

# **DULUXGROUP LIMITED - MODERN SLAVERY STATEMENT 2024**

*imagine*  
a better place

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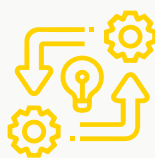
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# 1. Introduction

**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 fifth 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 throughout our supply chain, the actions taken to address those risks in the period from 01/01/2024 to 31/12/2024 (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”, “DGL” 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 2024 include the following:

- Continued application of our due-diligence process for suppliers.
- Continued application of human resources management processes to control modern slavery risk in our own operations.
- Completion of an audit of our modern slavery risk management processes by an independent third-party auditor.

## 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	20
6	Describe the reporting entity's consultation process with any entity that it owns or controls	3
7	Include any other information that the reporting entity considers relevant	3, 4 & 5

## Approval

This statement was approved by the board of DuluxGroup on 25/06/2025.

## 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).





## 2. Chairman's Message



**At DuluxGroup we are committed to helping eliminate modern slavery by 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 commitment to continually improve safety and sustainability performance of our business, including our supply chain. This Vision 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.

In recent years, we've seen an increase in the size and complexity of our operations and supply chain, due to the acquisition of new businesses in Australia and internationally. DuluxGroup's operations now span 27 countries, and we employ almost 9,000 people across more than 600 operating sites.

Collectively, across all of our businesses, we are now working with more than 6,700 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.

In 2024 we continued to make progress against key measures including engagement with our suppliers, and ongoing risk assessments and implementation of risk controls in our own

operations as well as across our supply chain. During the year we continued to put a significant focus on assessing new suppliers for a range of risks, including the risk of modern slavery. In particular, our due diligence includes audits to ensure suppliers meet our compliance standards and can include on-site inspections for those identified as particularly high risk.

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 in our businesses in the Pacific and our JUB business in central Europe. We are now also working to expand this to other businesses in the group to ensure we all understand our role in reducing modern slavery risks.

With the knowledge to identify risks, an understanding of ethical sourcing practices and the support to speak-up and have any issues addressed, our employees play an important role in helping to eliminate the scourge of modern slavery. I'm proud of their collective contribution to the health & wellbeing of the communities where we operate and the support our businesses provide to suppliers across our many sourcing locations.

I am pleased to present DuluxGroup's 2024 Modern Slavery Statement.

**Patrick Houlihan**  
Chairman and Chief Executive Officer  
25 June 2025



# 3. About DuluxGroup

## A — Our Structure

We are a leading manufacturer and marketer of premium branded products that enhance, protect and maintain the places and spaces in which people live and work. We manufacture & source, market & promote and sell & 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 – DGL Pacific and DGL Europe. DGL Pacific operates in Australia, China, Hong Kong, New Zealand, Papua New Guinea, Singapore and the United States. DGL Europe operates in central and western Europe, Morocco and the United Kingdom.

In the Reporting Period, the following acquisition activity took place:

Three Inspirations Paint stores were acquired by the Dulux Paint & Coatings business and are now included in the DuluxGroup Pacific governance framework.

During 2024, The Craig & Rose and Maison Deco businesses were transitioned to the Cromology business, and are now included as part of the DuluxGroup Europe governance framework.





# 3. About DuluxGroup

## A — Our Structure



Below is a summary of each key subsidiary or business unit, the key products they supply and the key brands they own or are licensed to use:

### DGL PACIFIC

Key subsidiary or business unit	Key products	Key brands owned or licensed
	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, Maxima, Porter's Paints, Rolana, Spring, Walpamur Dulux Acratex, Dulux EnviroSolutions, Dulux Powder Coatings, Dulux Protective Coatings, Edencrete, Emer, Flextool, Fosroc, Hadrian, RotaCota Cabot's, Feast Watson, Intergrain
	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, 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	Yates, Hortico, Munns, Munns Professional, OCP, Weed'n'Feed, Dynamic Lifter, Slasher, Zero, Thrive, Ratsak, Yates Home Pest, Seasol, Powerfeed, Earthcare, Sharp Shooter
	Garage doors, automatic openers	Automatic Technology, B&D, CSI, Dominator, Garador
	Cabinet and architectural hardware and related products	Assa Abloy, Breezway, Blum, Finista, Flypro, Hera, HexFix, Knight, Modar, Lockwood

### DGL EUROPE

Key subsidiary or business unit	Key products	Key brands owned or licensed
	Decorative paints, woodcare coatings, metal and flooring coatings, plasters, tools and accessories for paints and coatings, flooring, wall coverings	Alp, Arcol, Baldini Vernici, Craig & Rose (1829, Artisan), Duco, Duraval, 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
	Decorative paints, tools and accessories for decorative paints	Craig & Rose (1829, Artisan)
	Sealants, adhesives	NPT, Sigill

# 3. About DuluxGroup

## B — Our Operations



### DuluxGroup Pacific - Employees

3,831	Australia
541	New Zealand
165	Papua New Guinea
110	China
7	United States
3	Hong Kong
1	Singapore

4,658 Total

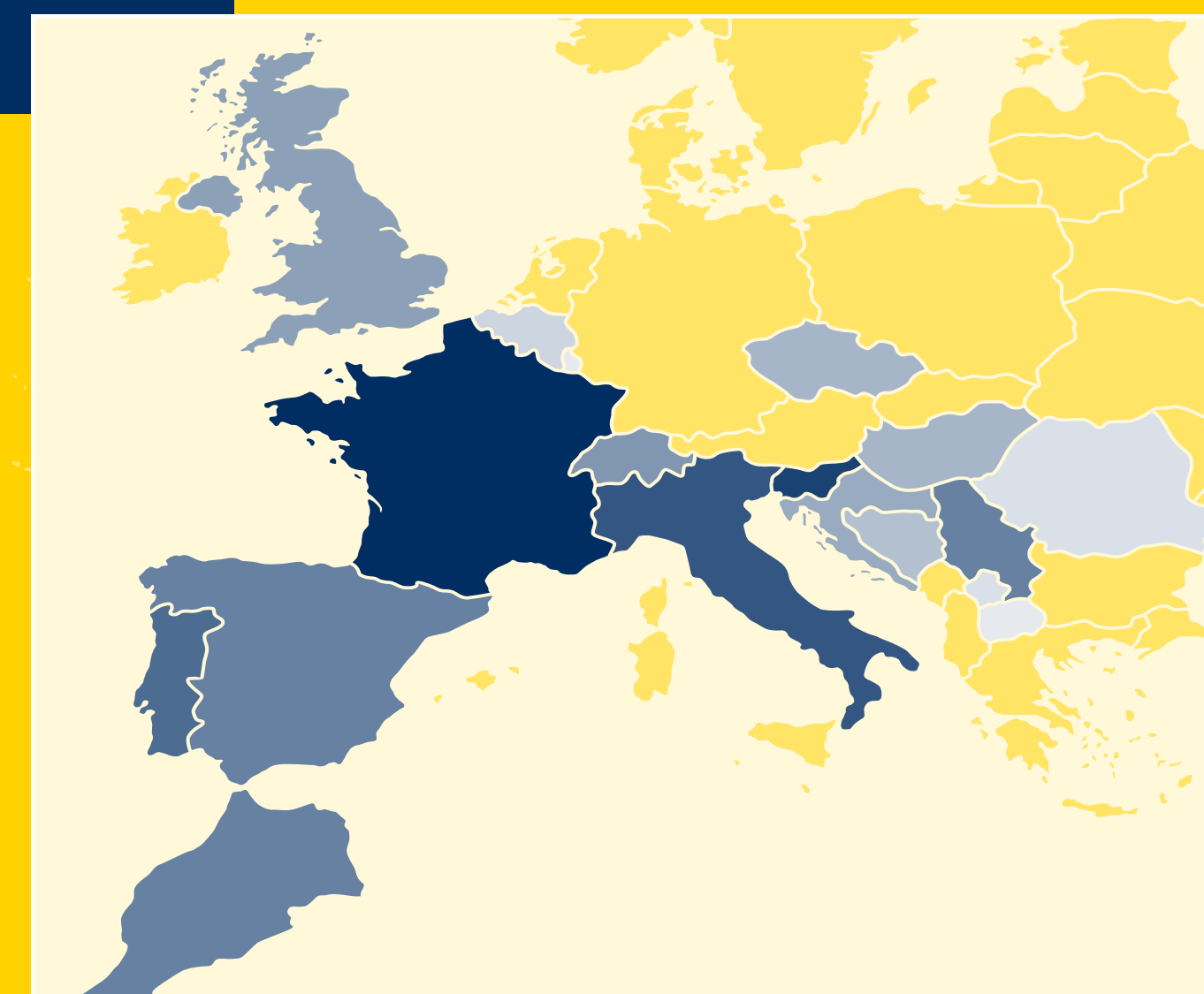
### DuluxGroup Europe - Employees

2,123	France
465	Slovenia
280	Italy
278	Portugal
189	Morocco
183	Spain
177	Serbia
77	Switzerland
33	Croatia
31	United Kingdom
28	Czech Republic
27	Hungary
27	Bosnia and Herzegovina
10	Belgium
7	Monaco
4	Kosovo
3	Romania
3	Luxembourg
3	Republic of Northern Macedonia
1	Slovakia

3,949 Total

### OUR OPERATIONS

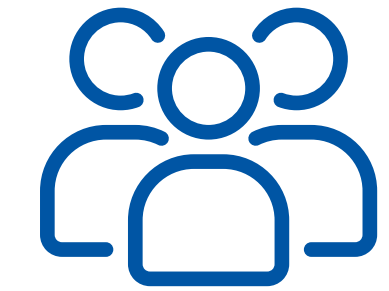
As at the end of the Reporting Period, we had 8,607 employees globally. On this page is a summary of our employee numbers by country.





### 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 and distribute to customers.

In the Reporting Period, we spent across all our businesses a total of over AUD 2.0b with over 6,700 suppliers. Approximately 74% 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 26% of spend is on 'indirect' goods and services essential to the running of our business.

On this page 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	DGL Pacific & Europe Spend %	Key Goods and Services Supplied
Direct goods - raw materials and packaging	45%	latex, minerals, pigments, tinters, other chemicals metal, plastic, fibre packaging
Direct goods - finished products	29%	architectural hardware, cabinetry hardware aerosols, paint accessories, waterproofing systems, fire protective coatings, concrete equipment garage door components, automatic opener components
Indirect goods and services	26%	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 Radar risk 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 risk within our operations and throughout our 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



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**RISKS**

ACTIONS

EFFECTIVENESS

# 4. Risks

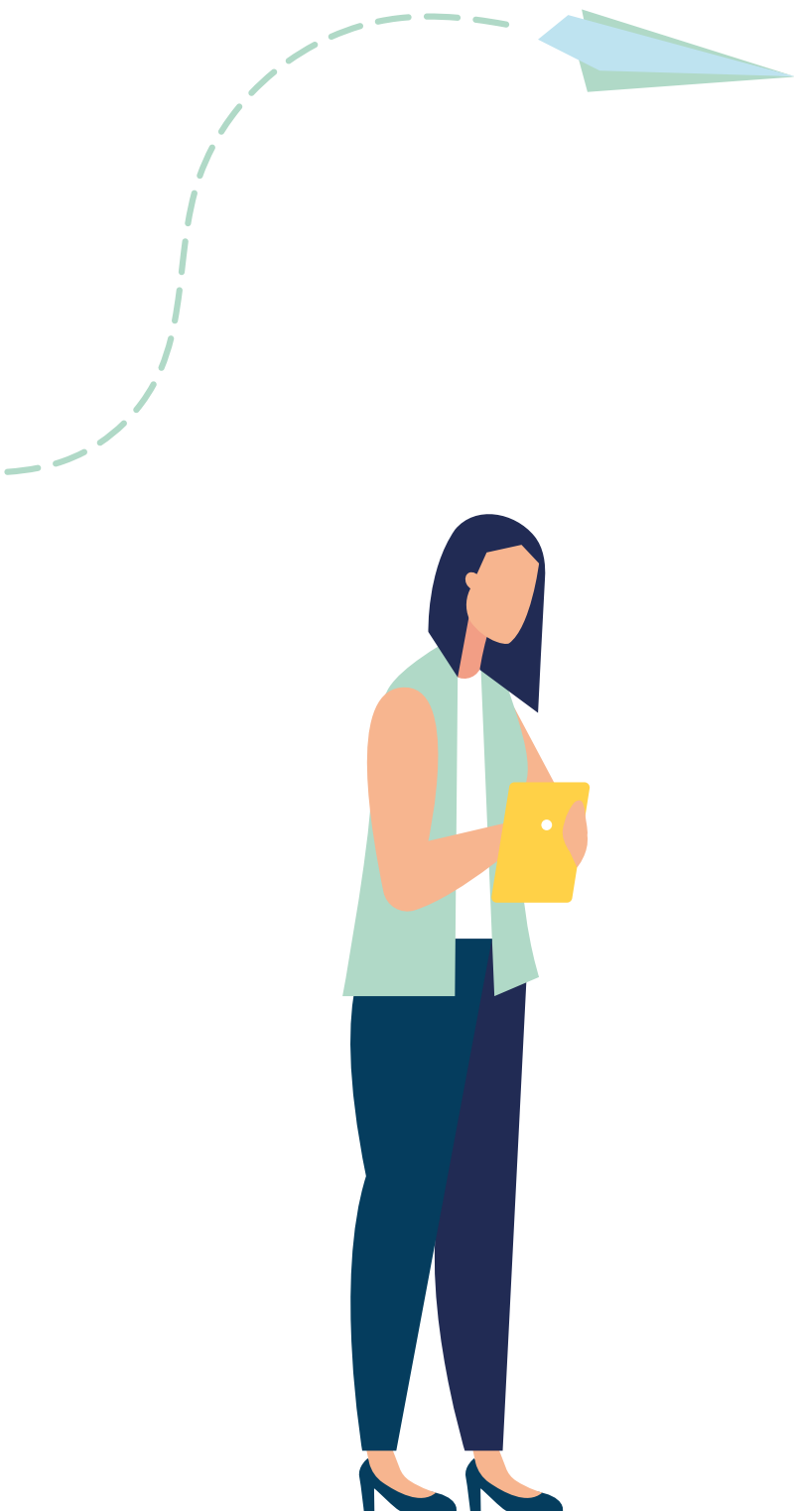
## A — Risk Assessment Within Our Operations



On this page is a summary of our assessment of modern slavery risks within our operations as determined by the SEDEX Radar Risk 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. 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	<div><div>DGL Pacific</div><ul style="list-style-type: none"><li>China</li><li>Papua New Guinea</li></ul><div>Note: While inherent risk in these locations is assessed as high, the residual risk, after applying management controls, has been assessed and rated as medium.</div></div>				<ul style="list-style-type: none"><li>Manufacture &amp; source</li><li>Market &amp; promote</li><li>Research &amp; develop</li><li>Sell &amp; distribute</li></ul>	<ul style="list-style-type: none"><li>Working hours</li><li>Freedom of association</li><li>Regular employment</li><li>Discrimination</li><li>Wages</li><li>Forced labour</li><li>Health, safety and hygiene</li><li>Children and young workers</li></ul>
Medium	<div><div>DGL Pacific</div><ul style="list-style-type: none"><li>Australia</li><li>Hong Kong</li><li>New Zealand</li><li>Singapore</li></ul></div>	<div><div>DGL Europe</div><ul style="list-style-type: none"><li>Bosnia &amp; Herzegovina</li><li>Croatia</li><li>Czech Republic</li><li>France</li><li>Hungary</li></ul></div>	<ul style="list-style-type: none"><li>Italy</li><li>Kosovo</li><li>Morocco</li><li>Portugal</li><li>Republic of North Macedonia</li><li>Romania</li></ul>	<ul style="list-style-type: none"><li>Serbia</li><li>Slovakia</li><li>Slovenia</li><li>Switzerland</li><li>United Kingdom</li></ul>	<ul style="list-style-type: none"><li>Research &amp; develop</li><li>Manufacture &amp; source</li><li>Market &amp; promote</li><li>Sell &amp; distribute</li></ul>	<ul style="list-style-type: none"><li>Freedom of association</li><li>Health, safety and hygiene</li></ul>
Low	<div><div>DGL Pacific</div><ul style="list-style-type: none"><li>United States</li></ul><div><div>DGL Europe</div><ul style="list-style-type: none"><li>Belgium</li><li>Luxembourg</li><li>Monaco</li><li>Spain</li></ul></div></div>				<ul style="list-style-type: none"><li>Market &amp; promote</li><li>Sell &amp; distribute</li></ul>	<ul style="list-style-type: none"><li>Freedom of association</li></ul>

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.

On this page 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 <sup>1</sup>	Goods or services sourced	Key risk types	Inherent Risk	Source Location <sup>2</sup>	Goods sourced	Key Risk types
High	<ul style="list-style-type: none"><li>China</li><li>Kosovo</li><li>Morocco</li><li>Papua New Guinea</li><li>Serbia</li></ul>	IT & Telecommunications, Catering, Consumables, Contract services, Transport, Security, Employment Services, Travel, Waste Management, Cleaning Services	<ul style="list-style-type: none"><li>Child &amp; young workers</li><li>Freedom of association</li><li>Forced Labour</li><li>Health, safety and hygiene</li><li>Regular employment</li><li>Wages</li><li>Working hours</li></ul>	High	<ul style="list-style-type: none"><li>China</li><li>Pakistan</li><li>Saudi Arabia</li></ul>	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"><li>Working hours</li><li>Freedom of association</li><li>Regular employment</li><li>Discrimination</li><li>Wages</li><li>Forced labour</li><li>Children and young worker</li><li>Health, safety and hygiene</li></ul>
Medium	<ul style="list-style-type: none"><li>Australia</li><li>Belgium</li><li>Bosnia and Herzegovina</li><li>Croatia</li><li>Czech Republic</li><li>France</li><li>Hong Kong</li><li>Hungary</li><li>Italy</li><li>Monaco</li><li>New Zealand</li><li>North Macedonia</li><li>Portugal</li><li>Romania</li><li>Singapore</li><li>Slovakia</li><li>Slovenia</li><li>Spain</li><li>Switzerland</li><li>United Kingdom</li><li>Luxembourg</li></ul>			Medium	<div><ul style="list-style-type: none"><li>Andorra</li><li>Australia</li><li>Austria</li><li>Belgium</li><li>Bosnia and Herzegovina</li><li>Czech Republic</li><li>France</li><li>Germany</li><li>Greece</li><li>Hungary</li><li>India</li><li>Indonesia</li><li>Ireland</li><li>Italy</li><li>Japan</li><li>Kazakhstan</li><li>Korea</li><li>Latvia</li><li>Liechtenstein</li><li>Luxembourg</li></ul><ul style="list-style-type: none"><li>Malaysia</li><li>Monaco</li><li>Morocco</li><li>Netherlands</li><li>New Zealand</li><li>Norway</li><li>Poland</li><li>Portugal</li><li>Romania</li><li>Serbia</li><li>Slovenia</li><li>Spain</li><li>Switzerland</li><li>Taiwan</li><li>Thailand</li><li>Turkey</li><li>United Kingdom</li><li>United States</li><li>Vietnam</li></ul></div>	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, packaging, expanded polystyrene, insulation materials, installation equipment, other chemicals and finished products	<ul style="list-style-type: none"><li>Freedom of association</li><li>Health, safety and hygiene</li><li>Working hours</li><li>Regular employment</li><li>Children and young workers</li><li>Forced labour</li><li>Discrimination</li><li>Wages</li></ul>

<sup>1, 2</sup>Where the country risk varies by goods or services sourced, the highest risk rating is shown.

Based on the above risk assessment, we make the following key observations:

- A small number of goods and services from specific locations present the highest risk of modern slavery, and our management processes therefore focus particularly on verifying and mitigating risks for goods and services sourced from these locations.
- Our key suppliers are typically large, multinational corporations located within our operating locations, who are themselves assessing modern slavery risks in their own operations and throughout their supply chains and implementing risk controls to mitigate those risks.
- DuluxGroup has direct, established relationships with our key suppliers. This gives suppliers certainty, which enables them to provide stability for workers within their operations and supply chain, thereby providing some mitigation of modern slavery risks.



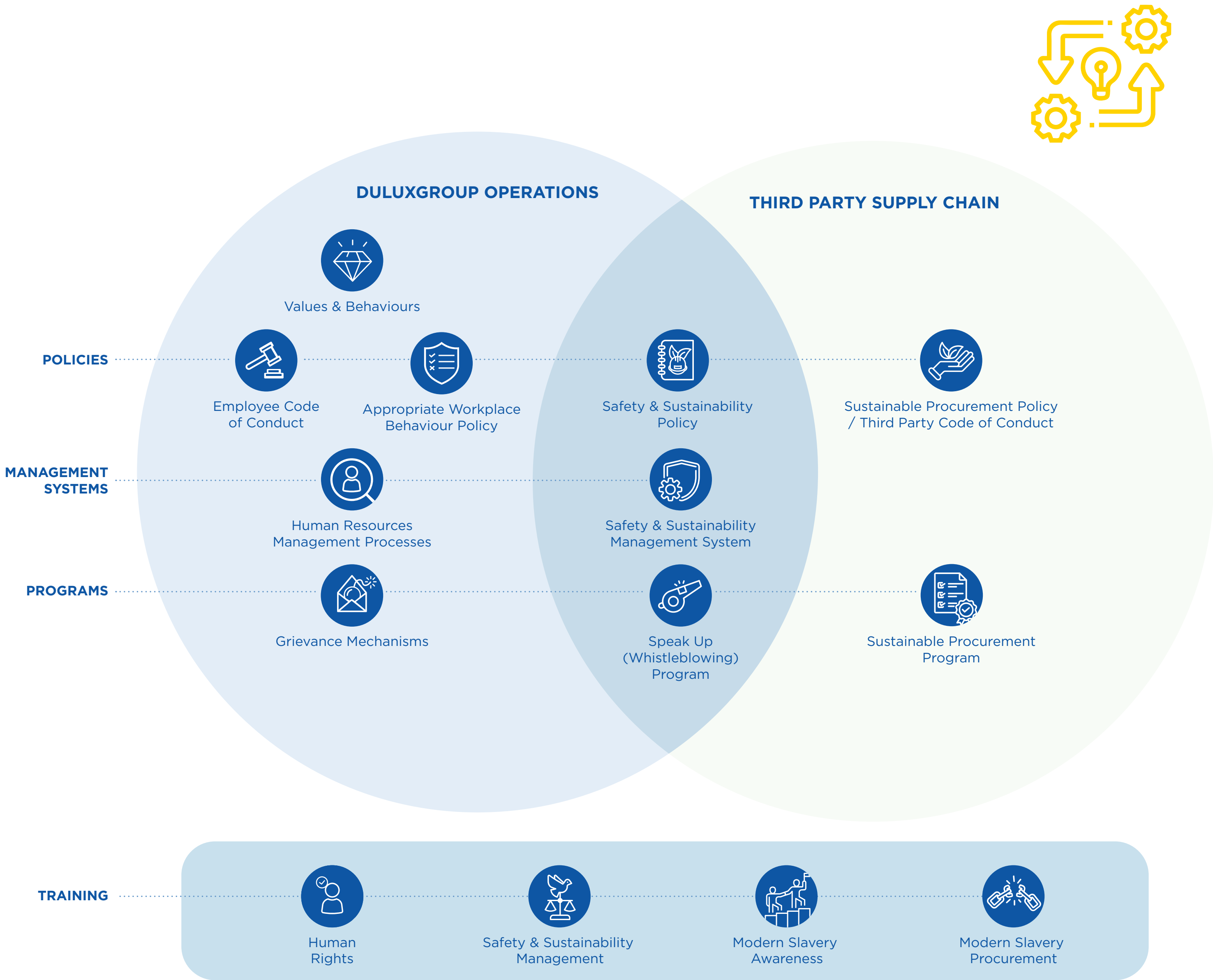
# 5. Actions

## A — Governance Framework

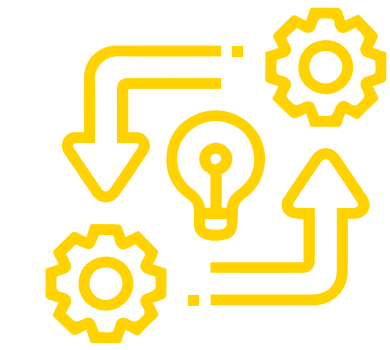
We have implemented a governance framework to manage human rights aspects of our business, including mitigating modern slavery risks within our operations and throughout our supply chain.

On this page is a summary of our policies, management systems, programs and training used to mitigate modern slavery risks both internally and externally to our business.

As a diverse business, comprising entities with different histories and operating in various cultures, this framework necessarily takes different forms across our geographies and businesses. We are currently working with all DGL businesses to understand the strengths and any gaps in existing processes and to develop standardised approaches to modern slavery risk management where it adds value. In 2025, we plan to establish a global Modern Slavery Working Group to further facilitate this alignment process.



# 5. Actions



## B — Policies



### 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, but aligned, forms of values and behaviours guidance are in place in the DGL Pacific and DGL Europe businesses, excluding Pental and NPT.

A review of the values and behaviours policies in the newer Pental and NPT businesses has not yet been completed to confirm alignment. This review will be completed in future reporting periods and improvements implemented as required.



### 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 DGL Pacific and DGL Europe businesses.

We have identified the opportunity to strengthen consideration of modern slavery in the codes in the Cromology and NPT businesses and will address this in future reporting periods.



### 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.

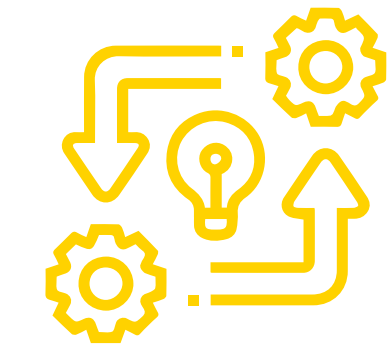
Different, but aligned, forms of this policy are in place across DGL Pacific and DGL Europe businesses.

In the reporting period, the recently acquired Seasol business migrated to DGL Pacific policies. A review of the Pental policies was also completed and this showed that the established policies in place in Pental are aligned with those in the DGL Pacific business. Moving forward, the Pental business will transition new employees to the DGL Pacific policies, with these provided to new employees on commencement.

A review of the policy in place in the NPT business has not yet been completed. The review will be actioned in 2025.



# 5. Actions



## B — Policies



### Safety & Sustainability Policy

The DGL Safety & Sustainability Policy describes our vision of “A Future Without Harm” and expresses our continuing commitment to improve the safety and sustainability of our businesses by identifying, understanding and minimising the health, environmental and community impacts associated with our activities. This policy applies to all DGL businesses.



### Sustainable Procurement Policy

Different forms of Sustainable Procurement Policy (or Supplier Code of Conduct) are currently in place across DGL Pacific and DGL Europe businesses.

DGL Pacific has a Sustainable Procurement Policy that outlines our commitment to understanding our supply chain and ensuring that environmental, health, safety, modern slavery, labor, and human rights considerations are integrated into our sourcing processes and procedures. This policy specifies our expectations of suppliers, including the requirement for suppliers to cascade our standards to the next tier in their supply chains, aiming to impact lower-tier suppliers over time.

In DGL Europe, the Cromology and JUB businesses have Supplier Codes of Conduct that specify our expectations of suppliers. Additionally, Cromology has an Ethical Procurement Policy that procurement employees must accept and comply with as part of their onboarding process. A Sustainable Procurement Policy is not yet in place in the NPT business.



In future reporting periods, we intend to review and update our Sustainable Procurement Policy as part of the Modern Slavery Group alignment process to apply across all DGL businesses globally.



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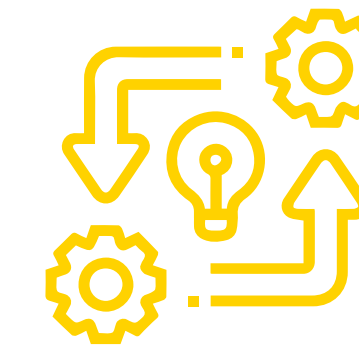
RISKS

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# 5. Actions



## C – Management Systems



### Human Resource Management Processes

All DGL business 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 3 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 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).



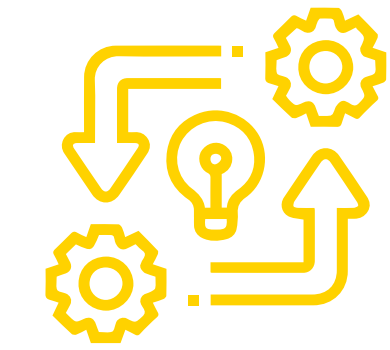
### Safety & Sustainability Management System

We maintain an integrated Safety & Sustainability Management System to enable delivery of our Safety & Sustainability Policy. The management system comprises safety & sustainability standards, including the sustainable procurement standard, and an audit program to assess and verify performance.

The management system is well established within the DGL Pacific business, and the transition of our more recently acquired DGL Europe businesses to operate under this same management system is underway.



# 5. Actions



## D — Programs



### Speak Up Program

Different forms of Speak Up Program or Whistleblower Policy are in place in across all businesses, aside from the more recently acquired NPT and Pental 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 DGL 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 DGL Pacific and select senior employees from group level functions.

The Speak Up Committee meets 3 times annually to review reports, identify patterns and implement improvement plans, and a report is tabled to the executive team of DGL 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 DGL Pacific and DGL Europe is tabled to the Speak Up Committee annually.



### Other grievance mechanisms

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

# 5. Actions

## D – Programs



### Sustainable Procurement Program

Different forms of a Sustainable Procurement Program are in place for DGL Pacific and DGL Europe.

Each program communicates our expectations to suppliers, assesses suppliers against relevant modern slavery criteria and, if required, verifies compliance via on-site audits of supplier facilities and business practices.

For DGL Pacific, we currently undertake the following due diligence process for our suppliers:

1. Terms and Conditions of supply require acceptance of our Sustainable Procurement Policy.
2. We assess whether the supplier requires further verification based on the following criteria:  
The supplier is a contract manufacturer with whom we spend \$10,000 or more per annum or any other supplier with whom we spend \$100,000 or more per annum.

3. If the supplier is assessed as requiring further verification, we require the supplier to indicate acceptance of our Sustainable Procurement Policy and to complete a self-assessment checklist. The self-assessment checklist is tailored to industry sector and designed to accord with standard global supply chain systems and guidance, including the International Labour Organisation conventions, Ethical Trading Initiative base code, ISO 14001 and SEDEX code. Under the self-assessment checklist, we require the supplier to provide information on labour practices, working conditions and safety and environmental management.

4. Based on the information provided in the self-assessment checklist, we identify high-risk suppliers and, if required, undertake an on-site audit to verify the information provided in the self-assessment checklist and adherence to the Sustainable Procurement Policy.

In Europe, the Cromology and JUB businesses undertake the following due diligence process for our suppliers:

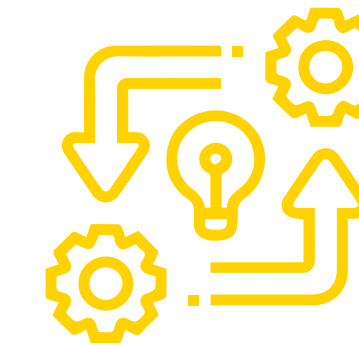
1. Suppliers must agree to our Supplier Code of Conduct.
2. We identify significant or high-risk suppliers and, if required, undertake an on-site audit to verify the information provided and adherence to the Supplier Code of Conduct.

In future reporting periods, we plan to establish a Modern Slavery working group, which will work to standardise our supplier management approach and share good practices across the Europe and Pacific businesses and extend implementation to the NPT, Pental and Seasol business.



# 5. Actions

## Training



### Safety & sustainability management training program

Our safety & sustainability management training program includes a section dedicated to product stewardship. This section includes sustainable procurement and modern slavery awareness.

It is mandatory for senior managers in DGL Pacific to complete this training program as part of their onboarding process.

In future reporting periods, we intend to roll out a similar training program for senior managers in DGL Europe.



### Modern slavery specialist training

In DGL Pacific, employees in procurement positions in Australia and New Zealand complete modern slavery specialist training every 3 years.

In DGL Europe, the JUB business has also implemented specialist training for employees in procurement positions.

In future reporting periods, we intend to:

- Maintain modern slavery specialist training for employees in procurement positions in the DGL Pacific & JUB businesses at least every 3 years.
- Roll out modern slavery specialist training to employees in procurement positions in other businesses in DGL Europe.



### Modern slavery awareness training program

It is mandatory for employees in key roles, such as executive management, human resources, procurement, key research and development, logistics, information technology and production positions in Australia and New Zealand to complete the modern slavery awareness e-learning module every 2 years.

In future reporting periods, we intend to roll out an awareness program to key employees in other jurisdictions in DGL Pacific to complete every 2 years.

Our JUB business has an awareness training program in place for its human resources staff. 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 future reporting periods, we intend to roll out an awareness training program for other key employees in DGL Europe to complete every 2 years.



### Human rights training program

It is mandatory for employees in DGL Pacific Australia and New Zealand businesses to complete a 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.

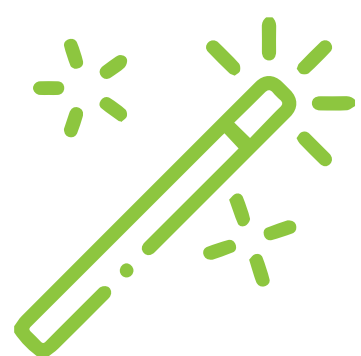
A human rights awareness program has also been implemented in the PNG and China businesses with employees being briefed on human rights policies and signing an acknowledgement stating that they have read and understood the policies.

In future reporting periods, we intend to roll out a training program to employees in DGL Europe and to formalise training in the DGL Pacific PNG and China businesses to complete every 2 years.





# 6. Effectiveness



We are committed to continually improving our policies, management systems, programs and training to effectively identify, assess and address modern slavery risks.



While we have an established governance framework in place in DGL Pacific, we are continually improving our approach as we gain a deeper understanding of our supply chain. The newer Pental and DGL Europe businesses have many of the same governance elements in place, but these are not yet fully aligned with those in the Pacific businesses.

In the next reporting period, we plan to establish a Modern Slavery working group which will oversee the standardisation of our operations and supply chain risk management approach across all Europe and Pacific businesses and monitor implementation of our Modern Slavery statement commitments.

On the next few pages is a summary of actions taken in the Reporting Period to improve the existing framework and align businesses in DGL Europe with that framework, as well as our assessment of the effectiveness of those actions and our intended next steps in future reporting periods.

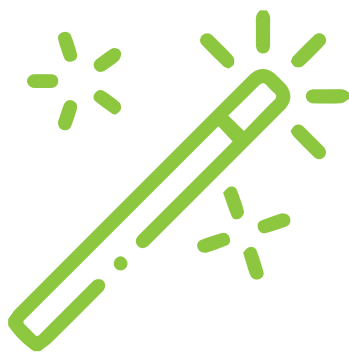
## A — Governance Framework

Target	Aligned governance framework for all businesses
Effectiveness Measure	All businesses operating under aligned governance framework
Reporting Period	<div><u>DGL Pacific</u><ul style="list-style-type: none"><li>Transitioned Seasol to the DGL Pacific governance framework</li><li>Commenced review of governance framework for newer businesses to identify and address gaps</li><li>Completed a third-party audit of our modern slavery risk management processes</li></ul></div> <div><u>DGL Europe</u><ul style="list-style-type: none"><li>Ongoing review of governance framework for DGL Europe to identify and address gaps</li><li>Maison Deco brought under Cromology governance framework</li><li>Craig &amp; Rose direct goods and services procurement governance brought under Cromology supply chain governance framework</li></ul></div>
Future Reporting Periods	<ul style="list-style-type: none"><li>Establish a modern slavery working group to oversee alignment of governance frameworks, sustainable procurement policy and data capture across all businesses in 2025</li><li>Address improvement opportunities identified in the 2024 third-party modern slavery audit</li></ul>



# 6. Effectiveness

## B — Policies



### Values and Behaviours

Target	Values & Behaviours (or equivalent) in place for all businesses
Effectiveness Measure	All businesses have guide in place
Reporting Period	<u>DGL Europe &amp; Pacific</u> (excluding NPT & Pental) <ul style="list-style-type: none"><li>Continued application of guide</li></ul>
Future Reporting Periods	Review values and behaviours policies in the NPT and Pental businesses and implement a guide if needed.

### Code of Conduct

Target	Employee Code of Conduct (or equivalent) in place for all businesses
Effectiveness Measure	All businesses have codes in place
Reporting Period	<u>DGL Europe &amp; Pacific</u> <ul style="list-style-type: none"><li>Continued application of Code across all businesses</li></ul>
Future Reporting Periods	Review codes to ensure that modern slavery risks are specifically referenced in the codes in Cromology and NPT businesses in 2025

### 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	<u>DGL Pacific</u> Established policy in Seasol business and commenced review of policies in Pental business to confirm alignment  <u>DGL Europe</u> JUB conducted a survey of employees to promote awareness among employees of human rights protections and dignity in the workplace
Future Reporting Periods	<ul style="list-style-type: none"><li>Continue to transition of new employees to DGL policies in Pental</li><li>Review policies in the NPT business in 2025</li></ul>

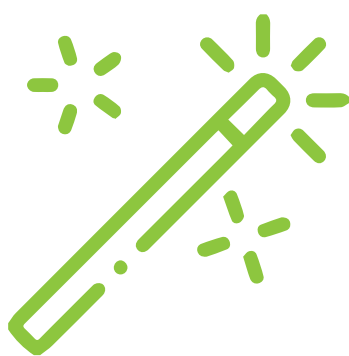
### Sustainable Procurement Policy

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	<u>DGL Pacific:</u> <ul style="list-style-type: none"><li>87% 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</li></ul> <u>DGL Europe:</u> <ul style="list-style-type: none"><li>50% of suppliers have accepted the code in the Cromology business</li><li>85% of suppliers have accepted the code in the JUB business</li><li>100% of suppliers have accepted the code in the Maison Deco business</li></ul>
Future Reporting Periods	Review and update sustainable procurement policy (code of conduct) for global application in 2025



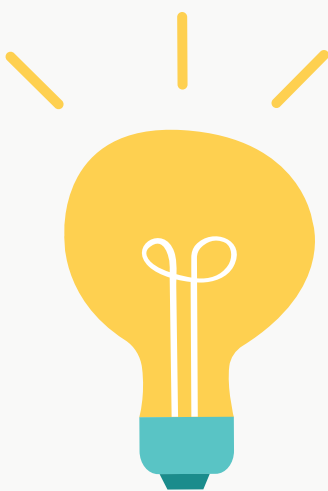
# 6. Effectiveness

## 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	<u>DGL Pacific</u> 0 suspected modern slavery breaches and 0 litigated matters relating to modern slavery under the Speak Up Program and other grievance reporting mechanisms <u>DGL Europe</u> 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	<ul style="list-style-type: none"><li>Roll out reporting of suspected modern slavery breaches in the</li><li>Cromology and NPT businesses</li></ul>



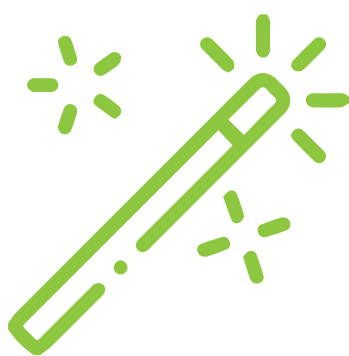
Target	Raise awareness and understanding of the Speak Up Program (or equivalent)
Effectiveness Measure	Employees aware of and understand the program
Reporting Period	<u>DGL Pacific</u> <ul style="list-style-type: none"><li>Speak Up Policy translated into Chinese and awareness programs in place for B&amp;D employees in China, implementation for DGL International employees in China pending</li><li>Speak Up Policy rolled out to all PNG employees.</li></ul> <u>DGL Europe</u> <ul style="list-style-type: none"><li>Quarterly meetings conducted between legal professionals in DGL Pacific and DGL Europe to share knowledge</li><li>Speak up program established in Cromology in France</li><li>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.</li></ul>
Future Reporting Periods	<ul style="list-style-type: none"><li>Continue knowledge sharing of program between legal professionals in DGL Pacific and DGL Europe</li><li>Roll out program for DGL International employees in China in 2025</li><li>Establish program in United States</li><li>Roll out training in the NPT business</li></ul>

Target	Speak Up Program (or equivalent) available to supplier workers in all businesses
Effectiveness Measure	Supplier workers are aware of, understand and can access the program
Reporting Period	<u>DGL Pacific</u> Commenced investigation of online form for suppliers <u>DGL Europe</u> JUB continued use of the online speak-up form established for suppliers
Future Reporting Periods	Identify and implement a solution to enable supplier workers to access the program in DGL Pacific



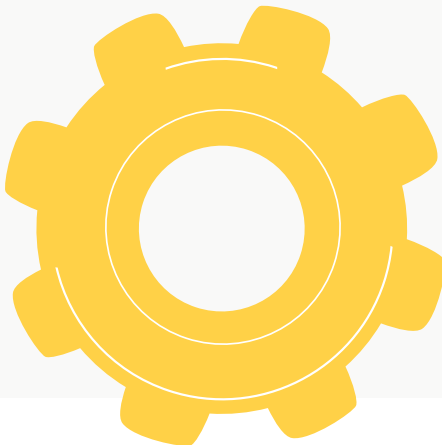
# 6. Effectiveness

## C — Programs



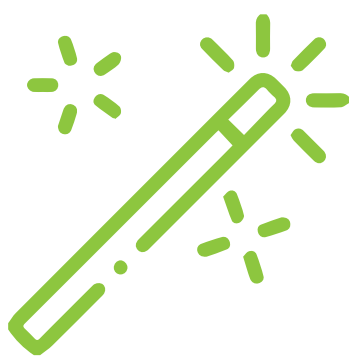
### Sustainable Procurement Assessment Program

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><u>DG Pacific:</u></p> <ul style="list-style-type: none"><li>82% 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</li><li>1 high-risk supplier had an on-site verification audit completed through the SEDEX platform</li><li>19 improvement actions were identified</li><li>0 suppliers were banned</li></ul> <p><u>DG Europe</u></p> <ul style="list-style-type: none"><li>81% of identified high or medium risk suppliers have completed the desktop due-diligence assessment in the Maison Deco business</li><li>3 high-risk suppliers had an on-site verification audit in the Maison Deco business</li><li>4 supplier improvement actions were identified in the Maison Deco business</li><li>10% of suppliers have completed the desktop due-diligence assessment in the Cromology business, verification audits were completed for 2 suppliers and 11 improvement actions have been identified</li><li>1 supplier was banned in the JUB business</li></ul>
Future Reporting Periods	<ul style="list-style-type: none"><li>Establish aligned supplier due-diligence and verification standards and metrics through the global modern slavery working group</li><li>Develop due diligence and verification process for independent contractors engaged directly by operating sites in DGL Pacific</li></ul>



# 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	<u>DGL Pacific</u> 102 senior managers completed training <u>DGL Europe</u> 30 management Board Members, General Managers and Key Executives in the JUB Group completed Modern Slavery training
Future Reporting Periods	<ul style="list-style-type: none"><li>Continue training for senior managers in DGL Pacific in 2025</li><li>Roll out safety &amp; sustainability management program training to senior managers in DGL Europe in 2026</li></ul>

### Modern Slavery Specialist Training Program

Target	Roll out modern slavery specialist training to employees in procurement positions to complete every 3 years
Effectiveness Measure	Completion for employees in procurement positions
Reporting Period	<u>DGL Pacific</u> 28 employees in procurement positions completed training in 2022 <u>DGL Europe</u> 12 employees in procurement position in the JUB business completed training in 2024
Future Reporting Periods	<ul style="list-style-type: none"><li>Roll out training to employees in procurement positions in the Cromology, Craig &amp; Rose and NPT businesses in 2025</li><li>Continue training for employees in procurement positions in DGL Pacific every 3 years</li><li>Continue training for employees in procurement positions in the JUB business every 3 years</li></ul>

### 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	<u>DGL Pacific</u> 79% completion rate for key employees in Australia and New Zealand <u>DGL Europe</u> 95% completion rate for directors and key employees in the JUB business
Future Reporting Periods	<ul style="list-style-type: none"><li>Continue training for key employees in Australia and New Zealand every 2 years</li><li>Continue training for key employees in the JUB business every 2 years</li><li>Roll out training to key employees in other jurisdictions in DGL Pacific in 2026</li><li>Roll out training to key employees in the Cromology, Craig &amp; Rose and NPT businesses in 2026</li></ul>

### Human Rights Training

Target	Roll out human rights training to employees every 2 years
Effectiveness Measure	80% completion rate for employees
Reporting Period	<u>DGL Pacific</u> <ul style="list-style-type: none"><li>Human Rights training extended to PNG and B&amp;D employees in China</li><li>Average 79% completion rate across employees in DGL Pacific (ANZ, PNG, China businesses)</li></ul> <u>DGL Europe</u> <ul style="list-style-type: none"><li>Human rights training expanded to general employees in the JUB business with 93% completion rate</li></ul>
Future Reporting Periods	<ul style="list-style-type: none"><li>Continue training for employees in DGL Pacific and JUB every 2 years</li><li>Roll out training to DGL international employees in China</li><li>Roll out training to employees in the Cromology and Craig &amp; Rose business in 2025</li><li>Roll out training to employees in the NPT business in 2026</li></ul>

