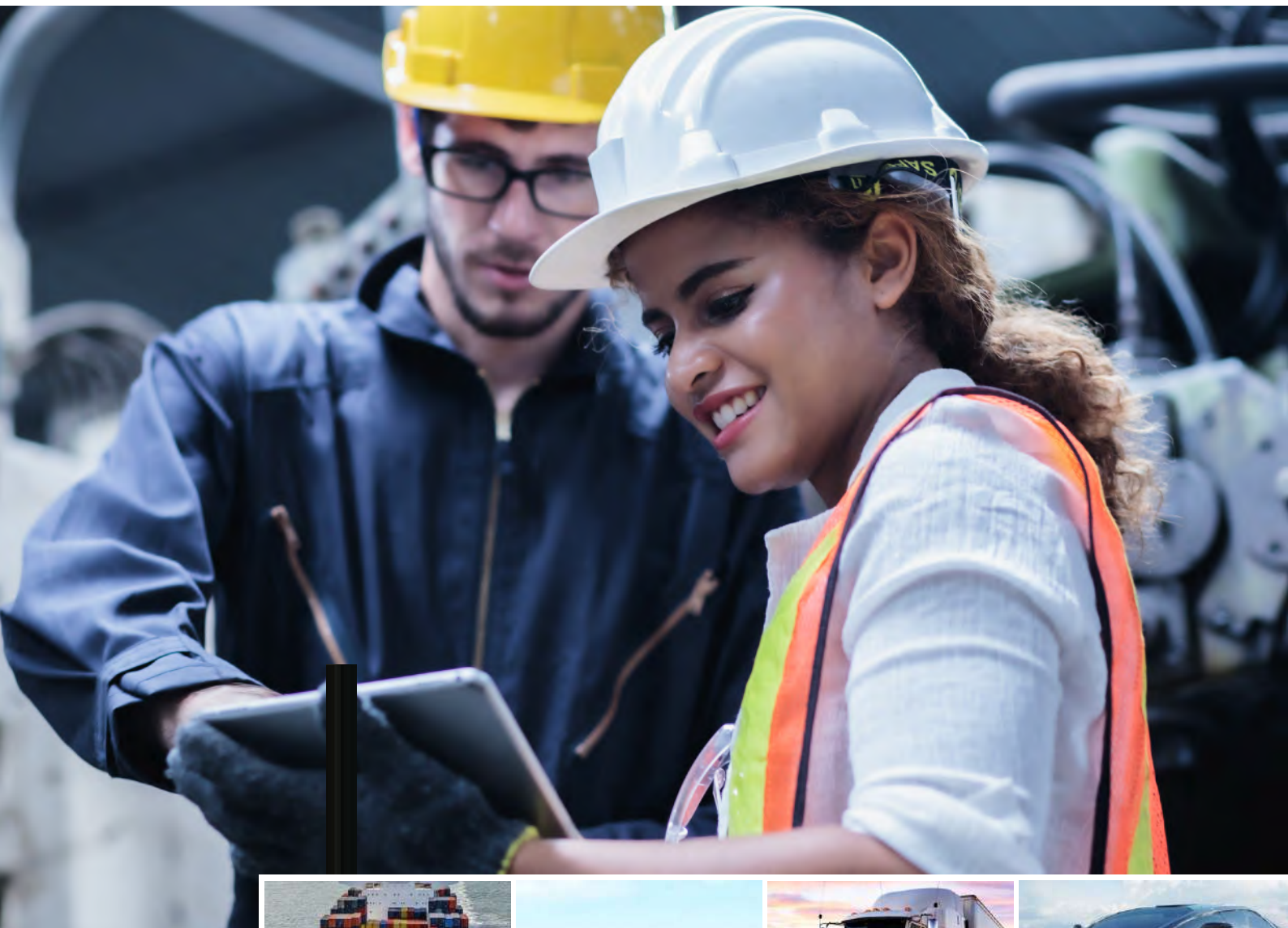




MODERN SLAVERY STATEMENT

2023

1. Introduction

- 1.1. This Modern Slavery Statement is a joint statement made pursuant to sections 14 and 16 of the *Modern Slavery Act 2018* (the “**Act**”) for the reporting period 1 January 2022 to 31 December 2022 (this “**Statement**”). This Statement has been approved by the relevant boards of each reporting entity in compliance with section 14(2)(d) of the Act.



2. Reporting Entities

2.1. This Statement is a joint statement comprising of the following reporting entities (collectively, **"Allnex Australia"**) under the Act:

- a) Company Name: Allnex Resins Australia Pty Ltd (**"Allnex Resins"**)
Registration Number: ACN 000 045 572
- b) Company Name: Allnex Australia Holding Pty Ltd
Registration Number: ACN 614 712 364
- c) Company Name: Allnex Australia Pty Ltd
Registration Number: ACN 160 397 768

2.2. The corporate structure of the reporting entities is set out in section 3.1 below.

2.3. Allnex Australia is part of the Allnex group (**"Allnex Group"**), a global company with EUR€2.4 billion revenue per annum and a leading producer of resins and additives. Allnex Resins is the sole operating entity in Australia and all employees are hired by Allnex Resins. Allnex Australia Pty Ltd formerly acted as a distribution entity but its operations were transferred to Allnex Resins in 2022 and it no longer has any employees. Allnex Australia Holding Pty Ltd is a holding company, with no employees. Allnex Resins and other Allnex companies in the Allnex Group's global structure operate under the same policies and share the same commitments as set out in this Statement. More information of our operation can be found in section 3.2.

2.4 Allnex Australia is committed to doing business ethically and responsibly, and continues to strive to consciously improve its implementation of the Act with the ultimate objective of eliminating and preventing any modern slavery risks within its operations and supply chains.



€2.4B in Sales



Leader in
Green Chemistries



76 Years of Innovation



TOTAL REVENUES
EUR 2.4 billion in 2021



4 BUSINESS AREAS



3.865 TOTAL STAFF
2021 (FTE)



33 MANUFACTURING SITES
worldwide

**SALES
PER REGION**

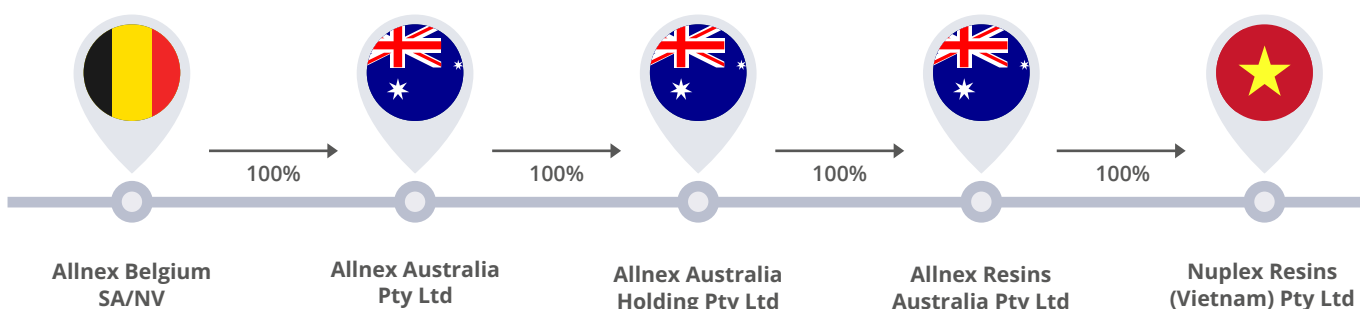


■ APAC ■ EMEA ■ Americas

3. Structure, Operations and Supply Chain

3.1. Structure

Allnex Australia is a group of private companies. Its parent company, Allnex Belgium, is managing and overseeing the global operation of the Allnex Group. Nuplex Resins (Vietnam) Pty Ltd ("**Nuplex Resins**") is controlled by Allnex Resins within the meaning of the Act. Nuplex Resins operates independently in Bien Hoa City, Dong Nai Province, Vietnam, following the same global policies and compliance framework as Allnex Australia. In summary, our corporate structure is as following:



Allnex Resins employs approximately 250 employees, operates in Australia, and is primarily administered from its head office in Botany, New South Wales. The employees are working in the different offices, manufacturing sites, and warehouses.

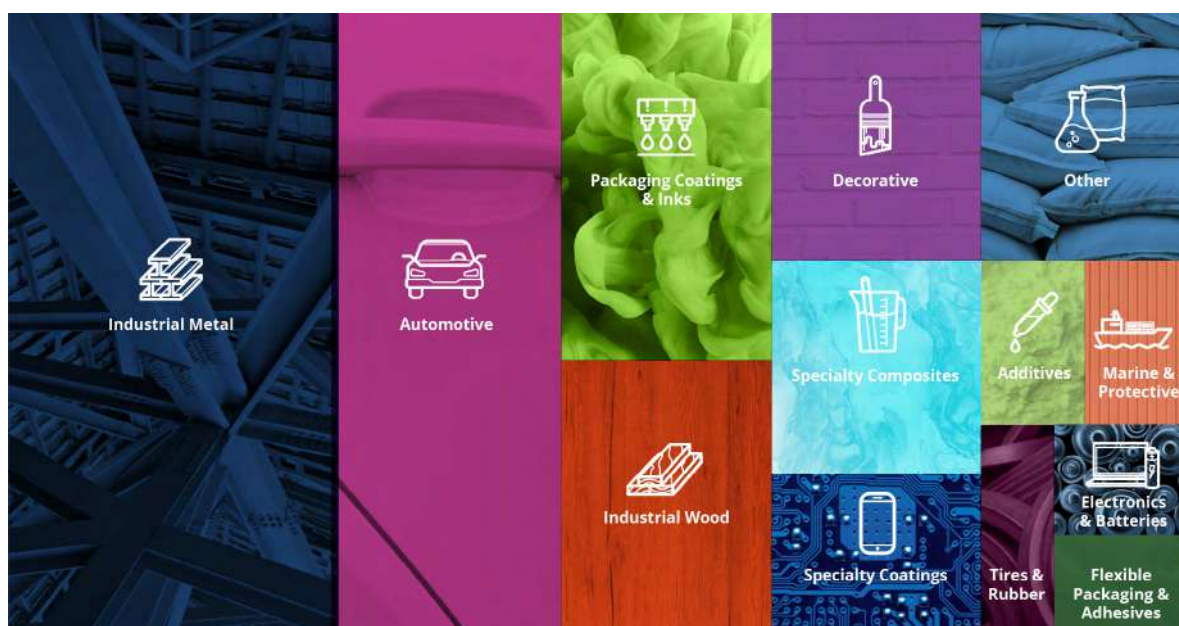
Allnex Group recognises that its employees are its most valuable asset; they are fundamental to the success of Allnex's business and operations. The diversity of the Allnex Group's workforce (including a diversified demographic profile across all regions and leadership levels, etc.) is an asset, bringing fresh ideas, perspectives and experiences that align with and support Allnex's values and will continue to enhance Allnex's performance and services to its customers. Allnex Group continues to support and promote an equal opportunity employment policy to guide its hiring processes in facilitating diversity.

3.2. Operations

Allnex Group is the leading global industrial coating resins company. It is a specialty chemicals pioneer in green chemistry, offering an extensive range of products including innovative polyesters, alkyd, acrylic, epoxy and urethane polymers which are used as key ingredients for coatings, i.e. resins, crosslinkers and additives. We know our strengths and use them well. Our key technologies and segments are:

	LIQUID RESINS & ADDITIVES	PERFORMANCE RESINS		
		Radiation Curable Resins	Powder Coating Resins	Crosslinkers
Key Technologies	- Waterborne - Solventborne - Additives - Urethane Specialties - Composites/Gelcoats	- Specialty Acrylated Resins - Specialty Oligomers - Water-based UV-curable Resins - Glass Lamination - Acrylics	- Polyester Resins <i>Hybrid, standard durable, super durable</i> - UV Powder Resins - Acrylics - Additives	- Amino Crosslinkers - Phenolic Crosslinkers - Technical Phenolic Resins - Acid Catalysts
	• Auto OEM and Refinish	• Inks & Overprint Varnishes	• Architectural Extrusions	• Metal Packaging
	• Industrial Metal	• Industrial Wood	• Domestic Appliances	• Coil
	• Marine & Protective	• Industrial Metal	• ACE	• Automotive OEM
	• Decorative	• Electronics	• General Metal	• Tires & Rubber Products
Key Segments	• Auto and Industrial Plastics	• Plastic		• Industrial Metal
				• Industrial Wood

Weighted view of our portfolio:



Underlying the success of the Allnex Group is a global network of research and development centres and manufacturing facilities. Allnex Group's research teams work in close cooperation with our clients to develop coating solutions which assist our clients to meet some of the most stringent sustainability requirements.

The majority of Allnex Resins' operations are in the liquid resins and additives division. In Australia, Allnex operates at two manufacturing sites located at Wacol, Queensland and Botany, New South Wales, respectively.

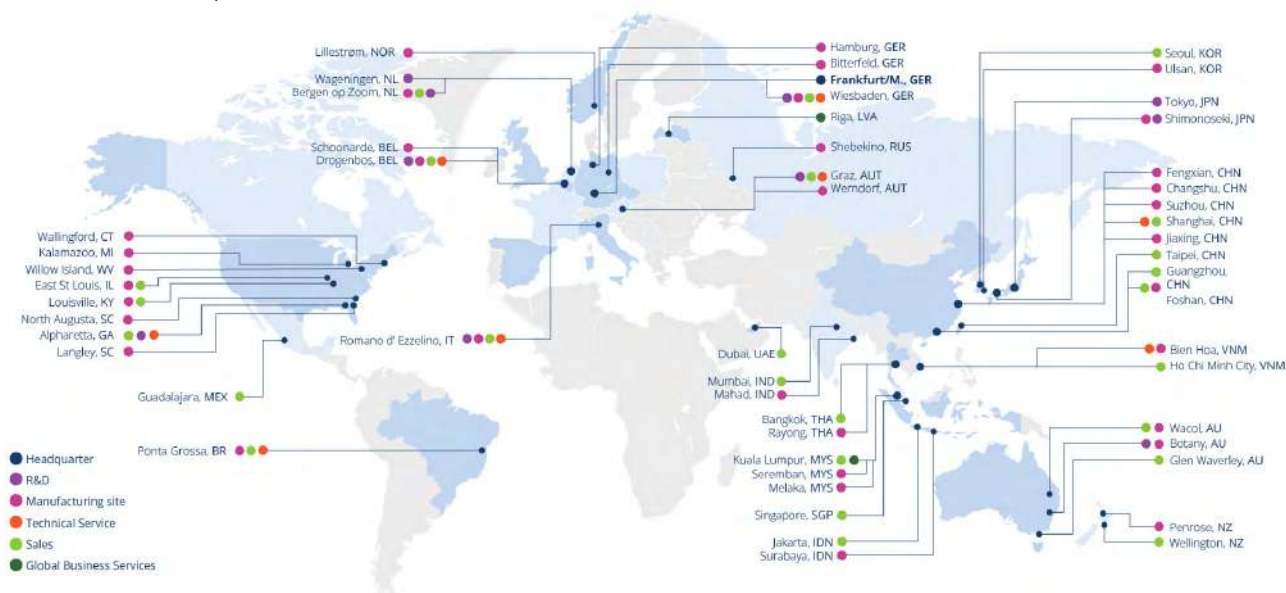
Allnex Resins also has non-production sites which are used for warehousing and distribution, sales and/or administration. These are located in Queensland,

New South Wales, Victoria, South Australia and Western Australia.

Allnex Resins' business model involves sales direct to our customer base, with most of our customers located within Australia and New Zealand.

Allnex Resins produces polymer resins from a diverse base of chemical raw materials. We have hundreds of finished resins, all of which are produced in our reactors at our manufacturing plants. Sales of our produced resins represent by far the majority of our revenue, but we do also buy and re-sell various ancillary products to support our customers in the composites industry.

Our Global Footprint





3.3. Supply Chain

The procurement strategy in Australia is developed in consultation with the Allnex Group's Global Procurement Team with the aim of seeking long-term relationships with respected producers and distributors. Allnex Australia seeks to align and leverage global positions, where appropriate, on large volume items used at multiple global sites.

The chemical raw materials required for our production are bought through multiple supply channels, with our primary aim being to transact with the producer directly, if possible and practicable. Where a direct relationship with a manufacturer is not practical or possible, we transact with distributors and traders to source the required products. Our purchases, therefore, include a mixture of direct imported product and locally supplied product.

The majority of the raw material product purchased comes from Asia, with major countries/regions of manufacture being Singapore, Korea, China, Taiwan, Malaysia, Indonesia, Thailand and Japan. Allnex Resins also sources product from the United States of America, Europe, the Middle East, Africa and other locations globally, in addition to the significant volumes sourced from Australian local suppliers. Where possible, it is also our policy to support local manufacturing in Australia. For example, Allnex Resins' packaging suppliers are all locally based, and the vast majority of Allnex Resins' logistic service suppliers, such as freight, storage and other logistical activities, are also based in Australia.

While Allnex Resins aims to transact directly with suppliers, for a variety of reasons, it is sometimes necessary to transact through traders and distributors. This may sometimes be due to the specialised nature of the products or at other times due to the trading terms, volume, simplicity, characteristics of different markets or industries, etc. Nevertheless, Allnex Resins continues to actively engage with third parties to seek from them the same compliance commitments referred to in this Statement.

Allnex Group produces resins globally at its other sites. When goods are purchased from another Allnex Group entity, the purchase and sale is treated as an inter-company transaction. The Allnex Group producers are bound by the same compliance policies and procedures that Allnex Australia follows.

Allnex Group and Allnex Resins manages supplier performance at both the local and global level, in line with our International Organization for Standardization (**ISO**) accreditation. Allnex conducts an annual review of supplier performance with its principal suppliers. Assessing the risks of modern slavery within the supplier and its supply chain forms part of that review, together with our global Corporate Social Responsibility (**CSR**) evaluation.

Allnex Group has achieved an Ecovadis Platinum Green rating, putting Allnex in the top 1% of Chemical Companies globally (overall score between 78 and 100) (<https://support.ecovadis.com>). Allnex Group is also a member of Together for Sustainability (TfS), an international member-driven initiative raising CSR standards throughout the chemical industry. (<https://www.tfs-initiative.com>)

4. Potential Modern Slavery Risks in Operations and Supply Chain

As detailed further in section 5.2 below, Allnex Resins has identified that the risk of modern slavery in its own operations and supply chain within Australia is very low. This is largely because of Allnex's awareness of, and the processes which it has put in place to ensure compliance with, the legislative and regulatory framework in Australia. Conversely, Allnex Resins has identified that the risks of modern slavery in its supply chain are likely to be relatively higher in relation to direct suppliers of raw materials. Such assessment is based primarily on the country of origin of the supplier, combined with the type of product the supplier is providing or producing.

Considering the complexity of Allnex Resins' supply chain, Allnex Resins utilises the services of a professional consulting firm, Intertek, to provide support and expertise in assessing, analysing and managing the risks of modern slavery in our supply chain and operations.

Allnex Resins' raw materials largely derive from three major sources: petrochemical-based materials, bio-based materials and mineral-based materials. Allnex Resins has identified that the nature of these sectors and the way they operate could, in some circumstances, expose individuals to the kinds of risks inherent in modern slavery. These risks include forced labour, child labour, excessive working hours, low wages and benefits,

inadequate working conditions and unequal treatment, etc. These risks are considered to be potentially higher and more prevalent in under-developed or developing countries than in developed countries due to, for example, poor governance, weak rule of law, conflict, weak or corrupt institutions or other socio-economic factors.

Indirect suppliers to Allnex Resins are predominantly based in Australia and are therefore largely considered to be lower risk for the same reasons that Allnex Resins' Australian operations are considered to be low risk. The main suppliers in this category include providers of utilities, professional services, transport, warehousing, packaging and waste management. Nevertheless, assessment of Allnex Resins indirect suppliers remains in scope

Nuplex Resins, Allnex Resins' controlled entity in Vietnam, has many of the same major suppliers as Allnex Resins and operates within the same compliance framework. These common major suppliers are, therefore, covered by the Allnex Group's supplier performance review with regard to CSR. Thus, the identification of modern slavery risks and assessment in relation to Allnex Resins also largely applies to Nuplex Resins.



5. Assessing and Addressing Modern Slavery Risks

Allnex Australia is committed to working with its stakeholders and business partners to assess and address the risks of modern slavery in its operations and supply chain, and to incorporate its approach of managing modern slavery risks into its overall corporate governance and compliance framework.

5.1. Policies and Procedures

Allnex Group operates a comprehensive global corporate compliance program in order to guide its decision-making and to promote ethical, legally compliant and socially responsible business conduct. The Allnex Group has a range of policies which contribute to Allnex Australia's (and indeed the Allnex Group's) commitment to respecting human rights and which support and assist in reducing and, where possible, eliminating modern slavery risks. These policies include the following:

Policy/Procedure	Objective and purpose
Code of Conduct	Builds on company values and formulates guidelines for daily activities; the code is not only applicable to all our employees, but also to contractors and consultants.
Supplier Code of Conduct	Outlines how suppliers of goods and services are expected to respect and adhere to required principles of lawful and ethical business.
Labour and Human Rights Policy	Communicates expectations with respect to human rights and labour practices and the high standard of conduct expected of our employees worldwide.
Hotline to Report Compliance Violations	Confidential reporting of any known or suspected violation of the Code of Conduct via a hotline.
Australian Whistle-blower Policy	Provides a reporting and investigative process that is objective, confidential and protects employees from any repercussions or adverse impact as a result of raising a concern.
Anti-Bribery; Anti-Corruption Policy; and Export Controls	Compliance with the laws of the countries in which it operates, particularly with respect to laws covering corruption and anti-competitive behaviour. This applies whether Allnex Group entity is acting directly in a country through employees, or indirectly through agents, distributors or other intermediaries.
Procurement Sustainability Manual	Outlines the increasing efforts of Allnex Group and Allnex Resins to uncover sustainable market offerings in terms of raw materials, goods and services, as well as best practice sustainable procurement principles to mitigate risks in its supply chain.

The policies can be found at:

<https://allnex.com/en/info-hub/compliance>

Allnex Group's Code of Conduct sets out the ethical principles which are to apply to all of the Group's operations and is the foundation on which Allnex's business is conducted. The Code of Conduct applies to every director, officer and employee and is available in 14 languages. Any alleged violations of policies and procedures in relation to ethical business behaviour are reviewed and investigated by a dedicated Compliance team comprising senior managers. A new training package on the Code of Conduct was prepared for classroom training, with special emphasis on our valued principles of labour and human rights. In the early part of the third quarter of 2022 Allnex launched a company-wide online training and certification on the Allnex Code of Conduct.

The Supplier Code of Conduct is incorporated into Allnex Australia's general terms of purchase and in respective individual purchase agreements for existing suppliers. The Supplier Code of Conduct requires that suppliers are to (amongst other things) act in compliance with the applicable laws of the countries where they operate, conduct business ethically, respect fundamental human rights and provide a safe working environment. Moreover, Allnex Australia reserves the right to terminate any agreement with any supplier that cannot demonstrate compliance with the Supplier Code of Conduct.

All new suppliers are asked to sign the Code of Conduct upon the implementation of vendor onboarding. Allnex Group is also shortly to introduce a pre-vendor creation check of each prospective new vendor's CSR score with Ecovadis (or other suitable body).

New or renewed contracts have specific contract terms on suppliers identifying and eliminating modern slavery risks in their operations and all major suppliers are required to complete a CSR questionnaire and participate in performance reviews.

The Procurement Sustainability Manual embeds CSR considerations into the various steps of Allnex Group purchasing processes, the dedicated team of procurement professionals works to ensure responsible partnerships with suppliers.

Refresher training on modern slavery was provided by Intertek to key employees and senior management in Australia in December 2021, including those from the senior leadership team, which represents all the key functions in the business.

In 2022, comprehensive training on modern slavery was provided by Dentons, a prestigious law firm well recognized in the areas of corporate social responsibility and compliance, to the Allnex global management team, including representatives from amongst senior leaders and function heads. A refresher course for Australian employees is currently scheduled for H2 2023.

We strictly adhere to the following principles according to internationally recognised and accepted standards: we embrace diversity and are committed to creating an equitable and inclusive work environment for all employees; we value each of our employees based on their individual talents, aspirations, and competence.

 SAFETY Protecting our employees, communities and environment from harm is the foundation for all of our activities.	 COMPLIANCE We comply with all relevant regulations in each of the countries where we operate, including rules relating to safety, health and the environment.
 DIVERSITY We celebrate diversity and are committed to an environment where all colleagues contribute – for the benefit of our employees, our products, and the communities we operate in.	 VALUE CREATION We strive to provide quality products to our customers and returns for our investors, as well as giving back to the communities in which we operate.
 INTEGRITY We set high value on being honest, transparent and respectful, adhering to a code of conduct which enables us to fairly navigate even challenging situations.	 TEAM/COLLABORATION We see teaming and collaboration as the most important way of engaging with upstream and downstream partners to create mutually beneficial solutions.

5.2 Risk Assessment and Due Diligence

Allnex Group depends on its supply chain to provide thousands of different raw materials from a large number of suppliers. The strategic importance of procurement is therefore also a lever to drive social and environmental improvements across our supply chain. This growing focus on CSR translates in many ways into our procurement practices. For instance, we will seek to partner more readily with those suppliers who have been assessed to have a good CSR or Ecovadis score. We also challenge suppliers to proactively provide Allnex with options that promote a Sustainable future. We have a global program known as "Supplier Interconnected Activities" that identifies products at high risk of Modern Slavery within a suppliers portfolio (for instance Conflict Minerals) and then seek to gain further input from the suppliers on the origin, sustainability and labour practices involved in the production and supply of such materials.

Allnex Australia strictly implements Allnex Group's sustainability strategy, and require suppliers to follow the strategy, as provided for in its purchasing terms and conditions, contract templates and Supplier Code of Conduct. Through these standardized and mandatory documents and procedures, Allnex ensures that business is done in compliance with applicable laws, regulations, industry standards and high sustainability standards, including the prevention of modern slavery.

The supplier selection process includes an assessment of economic, environmental and social impacts, which forms part of our proprietary checklists. These cover some of the key procurement processes, such as: the supplier approval process, complaint management system, supplier evaluation process, Management of Change process, and the CSR assessment questionnaire which is based on Allnex's Procurement Sustainability Manual.

The evaluation of suppliers includes social and environmental factors that impact the final scoring of the supplier, such as certificates or ratings from external agencies or auditors, internal sustainability programs, etc. The weight of such social and environmental criteria will continue to grow in importance in our supplier evaluation process.

To assess the extent to which its suppliers have adopted a satisfactory position on CSR, including modern slavery risks, Allnex Group has implemented a screening process for its suppliers which covers a range of CSR-related topics. This is a top down approach by which suppliers are ranked based on their importance to Allnex Group. This ensures that our most important raw material categories are purchased from vendors who are conducting business in a responsible way.

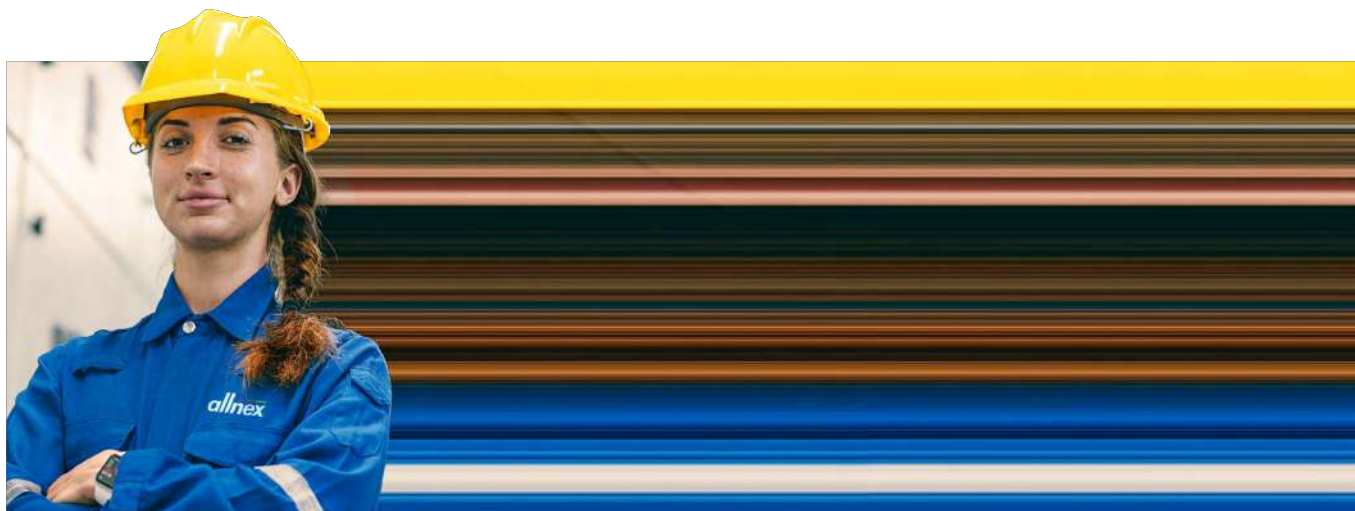
Intertek was engaged to assist in providing a further assessment to analyse and manage modern slavery risks in our supply chain and operations, including services such as supplier mapping and analysis; inherent risk screening; supplier self-assessment; supplier profiling; risk mitigation, supplier analytics and supplier audit. During the year in review, we have utilised the services of Intertek to perform the second round of full audits of the highest-risk suppliers. Within 2022, we also performed audits with 3 suppliers specific to Allnex Resins Australia, which were identified during analysis of reporting year 2021. The audits for two of the entities satisfied Allnex Group that the suppliers were performing in line with all expected regulations. Meanwhile our discussions with the third supplier are ongoing, with Allnex still awaiting responses to questions posed to the supplier

In addition, our global CSR assessment of the top 100 suppliers globally by spend was carried out, including many that also supply our Australian operation.

For the reporting year 2023 we have identified four suppliers to be audited based on the 2022 data and responses. Those audits are planned for H2 2023 and will form part of the 2024 statement.

A special Steering Committee of Allnex Australia has been established to oversee and manage Allnex Australia's compliance with Modern Slavery legislation (see section 5.5). This Committee is responsible for reviewing the supplier assessments and evaluating Allnex's responses to this important initiative, as further outlined below.





5.3 Supplier Engagement

The management of the procurement of raw materials is of strategic importance in driving Allnex's sustainability initiative and responding to Allnex's environmental and social responsibilities as a global company. Allnex strives to establish positive long-term relationships with its suppliers and to foster a culture of true transparency, effective communication and continuous improvement in its procurement practices.

One of the major milestones in 2021 was the implementation of the allnex Supplier Evaluation Program which was established to provide Allnex with a comprehensive insight into the commercial, environmental and social impacts of its key suppliers. The program was repeated in 2022 with some further improvements. The program is based on 3 pillars:

 Global Direct Supplier Evaluation	 Corporate Social Responsibility Self-assessment	 On-site Audit
a. Assesses business relationships with over 250 key direct suppliers using a consistent and objective methodology b. The 5 evaluation criteria, gauged using both quantitative and qualitative data, are: • Strategic partnership • Commercial factors • SHE quality • Sustainability • Delivery service	a. Assesses the sustainability maturity of a large range of suppliers b. With the support of a third party service provider, the suppliers were assessed on 7 themes: • CSR maturity • Supply continuity • Sustainable procurement • Respect of human rights • Working conditions • Business ethics • Environmental protection	a. The EMEA procurement team has drawn up a supplier audit plan for 2021 to 2023 to provide deeper insights on some critical suppliers. b. The plan aims to cover 66 suppliers in 3 years, with a number of the suppliers being global suppliers to most Allnex sites including those in Australia. c. Allnex Australia launched additional plan for its suppliers, see 5.2

5.4 Remediation/Redress

As outlined in section 5.1 above, Allnex Group has implemented a number of policies and procedures which have the effect of enforcing respect for human rights and addressing modern slavery risks in its operations and supply chains. Some of the policies and procedures provide avenues for redress where issues are identified and raised, including the hotline to report Code of Conduct violations and the Australian Whistle-blower Policy.

The Australian Whistle-blower Policy was reviewed and updated in early 2022, to ensure a clear channel for reporting, the protection of the whistle-blower and investigation in the allegations with due diligence.

There is an ongoing periodic review of policies and procedures generally to ensure that they meet Allnex Group's commitment to the support of human rights and the elimination and prevention of modern slavery risks.

In addition to these measures, additional provisions aimed at requiring the supplier's compliance with human rights and labor laws are proposed to be added to new procurement agreements aimed at ensuring that Allnex's suppliers were not involved in modern slavery practices. Allnex Resins plans to modify and implement such provisions to more standard contract templates and general terms and conditions, as well as individual agreements.

Allnex Resins also expanded the level of service from Intertek to provide further bespoke data analysis and follow-up remedial action with suppliers. This would include a three-way meeting between Intertek, Allnex and Identified Risk suppliers to enhance the supplier's

understanding of the Australian Modern Slavery legislation; to promote the awareness of modern slavery risks; and encourage the improvement of modern slavery risk management and different prevention measures.

If an employee has a concern that any supplier may be involved in modern slavery practices or any potential modern slavery risks may lie within Allnex's own operations, these concerns can be reported to the Steering Committee, the Allnex Legal & Compliance team, senior managers in Australia, or the compliance hotline. These avenues of redress have been incorporated into different internal and external policies which must be followed and implemented by Allnex employees or suppliers.

On receiving a complaint or notification of an issue, the Steering Committee and Legal & Compliance team will conduct comprehensive investigation, initiate third party audit (if necessary) and remediate properly (if the matter raised is found to be of substance).

5.5. Modern Slavery Management Steering Committee

The Modern Slavery Management Steering Committee of Allnex Australia consists of local senior management and includes personnel from relevant departments including Procurement, Planning and Logistics, Finance, Legal, Compliance, Human Resources and Manufacturing.

The Committee's purpose and function is to have oversight and management of the management and monitoring of modern slavery risks within Allnex Resins. The Committee assists with assessing and addressing modern slavery risks and implementing Allnex's processes and procedures aimed at eliminating modern slavery risks in Allnex's operations and supply chains. Two of the directors of all three entities of Allnex Australia sit on the Committee. Other directors are updated, and consulted with, on these issues on a regular basis.

Global level management from Finance, Legal, Compliance and other relevant department, as well as the key team members from our controlled entity, Nuplex Resins, will continue to be involved in monitoring and managing the risk of modern slavery.



5.6 Additional Developments

Allnex Australia is committed to keep improving its modern slavery risk control management in various manners. In addition to the foregoing:

1. Allnex Australia contributed to our global key achievements in operational excellence in 2021-2022: ECOVADIS Platinum Green status awarded for outstanding performance in terms of sustainability and operational reliability.
2. Allnex Group joined the Diversity & Inclusion (“D&I”) sessions organized by the United Nations Global Compact to further strengthen adoption of Sustainable Development Goals (SDGs). As a result, D&I networks were created; D&I awareness training was launched, and will be further implemented to Australia.

5.7 Our Controlled Entity

The compliance framework and risk assessments outlined in this section 5 also apply to Allnex Resins’ controlled entity, Nuplex Resins.

6. Assessing the Effectiveness of Our Actions

The Steering Committee meets regularly to review, discuss, and assess the effectiveness of the implemented measures, any necessary adjustment on the annual and quarterly plans, and the progresses made during each period.

The Steering Committee also tracks the status of supplier risk assessment, screening, and any potential target for third party due diligence on a case-by-case basis. Minutes and actions of each meeting are logged and tracked.

Allnex Australia continues to promote the awareness of modern slavery risks amongst its employees by communications and training, and purposefully promotes and urges suppliers to develop, improve and effectively enforce their own modern slavery risk management framework. Allnex Group is seeking to utilise a newly extended online training tool within our HR system in order to ensure all staff are educated on this topic. The course includes mandatory questions and pass-rate in order to ensure specifically that staff involved in our Supply Chain operations understand the importance of the legislation.





SUSTAINABLE DEVELOPMENT GOALS



7. Consultation with Controlled Entities

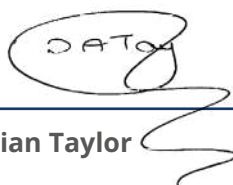
Allnex Australia and Nuplex Resins operate under, and are bound to comply with, the Allnex Group's policies, procedures and systems. Allnex Australia has consulted with its controlled entity, Nuplex Resins, with respect to considerations of the modern slavery risks that may be present in our global and domestic operations and supply chains, for the purpose of preparing this Statement.

This joint Modern Slavery Statement 2023 was approved on 16th June 2023 by:

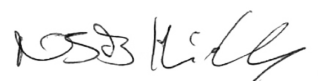
The board of Allnex Resins Australia Pty Ltd



Zeljan Nikola Medak
Director



Duncan Adrian Taylor
Director

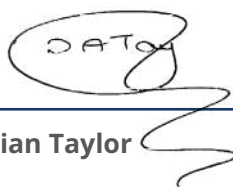


Nicholas James Brailsford Hindley
Director

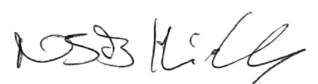
The board of Allnex Australia Holding Pty Ltd



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Duncan Adrian Taylor
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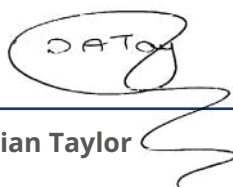


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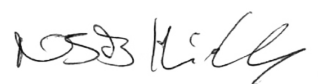
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