision of 'A Future Without Harm' includes a rejection of modern slavery in all its forms. This is underpinned by our DuluxGroup Values & Behaviours, which include the fundamental right of respect, valuing people and working safely. It also includes ensuring that we engage fairly with our suppliers and are ethical in our sourcing policies and practices.

This is DuluxGroup's sixth Modern Slavery Statement, the first being in 2020. Over that time, our business has more than doubled in size, adding to the complexity of our operations and supply chain. Our growth has been enabled by several new business acquisitions in Australia and internationally, and our operations now span 28 countries where we employ almost 9,000 people across more than 600 operating sites.

We now work with more than 6,000 suppliers providing goods and services from more than 30 countries. Our businesses seek to partner with suppliers that share our Values, including respect for human rights, and specifically, the right to be free from slavery.

Given the expanding diversity of our businesses and operating regions, we are continually assessing our governance to ensure it addresses modern slavery risks across the Group.

During this year, a DuluxGroup-wide global, supplier due-diligence and verification standard was developed. Our businesses assess new suppliers for a range of risks, including the risk of modern slavery, and during the year a small number of 'high-risk' suppliers underwent on-site audits, while others provided evidence of current independent audits.

Along with working with suppliers who share our Values and our approach to ethical sourcing and human rights, we also provide ongoing training and education for our employees, so everyone understands the part they play in understanding and mitigating modern slavery risks. This year, we delivered targeted modern slavery and sustainable procurement training for employees in procurement roles.

With the right knowledge to spot risks, a clear view of what ethical sourcing looks like, and the confidence to speak up if something doesn't seem right, our people play a key part in helping stamp out modern slavery. I'm proud of what they do together to support the communities where we operate and to work with suppliers across our many sourcing locations.

I am pleased to present DuluxGroup's 2025 Modern Slavery Statement.

Patrick Houlihan
Chairman and Chief Executive Officer
25 May 2026



3. About DuluxGroup

A — Our structure

We are a leading marketer and manufacturer of premium branded products that enhance, protect and maintain the places and spaces in which people live and work. We manufacture, source, market, sell and distribute a diverse range of products to trade and retail customers, through our subsidiaries and business units globally.

DuluxGroup (DGL) is part of Nippon Paint Holdings Co Ltd, the fourth largest paint company globally and the largest in Asia Pacific.

Our operations are organised into two divisions - DuluxGroup Pacific and DGL Europe. DuluxGroup Pacific operates in Australia, China, Hong Kong, New Zealand, Papua New Guinea (PNG), Singapore and the United States. DGL Europe operates in central and western Europe, Morocco and the United Kingdom.

In the Reporting Period, DuluxGroup completed the following acquisitions:

DGL Europe

- KOOP business (acquired under an Asset Purchase Agreement and a business unit of the JUB Group)

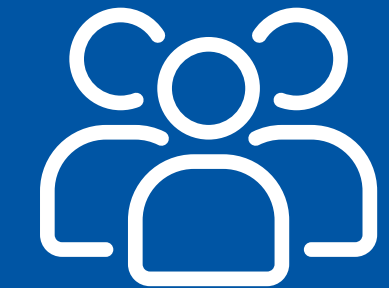
DuluxGroup Pacific

- Peerless JAL (under the management of the Selleys Group)
- Furniture Hardware Supplies (Australia) (under the management of the Lincoln Sentry Group)
- Pinegro Products Pty Ltd (acquisition of the remaining 49.9% interest not previously owned by DuluxGroup Pacific, bringing the business under the management of the Yates Group)



3. About DuluxGroup

A – Our structure



Below is a summary of the key products supplied, and brands owned by each key DuluxGroup subsidiary or business unit.

DGL PACIFIC

Key subsidiary or business unit	Key products	Key brands owned, licensed or distributed
	Garage doors and automatic openers	Automatic Technology, B&D, CSI, Dominator, Garador
	Decorative paints, tools and accessories for decorative paints Decorative concrete products, texture coatings, powder coatings, protective coatings, construction chemicals and related equipment Woodcare coatings and tools and accessories for woodcare coatings	Berger, British Paints, Dulux, Dulux Avista, Dulux EnviroSolutions, Maverick, Maxima, Paintwise, Porter's Paints, Rolana, RotaCota, Spring, Walpamur Dulux Acratex, Dulux Powder Coatings, Dulux Protective Coatings, Edconcrete, Emer, Flextool, Fosroc, Hadrian Cabot's, Feast Watson, Intergrain
	Cabinet and architectural hardware and related products	Assa Abloy, Blum, Breezway, Finista, Flypro, Hera, HexFix, Knight, Lockwood, Modar
	Sealants, adhesives, fillers, paint preparation products and accessories Household cleaning products	Admil, Hillmark, Parfix, Poly, Polyfila, Polyglaze, Selleys, TurtleWax Aim, Country Life, Huggie, Janola, Jiffy, Peerless JAL, Softly, Sunlight, Velvet, White King
	Home garden products, including fertilisers, potting mix, pest and disease control, lawn care, seeds, pots, accessories, organic gardening, organic crop protection and nutritional products	Dynamic Lifter, Earthcare, Hortico, Munns, Munns Professional, OCP, Pinegro, Powerfeed, Ratsak, Seasol, Sharp Shooter, Slasher, Thrive, Weed'n'Feed, Yates, Yates Home Pest, Zero

DGL EUROPE

Key subsidiary or business unit	Key products	Key brands owned, licensed or distributed
	Decorative paints, woodcare coatings, metal and flooring coatings, plasters, tools and accessories for paints and coatings, flooring, wall coverings	Arcol, Baldini Vernici, Craig & Rose (1829, Artisan), Duco, ICP, Jallut, Classidur, Maison Deco, MaxMeyer, Mister Color, Montana, Palm, Plasdox, Pure&Paint, Reveton, Robbialac, Settef, Tinasvip, Tollens, Viero, Zolpan
	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	JUB, JUBIZOL, JUPOL, KOOP
	Sealants, adhesives	NPT, Sigill



3. About DuluxGroup

B — Our operations



As at the end of the Reporting Period, we had **8,745 employees globally**. Below is a summary of our employee numbers by country:

DuluxGroup Pacific

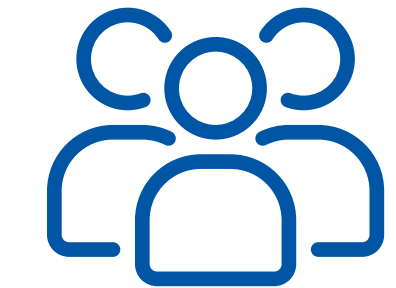
Australia	3770
China	124
Hong Kong	3
New Zealand	522
Papua New Guinea	157
Singapore	1
United States	6
TOTAL	4583

DGL Europe

Belgium	8
Bosnia	23
Croatia	37
Czech Republic	25
England	14
France	2118
Hungary	25
Italy	288
Kosova	4
Luxembourg	2
Monaco	8
Morocco	181
Portugal	279
Republic of North Macedonia	3
Romania	2
Scotland	10
Serbia	206
Slovakia	1
Slovenia	496
Spain	190
Switzerland	76
TOTAL	4162

3. About DuluxGroup

C – 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, such as raw materials and packaging, as well as goods supplied to us as finished products for resale.

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 & distribute to customers.

In the Reporting Period, we spent across all our businesses a total of more than AUD 2.5b with more than 6000 suppliers. Approximately 70% of this spend is on 'direct' goods that are utilised directly in our products, including raw materials, packaging and brought-in finished products. The remaining 30% of spend is on 'indirect' goods and services essential to the running of our business.

To the right is a summary of the goods and services supplied under the direct and indirect goods and services categories in the reporting period:

Supplier or provider type	DuluxGroup Pacific & Europe Spend %	Key goods and services supplied
Direct goods - raw materials and packaging, finished products	70%	latex, minerals, pigments, tinters, polystyrene, other chemicals, waste materials metal, plastic, fibre packaging architectural hardware, cabinetry hardware aerosols, paint accessories, waterproofing systems, fire protective coatings, concrete equipment garage door components, automatic opener components
Indirect goods and services	30%	marketing and media, consulting services, IT and telco, fleet vehicles, contract labour, waste management, utilities, recruitment services, consumables, facilities management, transport and warehousing
Total	100%	

4. Risks



We use the SEDEX risk pre-assessment tool to assist us to identify and assess modern slavery risks. This tool captures modern slavery related risk factors in its labour standards assessment to evaluate inherent risk within our operations and supply chain.

The inherent risk within our operations is dependent on the following key factors:

- Nature of operations
- Industry or sector of operations
- Geographical location of operations
- Employment arrangements for operations, such as direct hire, labour hire, contractor, and full time, part time or casual



The inherent risk throughout our supply chain is dependent on the following key factors:

- Industry or sector of goods sourced or supplied, or services provided
- Geographical location of supplier or provider
- Geographical location of goods sourced, or services provided
- Material or composition of goods, such as known safety hazards or modern slavery concerns
- Type of goods sourced and supplied, such as raw materials, packaging or finished goods

The risk assessment described in this section covers all businesses in the DuluxGroup Pacific and Europe regions, excluding supply chain risk for new acquisitions (Peerless JAL and Pinegro) and the NPT business. Data collection for these businesses is in transition following acquisition.

4. Risks

A — Risk assessment within our operations



To the right is a summary of our assessment of modern slavery risks within our operations as determined by the SEDEX pre-assessment tool. The assessment shows the inherent risk (which is the risk before implementation of risk controls) and risk types, based on operating location and key business activities. When a country has several business activities, the industry with the highest inherent risk is chosen, so the risk ratings reflect the worst-case scenario.

As a result of implementing the risk controls specified in section 5 (actions), the actual risk will be lower than the inherent risk. However, understanding inherent risk ensures we prioritise efforts on the areas and activities that have a higher risk of modern slavery if left unmanaged.

Inherent Risk	Operating Location		Key Business Activities	Risk Types	
High (Note residual risk, after management controls for these locations has been assessed as medium)	DuluxGroup Pacific • China • Papua New Guinea		<ul style="list-style-type: none"> • Manufacture & source • Market & promote • Research & develop • Sell & distribute 	<ul style="list-style-type: none"> • Working hours • Freedom of association • Regular employment • Discrimination • Wages • Forced labour • Health, safety and hygiene • Children and young workers 	
Medium	DuluxGroup Pacific • Australia • Hong Kong • New Zealand • Singapore	DGL Europe • Bosnia & Herzegovina • Croatia • Czech Republic • France • Hungary • Italy	<ul style="list-style-type: none"> • Kosovo • Morocco • Portugal • Republic of North Macedonia • Romania • Serbia 	<ul style="list-style-type: none"> • Slovakia • Slovenia • Spain • Switzerland • United Kingdom 	<ul style="list-style-type: none"> • Research & develop • Manufacture & source • Market & promote • Sell & distribute <ul style="list-style-type: none"> • Freedom of association • Health, safety and hygiene
Low	DuluxGroup Pacific • United States	DGL Europe • Belgium • Luxembourg • Monaco	<ul style="list-style-type: none"> • Market & promote • Sell & distribute 	<ul style="list-style-type: none"> • Freedom of association 	

Based on the above risk assessment, we prioritise activities to enhance our governance and risk controls in the regions and business activities that present the highest inherent risks.



4. Risks

B — Risk assessment throughout our supply chain



While our direct and indirect goods are predominantly sourced from suppliers located in the same regions in which we operate (where there is a lower risk of modern slavery), many of those suppliers source direct goods from other locations (where there can be a higher risk of modern slavery). As a result, we have assessed the modern slavery risks within our supply chain as follows:

- **Indirect goods and services:**
Risks are assessed based on our own operating locations as indirect goods and services are predominantly sourced from within our own operating regions.
- **Direct goods:**
Risks are assessed based on the location from which suppliers source the goods.

To the right is a summary of our assessment of modern slavery risks throughout our supply chain for indirect and direct goods based on this methodology. The assessment relates to approximately 99% of our supply chain by spend.

Indirect goods				Direct goods			
Inherent risk	Supplier location	Goods or services sourced	Key risk types	Inherent risk	Source location	Goods sourced	Key risk types
High	<ul style="list-style-type: none"> • China • Kosovo • Morocco • Papua New Guinea • Serbia 	IT& Telecommunications, Catering, Consumables, Contract services, Transport, Security, Employment Services, Travel, Waste Management, Cleaning Services, Textiles (uniforms)	<ul style="list-style-type: none"> • Child & young workers • Freedom of association • Forced Labour • Health, safety and hygiene • Regular employment • Wages • Working hours 	High	<ul style="list-style-type: none"> • China • Kazakhstan • Pakistan • Saudi Arabia • Turkey 	Powder coating, latex, resins, pigments, painting tools and accessories, concrete equipment, garage door components, door opener components, architectural hardware, cabinetry hardware, other chemicals	<ul style="list-style-type: none"> • Working hours • Freedom of association • Regular employment • Discrimination • Wages • Forced labour • Children and young worker • Health, safety and hygiene
Medium	<ul style="list-style-type: none"> • Australia • Belgium • Bosnia and Herzegovina • Croatia • Czech Republic • France • Germany • Hong Kong • Hungary • Italy • Luxembourg • Monaco • New Zealand • North Macedonia • Portugal • Romania • Singapore • Slovakia • Slovenia • Spain • Sweden • Switzerland • United Kingdom • United States 			Medium	<ul style="list-style-type: none"> • Andorra • Australia • Austria • Belgium • Bosnia and Herzegovina • Canada • Czech Republic • Estonia • Finland • France • Germany • Greece • Hungary • India • Indonesia • Ireland • Italy • Japan • South Korea • Latvia • Liechtenstein • Luxembourg • Malaysia • Monaco • Morocco • Netherlands • New Zealand • Norway • Poland • Romania • Serbia • Slovenia • Spain • Sweden • Switzerland • Taiwan • Thailand • United Kingdom • United States • Vietnam 	Latex, silicones, gap fillers, pigments, adhesives, speciality coatings, architectural hardware, cabinetry hardware, garage door components, gardening products, waterproofing products, painting accessories, polystyrene, concrete equipment, solvents, tinters and tinting equipment, other chemicals	<ul style="list-style-type: none"> • Freedom of association • Health, safety and hygiene • Working hours • Regular employment • Children and young workers • Forced labour • Discrimination • Wages

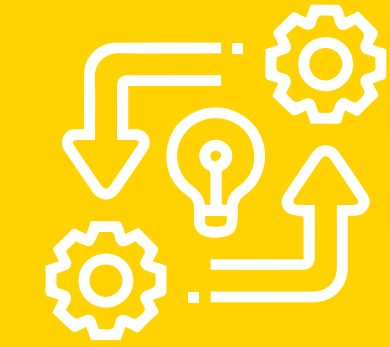
Where the country risk varies by goods or services sourced, the highest risk rating is shown. High inherent risk for Kosovo and Serbia indirect goods relates specifically to employment services & textiles.

Our assessment of supply chain risk highlights the following observations:

- Modern slavery risk is concentrated within a small subset of goods and services sourced from particular locations. Our risk management processes therefore focus on targeted verification and mitigation activities in these higher-risk areas.
- Key suppliers are generally large, multinational organisations located within our operating regions, many of which have their own modern slavery risk assessment processes and supply chain controls in place.
- The long-standing, and direct relationships we maintain with suppliers provides commercial stability, supporting greater certainty for workers in supplier operations and reducing exposure to modern slavery risks.

5. Actions

A — Governance framework

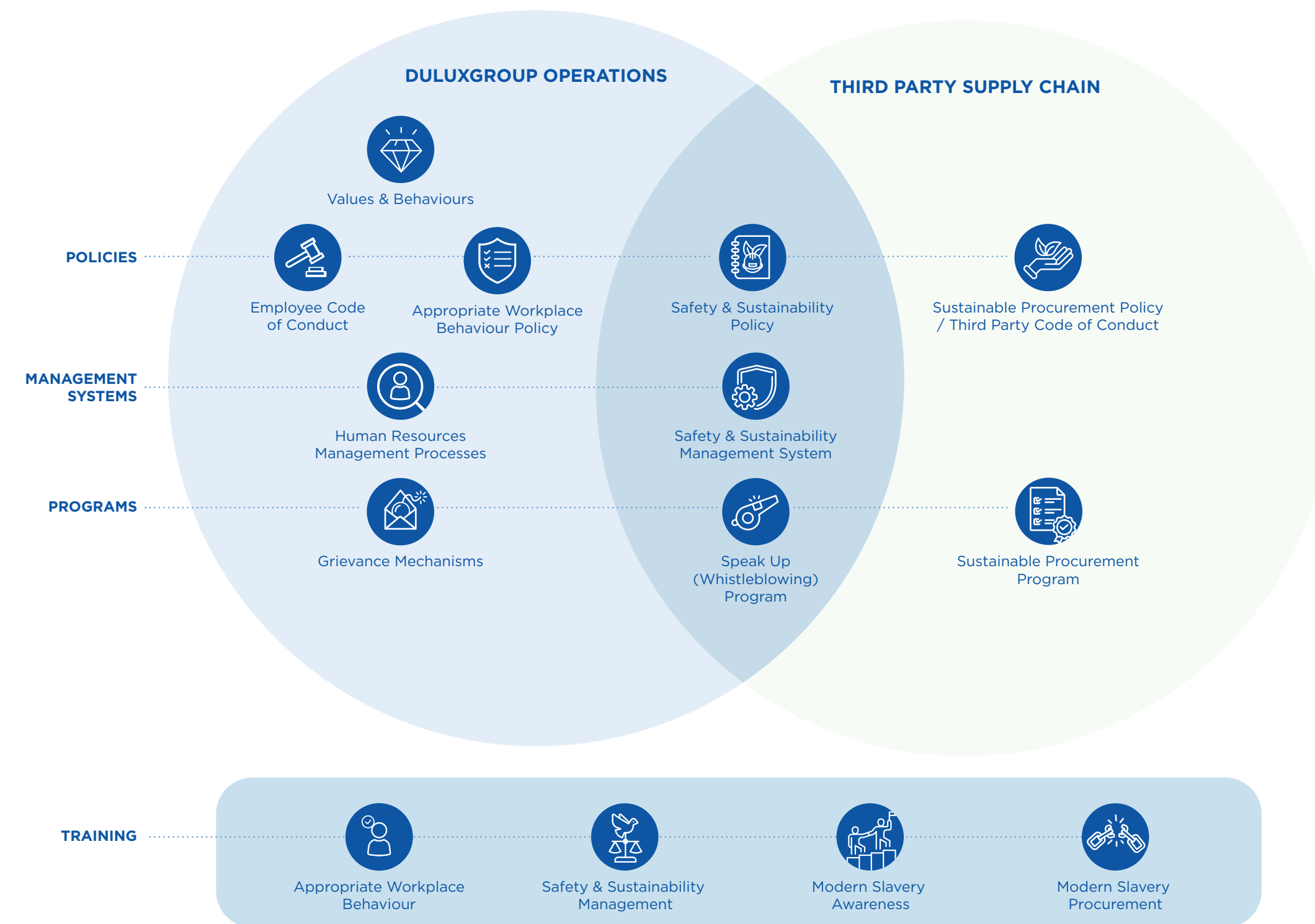


DuluxGroup has established a governance framework to manage human rights aspects of our business, including the identification and mitigation of modern slavery risks.

This framework comprises our policies, management systems, programs and training, which together support the management of modern slavery risks across our operations and supply chain.

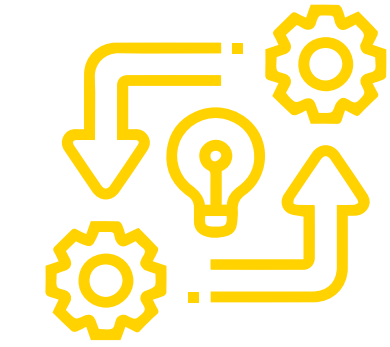
DuluxGroup has acquired several businesses since establishing its governance framework. As new businesses are acquired, DuluxGroup seeks to understand existing policies, systems and practices relevant to modern slavery risk management and to identify opportunities to strengthen alignment with Group expectations. The integration and enhancement of modern slavery risk management practices following an acquisition occurs alongside other

post-acquisition transition activities and may be implemented progressively over time (typically over one to three years), with prioritisation informed by risk. Where a newly acquired business does not yet have practices that are fully aligned with DuluxGroup’s approach, this is disclosed in this Statement, together with actions identified to support improved alignment. As a diversified group operating across multiple geographies and businesses with varying levels of maturity, DuluxGroup recognises that approaches to modern slavery risk management may differ across the Group. To support coordination, knowledge-sharing and continuous improvement, DuluxGroup established a Modern Slavery Working Group in 2025, with representation from relevant functions and businesses. The Working Group supports the progressive strengthening of capability and encourages greater consistency in approaches to modern slavery risk management where practical and value-adding.



5. Actions

B – Policies



DuluxGroup has a range of policies in place that support the management of human rights and modern slavery risks across its operations and supply chain. These policies set expectations for employee behaviour, business practices and supplier conduct, and provide a foundation for the identification, mitigation and reporting of modern slavery risks.



Values & Behaviours

Our Values & Behaviours guide our employees in how we deliver on our core purpose and achieve our strategic goals, while upholding principles like respect and safety. They empower our employees to “Imagine a Better Place”, while ensuring that we make fair, balanced and ethical decisions along the way.

Different forms of values and behaviours guidance are in place in the DuluxGroup Pacific and DGL Europe businesses. While tailored to local operating contexts, these frameworks are closely aligned in intent and application and provide a consistent foundation for expected standards of behaviour and control.



Employee Code of Conduct

- Our Employee Code of Conduct requires our employees to adhere to ethical and legal standards, prohibiting discrimination, harassment, intimidation and violence in the workplace.

Different forms of this code are in place across the DuluxGroup Pacific and Europe businesses.



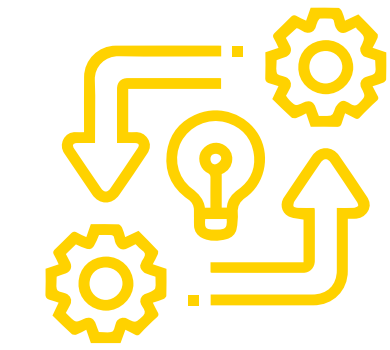
Appropriate Workplace Behaviour Policy

- Our Appropriate Workplace Behaviour Policy defines what is acceptable behaviour within our operations, and by law, and includes a complaint mechanism for the management of unacceptable behaviour complaints.

Different, but aligned, forms of this policy are in place across DuluxGroup Pacific and Europe businesses.

5. Actions

B – Policies



Safety & Sustainability Policy

DuluxGroup’s Safety and Sustainability Policy outlines the Group’s vision of “A Future Without Harm” and its commitment to identifying, understanding and minimising health, environmental and community impacts associated with its activities. This policy applies across all DuluxGroup businesses and underpins the Group’s approach to sustainable operations and responsible sourcing.



Sustainable Procurement Policy

All DuluxGroup businesses, except for recently acquired entities (KOOB, Pinegro and Peerless JAL), have a Sustainable Procurement Policy or equivalent Supplier Code of Conduct in place.

These policies and codes set out expectations for suppliers in relation to environmental, health, safety, labour, human rights and modern slavery standards, and encourage suppliers to cascade relevant requirements through their own supply chains.

During the Reporting Period, DuluxGroup reviewed procurement policies and supplier codes across regions to confirm alignment with Group expectations.



INTRODUCTION

CHAIRMAN'S MESSAGE

ABOUT DULUXGROUP

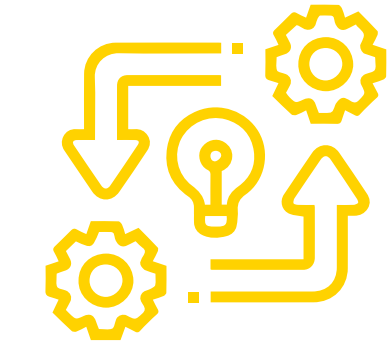
RISKS

ACTIONS

EFFECTIVENESS

5. Actions

C – Management systems



DuluxGroup has management systems in place to support the identification, assessment and mitigation of modern slavery risks. These systems are designed to reflect the differing risk profiles of DuluxGroup’s operating regions and business activities and are implemented alongside the policies and governance arrangements described above.



Human Resource Management Processes

All DuluxGroup businesses have group-level and jurisdictionally specific management processes in place as a baseline for managers to lead their people. These management processes include policies, guidelines, templates, videos and training materials. For our operations in the higher risk regions of China and Papua New Guinea, we have the following additional controls in place to address a higher risk of modern slavery:

- Documented policies and procedures, such as employee recruitment, leave allowances, salary payment and working hours.
- Strict adherence to Chinese Labour Law, Labour Contract Law, Female Workers Protection Law and Minors Protection Law (China).

- Accommodation provided for rural employees at a reasonable price and facilities closely monitored to ensure health, safety and hygiene of those employees (China).
- Direct employment in operational-based roles, with no use of labour-hire agencies (PNG).
- Casual employment does not extend beyond three months (PNG).
- Salaries based on Korn Ferry grade analysis which are above the minimum wages set by the Department of Labour (PNG).

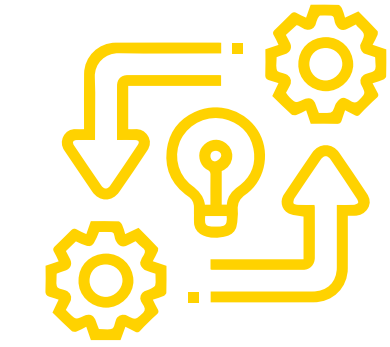
In lower risk jurisdictions, such as Australia, New Zealand and the United States, labour hire workers have been identified as presenting a higher risk of

modern slavery. We therefore have the following additional controls in place to address the use of labour hire workers:

- Labour hire and recruitment service providers complete onboarding assessment for modern slavery risks (Australia and New Zealand).
- Direct employment in operational-based roles, with no use of labour-hire agencies (United States).

5. Actions

C – Management systems



Safety & Sustainability Management System

DuluxGroup maintains an integrated Safety and Sustainability Strategy and Management System to support delivery of its Safety and Sustainability Policy. The system includes standards, procedures, guidance materials and an audit program. The sustainable procurement standard outlines the key minimum requirements across DuluxGroup to support the identification and management of modern slavery risks in the supply chain.

This management system is well established across DuluxGroup Pacific businesses, and the transition of DGL Europe businesses to operate under the same framework is well progressed.



Speak Up Program

Different forms of a Speak Up Program or Whistleblower Policy are in place across all businesses.

Each program or policy is designed to encourage reporting of policy breaches, including modern slavery or human rights breaches, via an independent channel that ensures confidentiality and anonymity for the discloser.

For DuluxGroup Pacific, the program is underpinned by a Speak Up Policy and Speak Up Line and is overseen by a Speak Up Committee comprising of members of the executive team of DuluxGroup Pacific and select senior employees from group level functions.

The Speak Up Committee meets regularly to review reports, identify patterns and implement improvement plans, and a report is tabled to the executive team of DuluxGroup Pacific annually.

The Speak Up Program in the Cromology business is underpinned by a Whistleblowing Procedure and Integrity Line and is administered externally and via Cromology's human resources and legal teams.

The Cromology business promotes awareness of the program via its company website, intranet and posters at its operating locations. The program is available to our employees in each jurisdiction in which Cromology operates, as well as external stakeholders.

The JUB business has a Whistleblowing Policy and external complaint channel in place.

A consolidated report for DuluxGroup Pacific and DGL Europe is tabled to the Speak Up Committee annually.

Other Grievance Mechanisms

We have grievance mechanisms in place for DuluxGroup Pacific and DGL Europe, and we continue to monitor and report on the number of grievances relating to modern slavery risks.



5. Actions

C – Management systems



Sustainable Procurement Program

Sustainable Procurement Programs have been in place across DuluxGroup Pacific and DGL Europe for several years, reflecting differing operating contexts. While the form of these programs has varied, each has been designed to communicate DuluxGroup’s expectations to suppliers and to assess supplier performance against relevant modern slavery and sustainability criteria.

In the established DuluxGroup Pacific and Europe businesses, supplier evaluation has historically been supported by structured, risk-based due-diligence approaches. In 2025, DuluxGroup strengthened and further aligned these approaches through a review of the Safety & Sustainability (S&S) Sustainable Procurement Standard. The updated standard establishes a consistent framework for supplier approval and oversight across DuluxGroup Pacific and DGL Europe.

Under the strengthened framework, suppliers are assessed through a risk-based due-diligence process comprising the following elements:

Policy acceptance

- Suppliers are required to agree to comply with the DuluxGroup Sustainable Procurement Policy, or an equivalent Supplier Code of Conduct, as part of the terms and conditions of supply.

Initial risk screening

- Supplier risk is reviewed to identify those requiring further assessment or enhanced verification, having regard to spend thresholds and exposure to industries or geographies associated with elevated modern slavery or sustainability risk.

Self-assessment

- Suppliers identified as requiring further verification are requested to complete a self-assessment questionnaire (SEDEX self-assessment questionnaire or equivalent), informed by recognised international standards including ILO conventions, the Ethical Trading Initiative Base Code, ISO 14001 and SEDEX/SMETA guidance.



Enhanced verification

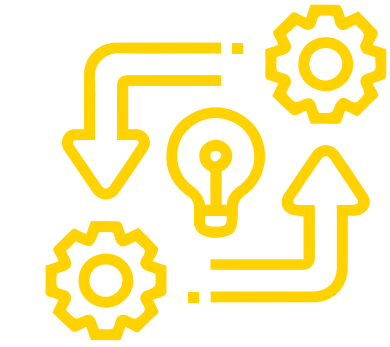
- Where higher levels of risk are identified, additional verification may be undertaken, including DuluxGroup-led on-site audits or independent third-party audits (e.g. SEDEX SMETA, BSCI).
- Verification outcomes inform supplier approval status and any corrective actions required. Suppliers that are unwilling or unable to address significant issues within agreed timeframes are not permitted to supply to DuluxGroup.

DuluxGroup’s focus in future reporting periods will be on progressively building sustainable procurement capability, supporting the effective implementation of the updated Sustainable Procurement Standard, and embedding enhanced due-diligence requirements across the Group, including within more recently acquired businesses.



5. Actions

D – Training



Training is a key component of DuluxGroup’s approach to building awareness, capability and accountability for the identification and mitigation of modern slavery risks across the business



Safety & sustainability management training program

DuluxGroup’s safety and sustainability management training program includes a dedicated module on product stewardship, incorporating sustainable procurement and modern slavery awareness. Completion of this training is mandatory for senior managers in DuluxGroup Pacific as part of the onboarding process. DuluxGroup intends to implement a comparable training program for senior managers in DGL Europe in future reporting periods.



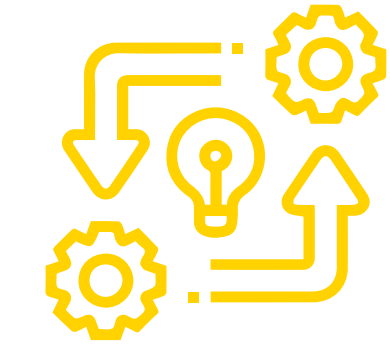
Modern slavery specialist training

During the Reporting Period, DuluxGroup continued to build capability through targeted training initiatives for employees in procurement roles. In DuluxGroup Pacific, employees in procurement positions in Australia and New Zealand complete specialist modern slavery training on a three-year cycle. In DGL Europe, the JUB business has implemented specialist modern slavery training for procurement employees on a three-year cycle, while the Cromology business has developed a specialist training program, with implementation scheduled for 2026. As part of post-acquisition integration activities, DuluxGroup intends to progressively include procurement professionals from newly acquired businesses in relevant training programs.



5. Actions

D – Training



Modern slavery awareness training program

It is mandatory for employees in key roles, including executive management, human resources, procurement, research and development, logistics, information technology and production roles in Australia and New Zealand, to complete a modern slavery awareness e-learning module every two years. The JUB business has an awareness training program in place for its human resources staff and has also implemented training for senior managers. This training program includes a general overview of modern slavery risks and details of measures and policies the JUB business has implemented to mitigate those risks. In Papua New Guinea and China, initial modern slavery awareness sessions have been delivered, with further training to be considered as part of future program development.

In future reporting periods, DuluxGroup intends to progressively expand the rollout of routine, scheduled modern slavery training programs to key employees in other jurisdictions across DuluxGroup Pacific and DGL Europe, where regular training is not yet in place.



Appropriate Workplace Behaviour training program

It is mandatory for employees in DGL Pacific Australia and New Zealand businesses to complete human rights training every 2 years.

This training program includes modules on discrimination, harassment and bullying. Additional training on discrimination, harassment and bullying is provided to senior managers in DGL Pacific.

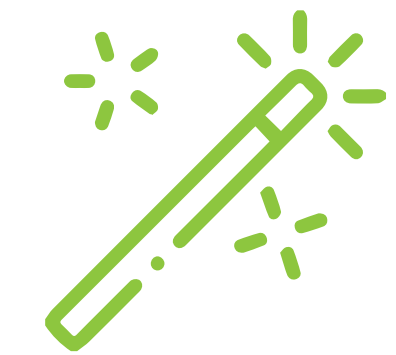
A human rights awareness program has also been implemented in the PNG and China businesses with employees being briefed on human rights policies and signing an acknowledgement stating that they have read and understood the policies.

In future reporting periods, we intend to roll out a training program to employees in DGL Europe and to formalise routine training in the DGL Pacific PNG and China businesses.



6. Effectiveness

A — Governance Framework



DuluxGroup is committed to the continuous improvement of its policies, governance arrangements, management systems and capability-building activities to support the effective identification, assessment and management of modern slavery risks across its operations and supply chain.



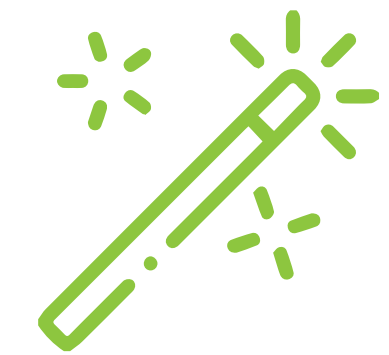
Over recent years, DuluxGroup has continued to strengthen its governance framework and deepen its understanding of and evolution of supply chain risk across the Group. While approaches to modern slavery risk management vary across businesses, due to differing operating contexts and levels of maturity, ongoing efforts are focused on improving consistency, capability and alignment, including within newly acquired businesses as they transition into the Group.

This section of the statement summarises actions taken during the reporting period to strengthen DuluxGroup’s modern slavery risk management framework, outlines how these actions contribute to managing risk, and identifies areas for further focus in future reporting periods.

Target	Aligned governance framework for all businesses
Effectiveness measure	All businesses operating under aligned governance framework
Reporting period	<ul style="list-style-type: none"> Established a Modern Slavery Working Group to oversee alignment of governance mechanisms, including the sustainable procurement policy and processes.
Future reporting periods	<ul style="list-style-type: none"> Use the Modern Slavery Working Group to oversee and coordinate the ongoing alignment of governance frameworks, sustainable procurement standards and data capture across all businesses. Support progressive governance uplift in newly acquired businesses, with prioritisation informed by risk and postacquisition transition timelines.

6. Effectiveness

B — Policies



Values and Behaviours

Target	Values & Behaviours (or equivalent) in place for all businesses
Effectiveness measure	All businesses have values and behaviours guidance in place
Reporting period	<ul style="list-style-type: none"> Reviewed values and behaviours policy in NPT business to confirm alignment with DuluxGroup framework. Continued application of existing Values and Behaviours guidance across DuluxGroup Pacific and DGL Europe businesses.
Future reporting periods	Continue application of Values and Behaviours policies.

Code of Conduct

Target	Employee Code of Conduct (or equivalent) in place for all businesses
Effectiveness measure	All businesses have an employee code in place
Reporting period	DGL Europe & Pacific <ul style="list-style-type: none"> Continued application of Code across all businesses. Implemented Code of Conduct in NPT business.
Future reporting periods	Review code for the Cromology business to reference specific modern slavery risks.

Appropriate Workplace Behaviour Policy

Target	Appropriate Workplace Behaviour Policy (or equivalent) in place for all businesses
Effectiveness measure	All businesses have policy in place
Reporting period	DuluxGroup Pacific <ul style="list-style-type: none"> Continued application of policy. DGL Europe <ul style="list-style-type: none"> JUB developed a webinar to strengthen ongoing awareness of human rights. Reviewed policy in NPT business to confirm alignment with DuluxGroup framework.
Future reporting periods	<ul style="list-style-type: none"> Continue transition of employees in recently acquired businesses to DuluxGroup policies.

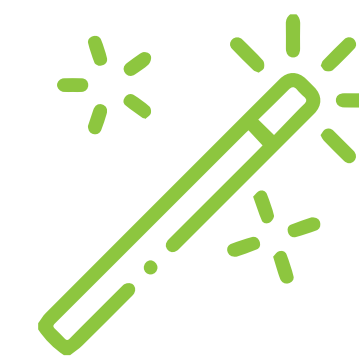
Sustainable Procurement Policy

Target	Sustainable Procurement Policy or Supplier Code of Conduct in place for all businesses and accepted by suppliers
Effectiveness measure	All businesses have policy in place and policy accepted by suppliers
Reporting period	Completed a review and update of the Sustainable Procurement Policy to support a standardised approach across the Group. Continued focus on supplier acceptance of Sustainable Procurement Policy/Code of Conduct with the following completion rates: <p>DuluxGroup Pacific</p> <ul style="list-style-type: none"> 84% of identified high or medium risk suppliers (contract manufacturers with whom we spend \$10,000 or more per annum or any other supplier with whom we spend \$100,000 or more per annum) have accepted the code. <p>DGL Europe</p> <ul style="list-style-type: none"> 42% of suppliers have accepted the code in the Cromology business (inclusive of Maison Deco suppliers). 80% of suppliers have accepted the code in the JUB business. NPT commenced process to issue code to suppliers.
Future reporting periods	<ul style="list-style-type: none"> Continue to focus on increasing supplier acceptance rates, prioritising higher risk suppliers and supply chains. Progressively roll out the updated Sustainable Procurement Policy/ Supplier Codes of Conduct in newly acquired entities.



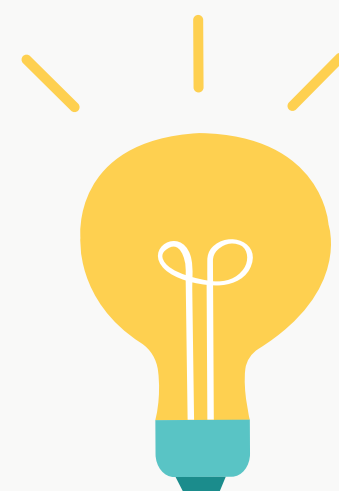
6. Effectiveness

C — Programs



Speak Up Program & other grievance reporting mechanisms

Target	Ongoing monitoring and reporting for all businesses
Effectiveness measure	Ongoing identification of trends, implications and improvements
Reporting period	<p>DuluxGroup Pacific</p> <ul style="list-style-type: none"> 0 suspected modern slavery breaches and 0 litigated matters relating to modern slavery under the Speak Up Program and other grievance reporting mechanisms. <p>DGL Europe</p> <ul style="list-style-type: none"> 0 suspected modern slavery breaches and 0 litigated matters relating to modern slavery under the Whistleblowing Programs or other grievance reporting mechanisms.
Future reporting periods	Continued monitoring of suspected modern slavery breaches across all businesses.



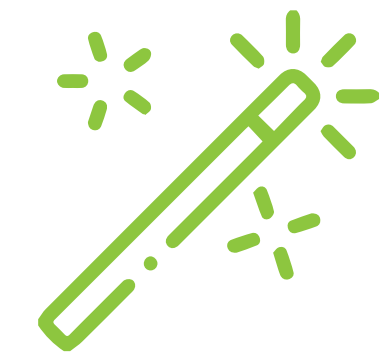
Target	Raise awareness and understanding of the Speak Up Program (or equivalent)
Effectiveness measure	Employees aware of and understand the program
Reporting period	<p>DuluxGroup Pacific</p> <ul style="list-style-type: none"> Speak Up Policy translated into Chinese and awareness programs in place for B&D employees in China, implementation for DuluxGroup International employees in China pending. Speak Up Policy rolled out to all PNG employees. <p>DGL Europe</p> <ul style="list-style-type: none"> Quarterly meetings conducted between legal professionals in DuluxGroup Pacific and DGL Europe to share knowledge. Speak up program established in Cromology in France. Regular consultations in the JUB business on Modern Slavery between General Counsel, executive management, human resources and health and safety departments. Continued consultation with company trade union.
Future reporting periods	<ul style="list-style-type: none"> Continue knowledge sharing of program between legal professionals in DuluxGroup Pacific and DGL Europe. Roll out program for DuluxGroup International employees in China in 2026. Establish program in United States. Roll out training in the NPT business.

Target	Speak Up Program (or equivalent) available to supplier workers in all businesses
Effectiveness measure	Supplier workers are aware of and can access reporting mechanisms
Reporting period	<p>DGL Europe</p> <ul style="list-style-type: none"> JUB continued use of an online speak-up form established for suppliers.
Future reporting periods	Investigate appropriate channels for supplier worker reporting of modern slavery concerns.



6. Effectiveness

C — Programs



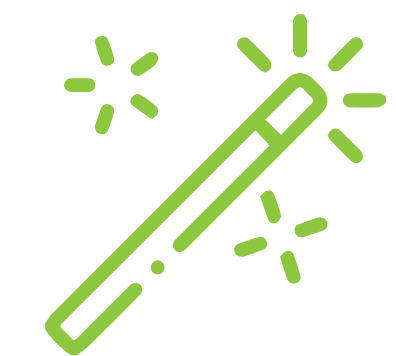
Sustainable Procurement Assessment Program

Target	Risk-based due diligence process for assessing and verifying suppliers in place for all businesses
Effectiveness measure	Suppliers assessed and verified under risk-based due diligence process
Reporting period	<p>A DuluxGroup-wide global, supplier due-diligence and verification standard was developed. Application of existing assessment programs continued while the updated standard was developed, supported by desktop reviews and targeted on-site audits where higher risks were identified:</p> <p>DuluxGroup Pacific</p> <ul style="list-style-type: none"> 84% of identified high or medium risk suppliers (contract manufacturers with whom we spend \$10,000 or more per annum and other suppliers with whom we spend \$100,000 or more per annum) have completed the desktop due-diligence assessment. Two high-risk suppliers underwent on-site verification audits, and a further 13 provided evidence of current independent audits (e.g., BSCI audits conducted via Amfori). 10 improvement actions were identified. 0 suppliers were banned. <p>DGL Europe</p> <ul style="list-style-type: none"> Two suppliers have completed an onsite audit, and two improvement actions were identified in the JUB business. 16 (50%) identified high or medium risk suppliers have completed desktop due-diligence assessment in the Maison Deco business, one verification audit has been completed, and one improvement action has been identified. No suppliers were banned in the Cromology and JUB businesses. NPT commenced due-diligence assessment process for high and medium risk suppliers.
Future reporting periods	<ul style="list-style-type: none"> Roll out the updated Sustainable Procurement Standard across the Group, including within more recently acquired businesses. Investigate due diligence and verification processes for procurement outside of procurement-managed processes (e.g. site contractor engagement, de-centralised business procurement).



6. Effectiveness

D — Training



Safety & sustainability management training program

Target	Roll out safety & sustainability management training program for senior managers as part of onboarding process
Effectiveness measure	Completion for senior managers as part of onboarding process
Reporting period	DuluxGroup Pacific <ul style="list-style-type: none"> 63 senior managers completed training. DGL Europe <ul style="list-style-type: none"> Program under review for implementation in DGL Europe businesses.
Future reporting periods	<ul style="list-style-type: none"> Continue delivery of training for senior managers in DuluxGroup Pacific. Roll out the safety and sustainability management training program for senior managers in DGL Europe in 2026/7.

Modern slavery awareness training program

Target	Roll out modern slavery awareness training to key employees every 2 years
Effectiveness measure	80% completion rate for key employees
Reporting period	DuluxGroup Pacific <ul style="list-style-type: none"> 90.5% completion rate for key employees in Australia and New Zealand. Toolbox talks have been delivered to employees in PNG and China. DGL Europe <ul style="list-style-type: none"> 95% completion rate for training delivered to directors and key employees in the JUB business.
Future reporting periods	<ul style="list-style-type: none"> Continue training for key employees in Australia, New Zealand and the JUB business every two years. Assess the feasibility of applying ANZ awareness training globally, including across Cromology, NPT, PNG and China, through standardised compliance modules.

Modern slavery specialist training program

Target	Roll out modern slavery specialist training to employees in procurement positions to complete every three years
Effectiveness measure	Completion for employees in procurement positions
Reporting period	DuluxGroup Pacific <ul style="list-style-type: none"> 35 employees in procurement positions completed training in 2025. DGL Europe <ul style="list-style-type: none"> 10 employees in procurement position in the JUB business completed training in 2025. Customised webinars, translated into local languages, were prepared. A modern slavery specialist training program was designed for delivery to procurement teams in the Cromology, Maison Deco and NPT teams in 2026.
Future reporting periods	<ul style="list-style-type: none"> Implement specialist training program for procurement employees in the Cromology, Maison Deco and NPT businesses. Continue three-yearly specialist training cycles for procurement employees in DuluxGroup Pacific and the JUB business. Undertake training in risk assessment tools (e.g. SEDEX platform) for procurement teams across DuluxGroup businesses.

Human rights training

Target	Roll out Values & Behaviour/human rights training to employees every two years
Effectiveness measure	80% completion rate for employees
Reporting period	DuluxGroup Pacific <ul style="list-style-type: none"> An average 91% completion rate was achieved across employees in ANZ. Training continues to be deployed in PNG. DGL Europe <ul style="list-style-type: none"> Human rights training webinar developed for the JUB business.
Future reporting periods	<ul style="list-style-type: none"> Continue training for employees in DuluxGroup Pacific and JUB businesses. Roll out training to DuluxGroup employees in China. Roll out training to employees in the Europe businesses.