MODERN SLAVERY POLICY

Gold Titan Pty Ltd | Trading as EcoSet Australia
ABN 47 124 061 169 | Version 1.1

1. Purpose and commitment

Gold Titan Pty Ltd, trading as EcoSet Australia (EcoSet), opposes modern slavery in all forms, including forced labour, child labour, human trafficking, debt bondage, servitude and deceptive recruitment. We commit to identifying, preventing and responding to potential exploitation in our operations and supply chains, in a manner proportionate to our size and influence.

2. Scope and business context

This policy applies to EcoSet management, employees and contractors and informs relationships with manufacturers, product and packaging suppliers, freight operators, warehousing providers and other service providers. EcoSet supplies timber flooring adhesive and related flooring products in Australia. We recognise that risks may occur at upstream manufacturing, raw-material sourcing, transport and subcontracted labour stages, where visibility can be limited.

3. Employment and supplier standards

We expect all workers to be engaged voluntarily, paid lawfully, treated safely and respectfully, and free from coercion, threats, unlawful document retention and exploitative recruitment fees. Suppliers are expected to comply with applicable labour laws, prohibit forced and child labour, and communicate equivalent expectations to relevant subcontractors. These are our standards and expectations, not a representation that all suppliers have been independently audited.

4. Identifying and prioritising risk

When selecting or reviewing suppliers, EcoSet will consider available information on country and sector risks, use of migrant or agency labour, recruitment fees, subcontracting, unusually low prices, limited transparency and other warning signs. Higher-risk relationships may warrant further questions, supporting documents or management review before orders are continued or expanded.

5. Prevention and due diligence

EcoSet will seek appropriate supplier assurances about labour practices, communicate this policy to relevant business partners, and consider modern slavery concerns in purchasing decisions. If concerns emerge, management will request information and consider proportionate corrective measures. We will not claim supplier verification, audits or risk assessments have occurred unless documented.

6. Raising and addressing concerns

Employees, suppliers and other stakeholders may report concerns to company management using the contact channels published on the EcoSet website. Reports will be handled sensitively, with confidentiality maintained where practicable and no retaliation for good-faith reporting. Management will assess concerns promptly, prioritise worker safety, seek corrective action where appropriate and consider pausing or ending supplier relationships or contacting competent authorities. Ending a relationship will not automatically be treated as the best outcome for affected workers.

7. Accountability and awareness

Gold Titan Pty Ltd management owns this policy and is responsible for oversight, supplier-risk decisions, response to reports and annual review. Personnel involved in procurement or recruitment will be informed of relevant warning signs and escalation procedures. Significant concerns and actions will be recorded by management.

8. Objectives and monitoring

EcoSet aims to: (a) consider modern slavery risk when onboarding new material suppliers; (b) review priority suppliers as information becomes available; (c) record material concerns, follow-up actions and outcomes; and (d) review whether staff awareness or supplier documentation needs improvement. Management will evaluate progress annually using records of supplier reviews, concerns raised, actions taken and outstanding issues. These are forward-looking objectives, not claims of completed assessments.

9. Review, approval and publication

This policy will be reviewed at least once each year and earlier if material risks, business operations or relevant requirements change. Management will document any substantive changes and make the current approved policy publicly accessible on the EcoSet website. This policy is not a statutory annual Modern Slavery Statement under the Modern Slavery Act 2018 (Cth); any separate reporting obligation must be assessed independently.