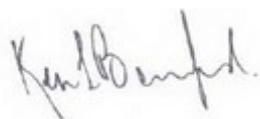


	Labelmakers Group Annual Declaration of Compliance to Modern Slavery and Social Workplace Accountability	December 2021
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Labelmakers Group Annual Declaration Statement of Compliance to Modern Slavery and Social Workplace Accountability

We declare that the following statement (report) is accurate and prepared in good faith and approved by the Board of Directors on Friday 10 December 2021, for Labelmakers Group Pty Ltd. 2020 - 2021 Statement of Compliance to Prevention of Modern Slavery and Social Workplace Accountability.



Kevin Bamford

Chairman of the Board



Adam Bamford

Managing Director

Labelmakers Group Pty Ltd. - ABN / ACN: 45 639 339 793 / 612 983 329

	<p>Labelmakers Group Annual Declaration of Compliance to Modern Slavery and Social Workplace Accountability</p>	<p>December 2021</p>
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Summary

The Labelmakers Group companies have monitored our direct labour recruitment, deployment, utilization, and remuneration practices in Australia, including in New Zealand, and found to be in full compliance with local and international labour laws and prevention of modern slavery as per the Australia Modern Slavery Act 2018.

Labelmakers continued to source 85% of its cost of supplied materials and services from reputable international businesses with their own monitoring and compliance practices to international labour laws and audited 35 of its major suppliers to be complying with preventing modern slavery.

The company will be monitoring the effectiveness of its Anti-Slavery and Ethical Sourcing Policy as per section 6.0 in this report to achieve its stated KPIs.

The Company maintained its membership to Sedex (being the world's leading ethical trade membership organisation working with businesses to improve working conditions in global supply chains). During this reporting period the company's labour protection, OHS, environmental and ethical practices were audited as per, ETI (Ethical Trading Initiative Code - founded on the conventions of the International Labour Organisation (ILO) and being an internationally recognised code of labour practice), Social Accountability (SA8000), ISO14001 and industry specific codes of conduct and found to be complying in protecting its workers' rights and maintaining its ethical sourcing practices.

1.0 The Company

Labelmakers Group design, print and manufacture self-adhesive labels, shrink sleeves, other forms of labels and cartons for the major food, grocery, beverage and home care companies in Australia and New Zealand.

The Company believes that sustainability starts with our value system and a principles-based approach to doing business. By incorporating the Principles of the UN Global Compact and the Commonwealth of Australia Modern Slavery Act 2018 into our strategies, policies, and procedures, we are committed to ensure compliance with the labour rights standards, legislation and statutory requirements in our supply chain processes and to act ethically upholding our basic responsibilities to people and planet and setting the stage for long-term success.

Labelmakers support and respect the protection of internationally proclaimed human rights and prohibit all forms of forced child and compulsory labour.

We seek to engage with suppliers who are in accord and share our core values. Suppliers must agree to Labelmakers Group Ethical Standard of Business and Responsible Sourcing policy and be in compliant. We evaluate and monitor suppliers' operations over a number of areas and require of them to cooperate and provide records for compliance.

2.0 Labelmakers Companies Mandatory Reporting and Declaration

During the reporting period of this statement, we have actively engaged, consulted with, and monitored the entities we own or control in the development of this statement, including:

- Labelmakers Group Pty Ltd – Head Office 55 Austrak Drive Somerton Victoria 3062 - Australia
- Labelmakers Group Pty Ltd – VIP Division 64 Freight Drive Somerton Victoria 3062 – Australia
- Labelmakers Flexibles and Linerless Pty Ltd – 33 Railway Road North Mulgrave NSW 2756 – Australia

	<p>Labelmakers Group Annual Declaration of Compliance to Modern Slavery and Social Workplace Accountability</p>	<p>December 2021</p>
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- Labelmakers WA Pty Ltd - 71 Paramount Drive Wangara WA 6065 - Australia
- Labelmakers Group Pty Ltd – NSW Division Unit 3 & 4, 1B Redbank Rd, Northmead – NSW 2152 – Australia
- Rapid Labels Pty Ltd - 1/25 Stud Road, Bayswater VIC 3153

We have provided training and distributed our policy for ethical sourcing and prevention of Modern Slavery to all divisions and as per the Modern Slavery Act 2018 reporting requirements.

3.0 Suppliers Approval Process

We acknowledge that there are potential risks of modern slavery in our supply chain processes as the result of their geographical location and the source of materials used in our products. Labelmakers have a [Supplier Approval Process](#) and the [Ethical Standard of Business and Responsible Sourcing](#) policies that we execute at the initial approval phase of contracting a new supplier. We subsequently monitor Suppliers' performance through the risk assessment process to ensure their compliance to our Ethical Standard of Business and Responsible Sourcing policy. We also acknowledge that, we lack full visibility in certain overseas markets, and this may carry additional risks of modern slavery, especially in secondary levels of our chain of suppliers and materials sourced for the Group.

4.0 Labelmakers Group Companies Sourcing Structure

Labelmakers Procurement Management Team at its Head Office, purchase the major materials used in the manufacturing of its products, or its subsidiary companies will buy directly but through the suppliers approved by the Group. 85 percent of the total cost of direct materials for the Group are sourced through reputable suppliers including Paper, Ink, Film, Cardboard, Adhesive manufacturers, and also for its machinery parts and components.

The company also purchase its support services and utilities from local and reputable sources with very low risk of Modern Slavery implications.

5.0 Our Commitment to Anti Modern Slavery Practices

During the last number of years, the company has joined [Sedex](#), world's leading ethical trade membership organisation, working with the members organisations, to improve working conditions in global supply chains and has participated in [Sedex Members Ethical Trade Independent Audits \(SMETA\)](#) to comply with:

- [Standard Business Ethics](#)
- [Labour Standards](#)
- [Health and Safety Regulations](#)
- [Structured Management Systems, Responsibility and Accountability](#)
- [Environmental Control Measure](#)

During this reporting period, we have implemented the Suppliers' Compliance and Risk Assessment and Rating procedure as part of our Group Anti Modern Slavery Policy and done the first-tier audit of about 35 suppliers.

6.0 Effectiveness of Labelmakers' Anti-Slavery and Ethical Sourcing Policy

The assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain is ongoing and evolving process that we are committed to continue and to build on. Whilst as indicated 85% of all our supplies are procured through known and reputable sources with their own policy for prevention of modern slavery, Labelmakers has set the following goals to achieve:

- A. Ensure Labelmakers Group Ethical Standard of Business and Responsible Sourcing policy is part of the supplier approval system and included in all contractual agreements.
- B. Formally assess up to 50% of our supplier for compliance in 2022 – 2023.
- C. Formally achieve another 25% supplier assessment in 2023 -2024.
- D. Achieve 100% supplier assessment by 2025.
- E. Continue Labelmakers' Group of companies' memberships with Sedex and participate in SMETA compliance audits as indicated in **5.0** above.

We will continue to measure and assess the effectiveness of our actions across key performance areas for our own and within our supply chain:

- Commitment and responsibility to prohibit Modern Slavery labour practices
- Level of commitment to monitor and assess outcomes against set targets for staff awareness and education
- Maintaining and meeting business responsibilities for safety, environment and reporting any non-compliance

7.0 Labelmakers Slavery Prevention Policy

Labelmakers Group acknowledges its responsibility within the Modern Slavery Act 2018 (Australia) to mitigate any form of Modern Slavery and to introduce a plan of action to:

- Educate staff on what modern slavery may encompass including; slavery, servitude, human trafficking, child and forced labour.
- Promote to staff the importance of raising any concerns they may have and protecting those who may raise issues found about modern slavery within our supply chain.
- Scope the risks, their classification by product or the origin of supply sources and prioritising action plans focused on preventive practices.
- Extend our understanding of modern slavery risks across our first-tier suppliers through supplier audits and risk assessments by the company or by a third-party certification body.
- Engage suppliers, recognising the required actions that must be implemented and carry out due diligence for identifying risks and remediation processes in collaboration with our supply chain partners.
- Regularly assess the effectiveness of our business strategy and actions towards this policy.
- Provide the annual statement and information considered relevant in compliance with the Act.

The above are implemented aligned with our Ethical Sourcing Policy, Code of Conduct, and the company's other policies related to the safety and wellbeing of our staff, contractors and suppliers of goods and services.



Kevin Bamford
Chairman of the Board



Adam Bamford
Managing Director

	Labelmakers Group Annual Declaration of Compliance to Modern Slavery and Social Workplace Accountability	December 2021
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8.0 Suppliers' Compliance and Risk Assessment and Rating

Labelmakers has started and assessed in choosing its Suppliers with consideration to potential social and environmental risks. The first part is in consideration to variety of factors including Supplier country of supply, industry specific risks, Supplier history and the Supplier's compliance management systems. Based on the initial screening for **Low, Medium, or High level of risk for compliance** one of the following methods has been and continue to be utilised to assess Suppliers' commitment:

- **Low Risk** - To sign a Supplier Declaration Statement (**attachment 1**)
- **Medium Risk** - Suppliers with this designation may be required to either complete a desktop audit or a site-based audit based on the results of the Supplier Self-Assessment Questionnaire (**attachment 2**).
- **High Risk**: Suppliers who are designated as higher risk will be required to complete a 2nd or 3rd party Responsible Sourcing audit (i.e. join as a member to Sedex and complete 3rd party SMETA audits).

I declare on behalf of _____

(Insert full legal name of entity) **Supplier Name/s**

ABN/S

(Insert ABN/S) _____

That:

1. I have read the Labelmakers Group SCM - 001GP Ethical Standard of Business and Responsible Sourcing and have understood the obligations we or our sub-contractors have.
2. I acknowledge that Labelmakers Group are committed to ethical, legal, and socially responsible practices.
3. I acknowledge that Labelmakers Group are relying on the statements I make in this declaration for the purposes of:
 - a. Labelmakers Group complying with its own legal obligations under modern slavery laws and Labelmakers Group's annual lodgement of Modern Slavery Statement to the Commonwealth Government of Australia; and
 - b. Ensuring our Supply Chain are committed to complying with the labour rights standards, legislation and statutory requirements in the countries in which they are operating in.

Name: _____

Position: _____

Signature: _____

Date: _____

Responsible Sourcing: Self-Assessment Questionnaire (SAQ)		Labelmakers Official Use
(Document No: SCM – 001GPF01)		
Supplier details		
1.	Supplier company name:	
2.	Describe goods and services provided:	
3.	Company website address:	
4.	List major supplier's customers:	
Details of the supplier representative completing this SAQ		
5.	Name:	
6.	Job title:	
	Number of years with the company:	
7.	Email address:	
Business and employees' details		
8.	Business address/s from which goods and services are originated:	
9.	Number of permanent employees on the site:	
	Male _____ Females _____ Children under 18 _____ Total _____	
10.	Number of contract / temporary employees on site:	

	Male _____ Females _____ Children under 18 _____ Total _____				
11	Hours and number of shifts worked:				
	Shift 1 _____ Shift 2 _____ Shift 3 _____				
Responsible Sourcing SAQ and Audit History		YES	NO	N/A	Don't Know
12.	Has the business completed a Responsible Sourcing SAQ?				
12a.	if yes what was the date of the SAQ:				
12b.	for what purpose (i.e., requested by a customer – name of the customer):				
13.	Has the company done any responsible Sourcing / Social / Ethical Audits on the supplier to Labelmakers (i.e., SMETA, SA8000, etc.)?				
	If yes what were the dates of the Audits:				
14.	Has the company done any other 2nd party or 3 rd party audits on its site?				
	2 nd party audits (name and date):				
	3 rd party audit (name and date):				
A. Health, Safety and Environment		YES	NO	N/A	Don't Know
A1.	Does your company have a health and safety program?				
A2.	Does the company have an OHS policy? If Yes please attached copy of the policy.				
A3.	Does your company have a structure to manage the OHS program?				
	If Yes above, whom the person in charge of OHS program reports to:				
A4.	Do you currently record workplace Injury Rates?				



Responsible Sourcing: Self-Assessment Questionnaire (SAQ)

(Document No: SCM – 001GPF01)

Revision 1

Attachment 2

A5.	Have you had work-related fatalities in the past 3 years?				
A6.	Do you have an appropriate fire warning system, safety evacuation procedures, and fire-fighting equipment (including persons trained in their usage) at your facility?				
A7.	Are all employees who require standard personal protective equipment (PPE) issued with these items at no charge?				
A8.	Are all employees required to undertake a safety induction when they start working for the company?				
A9.	Do you have trained first aiders, and easy access to first-aid boxes / equipment at your facility?				
A10.	Do you undertake any written risk assessments/job risk assessments for key tasks or chemicals which may have a safety, health or environmental impact?				
A11.	Do you agree to comply with the country's OHS and Environmental control laws and regulations where you supply goods and / or services to Labelmakers?				
B. Respect Labour and Human Rights		YES	NO	N/A	Don't Know
B1.	Do you agree to meet all labour law requirements of the country where you supply goods and services to Labelmakers for your business? – Including requirements below:				
	i) freedom of association and the effective recognition of the right to collective bargaining;				
	ii) the elimination of all forms of forced, modern slavery or compulsory labour;				
	iii) the effective abolition of child labour; and				
	iv) the elimination of discrimination in respect of employment and occupation?				
C. Increased Social Responsibility		YES	NO	N/A	Don't Know
C1.	Do you assess if your suppliers source their goods and services also from a Socially Responsible organisation?				



Responsible Sourcing: Self-Assessment Questionnaire (SAQ)

(Document No: SCM – 001GPF01)

Revision 1

Attachment 2

C2	Do you have visibility of the supply chain of your suppliers?				
C3.	Do you commit to conduct recruitment, procurement, and social investment activities in a fair, inclusive and diverse manner?				
	Please attached any related policies you have in relation to questions C1 – C3:				
	D. Conduct Business Fairly and with Integrity	YES	NO	N/A	Don't Know
D1.	Do you have a process to ensure that all managers and / or people with responsibilities in your business understand policies prohibiting bribery, corruption and fraud?				
D2.	Does the company have a written code of conduct?				
D3.	Will you declare all current (and future) potential conflicts of interest when working with Labelmakers?				
D4.	Do you have controls in place to safeguard against the improper use, loss, theft, abuse, unauthorised access or disposal of customer information, assets and property?				
	Declaration by person submitting this SAQ Confirmation				
	By submitting this form, you hereby declare:	Labelmakers Official Use			
	a) You are a duly authorised supplier representative;				
	b) You are permitted to complete this SAQ on behalf of the supplier company;				
	c) The information furnished herein is true, complete and correct; and				
	d) You will regularly review, and update information required by this SAQ				
	Signature:				
	Date:				