

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Company Profile

Star Packing Solutions (“Star”) provides innovative and sustainable supply solutions of essential products and services. Star are committed to working with all our product suppliers to ensure the highest standards are maintained in all areas of corporate responsibility. Our head office is based in Melbourne, Australia and the business is involved in sourcing, consolidating, and delivering a wide range of non-food consumable products across a variety of market sectors.

We do not manufacture any of the products we supply and most of the products we sell are sourced locally by our business. As our business continues to grow, so does our supply chain.

Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. The United Nations and Walk Free Foundation estimate there are approximately 40 million victims of modern slavery around the world. 16 million of these victims are exploited in the private economy. Modern slavery can occur in every industry and sector.

Our responsibility

At Star we have a zero-tolerance approach to modern slavery and are committed to preventing slavery and human trafficking in our operation and supply chain. We expect our suppliers to meet or exceed local legislative requirements and applicable international requirements for workers’ welfare and conditions of employment, such as those set by the International Labour Organization (‘ILO’) and the Ethical Trading Initiative (‘ETI’). We aim to ensure that our suppliers apply these standards within their operations and their own supply chains.

We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking.

Risks of modern slavery practices in our supply chain

We have conducted a risk assessment of our supply chain by considering:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- The insights of labour and human rights groups

Some of the possible risks identified in our operations and supply chains are:

- **Supply coming from higher-risk countries:** supply coming from countries where it is reported to have a high prevalence of modern slavery or labour rights violations, other human rights violations.
- **Working with suppliers in regions with temp workers:** working with suppliers in regions that employ temporary, seasonal and/or immigrant workers.
- **Demanding delivery timeframes:** delivery timeframes that might require suppliers to engage in excessive working hours, make cost savings on labour-hire or rapidly increase workforce size.

Risk mitigation and due diligence processes

Building an ethical supply chain is a high priority for Star and our customers. We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. We believe that building relationships and trust with suppliers is critical when it comes to preventing and identifying incidences of modern slavery. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

Detailed below is our approach for identifying and preventing slavery and human trafficking in our operations:

Policies in relation to slavery and human trafficking

Star adheres to a comprehensive suite of Corporate Responsibility ('CR') policies and standards. Those policies and standards reflect the UN Universal Declaration of Human Rights and require compliance with internationally recognised requirements for workers' welfare and conditions of employment as defined by the ILO or the ETI which specifically prohibit forced labour i.e. slavery and human trafficking, unfair wages and working hours, discrimination

- All suppliers are provided with **Star's Ethical Sourcing Policy** which is based primarily on Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions. This Policy outlines the minimum ethical standards that all suppliers, including sub-contractors engaged by suppliers, must comply with when producing and supplying goods to Star.
- All employees are provided with a **Code of Conduct** - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.

Supplier due diligence and audits

Star conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- All suppliers are provided with Star's Ethical Sourcing Policy which they must warrant they comply with at all times.
- Assessing risks in the provision of services on an ongoing and continuous basis.
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts. Our Audit program has been suspended in 2020 due to the COVID19 pandemic but it will resume as soon as it is safe to travel overseas and border restrictions permit.
- Requiring improvements to substandard employment practices.
- Terminating suppliers that fail to improve their performance in line with our requirements.

Awareness

Star has raised awareness of modern slavery issues by putting up posters across our facilities that are focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

Measuring how we're performing

Star has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain.

Our Ongoing Commitment

Star commits to act with integrity in all our business operations and to actively implement the due diligence process and mitigation actions described above, to ensure human rights are respected in our supply chain.

This statement been approved by the Board of Star.

A handwritten signature in black ink, appearing to read "A. Field".

Adrian Field
Board Chairman