

 **aliaxis**



Modern Slavery Statement

Aliaxis Operations in
Australia and New Zealand
June 2024



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Our Operations and Supply Chains

Section 1: Introduction

Aliaxis is pleased to submit this Modern Slavery Statement for the reporting period of 1 January 2023 - 31 December 2023.

The content of this Statement is focussed on the Aliaxis Operations within Australia and New Zealand. This Statement also meets the requirements of Vinidex Pty Limited as a reporting entity for the purposes of the Australian Modern Slavery Act 2018 (Commonwealth). This Statement describes the actions taken and planned during the reporting period to assess and address any modern slavery risks in our operations and supply chain.

Aliaxis opposes slavery in all its forms. Aliaxis is committed to identifying and preventing any potential modern slavery risks within our operations and supply chains.

Section 2: About Aliaxis



Aliaxis Group S.A. (BE) is privately owned, with our global headquarters in Brussels.

Aliaxis is a global leader in advanced piping systems for building, infrastructure, industrial and agricultural applications. We provide communities around the world with sustainable innovative solutions for water and energy, leading the industry in a way that anticipates the rapidly evolving needs of its customers and of society. Operating in over 40 countries, we design sustainable, easy to install, and innovative solutions. Thanks to our over 15,000 employees, our pipe and fittings systems meet our customer's most demanding needs for the building, infrastructure, industrial and agricultural sectors.

For more information on Aliaxis refer to: <https://aliaxis.com/>

For our latest Aliaxis Annual Report refer to: <https://annualreport.aliaxis.com/>



€4.1
billion in
Revenue



15,000+
Employees



100+
Distribution
Centres



75+
Manufacturing
Sites



40+ Countries

Aliaxis Global Operations and Brands

Aliaxis has a strong brand portfolio, delivering high-quality products and integrated solutions. We have operations in over 40 countries. This includes Aliaxis branded operations and product lines, as well as valued and reputable local brands. Below is a map indicating which countries and additional markets we serve, by country.

For all our brands refer to: <https://aliaxis.com/our-brands/>



Aliaxis Global Market Segments

Building	<p><i>High Performance and Durability</i></p> <p>At Aliaxis, we design high-quality sanitary, plumbing and building systems for a wide variety of residential and commercial applications. Our building products include drainage, sanitary solutions, rainwater management, electrical and telecom conduits.</p>
Industry	<p><i>Leading Range of Piping and Pressure Systems</i></p> <p>From managing water responsibly to processing chemicals or hazardous substances, there are complex requirements for industrial pipework. Aliaxis serves the chemical processing industry, industrial water, wastewater treatment, municipal water, marine, surface treatment, and swimming pool sectors.</p>
Infrastructure	<p><i>Focussed on today's and tomorrow's needs</i></p> <p>Our market leading and tailor-made solutions include pipework for leading infrastructure project around the world. This includes for major international waterways, highly complex gas networks, and transportation of cabling in megacities.</p>
Agriculture	<p><i>Enhancing efficient water management</i></p> <p>Greater food demand means pressure on precious water supplies, so making agriculture more efficient is essential for sustainability. At Aliaxis, we offer a range of product solutions that help farmers manage crop irrigation and provide drinking water for their animals.</p>

Aliaxis Operations in Australia and New Zealand

In Australia, Aliaxis has Vinidex Pty Ltd, which includes trading brand Rodney Industries as well as owned registered businesses Yatala Plastics Pty Ltd and Zetz Pty Ltd. In Australia, Aliaxis also has Philmac Pty Ltd. Within New Zealand Aliaxis has Marley New Zealand Ltd, RX Plastics Ltd, Dynex Extrusions Ltd and Dux (Amalgamated with Marley in November 2023). These key operations are owned by Aliaxis, which is a group headquartered in Belgium.

Section 3: Business Ethics and Compliance


Aliaxis Global Framework

Aliaxis has a consistent Global Framework across critical areas including Human Resources, Health, Safety, and Environmental Sustainability.

Human Resources	<p><i>Every employee should be treated with dignity and respect:</i></p> <ul style="list-style-type: none">• Committed to comply with applicable country regulations, including all working conditions & labour laws• Local HR Management ensuring compliance to government regulations, freedom of association, work life balance, the right to collective bargain, & fair equitable remuneration• HRIS Platform for all processes from recruitment to retirement• Global Diversity, Equity & Inclusion Initiatives & ANZ Council• Regional Local Heroes Program, for recognition & celebration
Health, Safety & Wellbeing	<p><i>Ambition to be recognized for world class safety performance:</i></p> <ul style="list-style-type: none">• Eight "Go for ZERO" guiding principles• Health and Safety 2025 Roadmap pillars; Culture & Behaviour, Management of Key Risks, & Ways of Working• Performance against objectives and milestone targets• Critical Risk Management through Global Standards• Proactive GEMBA Walks and Hazards Made Safe• Health and Wellbeing Programs
Sustainability	<p><i>Silver Status Award from EcoVadis for Sustainability:</i></p> <ul style="list-style-type: none">• External Audit of our Sustainability Framework and Performance• Ecovadis Scorecard Improvements resulting in Silver Medal <p><i>Our "Growth with Purpose" strategy includes:</i></p> <ul style="list-style-type: none">• Focus to significantly decrease our carbon emissions by 2025• Developing innovative solutions to Global water challenges• Increasing our consumption of recycled material• Transitioning our operations to 100% renewable electricity <p><i>Groups and associations:</i></p> <ul style="list-style-type: none">• Signed as member to the Sustainable Procurement Pledge (SPP)• Signatory to UN Global Compact
Best Practice Awards	<p><i>Aliaxis has a Global Best Practice Awards Program:</i></p> <ul style="list-style-type: none">• 436 submissions received in 2023 alone.• 2023 Gold Sustainability Award achievement for Maximising Recycled Content. Marley's Manurewa facility tripled the recycled content in their Drainflo drainage in 2023 through a joint venture with Waste Management New Zealand, achieving 47% of recycled content.

Section 4: Our Operations and Supply Chains

Aliaxis Operations in Australia

		Vinidex Pty Ltd	<p>Vinidex is a leader in Australian manufacturing and supply of advanced pipe systems and solutions, connecting Australian people with water and energy from 1960. Vinidex manufactures and supplies quality PVC, polyethylene (PE), polypropylene (PP), ductile (DICTL) and industrial pipe systems.</p> <p>https://www.vinidex.com.au/ & ABN 42 000 664 942</p>
		Rodney Industries	<p>(a trading brand of Vinidex Pty Ltd) Rodney supplies metal and plastic products.</p> <p>https://www.rodneyind.com.au/</p>
		Yatala Plastics Pty Ltd	<p>(Owned by Vinidex Pty Ltd) Yatala manufactures PE pipe systems.</p> <p>ABN 84 010 720 886</p>
		Zezt Pty Ltd	<p>(Owned by Vinidex Pty Ltd) Zezt manufactures PE pipe systems.</p> <p>https://www.zezt.com.au/ ABN 30 609 589 808</p>
		Philmac Pty Ltd	<p>Established in 1929, Philmac is a world leader in the design and manufacture of high-performance mechanical compression fittings and valves to connect polyethylene pipelines.</p> <p>https://www.philmac.com.au/ & ABN 17 007 873 047</p>

Aliaxis Operations in New Zealand



Marley New Zealand Ltd

Marley has been a household brand in the New Zealand marketplace for over 50 years, specialising in PVC and PE pipe and fittings systems.

<https://www.marley.co.nz/> & NZBN 9429038863431



Dynex Extrusions Ltd

Dynex produces a range of Santoprene, Polypropylene, ASA, ASB and PVC accessories and profiles custom designed by application.

<https://dynex.co.nz/> & NZBN 9429040475813



Dux Industries Ltd

(Amalgamated with Marley in November 2023)

Dux is a well-known distributor of plumbing products within the hot and cold, wastewater traps, grease management, surface water drainage, and sanitary categories.



RX Plastics Ltd

Established in 1972, RX Plastics specialises in on-farm water management including PE and PVC pipes, fittings, and tanks.

<https://www.rxplastics.co.nz/> & NZBN 9429031867276















Our Supply Chains

Aliaxis Operations in Australia and New Zealand rely on a network of over 2000 active tier one suppliers. Among these, 93% are locally based within Australia or New Zealand, where possible, we strive to support local businesses near our sites. Our supply chains span more than 30 origin countries, including strategically partnering with international suppliers for critical raw materials, manufacturing equipment and specialised finished goods.

Additionally, Aliaxis maintains intercompany supply chains. The majority of our intercompany spending occurs within the Aliaxis ANZ business, while transactions also extend to Aliaxis Europe and Aliaxis North America.

Our Supplier Spend

Below is a snapshot of our CY 2023 top ten supplier spend categories:

	Resin & Compounds		Facilities Management
	Logistic Services		Metal Parts
	Plant & Equipment		Plastic Parts
	Professional Services		Packaging
	Additives		Energy



Identifying, Assessing, and Addressing Modern Slavery Risks

Section 5: Identifying Modern Slavery Risks

Our Modern Slavery Framework

Our Aliaxis Operations within Australia and New Zealand are proud to have implemented a Modern Slavery Framework, including an ongoing program of Risk Assessment and Management. Below is an outline of our key Framework components.

Global Corporate Governance

Comprehensive Global governance processes are implemented:

- Ethics Alert Channel
- Whistleblowing Policy
- Trade Compliance Policy
- Supplier Code of Conduct
- Employee Code of Ethics

Regional Corporate Governance

Additional governance across Aliaxis in Australia and New Zealand:

- Modern Slavery Policy
- Modern Slavery Statements
- Modern Slavery Intranet Page
- Purchase Order Terms and Conditions
- Supplier Contract Templates
- Modern Slavery Response Management Process
- Procurement Playbook and Modern Slavery Risk Guide
- Trade Compliance Procedures and Reporting Structure
- Trade Compliance Intranet Page

Modern Slavery Risk Assessment

Ongoing Modern Slavery Risk Assessments deepen our insights:

- Annual Desktop Risk Assessments
- Reviewing Supplier Modern Slavery Statements
- Supplier Self-Assessment Modern Slavery Surveys
- Supplier Engagement and Communications Plan
- Procurement Playbook for Sourcing Risk Assessments
- Results and Recommendations Report

Modern Slavery Risk Management

Annual Risk Management Action Plans are executed:

- Supplier Collaboration
- Modern Slavery Risk Analysis Tool
- Supply Chain Investigations
- Framework Effectiveness Reviews
- Executive Team Progress Updates
- Governance Continuous Improvement
- Supporting Customer Modern Slavery Surveys

Training and Education

Investing into Training and Education is critical:

- Modern Slavery Awareness Module
- Modern Slavery Intensive Training Sessions
- Trade Compliance Training
- Anti Bribery & Corruption Training
- Employee Code of Ethics Training

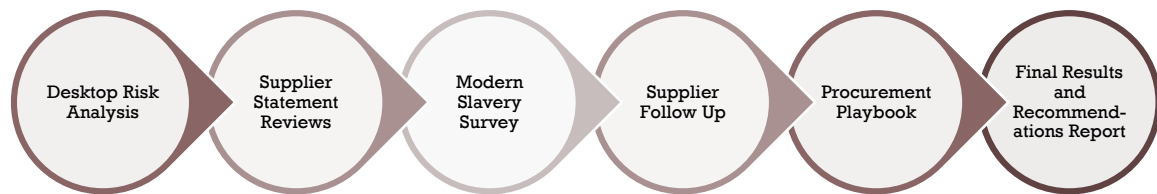
Identified Potential Modern Slavery Risks

After reviewing our over 2000 active suppliers, we have identified the following potential risks of Modern Slavery Practices within our supply chains.

Domestic Geographic Risks	By count, 93% of our active tier one suppliers are also based in Australia and New Zealand. Although always a potential risk, the Modern Slavery Index confirms low prevalence, low vulnerability, and low percentages of both Australian and New Zealand's populations as potentially living in Modern Slavery.
International Geographic Risks	Although the minority of our tier one and tier two suppliers are based internationally, together they make up a significant portion of our total spend. We have identified over 30 origin countries within our supply chains. We have assessed the varying geographic risks for each known origin country utilising data from "The Modern Slavery Index" published by the Walk Free Foundation. Over 84% of our spend was with Low-Risk countries, including Australia and New Zealand. All higher risk country sourcing is prioritised for deeper Risk Assessment, including our Modern Slavery Survey's and our Supply Chain Investigations.
Industry and Sector Specific Risks	Our taxonomy classifies our spend into 23 tier one industries. We identified 5 of these industries as having higher potential Modern Slavery Risks, based on findings from the "Global Slavery Index" now published by the Walk Free Foundation. <ul style="list-style-type: none">• Facilities Management• Factory Consumables• Human Resources• IT & Telecom• Professional Services
Product and Service Specific Risks	Our taxonomy classifies our spend into 129 tier two product and service types. Of these we identified 8 relevant spend categories as having higher potential Modern Slavery risks based on Guidance from the Department of Home Affairs. <ul style="list-style-type: none">• Cleaning and Gardening• Hand Tools• IT Software and Services• Maintenance• Packaging Equipment• Solar Panels• Temporary Labour• Workwear and Protective Clothing
Supplier Specific Risks	We also acknowledge there are entity specific risks which our suppliers have the responsibility to manage through corporate governance, legal compliance, and effective risk management. Where warranted, we validate our Supplier Specific Risk levels by assessing their Modern Slavery Statements or using our Self-Assessment Survey.

Section 6: Actions Taken to Assess and Address Modern Slavery Risks

Modern Slavery Risk Assessment Actions



Our 2023 Modern Slavery Risk Assessment process included the following actions.

Procurement Playbook

Our Procurement Playbook, as our internal guide for undertaking Procurement activities within Aliaxis ANZ, continues to be utilized and updated. It details process requirements across sourcing and conducting supplier modern slavery risk assessments.

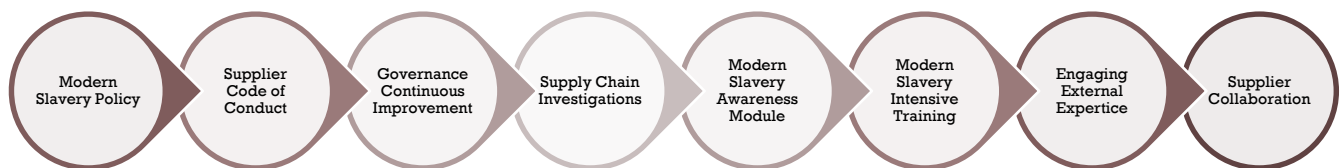
Case Study: Proactive Risk Assessment

A distributor introduced a Titanium Dioxide product for trialling. Drawing from our Procurement Playbook, which outlines country-specific risks, the producer was proactively assessed, an informed decision was made and the trials of the product from this producer were discontinued.

Desktop Risk Analysis	<p>We conduct an annual Desktop Risk Analysis, including all active suppliers within our Aliaxis ANZ supply chains. External Modern Slavery data from The Modern Slavery Index and local governments provides an objective and evidence-based methodology to calculate risks for greater focus and prioritization. Data is further enriched by our stakeholders.</p> <ul style="list-style-type: none"> • Aliaxis Master Data (supplier countries, categories etc) • Aliaxis Supplier Specific risk data • External Geographic risk data • External Industry & Sector risk data • External Product & Service risk data
Supplier Statement Reviews	<p>Of our active suppliers in CY 2023, we identified 246 who published Modern Slavery Statements into the Australian Register. We also identified 69 suppliers who published Modern Slavery Statements in the UK Register, instead of or in addition to those in the Australian Register. Where warranted by risk level, supplier Statements were reviewed.</p>
Modern Slavery Survey	<p>Our Supplier Sustainability Self-Assessment Survey is focussed on assessing Modern Slavery risks in our extended supply chains. Our Survey was sent to over 220 suppliers in 2023. Recipients were prioritised based on their desktop risk assessment levels. Survey focusses included:</p> <ul style="list-style-type: none"> • Employment Conditions • Child Labour and Forced/Bonded Labour • Human Trafficking • Supplier Policies & Controls • Supplier Supply Chain Risk Management

Supplier Follow Up	Our Survey was further updated and utilized to target our higher inherent risk suppliers. Supplier responses indicating higher risks were individually followed up and validated. Suppliers were provided our Modern Slavery Statement and requested to acknowledge our Supplier Code of Conduct.
Risk Analysis Tool	Development of a risk analysis tool that now includes enabling a continuous monitoring approach and improved data governance.

Modern Slavery Risk Management Actions



After identifying our potential Modern Slavery risks, we developed a Modern Slavery Risk Management Action Plan. Below is an overview of our actions within 2023.

Governance Continuous Improvement	<p>Our Corporate Governance Framework are living resources we continue to utilise and review for improvement opportunities. New team members are trained, and new suppliers onboarded.</p> <ul style="list-style-type: none"> • Ethics Alert Channel • Whistleblowing Policy • Employee Code of Conduct • Supplier Contract Templates • Purchase Order Terms and Conditions • Trade Compliance
Supplier Collaboration	<p>We collaborated with our suppliers, delving into their practices, examining their Modern Slavery Statements, sustainability reports, and meticulously reviewing their responses to sustainability surveys. This included review of their past responses to assess year-on-year progress. When we identified potentially elevated risk levels, we conducted thorough assessments and validations. Furthermore, we actively communicated our own statements and insights.</p>

Case Study: Sourcing Process

Where suppliers respond to our Self-Assessment Questionnaire (SAQ) with 'Work in Progress,' we monitor for improvement year on year. Concerned about a supplier's responses to a critical question, follow-up actions were initiated, including seeking acknowledgment of our Supplier Code of Conduct (SCOC). Instead of directly addressing our requests, the supplier submitted an extensive sustainability report, which unfortunately inadequately addressed our concerns related to Human Rights. Management recognized the issue and demanded a definitive resolution. Consequently, an overseas supplier meeting was convened at the supplier's regional headquarters, with a strong emphasis on Human Rights. Representatives from both the Distributor and Producer were present. The outcome: formal SCOC acknowledgment and enhanced clarity regarding the 'Work in Progress' response. Additionally, adjustments were made

Resin Category Review	Resins and Additives is both a critical and high-spend category, which also has supply operations in many overseas locations. We have thoroughly assessed inherent risks associated with the category and following numerous completed actions, we now operate with heightened awareness of geographic risk factors and proactively consider this in strategy development and for sourcing activities.
Employee Code of Ethics	As a Globally led activity, our Employee Code of Ethics was updated and relaunched, supported by mandatory online training for all staff.
Supplier Code of Conduct acknowledgements (SCOC)	We actively collaborate with our suppliers to seek their acknowledgement of our Supplier Code of Conduct. In 2023, we established an ambitious goal of achieving an ongoing 80% regional spend coverage, a 10% increase from the previous year. By year-end, we not only exceeded this target but also proactively targeted those suppliers with inherent Modern Slavery risk, irrespective of their spending levels.
Risk Training	After successfully launching the Modern Slavery Awareness Module and implementing the SCOC training in 2022, we partnered with HR to establish a robust system for ongoing monitoring of new starters and role changes. This has ensured consistent oversight of training requirements and progress, with regular reporting.
Trade Compliance and Adverse Media	With the 2022 Global Framework for Trade Compliance in place, robust processes and procedures were established across the APAC region in 2023. As a result, all suppliers are now subject to continuous monitoring for trade compliance risk. Furthermore, they undergo additional scrutiny to detect any adverse media associations.





Action Effectiveness, Consultations, and Approval



Section 7: Assessing the Effectiveness of the Actions

The following is in place to assess the effectiveness of our Modern Slavery framework.

Program Reviews	<p>Aliaxis undertakes regular reviews of our Risk Management Program, providing updates within weekly meeting forums. This includes assessing our progress against action items and the impact those actions have made. We utilise year-on-year data to assess the progress of ourselves and our suppliers.</p>
Executive Management Governance	<p>Our Aliaxis Asia Pacific Executive Team, Global Procurement Director, and Global Sustainability Director are regularly updated on our Modern Slavery initiatives. This process is led by our Asia Pacific Procurement Director and Procurement team.</p>
Ongoing internal and external feedback	<p>We have ongoing supplier engagement and communication plans throughout our Risk Assessment and Risk Management processes. We receive customer feedback following support of their Risk Assessment and Survey processes. We also engage with our Global Aliaxis colleagues, including in Aliaxis UK who are subject to their own local legislative modern slavery risk management requirements.</p>
Whistleblowing	<p>Aliaxis operates a global alert channel empowering our employees to raise an alert if they believe that something may not align with the purpose and behaviours we strive to achieve every day, such as any suspected violations of laws and regulations, our Code of Ethics or other group policies. In 2023, we did not receive any report containing allegations of modern slavery or child labour related to the operations of Aliaxis Australia and New Zealand or their suppliers.</p>

Section 8: Our Consultation Process

Consultation with Reporting Entities

During the development of this Modern Slavery Statement for CY 2023, we actively engaged and consulted with all our Aliaxis owned operations within Australia and New Zealand. As detailed within Section 4, these included review meetings with the Executive teams of each business. Dates of these meeting are below:

Entity	Date
Vinidex Pty Limited	09/05/2024
Yatala Plastics Pty Limited	09/05/2024
Zezi Pty Limited	09/05/2024
Philmac Pty Limited	10/05/2024
Marley New Zealand Limited	15/05/2024
Dynex Extrusions Limited	10/05/2024
RX Plastics Limited	10/05/2024

During the consultation sessions with our entities, we discussed details of the Modern Slavery Act 2018, including our reporting requirements. We discussed our Risk Assessment process and results. We provided information on our Risk Management Action Plan to address the risks identified. We provided our entity stakeholders with relevant supporting materials and Framework updates.

Consultation with the Entity giving this Statement

This Modern Slavery Statement is on behalf of our Aliaxis owned Operations in Australia and New Zealand. The issuing entity of this Statement is therefore Aliaxis.

As detailed within Section 2; Aliaxis Group S.A. (BE) is a privately owned business, with global headquarters in Brussels. Although Aliaxis is not a legally registered business within Australia or New Zealand, there is an overarching Aliaxis Asia Pacific Executive Management team.

Entity	Date
Aliaxis Asia Pacific Executive Management Team	15/05/2024

Post our consultation with each of our trading entities, we also held a consultation session with our Aliaxis Asia Pacific Executive Management team, we also discussed details of the Modern Slavery Act 2018, including our reporting requirements. We discussed our Risk Assessment process and results. We provided information on our Risk Management Action Plan to address the risks identified. We provided our entity stakeholders with relevant supporting materials and Framework updates.

Section 9: Other Relevant Information

Our Aliaxis Operations within the UK have released annual Modern Slavery and Human Trafficking Statements since 2016, in alignment with the UK's Modern Slavery Act 2015. Their latest Statement can be viewed on their website, via the "Modern Slavery Statement" link on the website at <https://www.aliaxis.co.uk/legal-notice>.

There is no additional relevant information to be disclosed.

Section 10: Statement Approval

In accordance with Section 14 of Modern Slavery Act 2018, it is confirmed that statements given by reporting entities included in this "Modern Slavery Statement for Aliaxis Operations in Australia and New Zealand" have been reviewed and approved by the principal governing body of each entity. For our Australian based businesses this was Board Approvals. For our New Zealand based businesses this was Executive Approvals. Our approval dates are below:

Entity	CY 2023 Modern Slavery Statement Approval Date
Vinidex Pty Limited	21/06/2024
Yatala Plastics Pty Limited	21/06/2024
Zezt Pty Limited	21/06/2024
Philmac Pty Limited	25/06/2024
Marley New Zealand Limited	21/06/2024
Dynex Extrusions Limited	21/06/2024
RX Plastics Limited	21/06/2024

The signatory for this "Modern Slavery Statement for Aliaxis Operations in Australia and New Zealand" is Mark Nykiel, our CEO of Aliaxis Asia Pacific.

Signed: 27 June 2024



Mark Nykiel
CEO Aliaxis Asia Pacific

Contact Details

If you have any queries, please contact us:

Aliaxis Procurement Team

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