

DETMOLD HOLDINGS PTY LTD
Modern Slavery Act
Statement FY24



Modern Slavery Statement FY24

This Modern Slavery Statement sets out the actions taken by Detmold Holdings to address modern slavery in our business and supply chain for the 2024 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 understand that clear steps are needed to address modern slavery, and we take our responsibility to respect and promote human rights seriously. As such, the Detmold Group have outlined clear expectations and standards that our people and suppliers must follow.

Our Modern Slavery Statement FY24 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.

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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 approximately 3,000 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.


The Detmold Group employs approximately 3,000 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



FY24 Key Actions Taken

During FY24 the Detmold Group undertook:

- SEDEX Members Ethical Trade Audits (SMETA), were conducted at our manufacturing sites in China, Australia, Indonesia and in Vietnam. On-going SMETA are planned.
- Supplier Workplace Accountability (SWA) audits, conducted at our manufacturing sites in China, Australia, Indonesia, India, Philippines, and Vietnam.
- Chain of Custody (Ethical sourcing) audits conducted in China, Australia and Indonesia.

All these audits contain criteria to ensure that child or forced labour is not used at any of our facilities. 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 have either had a SMETA or SWA 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

The Detmold Group supplier audit program was continued during FY24. Audit processes include supplier self-audits, desktop audits and on-site supplier audits.

During FY24 37 supplier audits were conducted at the local country level in Australia, Vietnam, China, Philippines, Indonesia, and India. In addition, two audits were conducted remotely and 11 self-audits were undertaken by our strategic suppliers.

Risk of Modern Slavery

Since the last report there has been no substantive change in the Detmold Group operations and supply chains. As such, this report incorporates the analysis of the Detmold Group operations and supply chains as outlined in previous Modern Slavery Statements.

The Detmold Group risk assessment of Modern Slavery examined sector, industry, country, and suppliers. This review utilised several published sources of known modern slavery risk, including:

- The 'Global Slavery Index' produced by Minderoo's 'Walk Free' Foundation
- The 'Modern Slavery Risk, Rights & Responsibilities – A Guide for Companies and Investors' commissioned by the Australian Council of Superannuation Investors (ACSI).
- The US Department of State's 'Trafficking in Persons Report – June 2023.

The Detmold Group Board is responsible for monitoring and oversight of Modern Slavery. The Board does this through setting policy direction, setting accountability of the Group Executive Team and through the Groups Risk Management Framework. The Audit, Risk and Compliance Committee is responsible for implementing and monitoring risk management performance.

The Detmold Group operations use predominantly direct employment of labour. Combined with the policy and risk framework and continuous stakeholder engagement and audit activity, the Group has maintained the assessment that the Detmold Group manufacturing and sales locations are considered a low risk of Modern Slavery.

We therefore remain on track in our pursuit to eliminate modern slavery.

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 – A Guide for Companies and Investors' 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.
- Raw material extraction and the smelting of minerals utilised in the production of that Information Technology equipment.

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

- Security, maintenance, and cleaning
- Asset and tenant Management
- Transportation: Ports, maritime freight, and truck drivers
- Storage of Hazardous material
- 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 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	20%	Australia, Austria, Belgium, Canada, Chile, Colombia, Czech Republic, Estonia, Finland, France, Germany, Netherlands, Philippines, Singapore, Spain, Sweden, Switzerland, Taiwan, United Kingdom (UK) and the United States of America (USA).
2	15%	Denmark, Egypt, India, Israel, Italy, Japan, Mexico, New Zealand, Poland, South Korea, Switzerland, Thailand, and the United Arab Emirates (UAE).
2 Watch List	22%	Hong Kong, Indonesia and South Africa
3	43%	China, Malaysia, Russia 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 as no modern slavery practices have been identified in our operations or supply chain to date, the Detmold Group have not had any need for remediation.

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.

To date no modern slavery practices have been identified in the SMETA, SWA and Ethical Sourcing audits of our operations.

However, we acknowledge that the actions we have taken to date have been primarily focused on our own operations and direct suppliers and not on our extended supply chain.

Given the prevalence of modern slavery around the world, as highlighted by the 'Walk Free' Foundation, there is the possibility that modern slavery may be found in our supply chain as we increase efforts to identify and eliminate these practices.

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 across our operations and supply chains. Upcoming actions include:

Assess

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

Identify

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

Continuous Improvement

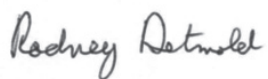
- Continue to educate and induct our employees on the Code of Conduct, Whistle-blower, and other relevant policies.
- Embedding risk assessments and risk processes into the Detmold Group underlying business processes to create a responsive reporting structure to understand actual modern slavery risks.
- Ongoing audit program of our manufacturing sites through the SEDEX SMETA and/or the SWA 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 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 18/12/2024.



Rodney Detmold

Director

Detmold Holdings Pty Ltd

18/12/2024

DETMOLD GROUP

DETMOLD HOLDINGS PTY LTD

ACN 007 527 022