



# Modern Slavery Statement 2021

Winson Group, incorporating Signet Pty Ltd  
and insignia Pty Ltd

# About the Winson Group

## **Group Summary:**

Winson Group Pty Ltd as the trustee of the Winson Unit Trust, whose principal activities are to administer and support the operations of its wholly owned subsidiaries: Signet Pty Ltd and insignia Pty Ltd, referred to hereafter as The Winson Group:

- Signet Pty Ltd: Signet is an importer. Manufacturer and distributor of packaging, cleaning, stationery and wholesaling consumables. Signet manufacturers industrial marking products as well as flexible films at sites within Australia.
- Insignia Pty Ltd is a leading national labelling manufacturer, importer and distributor of label printers and applicators.

## **The Winson Group Modern Slavery Statement:**

This statement, pursuant to the Modern Slavery Act 2018 (Cth), sets out the actions taken by the Winson Group to address modern slavery risks in the business and supply chains over the financial year ending 30 June 2021 and planned actions for the financial year ending 30 June 2022.

## **Modern Slavery Policy:**

- The Winson Group understands that Modern Slavery is a complex and multi-faceted problem. The Group is committed to continually reviewing, identifying and reducing modern slavery risks in the Groups supply chains.
- This commitment is captured in the Group's Modern Slavery policy which commits to:
  - Conducting risk assessments to determine which parts of the business and which supply chains are most at risk so efforts can be focused on these areas.
  - Engage directly with new and existing suppliers to set our expectations and gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.
  - educate and train our staff involved in selecting and managing suppliers so that they understand what modern slavery is, what circumstances may pose a risk and how to report any potential issues; and
  - always be prepared to respond if we find modern slavery occurring in our operations or supply chains, including responding to modern slavery complaints.

# Our structure, operations and supply chains

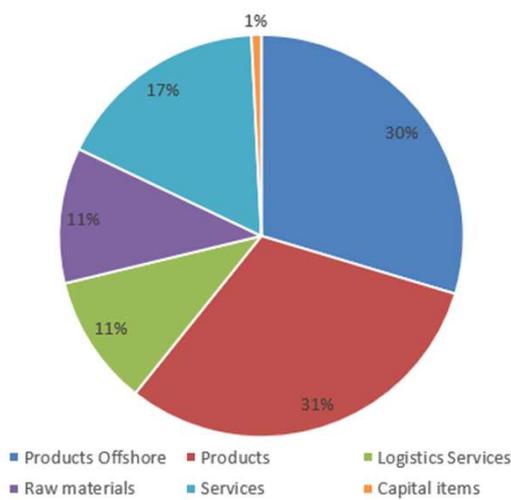
The Winson Group adheres to a common set of Group policies principles and practices for modern slavery risk management. Both operating businesses of the group conduct all operations domestically with Australia, which consists of manufacturing, warehousing and distribution to the domestic market. With the insignia business also conducting project based configuration and installation of manufacturing hardware as well as ongoing service and support of this equipment.

In summary our supply chains cover:

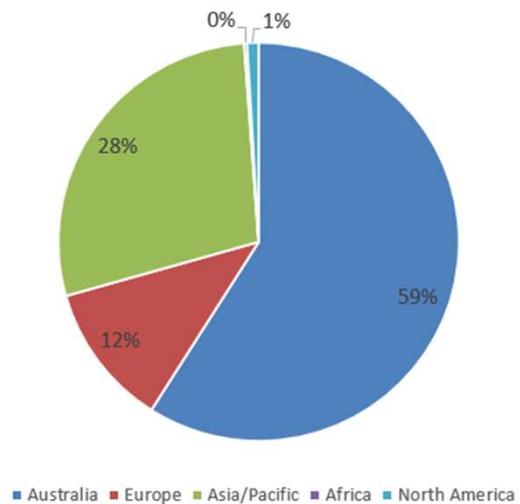
- Services, both domestic and offshore
- Domestic product supply
- Offshore product supply
- Capital items
- Utilities supply
- Supply Chain enablers (international and national freight)

The relative scales and distribution of these supply chains can be seen in the graphs below. The internal operations of the Group are covered by our policies covering all aspects of safe, fair and ethical work practices. Further the group is an active member of Sedex and is regularly audited against the SQ requirements of Sedex.

Supply Chain Segments (% of Spend)



Supply Chain Geographical Locations



# The risks of Modern Slavery in our the operations and supply chains.

Understanding the risks of modern slavery in the Group's supply chains requires a structured approach. As a result the following rigorous and structured four step methodology has been developed to manage modern slavery risks in our operations and supply chain.

Risk Management Steps	
1	Assess the risk factors present in our supply chains and operations
2	Identify and prioritise modern slavery risk focus areas
3	Identify and implement actions to further reduce the risks of modern slavery
4	Review the effectiveness of actions to reduce risk and adjust as necessary

**Assessing our Supply Chain Risk:** In reviewing our supply chains and operations, which span a range of segments with diverse risk profiles we have developed the following factors that shape our risk profiles:

1. Geographic location of our operations/direct suppliers
2. Type (category) of service or supplier
3. Key resources in products
4. Skill requirements for the supplier/service

**Prioritising areas of highest assessed risk:** Reviewing our holistic supply chains and operations against the above criteria has identified three areas of priority effort:

Higher Risk Supply Profiles	
1	Offshore Product Supply
2	Onshore unskilled services
3	Offshore supply chain enablers (International Freight carriage)

# Actions taken to assess and address those risks

The Group has spent considerable time over the last 12 months understanding Modern Slavery Risks and assessing the risks, specifically:

- **Build our Corporate understanding:** As a group we have worked hard to understand Modern Slavery, its potential manifestations and the intent of legislation to promote the reduction in modern slavery risks.
- **Explore the practices already in place:** We have reviewed our existing policies and practices to understand and benchmark our current practices that contribute to minimising the risks of modern slavery. These include our offshore supplier verification and selection processes and our Supplier Code that includes specific requirements regarding modern slavery practices.
- **Engaging with industry experts to understand approaches to risk management:** The business has engaged with subject matter experts to understand the requirements and intent of legislation and how businesses can pragmatically meet their responsibilities.
- **Benchmark against contemporary good practice:** We have reviewed and benchmarked our practices against contemporary good practice to identify opportunities to further improve.
- **Assess the risks in our supply chains:** We have reviewed the risks in our supply chains and identified those supply chains most at risk of modern slavery. These focus areas have formed the basis for development of our action plan for the next 12 months.

**Actions when issues are identified:** The Group has found no instances of Modern Slavery through our assessments and reviews to date.

Should we determine Modern Slavery practices are present in our supply chains or operations we will assess the prudent course of action based on the circumstances. At a minimum we would look to use alternate partners and report these practices to relevant agencies.

# Assessing the effectiveness of our actions

The Winson Group has undertaken the following activities to assess the effectiveness our current practices at minimising the risks of modern slavery:

- Established a Lead within the Executive Leadership Committee for Modern Slavery and included reporting and discussion of Modern Slavery Risks into our Management reporting framework; and
- Commenced a review of our responsible procurement practices, including a review of our Supplier Code and new vendor processes.

In addition to the above, we regularly review and assess the effectiveness of our policies, codes, standards and procedures as part of our Risk Management Framework.

# Consultation with entities within the Group

In developing the Winson Group approach to Modern Slavery the following groups were consulted through the process:

- The Group Operations Leadership Team and various levels of management within the team including representatives with oversight of suppliers assessed as potentially more highly exposed to risks of modern slavery.
- Winson Group's Executive Leadership Team who have reviewed the outcomes of relevant assessments and endorsed the Modern Slavery Statement.
- The Winson Group Board who have oversight of our modern slavery risks through our Risk Management Framework. The Statement was approved by the Board and is signed by the Chief Executive Officer.

## Goals for the next 12 months

- **Explore expanded SEDEX membership:** The Group will investigate and consider expanded SEDEX membership to allow access the audited performance of suppliers in higher risk supply chains
- **Supplier ethical sourcing process enhancement:** Review, benchmark and where needed enhance our supplier selection processes to better assess the risks of modern slavery
- **Ongoing training for staff engaging suppliers:** Continue to build our corporate knowledge and skillsets in understanding, identifying and managing Modern Slavery risks.
- **Investigate ways to reduce risks in our logistics services partners:** Investigate how we can work with our Logistics partners to minimise Modern Slavery risks in the logistics services in our supply chain.

Signed on Behalf of the Winson Group



Guy Cowan  
Chair of the Board

Dated 19 March 2021