



MODERN SLAVERY STATEMENT 2021



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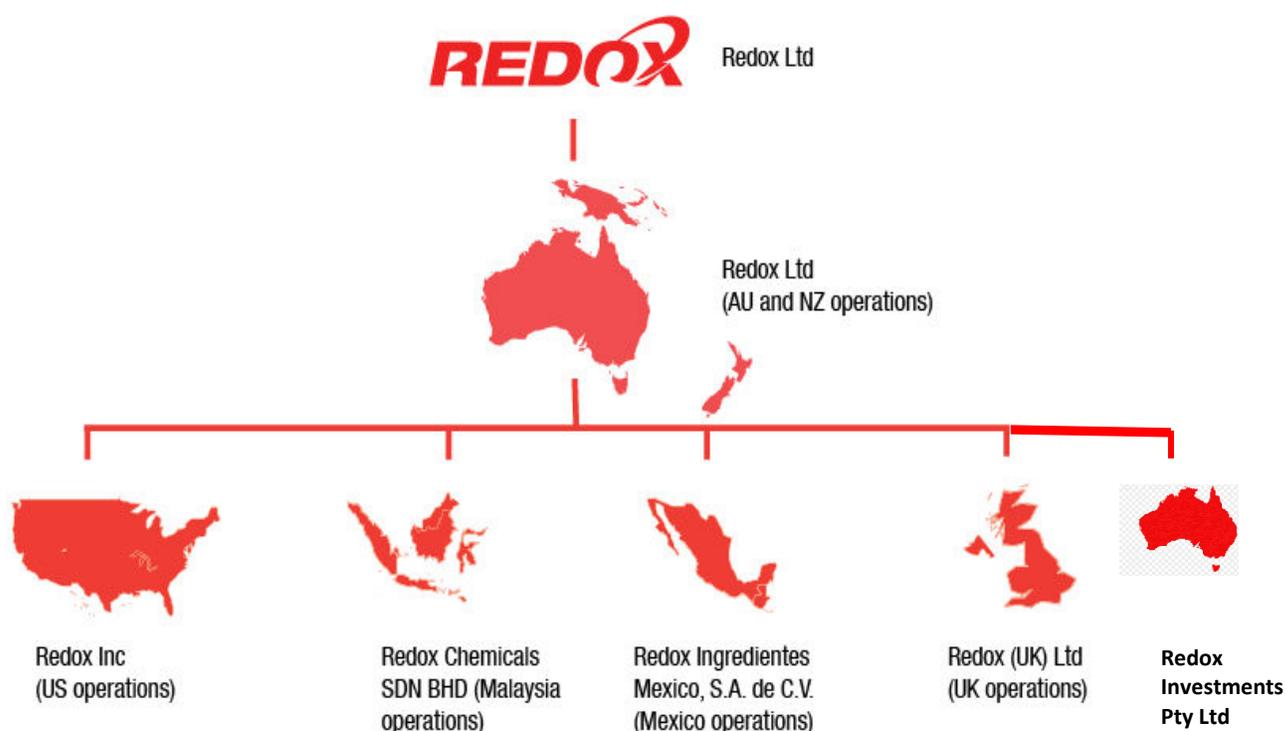
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REDOX MODERN SLAVERY STATEMENT

Redox Limited (Redox)¹ opposes slavery in all its forms and is committed to adhering to the highest ethical standards. This Modern Slavery Statement is made in accordance with the *Australian Modern Slavery Act 2018* (Cth). It applies to and describes the actions taken by Redox and its subsidiaries during the reporting year commencing 1 July 2021 and ending 30 June 2022 to mitigate modern slavery² risks in our business operations and supply chains.

This is Redox's third Modern Slavery Statement. It summarises the steps taken by Redox to identify, mitigate and manage the risk of modern slavery in its operations and supply chain.

This Statement³ is submitted as a joint statement intended to cover all wholly owned subsidiaries and operations within Redox including:



References to 'our' and 'we' in this Statement are references to Redox.

¹ "Redox" means Redox Ltd (ACN 000 762 345) and its related bodies corporate, as defined in section 50 of the Corporations Act 2001 (Cth).

² The term "modern slavery" is used to denote practices defined in the Modern Slavery Act 2018 (Cth) and includes eight types of serious exploitation: servitude, slavery, forced labour, forced marriage, the worst forms of child labour, debt bondage, deceptive recruiting for labour or services and trafficking.

³ "Statement" means this Modern Slavery Statement made by Redox pursuant to the Modern Slavery Act 2018 for the financial year ending 30 June 2022.



Redox acknowledges that modern slavery, which includes servitude, slavery, forced labour, forced marriage, the worst forms of child labour, debt bondage, deceptive recruiting for labour or services and human trafficking, forms part of other complex challenges and systems, including discrimination, harassment, abuse, long working hours, low wages and benefits, and unsafe workplaces and work environments. Where possible, Redox seeks to work in collaboration with our stakeholders and partners to promote a coordinated approach to tackle these complex modern slavery issues.

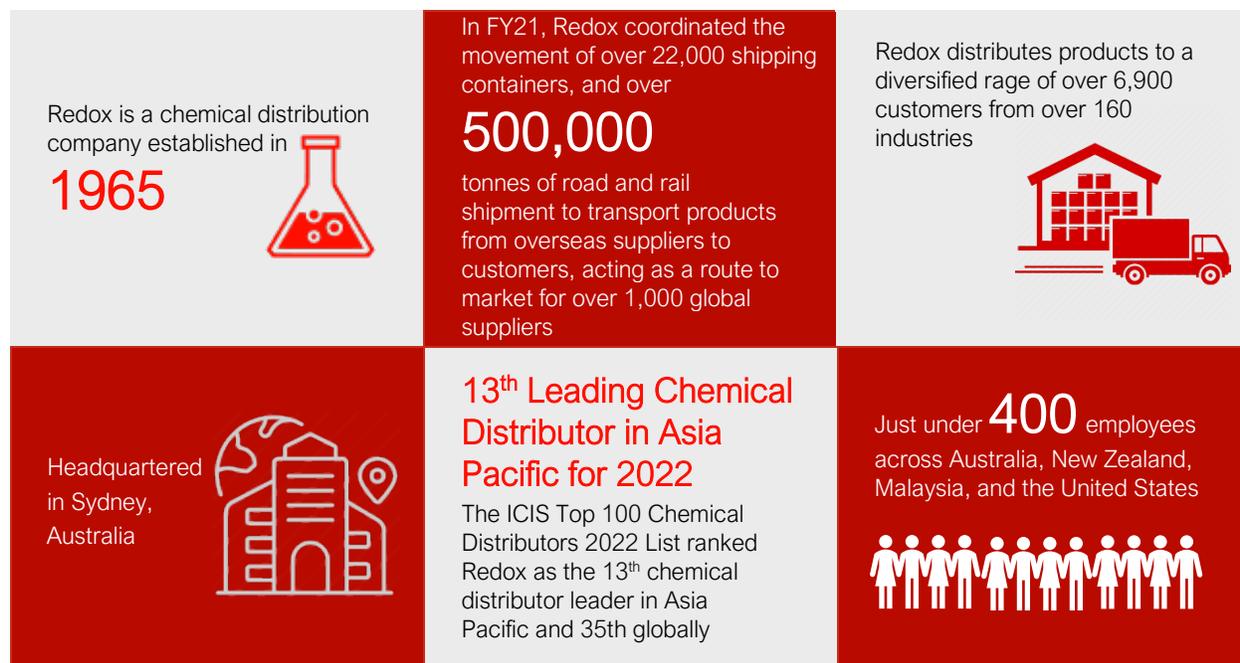
To manage the risk of modern slavery in Redox's operations and supply chains and to identify emerging issues, Redox provides training to relevant team members, collaborates with various organisations, embeds ethical sourcing and modern slavery policies into existing processes, and conducts risk assessments on suppliers.

Each of Redox's wholly owned subsidiaries were consulted in the development of this Statement. Before it was reviewed and approved by the Redox Board, this Statement was reviewed by the General Counsel for Redox.

At Redox we acknowledge our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices. We also recognise that safeguarding human rights across our business and supply chains is an area of great importance to our employees, shareholders, customers, and the communities where we operate. We are on a journey to improve our modern slavery risk identification and mitigation and are constantly working to reinforce and communicate our values to our employees, shareholders, customers, suppliers, and the broader community.

At Redox we are dedicated to the continuous improvement of our policies and procedures relating to the identification of modern slavery risk.

Redox's structure, operations, and supply chains



OUR STRUCTURE

Redox is an Australian chemical distribution company established in 1965. Redox has an in-house managed domestic distribution network of warehousing facilities. Redox currently operates from 13 locations across four (4) countries being Australia, New Zealand, Malaysia, and the United States. Redox's principal operations are predominately situated across Australia and New Zealand, with offices located in almost all major cities.

Redox's long-term strategy is to continue to build upon Redox's strong position in Australia and New Zealand, as well as expanding its North America and Southeast Asian presence. Redox is also in the early stages of exploring the possibility of establishing an office in England to service the UK market and source more products from European suppliers.

Since its establishment, Redox has been listed in the Independent Commodity Intelligence Services (ICIS) Top 100 Chemical Distributors List as the 13th largest in Asia Pacific and 35th worldwide.

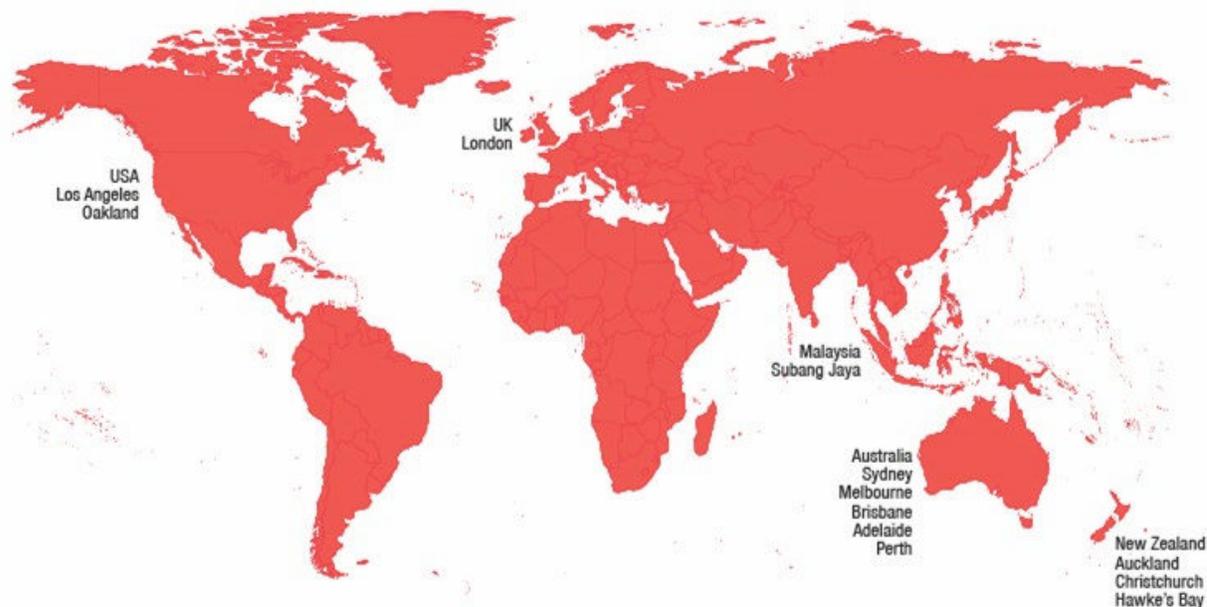
OUR OPERATIONS

Redox headquarters are in Sydney, Australia⁴ with the majority of our operations located in Australia and New Zealand. We are a public unlisted company, employing just under four hundred (400) people across Australia, New Zealand, Malaysia, and the United States.

Our business has grown to become one of the leading chemical and ingredients distributors in the world. Redox is proud to distribute more than 1,000 products to a diversified range of over 6,900 customers from over 160 industries consisting of: commodity and specialty chemicals; food ingredients; agricultural chemicals; household and personal care chemicals; mining chemicals; surface coatings; plastics additives; grease and lubricants; water treatment chemicals; building and construction chemicals and pharmaceutical ingredients.

⁴ Redox registered office being 2 Swettenham Road, Minto, NSW, 2566, Sydney Australia.

Redox does not externally engage in financial lending activities however, intra-company lending forms part of Redox's operations.



OUR SUPPLY CHAINS

Redox directly sources products for resale and for its own consumption and sources services. The procurement of goods for resale and/or for Redox's consumption and the procurement of services are all part of our supply chain and form an integral role in our business operations.

Goods for resale include a wide range of chemicals, ingredients, and raw materials which are sourced from manufacturers and other distributors around the world for the purpose of reselling onto our own customers. The chemicals, ingredients, and raw materials we source include sweeteners, stabilisers, emulsifiers, minerals, antioxidants, phosphates, vitamins, acids, fertilisers, salts, plasticisers and many more.



Goods consumed by Redox may include items such as IT equipment, tools, machinery, office supplies and uniforms that support Redox operations.



Services that Redox procure include maintenance, cleaning, transport logistics and catering or food services.



Redox source products from suppliers, manufacturers, and distributors all over the world, with the largest volume of product sourced from Australia, China, India, Indonesia, Malaysia, New Zealand, Singapore, Taiwan and the United States (in alphabetical order). Redox supports the economic development in the countries we source goods from, buying from manufacturers in Australia and overseas. The suppliers who make up Redox's supply chain employ thousands of people.

REDOX POLICIES AND GOVERNANCE

The policies and frameworks that support the day-to-day operations of Redox require that Redox as a whole respect and safeguard universally recognised human rights. Our policies prohibit any activities involving modern slavery and commit to safe and healthy working conditions, including the right to freedom of association and collective bargaining along with the right to workplaces free of harassment and discrimination.

Redox works with suppliers and business partners to source goods and services in a manner that aligns with our own policies. Each of Redox's businesses require all their suppliers, partners, and stakeholders to comply with Redox's Minimum Workplace Practices Code of Conduct (Supplier Code of Conduct).⁵ The minimum standards in the Supplier Code of Conduct with which our suppliers must comply draw upon the key principles of the *United Nations Universal Declaration of Human Rights (UDHR)*, the *United Nations Conventions on the Rights of the Child* and *International Labour Organisation (ILO) Core Labour Standards*. While not all the minimum standards in the Supplier Code of Conduct are directly relevant to modern slavery, they are important to the holistic approach Redox takes with respect to human rights due diligence and ethical sourcing.

The Redox Modern Slavery Policy sets the minimum standards expected of Redox employees and officers to mitigate the risks of modern slavery across our operations and supply chain. The Redox Modern Slavery Policy is periodically reviewed and updated as appropriate to seek alignment with evolving international best practice.

IMPACT OF COVID-19 ON OPERATIONS

We continue to work to safeguard the health and wellbeing of our employees, contractors and business partners as the pandemic continues. As we manage the ongoing disruptions to global supply chains caused by COVID-19, we recognise that strong due diligence regarding human rights and other business integrity issues are more important than ever.

The disruption caused by COVID-19 presents emerging modern slavery risks including worker health and safety risks in key sourcing countries.

In response to COVID-19 international border closures and restricted movements enforced by many governments all over the world, our supply chains have suffered from shortages, supply interruptions, restricted internal movements in their workplaces as well as our own workplaces, and greater workloads to resolve issues which arise as a result of COVID-19. This in turn has limited the ability of Redox to receive supplier declarations or responses within the estimated timeframes and complete modern slavery due diligence on these suppliers.

As the risk of modern slavery increases due to COVID-19, Redox continue to focus on managing the unpredictable challenge COVID-19 presents to our supply chains.

⁵ Redox's Minimum Workplace Practices Code of Conduct ("Supplier Code of Conduct") is a document created by Redox, which outlines the way we expect all suppliers to conduct themselves, and rights to be afforded to their employees. Redox requires that all suppliers comply at all times with the Workplace Practices and for all Suppliers to confirm such practices are being complied with by executing the Ethical Sourcing Supplier Declaration ("Supplier Declaration Form").

Risks of modern slavery practices in Redox operations and supply chains

Redox is committed to responsible supply chain management and recognises modern slavery risks may arise due to issues present in the countries and regions in which we operate and source goods and services from, the products and services we procure, as well as the suppliers that make up our supply chain.

MODERN SLAVERY RISKS IN REDOX OPERATIONS

Redox has assessed the risk of modern slavery in our operations as low, with the majority of our operations and workforce in low modern slavery risk countries, such as Australia and New Zealand.

We also monitor and address modern slavery and human rights issues in our workforce under various policies and procedures, including the Redox Code of Conduct and Ethics, Harassment, Bullying and Discrimination Policy, Diversity Policy, Whistleblower Procedure and Modern Slavery Policy. These robust policies and grievance mechanisms, create greater transparency of modern slavery issues in our operations and is another driving force in Redox considering the risk of modern slavery in its operations as low.

The Redox workforce during the reporting year was either covered by a modern award or employed via individual agreements. These individual agreements or award covered employment contracts confer minimum pay and entitlements in compliance with legal requirements and typically set working hours and overtime arrangements.

Redox also recognises the right of our employees to bargain collectively, with or without the involvement of a representative.

MODERN SLAVERY RISKS IN REDOX SUPPLY CHAINS

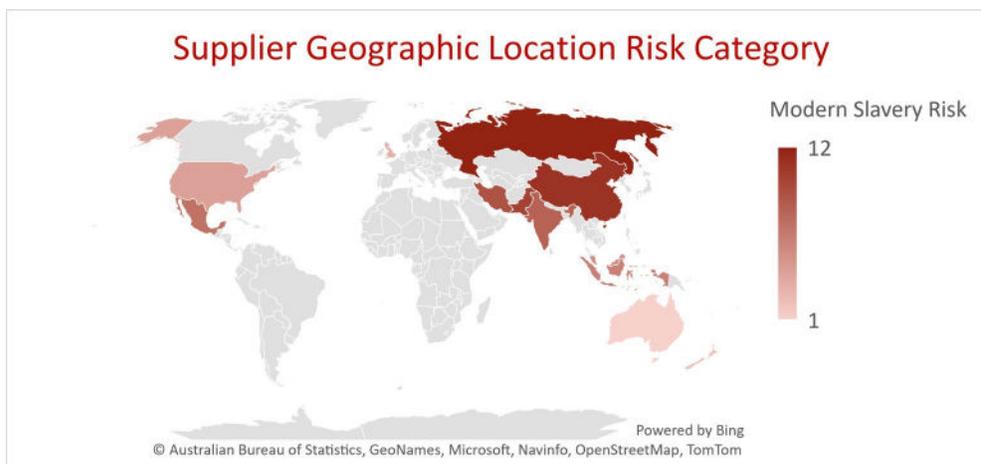
Redox recognises that there is a greater risk of modern slavery issues in our complex and multi-tiered supply chains that span across various countries, as Redox have less visibility and clear oversight of the working conditions in our supply chains.

The risk of exposure to modern slavery within our supply chain and operations is primarily centred around:

Third-Party Labour: We have identified that the employment of persons through third-party labour hire companies or recruitment agencies increase the risk of worker exploitation and unfair working conditions by reducing our visibility over recruitment, remuneration and workplace practices. We have reduced our exposure to modern slavery risk by receiving a signed Supplier Declaration Form from any labour hire company we engage and requiring they comply with our Supplier Code of Conduct.

Product or Services Market: Redox has identified some products and services we source which carry a greater exposure to modern slavery risk, such as palm oil or electronics.

Supplier Geographic Location: The procurement of goods or services from suppliers in certain geographic locations heightens the risk of modern slavery in our supply chains.



Actions taken to address identified modern slavery risks

ETHICAL SOURCING DECLARATION PROGRAM

To mitigate the risk of modern slavery and unethical practices occurring in our supply chain, Redox have implemented our own modern slavery and ethical sourcing declaration program. Before any business contracts with a new supplier are entered into, Redox requires the suppliers complete a Supplier Declaration Form or provide their own modern slavery internal governance policies for assessment. Suppliers are assessed to identify the risks of the supplier not having practices in place which align with our Supplier Code of Conduct. If the supplier returns a signed Declaration Form or we accept their internal policies in lieu of our Declaration Form, it is deemed to be an approved supplier and issue a modern slavery permit. Redox also requires that any of our suppliers who were onboarded before this program was implemented complete the same process retrospectively.

The Supplier Declaration Form requires that our suppliers ensure their own suppliers, contractors, and employees comply with the minimum workplace practices in our Supplier Code of Conduct and provide Redox with rights of termination if the supplier is unable or unwilling to work towards full compliance with our minimum standards. Where non-compliance with the Supplier Code of Conduct is suspected, the Supplier Declaration Form extends Redox the right to investigate the business practices of the supplier, should Redox find this necessary.

SUPPLY CHAIN RISK MONITORING

To further improve our existing human rights due diligence processes and our understanding of the modern slavery and broader human rights risks that may be present in our supply chain, Redox regularly conducted reviews of the US Customs and Border Protection (CBP) Active Withhold Release Orders and Findings List. Redox monitor the list to identify any of the suppliers in our supply chain who have been issued a Withhold Release Order (WRO) by the Commissioner or if findings have been published against them in the Federal Register. This practice ensures our view of risk is kept up to date and enables Redox to identify a supplier's critical breach of Redox's Supplier Code of Conduct.

CBP issues a WRO when the agency has reasonable evidence of the use of forced labour in the manufacturing or production of a good or goods entering the US. A WRO allows the CBP to detain the products in question at all US ports of entry until or unless importers can prove the absence of forced labour in their product's supply chain. CBP issues a finding when the agency has conclusive evidence of the use of forced labour in the manufacturing or production of a good or goods entering the US supply chain. A finding allows CBP to seize the product(s) in question at all US ports of entry.

During the reporting period, Redox identified two suppliers in our supply chain who either were issued a WRO themselves or has supply deals or ties to an entity issued a WRO. Redox leveraged the findings to better articulate Redox's commitments regarding salient human rights and keep abreast of the suppliers' steps to remediate the issue. Redox understands remediation is multifaceted and are focused on supporting these suppliers in their ability to remediate concerns.

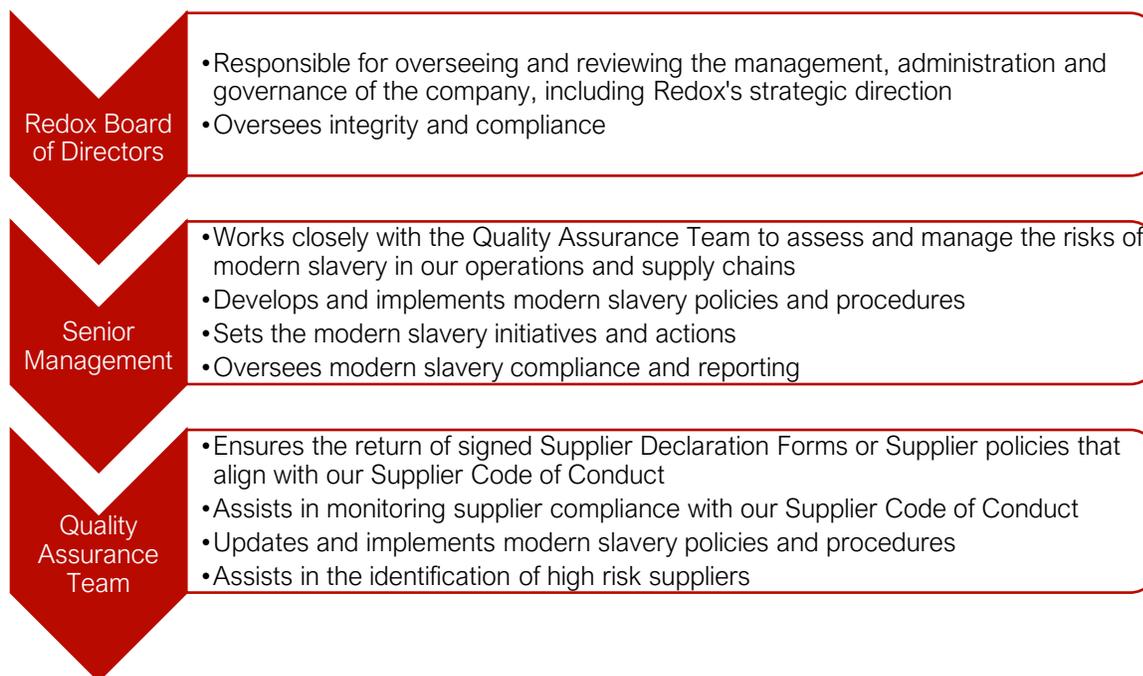
RISK ASSESSMENT PROGRAM AND SUPPLY CHAIN MAPPING

Redox continue to be in discussions about adopting a risk-based approach to modern slavery due diligence that is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs). This risk-based approach will be focused on mapping suppliers based on their risk profile. The assessment of a supplier's risk profile will be based on factors including the products or services they supply to Redox and the geographic location in which they are based or country of origin. Once Redox have agreed on the approach, we will begin to implement the program by mapping high risk suppliers to prioritise business and sustainability issues across our complex supply chains. Redox recognises that implementing the risk assessment program and mapping suppliers is a complex and ongoing process. It will take time for Redox to complete the mapping exercise for high-risk suppliers and later for medium and low risk suppliers.

Redox also work closely with their suppliers to examine traceability of the raw materials we source and map product sources so we can have confidence the products we source are sourced responsibly.

GOVERNANCE AND ACCOUNTABILITY

Redox regularly engages with business stakeholders to understand their expectations of our ethical sourcing and modern slavery performance. Our commitment to sustainable governance is led from the top, with clear accountabilities for oversight and implementation of our ethical sourcing commitments. At Redox we have adopted a collaborative modern slavery governance process to learn from each other in identifying and managing our modern slavery risks. Redox's Board of Directors (Board) has ultimate responsibility for Redox's governance of labour rights and modern slavery, supported by Senior Management and our Quality Assurance Team as set out below. Through these forums, Redox's Board and Senior Management receive periodic updates on the status of the actions we take to address modern slavery risks and the performance of our sites and key suppliers.



COLLABORATION WITH ORGANISATIONS

Redox recognises that collaboration with industry-wide initiatives, government and non-government organisations is an important strategy to better manage modern slavery risks. This reporting year, Redox worked collaboratively with non-government organisations and participated in and supported a range of initiatives that aim to reduce our modern slavery risks.

Roundtable on Sustainable Palm Oil (RSPO)

Redox acknowledges that the palm oil industry in which we deal in is particularly vulnerable to modern slavery violations and unethical labour practices including excessive working hours, passport confiscation, induced indebtedness, contract substitution, underpayment of wages and child labour. Redox collaborates with RSPO to reduce risks associated with the procurement and distribution of palm oil in our supply chains. RSPO have developed a set of environmental and social criteria which Redox suppliers of palm oil must comply with to ensure our supply chains produce Certified Sustainable Palm Oil.

Australian Trusted Trader (ATT)

Redox partners with ATT to secure Australia's borders and facilitate legitimate trade practices in our operations and supply chains. Redox is an accredited trusted trader by Australian Government Department of Home Affairs and the Australian Border Force with compliant trade practices and a secure supply chain.

Rainforest Alliance (RA)

Rainforest Alliance is an international non-profit organization creating a more sustainable world by using social and market forces to protect nature and improve the lives of farmers and foresters. RA develops and implements certification standards to promote sustainable agriculture. Redox participates in the RA certification program which plays an important role in ensuring we drive a sustainable supply chain and improve working conditions in suppliers' factories or farms.

INTERNAL GOVERNANCE POLICIES

Redox recognise our success in managing modern slavery risks in our operations and supply chains requires clear performance expectations and standards, including a set of policies that enshrine a clear commitment to protect labour rights. Redox has adopted a company-wide policy framework that outlines our baseline expectations for labour standards across our operations and supply chains. These policies are periodically reviewed and updated, with oversight from our executive leadership team.

Company-wide policies and procedures with relevance to management of modern slavery

Modern Slavery Policy	Sets the baseline expectations for business operations and our employees with regard to labour standards, including child labour, forced and compulsory labour, human trafficking, freedom of association and collective bargaining
Whistleblower Policy	Outlines the process for making and investigating a disclosure in line with the Whistleblower Protection Scheme set out under the Corporations Act 2001 and the Taxation Administration Act 1953
Diversity Policy	This policy formalises our commitment to diversity and inclusion in our workplace
Harassment, Bullying and Discrimination Policy	Sets out Redox's commitment to providing safe, healthy, and respectful workplaces that are free from bullying, harassment, and discrimination

Operational policies and procedures

Code of Conduct and Ethics	Our Code of Conduct and Ethics sets out our expectations of employees, officers and directors and serves as a guide to the ethical principles and business conduct at Redox
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Supply chain policies and procedures

Supplier Code of Conduct	Sets out our baseline expectations for our suppliers and their related companies in relation to human rights, human trafficking, discrimination, harassment and abuse, health and safety and environmental protection
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TRAINING AND CAPACITY BUILDING

Redox maintains an ongoing focus on adequate training and development of our staff and acknowledges the vital role it plays in promoting modern slavery awareness throughout our businesses. All Redox employees and directors are required to undertake compliance training programs, including modern slavery training, every year to keep abreast of relevant legal and industry developments and ethical practices. The modern slavery training briefs employees on Redox's core values and includes several topics relevant to our management of modern slavery and labour rights. A failure to comply with our modern slavery policy may lead to disciplinary action, up to and including termination, consistent with local law. Our modern slavery training is periodically reviewed by senior management to ensure our employees continue to improve and develop their understanding of ethical sourcing and human rights. We are constantly working to reinforce and communicate our values and practices to our employees, shareholders, customers, suppliers, and the broader community.

GRIEVANCE MECHANISMS

Redox provide all workers within our operations and supply chains with access to grievance mechanisms to identify and escalate human rights issues or concerns. Redox continues to build human rights awareness and knowledge among employees in our operations, encouraging them to raise their concerns without fear of retaliation. Redox also supports grievance reporting by all directors and employees within Redox and external whistleblowers, by providing them with avenues to report issues and concerns of wrongdoing, misconduct or inappropriate behaviour consistent with our Whistleblower Policy.

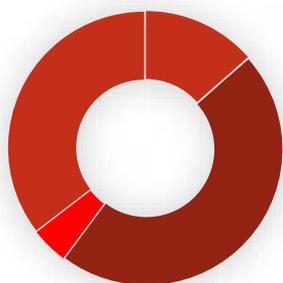
Redox Whistleblower Procedure	Redox Code of Conduct and Ethics	Supplier Code of Conduct
<ul style="list-style-type: none">• The Redox Whistleblower Policy, sets minimum standards for our businesses and contains details of how to make a report under the policy. Reports of misconduct are to be made to the Whistleblower Protection Officer or the General Counsel	<ul style="list-style-type: none">• It is a requirement that any unlawful or unethical behaviour that does not comply with the code be reported in accordance with our whistleblower policy or to our human resources manager	<ul style="list-style-type: none">• Any contravention of the workplace practices in the Supplier Code of Conduct must be immediately reported by the supplier to their Redox point of contact

Assessing the effectiveness of actions being taken to assess and address modern slavery risks

ETHICAL SOURCING DECLARATION PROGRAM

It is difficult to measure the effectiveness of any single action Redox takes to address the risk of modern slavery in its operations and supply chain. To understand how Redox is managing the risk of modern slavery, it regularly reviews the effectiveness of our ethical sourcing declaration program by internally reporting on the number of active suppliers that have not returned a signed Supplier Declaration Form or acceptable policy and therefore not been issued a modern slavery permit.

Ethical sourcing supplier declaration assessment numbers



1,185

NUMBER OF THE TOTAL ACTIVE SUPPLIERS COVERED BY THE ETHICAL SOURCING DECLARATION PROGRAM

■ Suppliers part of the declaration program but not holding a permit	160
■ Chemical suppliers assessed and holding a permit	553
■ Logistic suppliers assessed and holding a permit	52
■ Other suppliers assessed and holding a permit	420

By the end of the reporting period, Redox assessed and issued modern slavery permits to a total of 1,025 new and current active suppliers, representing approximately 86% of our active supply chain. Since the end of the previous reporting period, 1,123 suppliers were issued a modern slavery permit. No critical breaches of Redox's Supplier Code of Conduct were reported by suppliers to Redox during the reporting period. Redox however, identified 2 potential breaches of its Supplier Code of Conduct during the reporting period in its monitoring of the CBP Active WRO and Findings List.

MODERN SLAVERY TRAINING

Redox ensured that during the reporting period all employees with relevant roles in relation to its modern slavery and ethical sourcing received adequate training on Redox's Modern Slavery Policy and any supporting processes applicable to their role. All employees who undertook the modern slavery training course in the reporting period successfully completed the course.

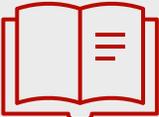
GRIEVANCE REPORTING MECHANISMS

Redox has an accessible and well-publicised reporting mechanism for workers in direct operations and in its supply chain to raise concerns in relation to modern slavery. The reporting mechanism allows for confidential and anonymous reporting and provides protection from reprisal. Redox also have a clear process for investigating and reporting on issues raised through all its reporting mechanisms.

Looking ahead to Redox’s focus for the next reporting period

Redox recognise that preventing and addressing modern slavery risks in our operations and supply chains requires long-term planning and vigilance. Redox are committed to continuously improving our strategies to minimise the risk of modern slavery in our operations and supply chain. During the next reporting period we will focus on:



<p>ensur</p>  <p>Modern Slavery Policy</p> <p>Redox will refresh our control framework by reviewing and updating our Modern Slavery Policy, including considering further how modern slavery fits within our communities and social performance standards. We will also embed any changes to our policies and standards through targeted business-wide training.</p>	 <p>Ethical Sourcing Declaration Program</p> <p>Redox will strengthen the expansion of our Ethical Sourcing Declaration Program through continuing to ensure all new suppliers and current existing suppliers sign Redox’s Supplier Declaration Form or provide their internal policies evidencing compliance with our Supplier Code of Conduct.</p>	 <p>Develop Supplier Risk Assessment Program</p> <p>Redox will develop and implement a comprehensive Supplier Risk Assessment Program. The program builds upon our existing due diligence program, by placing suppliers into risk categories based on the inherent modern slavery risk within the types of goods and services procured, industry and sourcing countries.</p>
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Redox are confident that the actions we intend to take in the next reporting period will support our continued multi-faceted approach to preventing and addressing modern slavery in our own operations and across our supply chains. We understand there is more we can do and will continue to work and seek progress on this global issue through meaningful and effective action, both across our business and in partnership with others.

Redox recognises modern slavery is an increasingly complex problem, best tackled by collective commitment and responsibility to bring it to an end.

This Statement has been prepared collectively and in consultation with management and key stakeholders, to deliver on our human rights commitments and ensure Redox's continuous improvement in identifying and mitigating modern slavery and ethical sourcing risks.

This Statement was reviewed and approved by the Redox Limited Board of Directors on 26 October 2022.

We are pleased to publish this Redox 2021 Modern Slavery Statement and commit to continuing to monitor and publicly report on our progress.



Robert Coneliano
Managing Director

26 October 2022



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