



DETMOLD HOLDINGS PTY LTD

Modern Slavery Act Statement FY2025

DETMOLD GROUP

Detpak

 **PAPERPAK™**

DETMOLD
PACKAGING

DETMOLD
+medical



Modern Slavery Statement FY2025

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) and sets out the actions taken by Detmold Holdings to address modern slavery in our business and supply chain for the 2025 financial year. The statement is made by Detmold Holdings Pty Ltd (ACN 007 527 022) on behalf of the reporting entity (Detmold Australia Sales Pty Ltd) and the owned or controlled entities which form the "Detmold Group" headquartered in Adelaide, Australia.

The Company Secretary and the Directors of all the Detmold Group owned, or controlled, entities were consulted during the development of this Modern Slavery Statement.

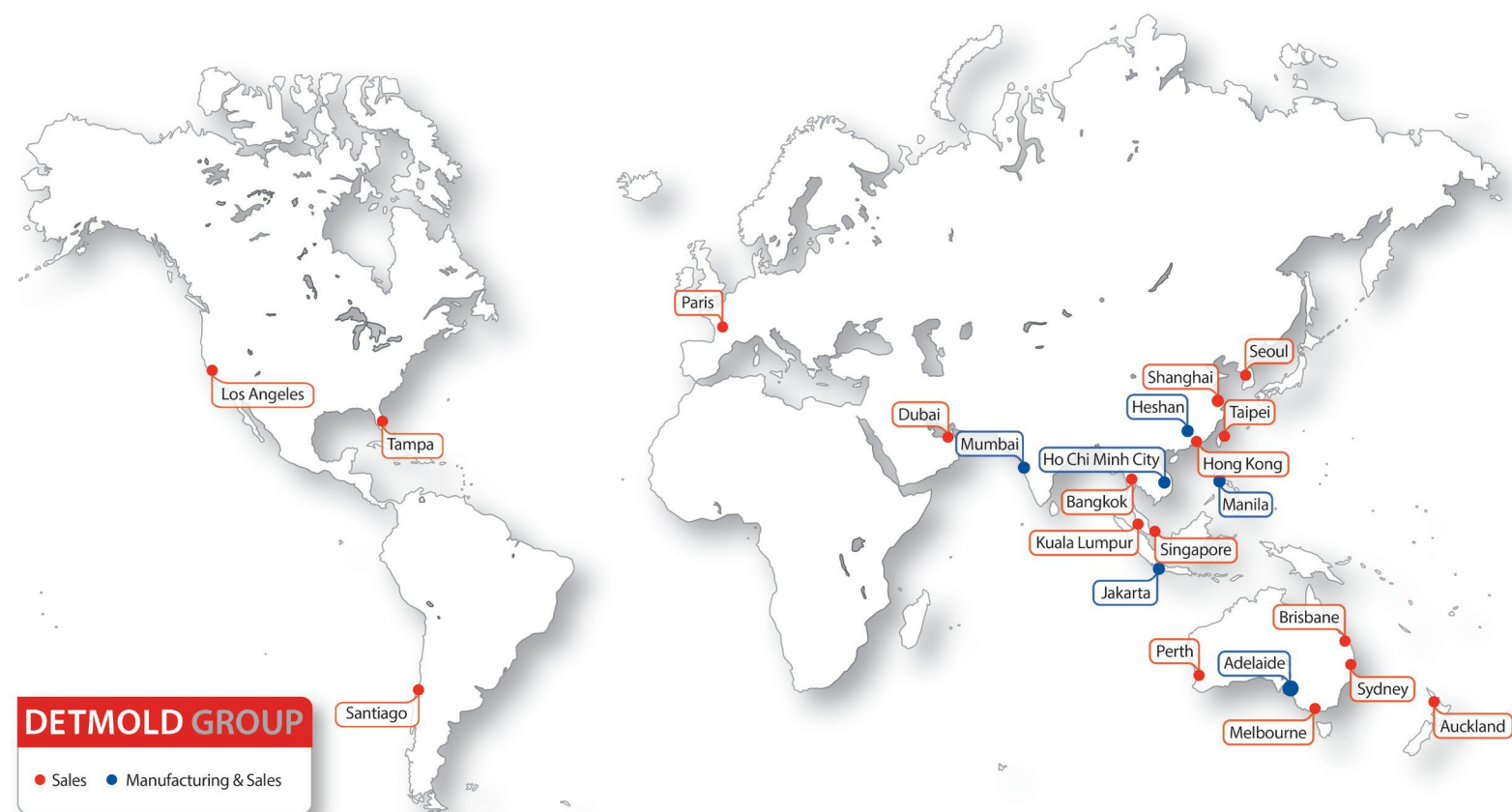
Our Position

The Detmold Groups commitment to ethical conduct and corporate responsibility are reflected in our policies, procedures and practices across our business and operations and throughout our supply chain. Safeguarding human rights and preventing modern slavery is an absolute commitment of the Detmold Group.

We recognise that modern slavery can occur in any industry or geography and understand that ongoing vigilance, risk-based due diligence and continuous improvement are required to identify and address these risks effectively. The Detmold Group maintains a zero-tolerance approach to modern slavery and expects the same standard of conduct from its employees, contractors and suppliers.

Our Modern Slavery Statement FY2025 recognises the actions that the Detmold Group is taking to identify and eliminate the risk of modern slavery within our operations and supply chain. It ensures we are fully compliant with all requirements and stay true to our commitment.

Safeguarding human rights
across our global supply chain
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Our Structure, Operations and Supply Chains

Established in 1948, the Detmold Group is a privately owned Australian business. Headquartered in Adelaide, Australia, the Detmold Group operates across the globe to manufacture and supply some of the world's largest and most iconic food and retail brands with specialised board and paper packaging solutions.

In total, the Detmold Group produces over 22,000 different food and retail packaging products.

The Detmold Group employs over 2,800 people worldwide across six manufacturing facilities and seventeen sales locations.

Manufacturing operations are located in Australia, China, India, Indonesia, Vietnam, and the Philippines.

The Detmold Group operates businesses Detmold Packaging and Detmold Specialty Packaging and trades under the brands:

- Detpak
- PaperPak
- Detmold Medical

The Detmold Group works with up to 4,000 direct suppliers from 38 different countries around the world. These suppliers provide raw materials (including paper and board), manufactured inputs, logistics, labour-related services and other operational goods and services.

Governance and Accountability

Oversight of modern slavery risk is the responsibility of the Detmold Group Board, which sets the overall governance framework and risk appetite in relation to human rights and ethical business practices.

The Board is supported by the Audit, Risk and Compliance Committee, which oversees the effectiveness of risk management processes, including those relating to modern slavery.

Management is responsible for implementing policies, conducting risk assessments, engaging with suppliers, overseeing audit and remediation activities, and reporting to the Board as required through the Group's Risk Management Framework.

The Detmold Group employs
over 2,800 people worldwide

Our Values

Our values shape what we do and how we do it; to drive success for the Detmold Group and ultimately deliver value to our stakeholders.



Focus: Concentrate on the key priorities which will make the business successful.



People: Demonstrate respect, integrity and loyalty to each other, our business & our community.



Passion/Persistence: Be relentless in driving forward to achieve our objectives and deliver success.



Performance: Take accountability for our own results whilst supporting others to achieve their best.



Leadership: Consistently demonstrate these Values & take responsibility for the impact of our own behaviours & actions.



Sustainability: Believing the foundations for tomorrow are built today and therefore strive to continuously improve.

We Genuinely Care



FY2025 Key Actions Taken

During FY2025 the Detmold Group undertook:

- SEDEX Members Ethical Trade Audits (SMETA)(incorporating Supplier Workplace Accountability (SWA) audits), were conducted at all our manufacturing sites. On-going SMETA are planned.
- Chain of Custody (Ethical sourcing) audits were conducted at all our manufacturing sites.

All audits include criteria designed to identify indicators of forced labour, child labour and other forms of modern slavery. These audits are conducted as part of our Global Commitment to Responsible Business Practices.

As committed in previous Modern Slavery Statements, the Detmold Group also undertook the following:

- All manufacturing operations had a SMETA audit conducted.
- Monitoring and assessing risk during pre-qualification process for strategic external material providers based on their response to criteria specific to modern slavery and Business Ethics.
- Require all current “High Risk” and “Strategic” providers to sign and commit to Detmold’s External Provider Code of Conduct, which includes a commitment to not engage in any form of modern slavery practice.
- Educating employees on the Code of Conduct, Whistleblower and other Group policies

Supplier Audit Program

As part of its supplier management framework, the Detmold Group:

- Assesses modern slavery risk during supplier pre-qualification.
- Requires high-risk and strategic suppliers to sign the External Provider Code of Conduct.
- Provides training to employees on the Code of Conduct and Whistleblower Policy.

The Detmold Group maintained its supplier audit program throughout FY2025. Audit activities included:

- 44 on-site audits conducted across Australia, Vietnam, China, Indonesia, India and the Philippines
- 50 supplier self-assessments

Where audit findings are identified, suppliers are required to develop and implement corrective action plans, which are monitored by the Detmold Group.

Risk of Modern Slavery

Since the previous reporting period, there has been no material change in the Detmold Group's operations or supply chains. Accordingly, this Statement builds on the risk analysis outlined in prior Modern Slavery Statements.

The Detmold Group's modern slavery risk assessment considers:

- Sector and industry risk
- Geographic risk
- Supplier-specific risk
- Nature of labour arrangements

Published and internationally recognised sources used in this assessment include:

- Walk Free Foundation Global Slavery Index (2023)
- ACSI Modern Slavery Risks, Rights and Responsibilities
- US Department of State Trafficking in Persons Report (June 2023)

Risks are prioritised based on their potential severity, likelihood and the degree of influence the Detmold Group can exercise. This approach supports the allocation of resources to areas of greatest potential impact.

While the Detmold Group's operations primarily rely on direct employment, inherent risks remain within certain supply chain categories and geographies, particularly within upstream raw material sourcing, third-party logistics and labour-intensive service providers.

Based on current assessments, the risk of modern slavery within the Detmold Group's direct operations is considered low. However, the Group recognises that risks may exist beyond Tier 1 suppliers and continues to focus on improving visibility further upstream.

Sector and Industry Risk

Through a combination of direct engagement, questionnaires and audits, the Detmold Group monitor the risk of modern slavery in our supply chain.

Analysing the Detmold Group's supply chain with reference to the ACSI 'Modern Slavery Risks, Rights & Responsibilities identified the following sectors as potential areas of risks for our "Corporate & Sales divisions":

- Branded and unbranded goods (including garments) not for re-sale utilised for Marketing or Cleaning.
- Transport and accommodation utilised by our people when they travel for work.
- The manufacturer of the Information Technology equipment we use including computers and printers.

The following sectors were identified as potential areas of supply chain risk for our "Manufacturing & Warehousing" operations:

- Security, maintenance, storage, and cleaning
- Asset and tenant Management
- Transportation: Ports, maritime freight, and truck drivers
- Base skill processing labour
- Raw Materials: paper and card.



Country and Supplier Risk

The Detmold Group's direct suppliers have been assessed for risk against globally recognised data sources, such as, the Walk Free Foundation's Global Slavery Index 2023 and the US Department of State "Trafficking in Persons report" June 2023.

These sources categorise countries as Tier 1, 2, 2 Watch List or 3 based on the following definitions.

TIER	DEFINITION
1	Countries whose governments fully meet the US Trafficking Victims Protection Act (TVPA) minimum standards for the elimination of trafficking.
2	Countries whose governments do not fully meet the TVPA's minimum standards but are making significant efforts to bring themselves into compliance with those standards.
2 Watch List	Countries whose governments do not fully meet the TVPA's minimum standards but are making significant efforts to bring themselves into compliance with those standards, and for which: <ul style="list-style-type: none"> a the estimated number of victims of severe forms of trafficking is very significant or is significantly increasing and the country is not taking proportional concrete actions; b there is a failure to provide evidence of increasing efforts to combat severe forms of trafficking in persons from the previous year, including increased investigations, prosecution, and convictions of trafficking crimes, increased assistance to victims, and decreasing evidence of complicity in severe forms of trafficking by government officials.
3	Countries whose governments do not fully meet the TVPA's minimum standards and are not making significant efforts to do so.

Source: US Department of State 'Trafficking in Persons Report' June 2023.

This analysis identified that the Detmold Group has active direct suppliers across Tier 1, Tier 2, Tier 2 Watch List and Tier 3 countries.

TIER	PERCENT DIRECT SUPPLIERS	COUNTRIES IN WHICH SUPPLIERS ARE BASED
1	18%	Australia, Austria, Belgium, Finland, France, Germany, Netherlands, Philippines, Singapore, Spain, Sweden, Taiwan, United Kingdom (UK) and the United States of America (USA).
2	9%	Denmark, India, Italy, Japan, New Zealand, South Korea, Thailand, and the United Arab Emirates (UAE).
2 Watch List	29%	Hong Kong, Indonesia and South Africa
3	44%	China, Malaysia and Vietnam

It is our commitment to ensure suppliers from all countries will continue to be reviewed, in particular those from Tier 2 Watch List and Tier 3. All direct suppliers are asked to comply with our obligations in relation to modern slavery.





Need to Remediate

We are pleased to confirm that no instances of modern slavery were identified in the Detmold Group's operations or supply chain during FY2025.

We do commit that if the Detmold Group were to uncover modern slavery practices in our supply chain or business operations, we will take action to cease any related activity and prevent our contribution to modern slavery practices. We have included our Whistle-blower details in our External Supplier Code of Conduct. The Detmold Group will also use our leverage to influence any entities causing a risk of modern slavery to take action. Proposed remediation may involve evidence of restitution, making good any harm caused and guarantees of non-repetition. If we are unable to exert due influence to have the entity cease the modern slavery practices, we will consider terminating the business relationship.

Assessing the Effectiveness of our Actions

The Detmold Group acknowledges the significant responsibility of our business to continue to respect and protect human rights and to act with due diligence to prevent the violation of these rights.

We assess the effectiveness of our actions through a combination of audit outcomes, supplier engagement and internal reporting mechanisms. Indicators used to assess effectiveness include:

- Coverage of audits across manufacturing operations
- Closure of corrective actions arising from audits
- Supplier commitment to the External Provider Code of Conduct
- Employee awareness of ethical conduct and reporting mechanisms

The Group acknowledges that its effectiveness measures are primarily focused on direct suppliers and that extending oversight into deeper supply chain tiers is an ongoing area of development.

The Detmold Group acknowledges the significant responsibility of our business to respect and protect human rights



Looking Forward

The Detmold Group is committed to strengthening our response to modern slavery through continuous improvement. Key priorities for future reporting periods include:

Assess

- Increase awareness and consistency of application across the Detmold Group including reporting and risk assessments.
- Extend supplier engagement and continue to monitor suppliers to drive improvements within our supply chain.

Identify

- Strengthen supplier risk assessment to drive improvement within our supply chain and risk-based commercial decisions.
- Investigate and implement opportunities with our suppliers to assist in eradicating modern slavery within our supply chain.

Continuous Improvement

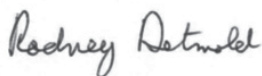
- Continue employee education on modern slavery.
- Enhance risk assessments and risk processes to create a responsive reporting structure for modern slavery risks.
- Ongoing assessment of our manufacturing sites through the SEDEX and Chain of Custody audit programs.

We understand that clear steps are needed to address modern slavery and we take our responsibility to respect and promote human rights seriously

Statement Approval

This Statement constitutes the joint statement of Detmold Holdings Pty Ltd and was prepared in consultation with our controlled entities (including the reporting entities). As a group of entities where Detmold Holdings has operational control, common policies, systems and governance processes, consultation with operational management, executive leadership, company secretary and directors occurs between Detmold Holdings and each of our reporting entities, owned entities and controlled entities.

This statement is prepared pursuant to Modern Slavery Act 2018 (Cth) and has been approved by the board of Detmold Holdings Pty Ltd on 18/12/2025.



Rodney Detmold

Director

Detmold Holdings Pty Ltd

18/12/2025

Australian Modern Slavery Act Mandatory Criteria

Modern Slavery Act requirement (s 16)	Where addressed in this statement	
(a) Reporting entity	Introduction	Page 1
(b) Structure, operations and supply chains	Section: Our Structure, Operations and Supply Chains	Page 2
(c) Risks of modern slavery	Section: Risk of Modern Slavery	Page 5–6
(d) Actions taken	Sections: FY2025 Key Actions Taken; Supplier Audit Program	Page 4
(e) Assessing effectiveness	Section: Assessing the Effectiveness of our Actions	Page 8
(f) Consultation with owned/controlled entities	Sections: Introduction; Statement Approval	Page 1 Page 10
(g) Other relevant information	Section: Looking Forward	Page 9

