

Modern Slavery Statement

1 May 2020 to 30 April 2021



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Introduction

According to the estimates of the Global Slavery Index, around 15,000 individuals are held in modern slavery in Australia by way of migrant worker exploitation, debt bondage, and deprivation of liberty.¹ The *Modern Slavery Act 2018* (Cth) (the **Act**) requires that certain entities operating or based in Australia report on the risks of modern slavery in their operations and supply chains and the actions undertaken to address these risks. Reporting entities subject to the Act are required to produce an annual modern slavery statement.

Modern slavery, according to the Act, describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. Modern slavery applies to any conduct that would constitute²:

- (a) an offence under Division 270 or 271 of the *Criminal Code*; or
- (b) an offence under either of those Divisions if the conduct took place in Australia; or
- (c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- (d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Eight types of modern slavery are included: human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and the worst forms of child labour.³ Modern slavery only applies to serious exploitation and does not include practices like substandard working conditions or underpayment of workers, though these practices are also harmful and may be present in some situations of modern slavery. Sectra PTY Limited fully supports the objectives of the Modern Slavery Act and has prepared this statement for the period of 1 May 2020 to 30 April 2021 (**Reporting Period**).

Identify the reporting entity

SECTRA PTY LIMITED
ABN 67 105 376 190

Describe the reporting entity's structure, operations and supply chains

Sectra PTY Limited (**Sectra ANZ**), based in North Ryde, NSW, is the Australian and New Zealand branch of Sectra's global operations. We are a registered Australian Private Company that has been active since 02 July 2003. Given Sectra ANZ's status as a wholly-owned subsidiary, the remainder of this statement will refer to the parent company **Sectra AB** (hereinafter *Sectra*).

Sectra offers solutions for medical IT and cybersecurity, with the aim of contributing to a healthier and safer society. The company's headquarters are in Linköping, Sweden, but we have offices around the

¹ *Country Study: Australia*. (2018). Global Slavery Index. <https://www.globallslaveryindex.org/2018/findings/country-studies/australia/> ²

Modern Slavery Act 2018 (Cth) s. 1.4 (Austl.).

³ *Modern Slavery*. (2018). Home Affairs. <https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx>

world and customers in more than 60 countries. As of 01 July 2020, we have more than 800 employees worldwide and net sales of 1.7 billion SEK (equivalent to \$264 million AUD on 01/07/2020).

The company's model for working with customers, distributors and strategic partners is based on responsibility, transparency and knowledge sharing. We endeavour to build long-lasting relationships which allow us to develop both mutual respect and an understanding of each other's values. These close, long-term partnerships play a very important role in Sectra's success. While increasing our market shares and winning the loyalty of new customers is of paramount importance to us, we refuse to compromise when it comes to our business ethics and responsibilities.

Describe the risks of modern slavery practice in the operations supply chains of the reporting entity and any entities it owns or controls

Based on the company's product portfolio, business model and value chain, we consider the risk of modern slavery practices in our operations to be negligible. Nonetheless, Sectra's Board has established a Code of Conduct (**Code**) that addresses various areas, such as product safety, work environment, confidential information, anti-corruption, respect for human rights, conflicts of interest, use of social media and competition. It also describes the values and basic principles that Sectra expects its Board members, managers, employees, consultants, and partners to follow. When it comes to external parties and sub-suppliers, this is regulated by the terms of agreement or (in the case of large companies over which Sectra has only a minor influence) the choice of sub-supplier.

Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

The Code of Conduct is included in all distribution agreements and Sectra is entitled to terminate its business relationships at short notice if the Code is not followed. Should this happen, Sectra is also entitled to transfer its ongoing service agreements to a new partner or take over the agreements itself, making it clear to the party in question that Sectra treats such breaches with the utmost seriousness. There is a follow-up every year with all the company's distributors and business partners, which can lead to a more detailed review of these issues as needed. Reviewing partners and suppliers is part of the annual management review and is regulated by Sectra's quality management system. In addition, regulatory partner audits are conducted frequently in accordance with management procedures.

Describe how the reporting entity assesses the effectiveness of these actions

In light of our assessment that the risk of modern slavery practices in our operations is negligible, Sectra does not currently have any formal monitoring systems in place. However, promoting human rights in all parts of Sectra's operations is of the utmost importance to us. For this reason, we address modern slavery and human rights every fiscal year in the Annual Report as part of Sectra's Code of Conduct. Sectra respects the rights enshrined in the International Bill of Human Rights⁴ in every country where

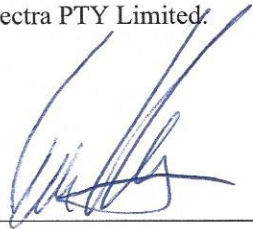
⁴ *International Bill of Human Rights*. (1948). United Nations.
<https://www.ohchr.org/documents/publications/factsheet2rev.1en.pdf>

we operate. We also respect the principles of fundamental rights in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.⁵

Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)

Sectra PTY Limited does not own or control any other entities.

This Modern Slavery Statement is made in accordance with section 14 of the *Modern Slavery Act 2018 (Cth)* and represents Sectra PTY Limited's statement for the period from 1 May 2020 to 30 April 2021. It has been approved by 1) Torbjörn Kronander, the president and CEO of Sectra AB, acting as the principal governing body for the reporting entity, and 2) Bart Thielen, the ANZ managing director of Sectra PTY Limited.



Name: Torbjörn Kronander
Organisation: Sectra AB
Role: President & CEO
Date approved: 16 Aug 2021



Name: Bart Thielen
Organisation: Sectra PTY Limited
Role: Managing Director
Date approved: 24 May 2021

⁵ *Declaration on Fundamental Principles and Rights at Work*. (1998). International Labour Organisation.
https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/normativeinstrument/wcms_716594.pdf

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