

Modern Slavery Statement

2022

Santé Global Pty Ltd

75 640 677 783





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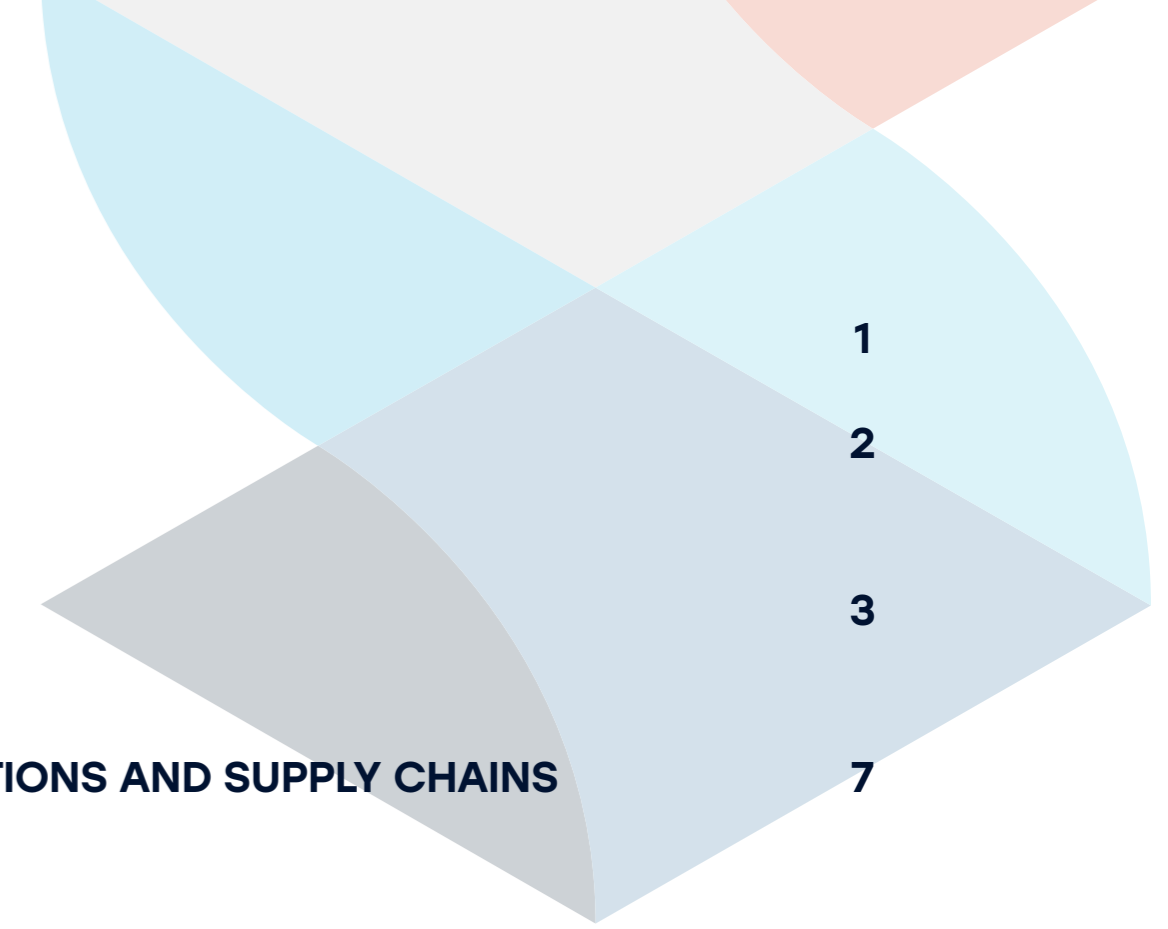
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INTRODUCTION

Modern slavery is a term used to cover practices such as forced labour, slavery, debt bondage, extreme forms of child labour, forced marriage, deceptive recruitment, and human trafficking. It is a human rights violation and exploitative crime that with devastating consequences for the health and wellbeing of its victims.

The International Labour Organisation estimated that forty million people were victims of modern slavery worldwide in 2016, approximately 5.4 victims for every thousand people. The most prevalent form of modern slavery is forced labour, which disproportionately affects people in more vulnerable circumstances, such as children and young people, undocumented migrants, and those living in poverty.

During the financial year (July 1, 2021 – June 30, 2022), Sante Global Pty Ltd [Santé] became a reporting entity for the Modern Slavery Act 2018 (Cth) and began the process of understanding their obligations to report on actions taken to address the risk of modern slavery our supply chains and operations. To assist them in this endeavour, Sante Global Pty Ltd has consulted with Unchained Solutions Pty Ltd to develop a governance framework to assess the risks and develop a strategy for continuous improvement.

This 2022 Modern Slavery Statement articulates our position on modern slavery and our plans in the 2023 financial year to understand and investigate the risk of modern slavery in our operations and supply chain.

Our aim with reporting our actions against Modern Slavery, is to be as transparent as possible. We hope our transparency will help other organisations to learn from our experiences, as they implement their own approaches. We welcome feedback, and look forward to learning from others, as we collaborate with our members and stakeholders to address this serious human rights violation.

A MESSAGE FROM THE DIRECTORS

In conjunction with our approach to Next Generation Sourcing, here at Santé we are dedicated to providing a positive social impact on society, our communities, and the environment for the next generation. We aim to use our standing as a global consortium to continue to act as a good citizen in advancing the global sustainability agenda – prioritising our efforts on the most rigorous ethical, professional and legal standards.

A commitment to the principles of corporate social responsibility complements our business strategy and corporate values, aligning Santé with global best practices and proven methodologies – establishing new precedents for the future of workplace safety and supply on a global scale. We will continue to invest resources and actively work towards creating positive transformational change, guaranteeing a seamless, stronger and smarter solution for all stakeholders.

At Santé, we have placed trust at the very apex of who and what we are – safeguarding business around the world through committed, reliable relationships. Integrated CSR considerations are factored into all business operations, centering our whole approach around the Universal Declaration of Human Rights and the United Nations Global Compact.

We would love to see ourselves as consistent economic drivers, contributing positively and effectively to the main pillars of sustainability – social, environmental and economic. Recognising the importance of these three factors alongside our global procurement and distribution network is of utmost importance and leaves our due diligence obligations as a first priority.



Sebastian Parsons
Director





CRITERION 1

IDENTIFY THE ENTITY

Sante Global Pty Ltd, ABN 75 640 677 783 is a private company registered in NSW. Sante Global Pty Ltd is part of the wider Santé Group, which comprises of the following companies worldwide. Together, these entities are referred to as Santé (“we”, “us”, or “our”)

- 1. Sante Global Pty Ltd**
- 2. Santé USA, LLC**
- 3. Santé Global LLP**

Santé is a global professional healthcare and sourcing service, headquartered in Sydney, Australia. Our reach is extensive, our results rapid. Santé assists governments, the corporate sector, medical and health services to facilitate business continuity by sourcing and deploying essential products anywhere in the world.

At the core of this focus, we guarantee the supply of quality-assured PPE and medical devices through a global network of manufacturers. Our strength lies 100% around our people, a dedicated body of committed, clear thinking problem solvers who share a dedication to absolute results. Santé’s success is due to talented people, collective expertise, and an ability to provide innovative solutions to our clients.

As the world around us and the markets we operate in continue to flex and change, we must adapt our business accordingly, to meet the needs of our clients and stakeholders. However, despite our versatility, we are committed to maintaining our high ethical standards, with respect for the human rights and dignity of all involved.

The importance of our social responsibilities is respected throughout our organisation, with all levels of management and leadership involved in the development, review, and enforcement of our relevant internal policies. Drawing on the wealth of experience within our team, we also engage with a number of subject matter experts to ensure our approach is informed and intelligent. In the culture of continuous improvement, our team continues to review and develop our processes and policies, making revisions and distributing to & re-training our teams as needed.

OUR POLICIES

- **Modern Slavery Policy** – outlines our commitment to the prevention of any modern slavery within our business and our associated suppliers, and actions we are taking.
- **Business Ethics Policies including Anti-bribery Policy** – Santé prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or any other inducement) by any of our team members.
- **Supplier Code of Conduct** – outlines our high expectations for the ethical values and principles of doing business that we expect our suppliers to share, based on the Ethical Trade Initiative Base Code
- **Public Interest and Whistle-blowing Policy** – clear whistle blowing policy so employees can feel comfortable to raise concerns about how colleagues are being treated, or practices within our business or suppliers without fear of reprisals.
- **Employee Handbook, Code of Conduct** – provides a clear, practical set of guiding principles and outlines our expectations to help employees make decisions as to how to behave and act as an individual at work, and as they represent Santé within the workplace.
- **Terms and Conditions of Purchase and Supply** – standard terms & conditions of purchase, including clauses relating to modern slavery, anti-bribery, and compliance with our code of conduct.

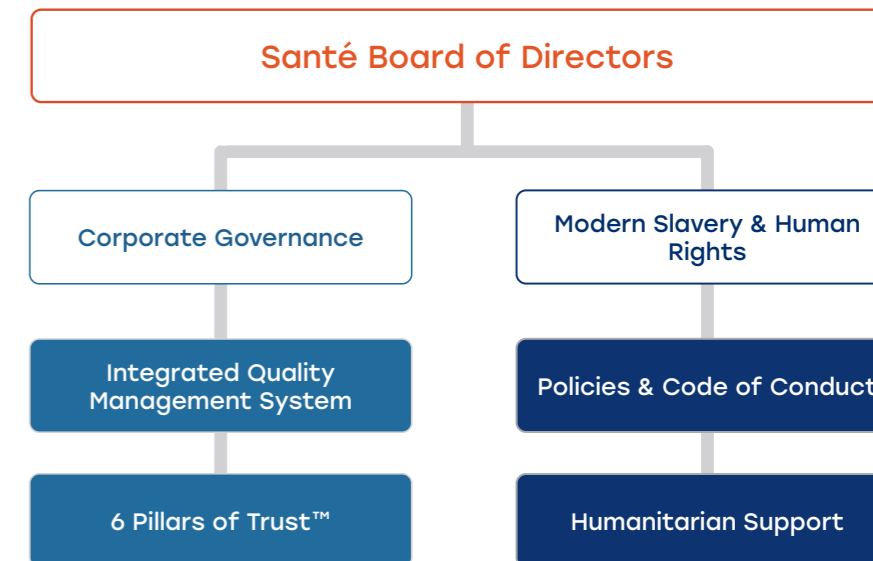


CORPORATE GOVERNANCE

Santé has a sturdy corporate governance framework in place and is governed by the Board of Directors. The Board is responsible for ensuring that Santé has an appropriate corporate governance structure and Santé continues to grow and develop for the advancement of the healthcare and procurement sector and in line with its constitution. Santé Global Pty Ltd is not owned by any parent entity, neither is it related to any subsidiaries or other entities.

The Board is also responsible for reviewing the organisation’s management policies at planned intervals to ensure alignment with strategic direction and opportunities for improvement. Santé’s Quality Management System is an accredited Integrated Management System audited by a third-party accreditation body comprising ISO 9001:2015 Quality Management System and ISO 14001:2015 Environmental Management System. Santé conducts international humanitarian work supporting the Rapid Relief Team, a registered not-for-profit charity organisation.

The Santé Board of Directors reviews progress of the Corporate Governance and Modern Slavery/ Human Rights program on a regular basis, as demonstrated in the schedule to the right.



| Item | August 2022 | February 2023 | August 2023 | February 2024 |
|--|-------------|---------------|-------------|---------------|
| Corporate Governance | ✓ | | ✓ | |
| Modern Slavery & Human Rights | ✓ | | ✓ | |
| Functions & Businesses Procurement and Legal | ✓ | ✓ | ✓ | ✓ |



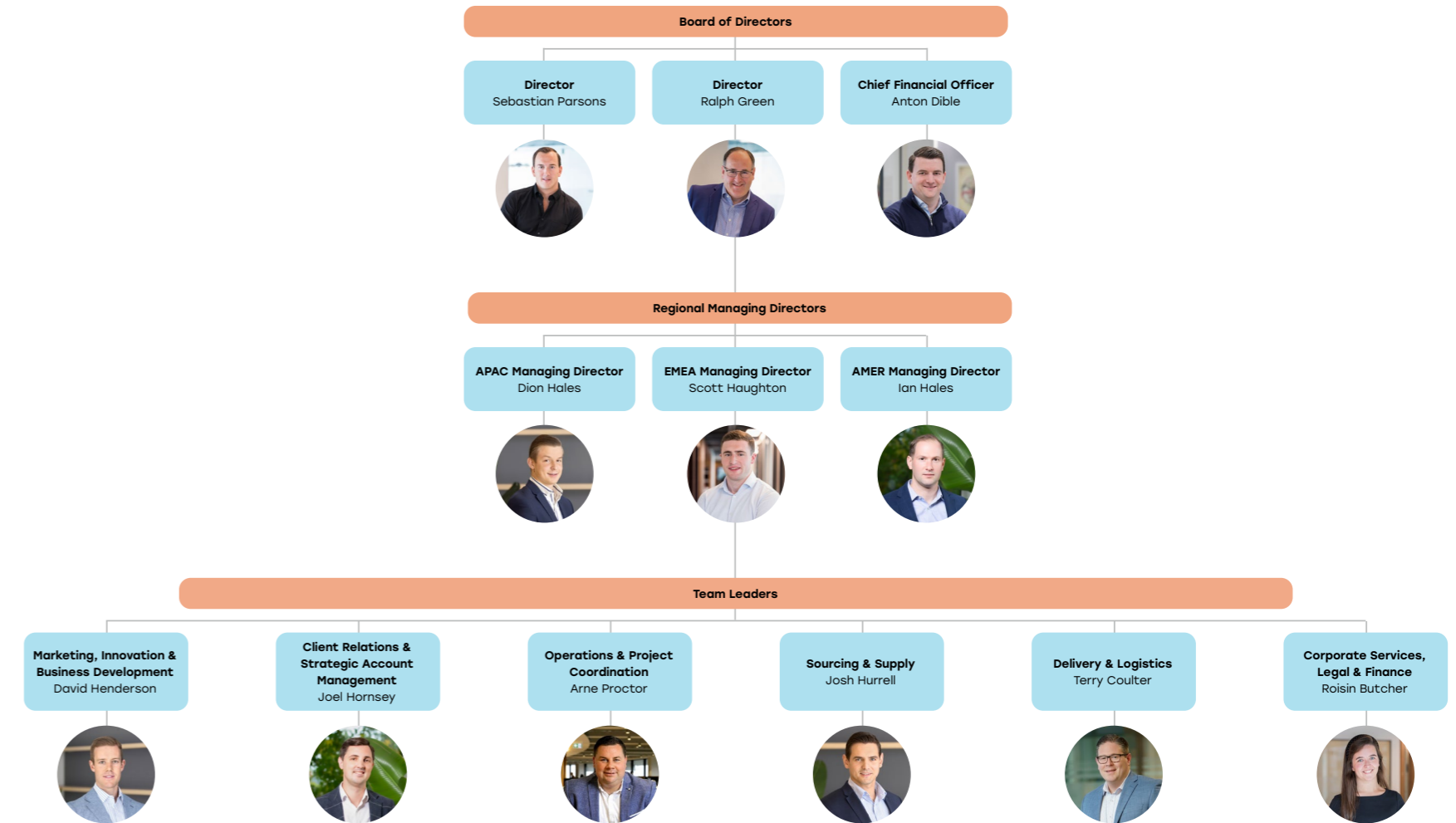
CRITERION 2

DESCRIBE THE ENTITY STRUCTURE, OPERATIONS AND SUPPLY CHAINS

ORGANISATIONAL STRUCTURE

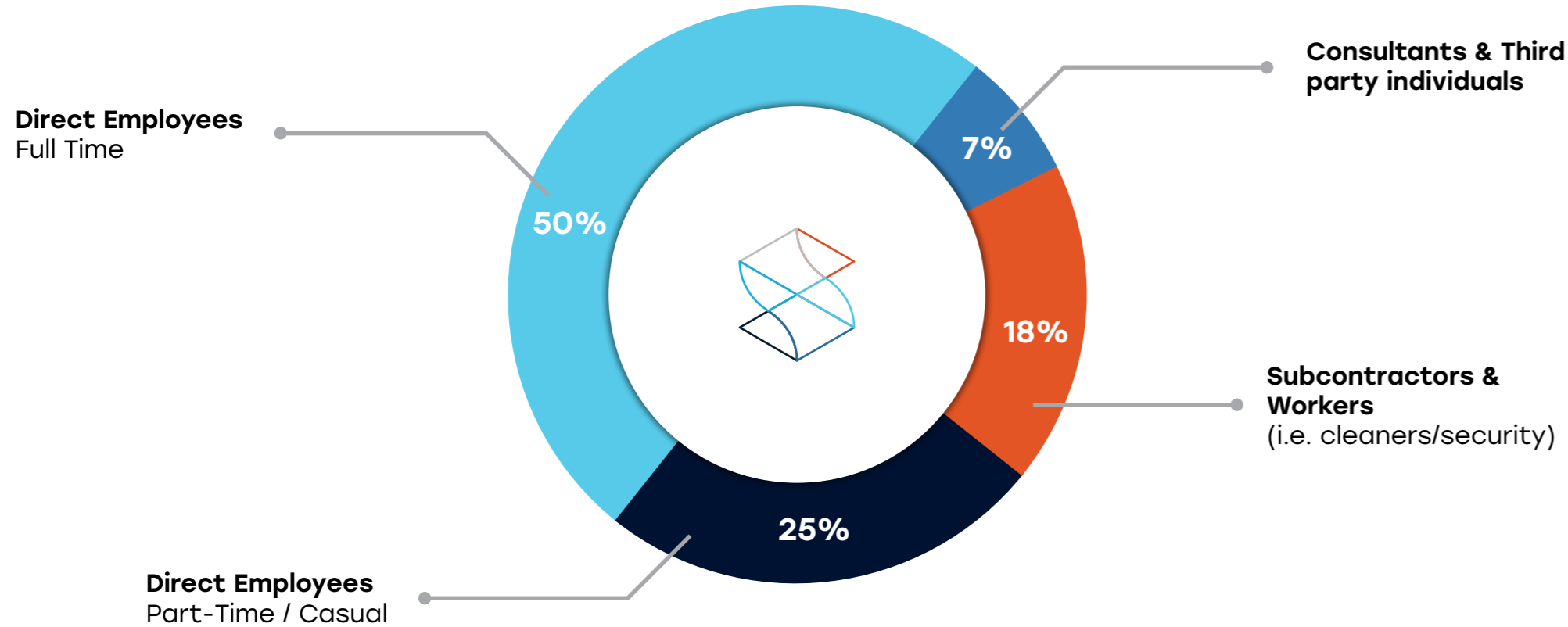
Sante Global Pty Ltd, ABN 75 640 677 783 is a private company registered in NSW. The registered office is in 2A Hope Street, Ermington, NSW, 2115.

Below is a diagram illustration of the organisation structure.



OPERATIONS

Santé has a total of 15 full-time employees in Australia. Below is a breakdown of additional workers and relationship with the wider Santé Group.



GLOBAL PRESENCE

Santé operates in the below regions and has 29 locations globally. Santé's operations primarily include sales, distribution, project advisory and administration for the products outlined below.



29
OFFICE
LOCATIONS

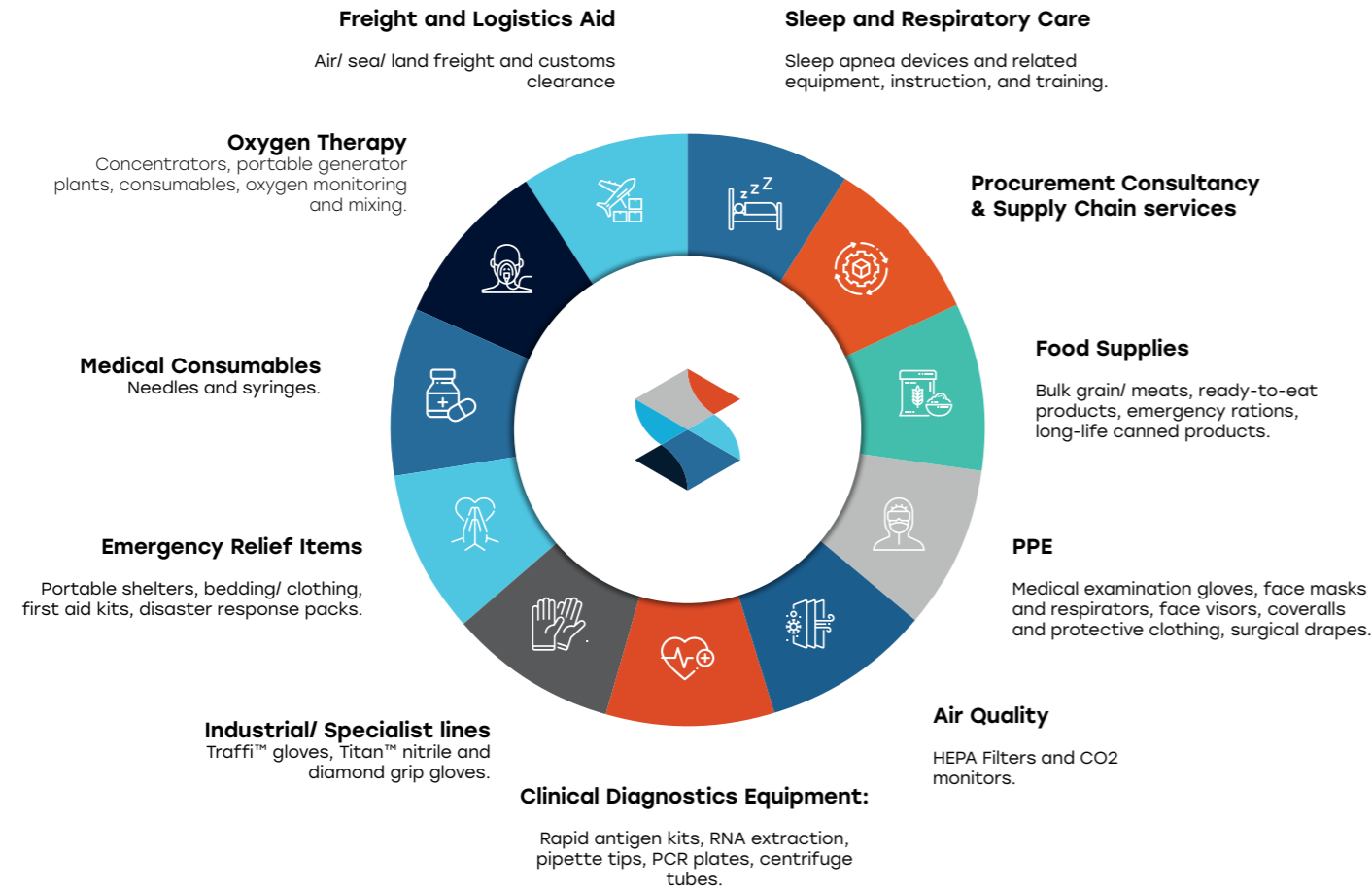
700+
CLIENTS

560
VALIDATED DIRECT
SUPPLIERS

32
SOURCING
COUNTRIES

PRODUCTS AND SERVICES

All our products and services are worldwide and include:



YOUR 6 PILLARS OF TRUST™

How we de-risk the process



At Santé, we recognise the importance of a verified and trusted supply chain. We hold long standing, validated relationships with our suppliers, and implement our proven methodology, “6 Pillars of Trust™” when establishing new partnerships. Find out more in the videos & content on our [website](#).

SUPPLY CHAIN

Santè has a diverse and versatile product supply chain, from multiple countries & regions, providing a wide variety of different PPE & medical products. The risk profile of these suppliers varies depending on factors such as the type of product distributed/manufactured, and the country/region in which the supplier is located.

To supplement our standard policies and procedures to prevent modern slavery in our supply chains, our team also review information published by authorities such as the country profiles issued by [Sancroft International Limited](#) which highlight particular risks common to each region / country, and the research published by [Global Slavery Index](#).

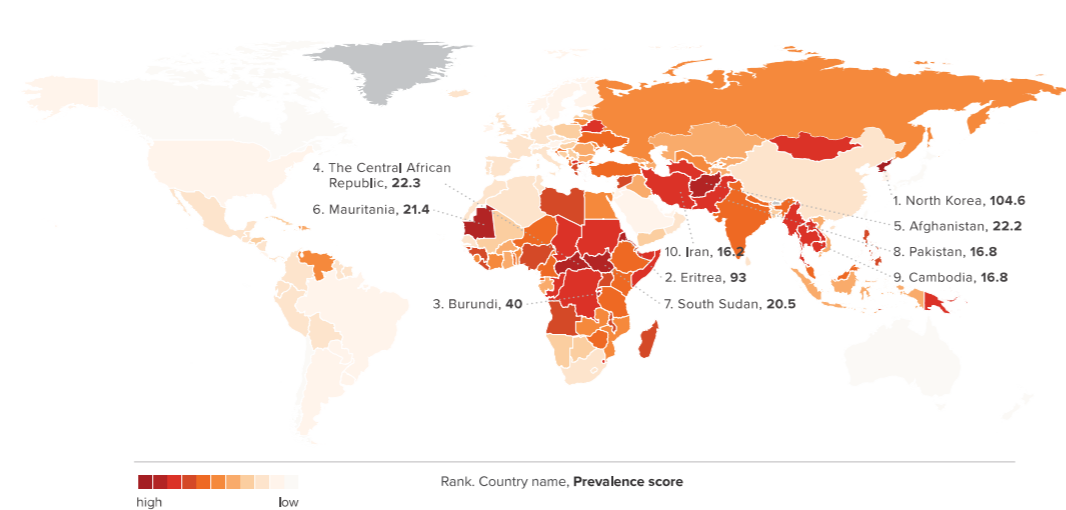
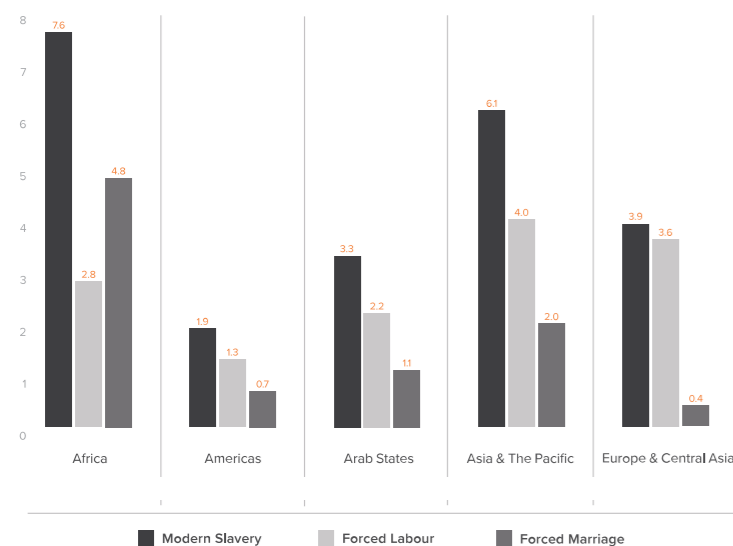
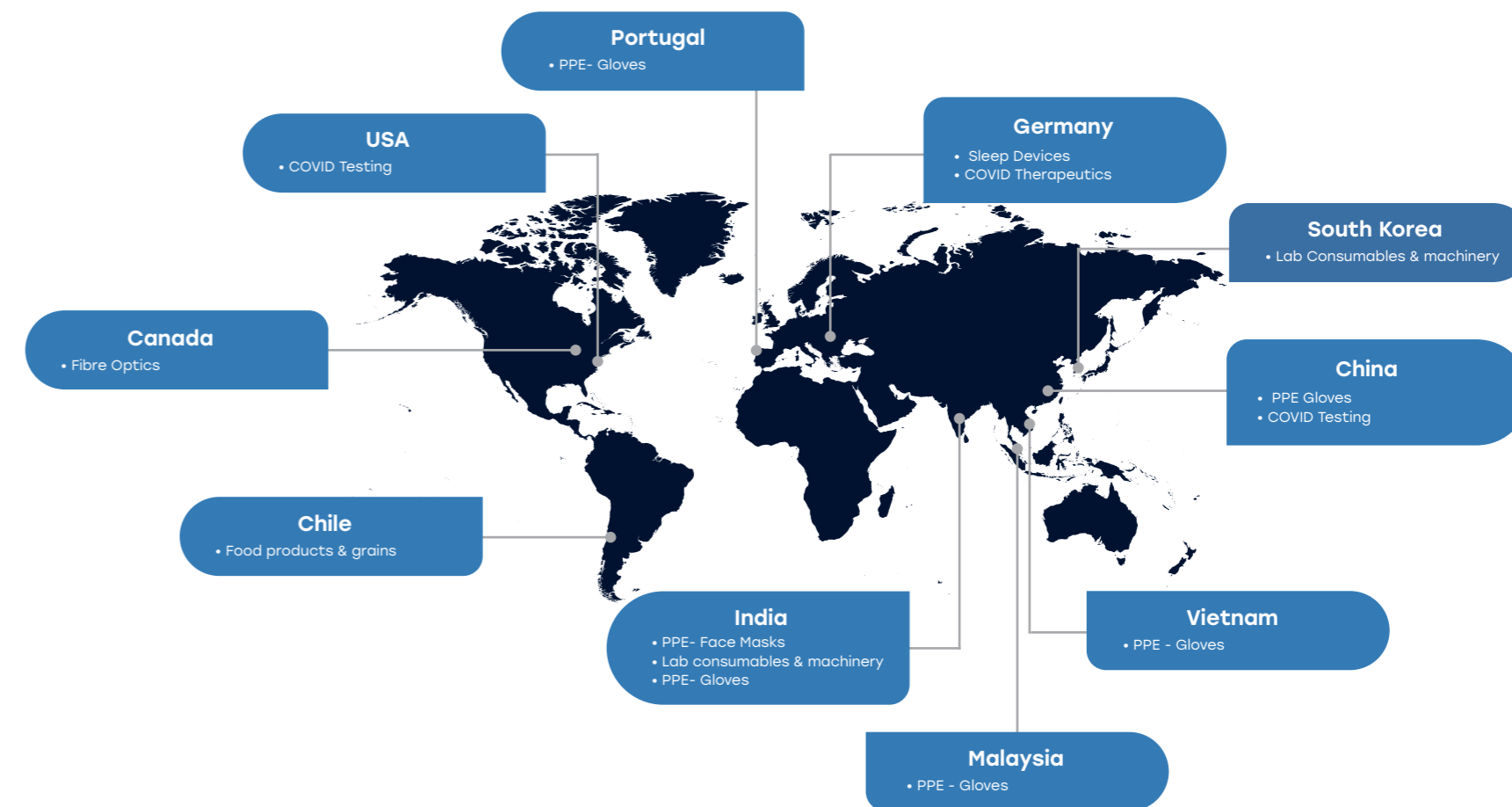


Figure 1
Global Slavery Index [research](#) showing regional prevalence of modern slavery by category

Figure 2
[Research](#) from Global Slavery Index

Our supply chain includes not only the primary goods / OEM manufacturers in various locations and regions around the world (per below snapshot) but also the logistics companies that we partner with. We select highly reputable, international firms with long-standing experience and a commitment to sustainability.



With an intent to map out our supply chain and build a platform of transparency for our stakeholders and partners, Santé has performed an analysis of data and introduced KPIs for the reporting period. We identified the following spend categories:

| Spend Category | Sourcing Regions | No. of Validated Suppliers | No. of Manufacturing Facilities | % Of Overall Spend | % Of Australian Suppliers |
|---|--|----------------------------|---------------------------------|--------------------|---------------------------|
| PPE & Medical Consumables | Asia, Europe, Middle East, Americas, Australia | 269 | 359 | 34% | 8% |
| Food Supplies | Europe, South America, Africa, Australia | 174 | 234 | 28% | 4% |
| Freight, Logistics & Warehousing | Global | 28 | 0 | 25% | 15% |
| Other Product Categories | Global | 50 | 68 | 10% | 34% |
| Operational Services (Security, Cleaning) | Global | 39 | 0 | 3% | 72% |
| Totals | | 560 | 661 | | |

Santé ensures that outputs/ activities that are not in conformance to our modern slavery and sustainability commitments are identified and controlled to prevent and remove their impact on our supply chain and operations, in accordance with the following 5-step process. The table below highlights our global footprint in higher risk manufacturing countries and examples of actions taken to mitigate and monitor the risk.



| Country | # Direct Suppliers | Top non-conformances from supplier audits | Examples of actions taken |
|-----------------|--------------------|---|---|
| China | 84 | N/A - No non-conformances | N/A - no action required, Santé continues to review and monitor suppliers through 6 Pillars of Trust™. |
| Malaysia | 33 | Instances of working hours exceeding ILO standards. | Santé representative scheduled to visit factory every 6 months and supplier now conducts virtual factory tours quarterly. |
| Thailand | 50 | Machinery signage missing. | Health and safety and management systems are addressed by performing routine inspections and ensuring adequate PPE provided. |
| Germany | 6 | N/A - No non-conformances | Risks are monitored through weekly update meetings and regular written correspondence. No mitigation actions required. |
| India | 50 | Inconsistent records around working days. | Santé representative scheduled to visit factory every 6 months and supplier now conducts virtual factory tours quarterly. |
| Chile | 35 | Fire exit obstructed. | Health and safety and management systems are addressed by performing routine inspections. |
| Portugal | 22 | N/A - No non-conformances | N/A - no action required, Santé continues to review and monitor suppliers through 6 Pillars of Trust™. |
| Hungary | 13 | Some employment contracts did not comply with applicable local laws/ international standards. | Conducted third-party audit of all employment contracts reducing all sites from critical to minor risk. |
| South Korea | 11 | Fire exit obstructed. | Health and safety and management systems are addressed by performing routine inspections and ensuring adequate PPE provided. |
| Australia | 34 | N/A - No non-conformances | Risks are monitored through 3PL warehouse inspections including suggestions for improvement, supplier factory/ facility office and on-site meetings, and regular verbal and written correspondence. No rectification action required. |
| Slovenia | 7 | Workers provided inadequate rest days. | Santé representative scheduled to visit factory every 6 months and supplier now conducts virtual factory tours quarterly. |
| United States | 101 | N/A - No non-conformances | N/A - no action required, Santé continues to review and monitor suppliers through 6 Pillars of Trust™. |
| Other Countries | 112 | Some employment contracts did not comply with applicable local laws/ international standards. | Conducted third-party audit of all employment contracts reducing all sites from moderate to minor risk. |

COVID-19 IMPACT AND SOURCING OUT OF CHINA/ MALAYSIA

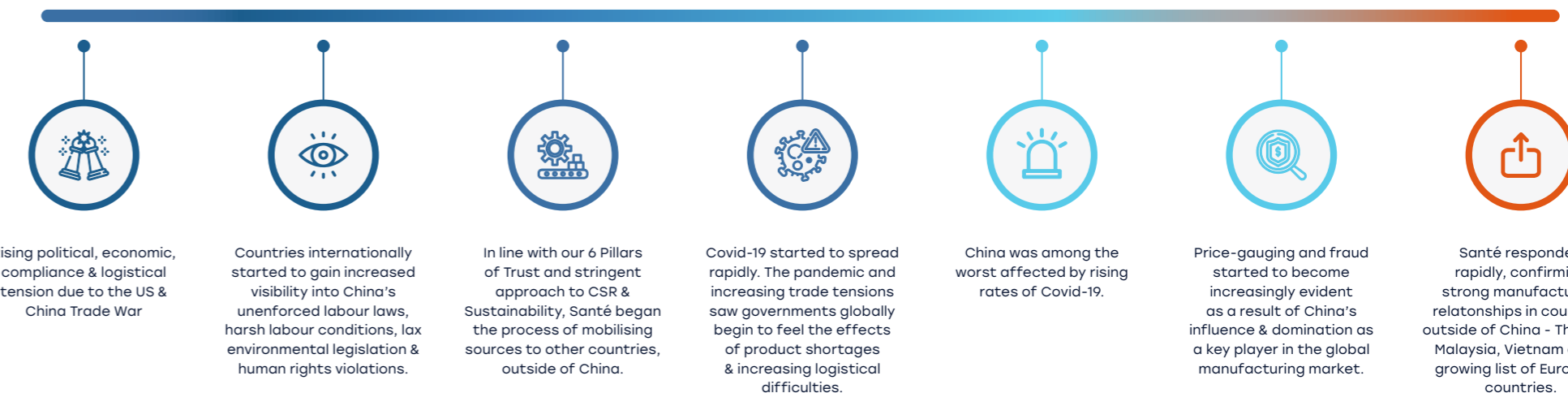
The Coronavirus pandemic exposed the world to significant supply chain disruption. Using the healthcare sector as a prime example, the dangers of single sourcing were highlighted as hospitals and other facilities found themselves unable to access the required personal protection and healthcare consumables required to keep them fully operational.

Diversification of the supply chain has been an effective risk management strategy for Santé, and companies with a broad supplier network have been able to respond with flexibility and agility in the face of the different disruptions over the past eighteen months. Adding suppliers introduces more complexity into the supply chain but has been proved to be a great line of defence amongst the recent uncertainty and challenges surrounding procurement.

Greater risks of exploitation of third-party employees or trafficking of vulnerable persons as a result of the economic uncertainty exacerbated by the COVID-19 pandemic is a risk that has been acknowledged across Santé's operations and supply chain. Transparent, sustainable supply chains are essential for businesses committed to ethical working practices. 2021 has seen a huge percentage of companies place increased emphasis on their sustainability and social responsibility strategy.



Santé has identified elevated risk of exploitative working conditions and China and Malaysia, especially in the large-scale production of PPE. As a result, we have embarked on a process to move 95% of our supply chain outside of these countries, as demonstrated in the below timeline. Santé targets to achieve this goal by December 2023. In order to mitigate risks of modern slavery instances whilst working towards this goal, Santé maintains regular third-party auditing of manufacturing facilities and discussions with the suppliers' top management to understand their commitments, substantiation actions and accelerated rate to which audit findings are addressed. Santé also acknowledges that audit findings represent a snapshot in time and therefore focuses on regular communication with suppliers and cross-industry collaboration with leading reputable medical consumables and food manufacturers.





CRITERION 3

ACTIONS TAKEN TO IDENTIFY THE RISKS OF MODERN SLAVERY

MODERN SLAVERY ACT

The Act provides eight types of exploitation that meet the definition of modern slavery. They are:

- Trafficking in persons
- Slavery
- Servitude
- Forced marriage
- Forced labour
- Debt bondage
- Deceptive recruiting for labour or services; and
- The worst forms of child labour.

The worst forms of child labour refer to slavery practices or hazardous work involving children.



RISK IN SUPPLY CHAIN

With only 6% of our suppliers based in Australia, it is likely that the potential to be related to or contribute to modern slavery in our supply chain sits outside of our national borders.

We have assessed the factors, sectors and geographies shown in the below risk register as being high risk of potentially causing, contributing, or linking Santé’s operations and supply chain to modern slavery occurrences.

| No. | Risk Description | Risk Level | | | Impact | | | Mitigation/Action | Residual Risk |
|-----|---|---|--------|------|---|--------|------|---|---------------|
| | | Low | Medium | High | Low | Medium | High | | |
| 1 | COVID-19 | Manufacturing plant/staff becomes infected by COVID-19 | | | High impact as reduced production creates additional demand for workers/ increased working hours. | | | Santé works with multiple suppliers to ensure that additional contingency capacity is available and that the loss or reduction of production at a single facility will not impact business operations/ endanger working conditions. | Medium |
| 2 | Geographical risks | Unbalanced dependence on China & specific regions within China | | | High impact with China’s higher rate of non-conformance | | | Santé is currently sourcing the specified products from a number of countries including; Vietnam, South Korea, Japan, Malaysia, India, Taiwan, Turkey to decrease dependence on China | Medium |
| 3 | Social responsibility - slave labour | PR & ethical risk of association with a supply line that utilises forced labour. | | | High impact of reputational damage due to regulatory watchdogs & media coverage. | | | At Santé, our legal advisors and 3 rd party QC firms conduct both historical and ongoing checks and random site inspections throughout the production process to identify any breach of international law. | Medium |
| 4 | Outsourced labor hire/ use of migrant workers | Outsourced migrant workers subjected to unethical working conditions/ modern slavery | | | High impact as workers subjected to unethical working conditions | | | At Santé, our legal advisors and 3 rd party QC firms conduct both historical and ongoing checks and random site inspections throughout the production process to identify any breach of international law. | Medium |
| 5 | Raw materials sourcing | Health and safety issues arise working in raw material industries (mining, farming, etc.) | | | High impact as workers subjected to unethical working conditions | | | At Santé, our legal advisors and 3 rd party QC firms conduct both historical and ongoing checks and random site inspections throughout the production process to identify any breach of international law and/or local health and safety guidelines and regulations. | Medium |
| 6 | Labour Intensive services | Intensive labour requiring additional labour to fulfill production | | | High impact as workers subjected to unethical working conditions | | | At Santé, our legal advisors and 3 rd party QC firms conduct both historical and ongoing checks and random site inspections throughout the production process to identify any breach of international law and/or local health and safety guidelines and regulations. | Medium |

With the risks identified in mind we see the focus of our actions to strengthen our understanding of our suppliers’ supply chain and raise their awareness of the issue, as well as strengthening our supplier on-boarding process procedures. We recognise that the greatest risks of modern slavery and human trafficking come from our supply chain. The steps we take to manage these risks and ensure our suppliers comply with the high standards we expect include: (Note: Please refer to the Improvement Road Map for data relating to the below steps, progress to date and KPIs)

- Partner with top tier law firms to negotiate new supply agreements, validate supplier legitimacy and their ability to supply.
- Transacting on our standards terms & conditions of purchase, as previously detailed, including specific supplier agreement to ensure compliance across multiple areas (including anti-bribery and modern slavery), and in respect of our suppliers’ use of sub-contractors, to cascade contractual obligations and make clear what Santé’s expectations are for compliance.
- Third party audit assessments undertaken by globally recognised bodies i.e., Intertek and SMETA, specifically focussing on social compliance including forced labour, modern slavery & human trafficking.
- Encourage suppliers to work towards & supply internationally recognised standards including in respect of BSCI / SEDEX.
- Third-party quality control audit assessments of goods by independent auditors
- Supplier code of conduct shared with all existing and new suppliers, and suppliers encouraged to support the values & principles outlined therein.
- Regular review meetings and open collaboration / communication with suppliers, is encouraged at all times.
- Visits by management and/or Santé representatives to key partner factories as part of our own due diligence process

If required, CAPA Reports (Corrective and Preventative Action) will be implemented and closely monitored until we are satisfied the supplier has rectified any areas of concern.

RISK IN OPERATION

We are committed to preventing slavery & human trafficking, and we take the following steps to ensure this is prevented within our business.

- All employees have a contract of employment, which sets out their rights & obligations as an employee, and the notice period required to terminate their contract. Employees are free to serve notice at any time.
- We comply with, or exceed, the requirements of all employment legislation regarding, for example, minimum wages, working time, statutory time off & holiday entitlement, sickness & maternity/paternity/adoption leave, rest breaks/ periods and time off for personal emergencies.
- Right to work checks and identity verification are carried out on all new employees.
- We respect the right of employees to join trade unions of their own choosing, to the extent permitted by local law.
- We do not regularly use agency or sub-contracted labour within our own business. However, in the event that this is required on a short-term basis, procedures are in place to ensure that any sub-contractors are on-boarded with a formal agreement, and right to work checks are carried out as relevant. If needed, professional advice will be taken, to ensure we are compliant in all areas, when engaging with temporary or sub-contract labour.





CRITERION 4

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

PLAN

In March 2022, Santé formed a working group with three objectives:

1. Assessing the potential for Santé to cause, contribute to, or be directly linked to modern slavery through its operations and supply chains,
2. Developing a roadmap for establishing meaningful actions to combat the issue, and
3. Assessing the risk in the first-tier supply chain.

In the 2023 reporting period, we have committed to the following actions:

1. Executive engagement with the issue of modern slavery and the impact of the Modern Slavery Act 2018 (Cth) on the business
2. Formation of a modern slavery working group to steer the implementation process
3. Consultation with modern slavery experts
4. Gaps analysis of governance framework and development of an action plan for FY24
5. Supplier categorisation and initial risk assessment of first-tier suppliers to understand where the risks lie our supply chain
6. Awareness training of key stakeholders through e-learning module
7. Review of purchasing and procurement policy, and human resource and recruitment policy
8. Development of modern slavery statement for 2023 financial year.

SUPPLIER RISK ASSESSMENT

A review of data and categorisation of the spend categorisation allowed Santé to conduct an assessment based on the following risk factors:

- **Sector and industry risks:** Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes. For example, mining, textiles and fashion, fishing, electronics, cleaning, and agriculture are recognised as high-risk industries globally.
- **Product and services risks:** Certain products and services may have high modern slavery risks because of the way they are produced, provided or used. For example, bricks, cobalt, cotton and rubber are recognised as high-risk products globally. Similarly, services that involve lower wages, manual labour, casual/seasonal workers or low qualification, such as cleaning may have high modern slavery risks.
- **Geographic risks:** Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.



SUPPLIER SELECTION & MODERN SLAVERY RISK ASSESSMENT

When researching new supply chain partners, our team ensure that full risk assessments are carried out to ensure any concerns are flagged early in the engagement, prior to any transactions. Our business model means that our revenue typically comes primarily from a smaller number of large contracts, this enables us to ensure that in-depth reviews and risk assessments are carried out on each contract in isolation.

When bidding / preparing for a new contract, full sourcing / supply chain mapping will be reviewed, together with the due diligence processes outlined in the previous section. As part of the pre-qualification process, suppliers will be initially classified based on their geographic region and the common associated risks (see research used from Global Slavery Index, and Sancroft country profiles), before further engagement will review their past history and audit results. Professional advice will be taken as needed, to ensure that supplier agreements are implemented, with reasonable clauses & terms, and ensuring compliance with our Code of Conduct. Throughout all phases of a supplier contract / relationship, our team will continually review their performance regarding social compliance. Any concerns will be immediately flagged to our senior management, and a strategy for corrective action agreed, and implemented with the supplier. An example of the supplier selection is shown in the next page.

PURCHASING PRACTICES

Santé has evaluated our purchasing practises and business model when assessing contributing risk factors to exploitive working conditions. As demonstrated in the Improvement Road Map below, embedding responsible sourcing practises that support decent work and alleviate downward pressure onto suppliers and employees are a key focus for 2023.

SAMPLE SUPPLIER ANALYSIS

The below sample supplier analysis document scores manufacturer specifications and supply chain resilience against client requirements and global best practises.

| Product Specification | Manufacturers | | | | Comments |
|--|------------------|------------------|------------------|-----------------|--|
| | Manufacturer #1 | Manufacturer #2 | Manufacturer #3 | Manufacturer #4 | |
| Nitrile Gloves - three categories Std Cuff Nitrile, Std Cuff Chemo rated Nitrile & Long Cuff Chemo rated Nitrile | Available | Partial | Available | Partial | The manufacturers are either at capacity, or do not manufacture some of the range. |
| Chemotherapy rated available | Yes | Yes | Yes | Yes | |
| FDA Approved | Yes | Yes | Yes | No | |
| CE Marked | Yes | Yes | Yes | Yes | |
| TGA Registered | Yes | Yes | Yes | Pending | Manufacturer #4 TGA registration pending. |
| ISO 13485 | Yes | Yes | Yes | Yes | |
| EN455 | Yes | Yes | Yes | Yes | |
| Weight | Complies | Complies | Complies | Complies | |
| Manufacturer Ratings | | | | | |
| Country of Origin | Malaysia | Thailand | China | India | India and Malaysia potential delays due to Covid |
| Legal background check | Pass | Pass | Pass | Pass | Company, ownership and trading history background review. |
| Santé factory tour completed | Yes | Yes | Yes | Yes | Physical inspection completed by Santé personnel. |
| Sedex approved (Social Compliance) | No | Yes | Pending | No | Sedex - independent registration of social compliance for policies/practices. |
| Existing Santé contracts | Yes | Yes | Yes | No | All manufacturers currently servicing Santé contracts globally |
| International Sanctions | Yes | No | No | No | Manufacturer #1 blocked by US Govt due to evidence of forced labour |
| COVID-19 Impacted | Yes | No | No | No | Malaysia currently heavily affected by COVID-19 outbreaks |
| Current state of export infrastructure | Potential delays | Potential delays | Potential delays | Critical | Short supply of containers impacting global shipping. |
| Available production slots - next 12 months | Yes | Partial | Yes | No | Santé have reserved substantial production slots for the next 12 months with Manufacturers #2 and #3. |
| Quarantine stock available | Partial | Yes | Yes | Yes | Stock holdings in country of origin |
| Co-operation with 3rd-party QC and auditing | Partial | Full | Full | Full | Manufacturers #2, #3 and #4 offer full co-operation and disclosure; Manufacturer #1 demonstrated some resistance in some facilities. |
| Final Ratings | 18/38 | 32/38 | 34/38 | 16/38 | |

| Scorecard | Color | Points |
|-----------|--------|-----------|
| Green | Green | +2 points |
| Yellow | Yellow | 0 points |
| Red | Red | -2 points |

IMPROVEMENT ROAD MAP

We have set a number of targets (KPIs) to monitor effectiveness in ensuring that slavery and human trafficking is not present in our business or supply chains. The below table reviews our progress in the prior period against these targets set:

SUPPLIER ASSESSMENT & ENGAGEMENT

| Target KPI Set | Status | Base line data | Prior FY Progress | Current FY Target |
|---|--------|--|--|---|
| 100% of existing and new suppliers to undergo due diligence review during the on-boarding process by December 2022. | ● | Internal supplier due diligence checklist | Consistently applied across 75% of our supply chain, with all new / prospective suppliers currently undergoing due diligence review. | Continue to maintain current due diligence processes to achieve 100% by December 2022. Ongoing project to ensure that all existing suppliers have undergone due diligence, and subsequent reviews. |
| Communication of our Supplier Code of Conduct to 100% of our suppliers by December 2022. | ● | Internal supplier due diligence checklist | Good progress towards this target, although still some room for improvement to ensure all suppliers are consistently provided with our Code of Conduct. | Ongoing project to review existing suppliers and request their agreement / signature to our Code of Conduct. Inclusion of our Code of Conduct in our Standard Terms & Conditions of Purchase, and publication on our website, to ensure this is communicated to all active suppliers. |
| 100% of employees in supply chain facing roles to undergo Modern Slavery Training by December 2022, ensuring they understand our responsibilities, how to spot modern slavery & how to report any areas of concern. | ● | Human Resources training data by employee. | Reached out to multiple vendors on modern slavery training capabilities. | Modern slavery training to be provided to all supply chain facing employees by December 2022. Ensure all relevant new team members have been provided with Modern Slavery training and provide refresher training for all employees within our business. |
| Ensure that all 100% of employees are aware of our policies regarding modern slavery & human trafficking. | ● | Human Resources training data by employee. | Modern slavery & supplier due diligence is one of the essential focuses of our entire team, and is a regular agenda point for review in internal meetings. All employees would be aware of our stance and policies, and the contacts / methods for communicating any concerns. | Continue our strong focus on supplier due diligence and social compliance practises. Ensure all employees (including new starters) are aware of our obligations, policies, due diligence procedures and reporting mechanisms. |

FURTHER INITIATIVES COMPLETED IN THE LAST PERIOD

Over the course of the prior financial year, we have commenced a number of new projects and initiatives, to support our activities to prevent modern slavery and human trafficking within our business:

- Engagement and ongoing work with a CSR consultant, to help us further develop our social responsibility policies and procedures, with areas of focus including sustainable procurement, environmental policies and business continuity planning.
- Introduction of Santé representatives on the ground in Asia and Europe, allowing us to directly engage with our suppliers and manufacturing partners, to assess/validate and help mentor suppliers as they work through improvements and CAPA Reports (Corrective and Preventative Action) actions.
- Relationships set up with key auditing partners including Intertek and TÜV – these are globally renowned firms with broad geographic cover & experienced teams of auditors and advisers.



TRAINING & CAPACITY BUILDING

In accordance with our focus on social responsibility, and to support our efforts to prevent modern slavery & human trafficking within our operations and supply chain, training and briefings are carried out at all levels within Santé:

BOARD

Regular updates and briefings are provided to the Board, covering relevant Modern Slavery Act governance requirements, and our proposed strategies and responses. Supplier due diligence and social responsibility is a regular agenda point to be reviewed, especially in light of new supplier, and large upcoming contracts.

ALL EMPLOYEES

Our policies (as outlined previously) are issued to all new employees as part of our regular induction process. The policies are available on the internal company HR portal for review at any time. Modern slavery training has been provided to all supply chain facing employees. We will aim to provide refresher training on a regular basis (annually), to ensure all employees throughout the business, including new hires, have received training, and employees are kept up to date with any changes in legislation / guidance.

SUPPLIERS & PARTNERS

We work with our supply chain partners, to encourage them to work towards globally recognised social compliance assessment standards including BSCI, SEDEX, SMETA, and Workplace Conditions Assessments. Our team collaborates with suppliers, to review Corrective Action processes, mentoring as needed to ensure the required improvements are implemented and sustained.

FURTHER STEPS TO PREVENT MODERN SLAVERY

At Santé, we will continue to make high standards of ethical supply chain one of our key priorities and will work to ensure we continue to address the importance of tackling Modern Slavery through our policies, practices, and risk assessments. We will maintain our current strong supplier partnerships and will continue to engage with them to ensure they comply with our requirements and high standards.

Some specific initiatives / projects that we will be working on, to further strengthen our due diligence processes, include:

1. Development of supplier self-certification process, requiring our suppliers to complete a declaration / questionnaire to confirm their compliance & processes, specifically around labour law and social responsibility.
2. Further development of our supplier code of conduct to include core ILO standards, in addition to the ETI base code principles already covered.
3. Further training of our sourcing & procurement team, to ensure that our procurement practises are not increasing the risk of modern slavery – i.e. through unreasonable changes / deadlines / cost pressures



GRIEVANCE MECHANISMS AND REMEDIATION

Santé provides all workers and stakeholders with access to grievance mechanisms which enable them to raise concerns confidentially and/or anonymously. Concerns relating to labour rights, modern slavery or other human rights abuses can be reported via an Employee Hotline in English or submitted via an online form in the language of their choice. Metrics regarding the hotline and online form are reported to the Santé Board of Directors every 6 months as part of the Corporate Governance framework. Santé ensures a no-retaliation policy is upheld, ensuring there are no adverse consequences to workers/ stakeholders for reporting concerns in good faith.

Furthermore, Santé strives to work alongside governments and civil society to stimulate action to achieve the United Nations Sustainable Development Goals. Santé has identified 7 Sustainable Development Goals which we believe we are best placed to impact.





CRITERION 5

ASSESSING EFFECTIVENESS

As we deploy the road map, we will identify the appropriate effectiveness indicators so that efficiency can be measured at regular interval with three primary mechanisms; tracking the impacts of our actions, reporting on progress and reviewing the outcomes.

TRACK

Santé utilises a CSR Workplace Impact Assessment Tracker in its operations to track the performance of our manufacturers and suppliers against labour rights metrics over time, allowing us to evaluate the effectiveness of policies and procedures and identify opportunities for improvement.

REPORT

Regular reporting intervals have been set to detail performance on labour rights metrics including compliance with local laws on working hours and rest days at each of our manufacturing sites.

REVIEW

The Santé Board of Directors seeks ongoing feedback on the structure, efficacy and function of the labour rights management system, periodically utilising internal reviews as per the schedule in Criterion 1. We regularly seek feedback from employee representatives and workers on our approach to labour rights management and identify new or emerging risks.



CONCLUSION

This first annual Modern Slavery Statement 2022, marks the start of our organisations journey to assess, engage, address and monitor modern slavery risks and to positive actions against violation of human rights.

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by Sante Global Pty Ltd Board of Directors and Executive Leadership Team on 21 June 2022.

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of Santé as defined by the Act:

A handwritten signature in black ink, appearing to read 'D Hales'.

Dion Hales
Managing Director, Asia Pacific

MANDATORY CRITERIA

Below table outlines the page number/s of our statement that addresses each of the mandatory criteria in section 16 of the Act.

| Mandatory criteria | Page number/s |
|---|--|
| Identify the reporting entity | 3 |
| Describe the reporting entity's structure, operations and supply chains. | 7 |
| Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls. | 19 |
| 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. | 25 |
| Describe how the reporting entity assesses the effectiveness of these actions. | 35 |
| Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultations with the entity covered by the statement). | Do not own or control any other entities |
| Any other information that the reporting entity, or the entity giving the statement, consider relevant. | |





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