



## CSL's Statement on Modern Slavery

1 July 2020 to 30 June 2021

### About our Statement

Toward meeting the expectations of disclosure requirements in a number of jurisdictions,<sup>1</sup> this Statement on Modern Slavery (the Statement) describes where we believe there may be risks of modern slavery in our business supply chains, due diligence steps that we have begun taking to identify, manage and mitigate those risks in our operations and supply chains, and how we evaluate the effectiveness of our responses.

The Statement is a joint statement in relation to the reporting period 1 July 2020 to 30 June 2021 prepared by and for CSL Limited and also for the reporting entities CSL Behring (Australia) Pty Ltd and Seqirus (Australia) Pty Ltd.

For the purposes of this Statement, 'CSL', 'we', 'us' and 'our' collectively refers to CSL Limited and its key businesses, CSL Behring, CSL Plasma and Seqirus (and includes all relevant reporting entities for this Statement). This Statement also describes practices that are common to CSL's other controlled entities and CSL-managed joint venture operations (together with CSL, referred to as the 'Group' or the 'CSL Group').

**Modern slavery is used to describe serious forms of exploitation where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Types of serious exploitation include trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and child labour.**

**The International Labour Organization further defines forced labour as work that is performed involuntarily and under the menace of any penalty. It refers to situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as manipulated debt, retention of identity papers or threats of denunciation to immigration authorities.**

[CSL's modern slavery statement can be found on CSL.com > Corporate Responsibility.](#)

### Organisational structure

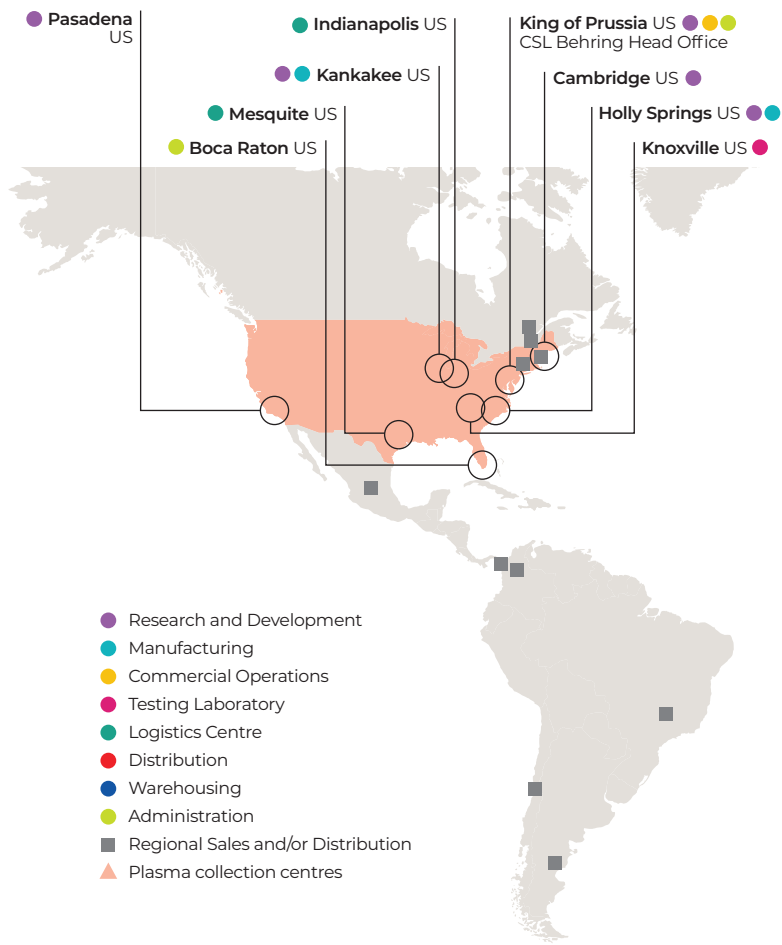
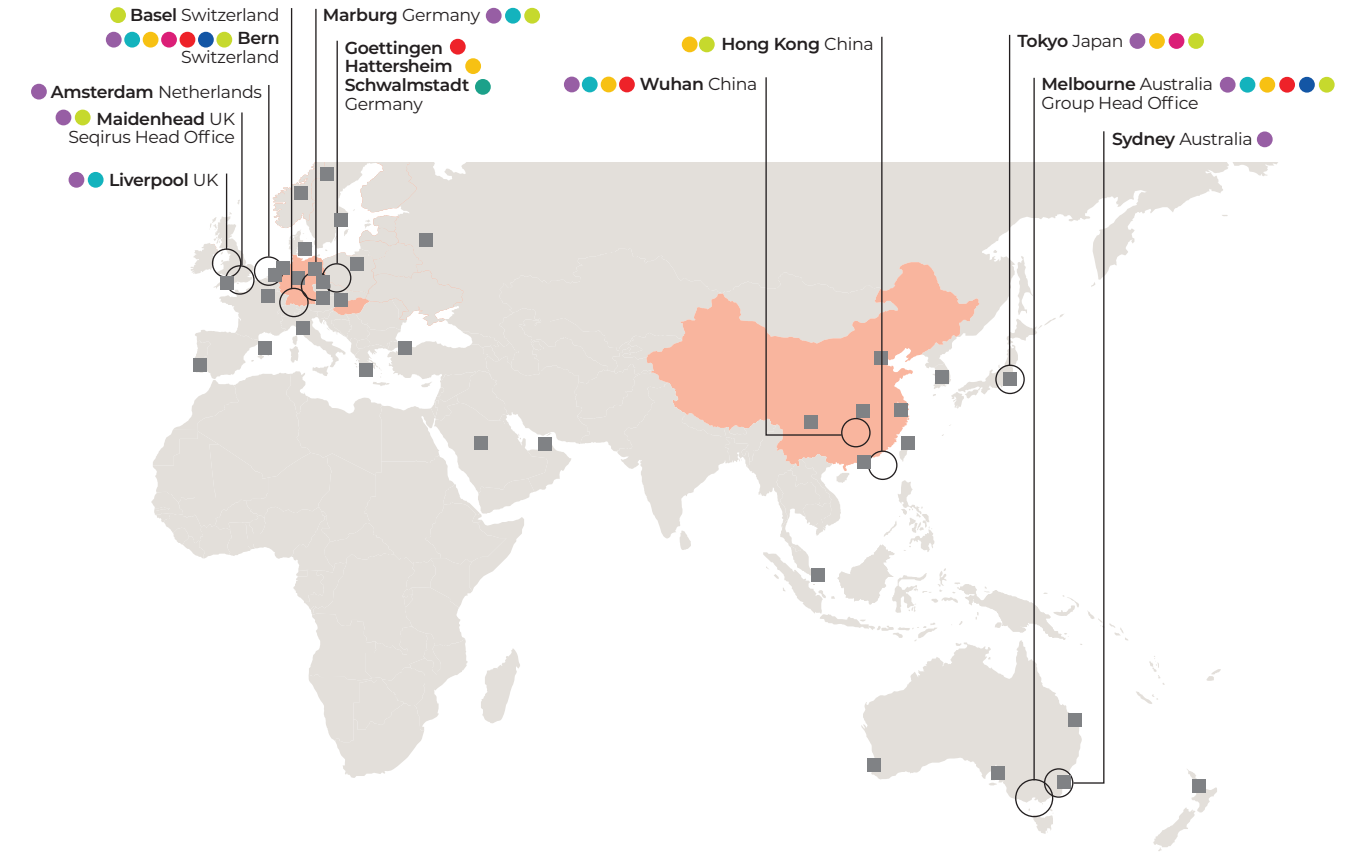
CSL Limited is the parent of the CSL Group and is headquartered in Melbourne, Australia. It is listed on the Australian Securities Exchange (ASX) and is a constituent of the S&P/ASX 20 index.

CSL is a leading global biotechnology company with a dynamic portfolio of lifesaving medicines, including treatments for haemophilia and immune deficiencies, as well as vaccines to prevent influenza. Since our beginning in 1916, we have been driven by our promise to save lives using the latest technologies. Today, CSL – through our two businesses, CSL Behring and Seqirus – provides lifesaving products to more than 100 countries and employs 25,415 people in 39 countries.<sup>2</sup> Our unique combination of commercial strength, research and development focus and operational excellence enables us to identify, develop and deliver innovations so our patients and global communities can live life to the fullest.

<sup>1</sup> The Statement has been prepared for purposes of the *Modern Slavery Act 2018* (Cth) (Act), United Kingdom *Modern Slavery Act 2015* and the *California Transparency in Supply Chains Act 2010*.

<sup>2</sup> As at 30 June 2021.

# Our locations



- Research and Development
- Manufacturing
- Commercial Operations
- Testing Laboratory
- Logistics Centre
- Distribution
- Warehousing
- Administration
- Regional Sales and/or Distribution
- ▲ Plasma collection centres

## CSL Group includes the following businesses.

**CSL Behring** is a global leader in developing and delivering high-quality medicines that treat people with rare and serious diseases. Our treatments offer promise for people who are living with conditions in the immunology, haematology, cardiovascular and metabolic, respiratory, and transplant therapeutic areas. CSL Behring drives more than 80% of overall company revenue with substantial markets in more than 100 countries across Asia Pacific, Europe, Latin America and North America.

**CSL Plasma** is a division of CSL Behring and collects human-derived plasma (sourced plasma) via its global network of plasma collection centres located in China, Hungary, Germany and the United States of America (US).

**Seqirus** is a major contributor to the prevention of influenza globally and a transcontinental partner in pandemic preparedness. Seqirus operates state-of-the-art production facilities in the US, the United Kingdom (UK) and Australia, and utilises both egg-based and cell-based manufacturing technologies as well as a proprietary adjuvant. It has leading research and development (R&D) capabilities, a broad and differentiated product portfolio and commercial operations in more than 20 countries.

### Our Workforce Breakdown (as at 30 June 2021)

Asia Pacific	3,736
Europe, Middle East, Russia	7,186
North America	14,382
South America	111
<b>Total</b>	<b>25,415</b>

## Our value chain

We achieve value creation through high-quality, focused innovation capabilities, operational excellence and global commercial strength. At the origins of our value chain, plasma donors provide our pipeline, while partners and collaborators support innovation and portfolio diversification. Employees enable value creation by driving our performance to deliver against our 2030 strategy and our promise to patients.



CSL's Purpose, Values and Code of Responsible Business Practice

## Our operations at a glance

### CSL Limited

Headquarters  
Australia



Total headcount<sup>3</sup>

**628**



#### Key operations

- Early stage research and development
- Corporate head-office support (including company secretary, governance, finance and legal)

### CSL Behring

Headquarters  
US



Total headcount<sup>3</sup>

**10,969**



#### Key operations

- Sourcing
- Research and development (R&D)
- Product manufacturing – 5 facilities located in Australia, China, Germany, Switzerland and the US
- Contract manufacturing
- Warehousing, transport and logistics
- Business technology
- Commercial operations
- Key products: PRIGIVEN®, ALBUREX®, HIZENTRA®, IDELVION®, KCENTRA®, HAEGARDA®

### CSL Plasma

Headquarters  
US



Total headcount<sup>3</sup>

**10,976**



#### Key operations

- Sourcing
- Plasma donor management
- Product manufacturing – plasma collection centres located in China (5), Germany (8), Hungary (3) and the US (287)<sup>3</sup>
- Warehousing, transport and logistics
- Business technology
- Commercial operations

### Seqirus

Headquarters  
UK



Total headcount<sup>3</sup>

**2,842**



#### Key operations

- Sourcing
- Research and development (R&D)
- Product manufacturing – 3 facilities located in Australia, the UK and the US
- Contract manufacturing
- Warehousing, transport and logistics
- Business technology
- Commercial operations
- Key products: FLUAD®, FLUCELVAX®, AFLURIA®

CSL does not undertake external financing activities.

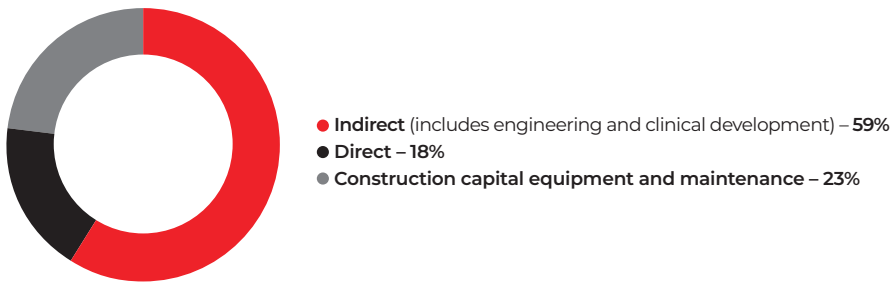
<sup>3</sup> As at 30 June 2021. Excludes contract workers.

## Our supply chain

Across our global operations we work with more than 20,000 suppliers in the following categories:

- **indirect** – refers to expenses incurred for materials, services (including clinical trials) and maintenance required to operate the business, such as professional services, logistics, sales and marketing support, business travel, information technology and commercial spend;
- **direct** – involves the procurement of goods, materials and services directly related to the production of goods and/or services that CSL manufacture, such as packaging, chemicals, medical devices, filters, gels and ingredients; and
- **construction capital equipment and maintenance** – goods and services related to new plant and equipment and its ongoing maintenance, engineering goods and services to ensure our production lines remain operational and fit for purpose.

### Spend by category\*



\* Utilising 2019/20 data to delineate COVID-19 interruptions.

### Snapshot of CSL's business critical direct suppliers

CSL's supply chain is very diverse, with a range of products/materials required for the manufacture of our lifesaving and life-enhancing therapies. Across CSL Limited's businesses – CSL Behring and Seqirus – we have identified 49 highly critical direct suppliers (at the parent company level) that provide products/materials and are based in 29 countries.


Of the materials sourced from these suppliers, 80% originate from suppliers in 10 countries, with a low to medium risk for modern slavery, including (in order of frequency) the US, Germany, France, Australia, Switzerland, the UK, Belgium, Spain, Ireland and Japan, with the remaining materials sourced from 19 countries (20% of total). We will continue to engage with suppliers to develop our understanding and verify the locations where suppliers are manufacturing or sourcing the products that we buy. This will assist us to deepen our understanding of modern slavery risks that may be present in our supply chain and which are described in the section 'Identification of modern slavery risk in our operations and supply chain' on page 7.

## Business suppliers by country of manufacture and category of product/material

Disclosed source country of origin of finished product	Frequency across highly critical suppliers	Category of products/materials provided (top three where applicable)	Top five categories across 80% of countries
US	24%	1. Filters 2. Chemicals 3. Primary packaging	1. Chemicals 2. Filters 3. Primary packaging 4. Manufacturing supplies 5. Gels and resins
Germany	15%	1. Primary packaging 2. Filters 3. Chemicals	
France	10%	1. Primary packaging 2. Filters 3. Chemicals	
Australia	9%	1. Chemicals 2. Filters 3. Manufacturing supplies	
Switzerland	6%	1. Chemicals 2. Filters 3. Primary packaging	
UK	5%	1. Chemicals 2. Manufacturing supplies	
Belgium	4%	1. Chemicals 2. Filters	
Spain	3%	1. Chemicals 2. Syringes	
Ireland	2%	1. Syringes, chemicals, filters	
Japan	2%	1. Chemicals, filters, primary packaging	
Austria, Bosnia, China, Czech Republic, Finland, Hungary, India, Indonesia, Israel, Italy, Mexico, Netherlands, New Zealand, Norway, Poland, Singapore, Sweden, Thailand, Tunisia	20%	Numerous categories covered given the number of countries	Numerous categories covered given the number of countries

## Description of categories

Category	Description
Chemicals	Includes acids, amino acids, heparin and pepsin, base (pH 7), manufacturing cleaning chemicals, disinfectants, filter aids, inorganic and organic substances
Filters	Air filters, laboratory filters, filter cloth, process and bag filters, virus filters, sterile filters
Primary packaging	Includes printed and non-printed carton/box, plastic or other corrugated material, leaflets, tape binders, sealing foil, blister foil, pallets and shippers, printed labels
Manufacturing supplies	Single-use technology (plastics), gloves, plastic container, sample testing units, tubing and connectors
Gels and resins	Chromatography media for production and research and development
Syringes	Glass syringes

 You can find more information on CSL, our operations and our strategic priorities, including our recent financial and non-financial performance in our 2020/21 Annual Report, on [CSL.com](https://www.csl.com).



## Identification of modern slavery risk in our operations and supply chain

CSL maintains its view that the identification and elimination of modern slavery is an ongoing and long-term concern for all businesses. Whilst ongoing mapping, investigation and applying leverage can influence continuous improvement for workers where risks might exist in supply chains, regrettably, there is no complete approach to identifying and therefore eliminating egregious forms of modern slavery, forced labour and exploitation from supply chains.

In 2020, we acknowledged that we were early in our program rollout and in the investigation down the tiers of suppliers and other partners. In support of advancing our program, in 2021 our primary focus has been on the development, testing and successful launch of an enterprise third party risk management (TPRM) system (detailed further below) to better understand and help us map our supply chains.

Despite an expected elevated risk of modern slavery due to employment uncertainty and layoffs caused by the global pandemic (COVID-19) driving the movement of workers/migrants, over the reporting period, no instances of modern slavery were identified by CSL or reported to CSL for investigation and/or remedy. We note though that the pandemic travel restrictions did slow our efforts to perform on-site assessments where higher risks may lie as companies in our sector focused on navigating supply chain disruption to deliver support to the healthcare sector.

In 2020/21, we conducted the following activities to identify possible modern slavery risks in our operations and supply chain and have taken action to assess and address those risks.

### Our operations

Over 90% of CSL's direct workforce are permanent employees with a minority on fixed-term employment contracts. At a number of our sites, some workers are members of independent trade unions recognised by our management, and with which management retain ongoing dialogue regarding workforce conditions. These sites are located in Australia (Melbourne), the UK (Liverpool), Germany (Marburg) and the US (Kankakee). Given the high level of transparency and control we have over the Group's direct workforce, we do not consider our owned operations to be a significant area of modern slavery risk.

#### Activities to identify risks and actions to assess and address those risks

- CSL's Supply Chain Integrity Council met three times over the reporting year to review and approve CSL's 2021 Modern Slavery Statement and received guidance on our program development from an external expert in the area of human rights and modern slavery and regulatory insights. The Supply Chain Integrity Council is comprised of CSL leadership members from supply chain, sourcing/procurement, sustainability, ethics and compliance, legal, human resources, product quality and trade compliance. The Supply Chain Integrity Council discussed how to improve tailored protocols for how CSL should respond where reports of modern slavery are raised or instances identified.
- CSL relies on contract workers to fulfil some aspects of our work. We have less direct visibility and control over these workers and their employment terms and these workers may be less aware of their rights and, consequently, susceptible to exploitation. The use of contract workers through contractor agencies remains an area of potential modern slavery risk for CSL and in our past modern slavery statement we shared possible risks for contractor work, including logistics, repairs and maintenance, construction and security.

In June 2021, we reorganised our management of contractor agencies across the Group. As a result, some changes were made to the providers in use. This activity, along with the launch of our new TPRM system in June 2021, and the COVID-19 pandemic, delayed plans to screen a sample of suppliers through our new system and engage where we may identify high risks and to influence good practices. We expect to conduct this work in 2021/22.

- In March 2021, CSL's 2020 Modern Slavery Statement was circulated to all employees. In addition to raising awareness of our due diligence framework initiation and performance, the message invited employees to share external modern slavery hotline resources with other employees or supply partners, including the promotion of the UK modern slavery helpline run by the charity Unseen, the Polaris anti-trafficking helpline in the US and the Red Cross-operated hotline in Australia. The call to action also encouraged employees to report any instances of inappropriate practices via CSL's Speak Up Policy, which includes a Speak Up hotline.



## Our operations continued

- Anyone with information about potential misconduct is encouraged to 'Speak Up' under the CSL Speak Up Policy. This includes all of CSL's current and past employees, directors, contractors, customers, suppliers and associates. All reports made under this policy will be received and treated sensitively and seriously, and will be dealt with promptly, fairly and objectively.

From 1 July 2020 to 30 June 2021, no instances related to human trafficking or slavery and forced labour in our global operations were received. CSL's hotline can be accessed by toll-free numbers or online in more than 20 countries and is promoted periodically through employee communications and trainings. We are nevertheless evaluating whether the hotline is an effective grievance mechanism for subcontractor workers, who could be at risk of labour exploitation and even modern slavery.

- Over the reporting period, CSL held a targeted and customised virtual training on modern slavery and forced labour awareness training and engagement session with leaders/decision-makers in the talent acquisition team across the Group. The session was designed and facilitated by an external expert in human rights/modern slavery in business supply chains, who tailored the session for our business and in response to the answers to a pre-session participant survey. Our team leaders raised practical questions about how as a business we can better implement due diligence into our procurement processes. The virtual training was also recorded and made available for broader circulation.
- Following an independent review and consultations with employees, heads of function from across the Group and CSL's Global Leadership Group, the Board endorsed our 4th-edition Code of Responsible Business Practice (Code), which was published on 1 July 2021. The Code sets out our expectations for suppliers to respect international labour standards and to prevent modern slavery, and includes a new ethics-based decision-making tool that weaves together CSL's Purpose, Values and decision-making Principles to establish a clear point of reference when making decisions across the organisation. The 4th-edition Code has been translated into 14 languages and distributed to all management and employees, new and current, with a training program to be made available by December 2021.

### Risks identified in our operations

- While many of CSL's contract workers operate in highly professional/skilled areas of CSL's operations, such as business technology, manufacturing and engineering, we are aware that some, especially less senior foreign and other migrant workers in manufacturing, maintenance and repair, construction, security and cleaning contract roles, could be exposed to labour exploitation, especially when these contract workers are hired through agents/agencies.

### Future focus in expanding our assessing of any modern slavery risk in our operations

- Assess a sample of labour hire firms through CSL's TPRM system (which launched in June 2021).



## Our supply chain

In 2019/20, CSL commissioned country modern slavery and related human rights risk mapping, tailored to our industry and footprint, undertaken by an independent modern slavery risk monitoring advisory firm. This was in line with business human rights due diligence good practice. Countries we source from and/or have operations in, were ranked for risk of modern slavery in the types of industries our footprint is comprised of. Following the country risk assessment, we assessed supplier risk based on supplier sector and the work practices of various suppliers based on our understanding of heightened risk in areas such as manufacturing and logistics versus accounting and other professional services supply. This helped us shortlist a pilot group of suppliers to begin desk-based risk assessment. You can find the outcomes of this, and other related work undertaken, in CSL's 2020 Modern Slavery Statement available on CSL.com > Corporate Responsibility.

### Activities to identify risks and actions to assess and address those risks

- In March 2021, CSL became an associate member of the Pharmaceutical Supply Chain Initiative (PSCI). The PSCI is a group of major pharmaceutical and healthcare companies who promote responsible practices to continuously improve social (labour standards), health, safety and environmental sustainable outcomes for their supply chains. This includes fair and safe work conditions and practices, responsible business practices, and environmental sustainability and efficient use of resources.

As a member, CSL is committed to integrating the PSCI Principles for Responsible Supply Chain Management (see below for more on how CSL has achieved this). PSCI's Principles include those for human rights, ethics, labor, health and safety, environment and related management systems, which are then applied in a shared audit tool and working group committees to deepen work on issues. CSL now has representatives on PSCI's Human Rights and Labour Team and Environment Team which seek to advance areas of interest for the sector and its suppliers. In addition, as a member organisation, CSL is able to benefit from PSCI's audit program which enables the sharing of audit reports with more than one buyer member via a web-based platform. This means fewer audits for each supplier and efficiency gains for PSCI members (see more below), and alignment of leverage to support influencing and recognition of remediation of non-compliance.

#### PSCI audits

PSCI's audit framework is designed to assess a supplier's performance against the PSCI Principles as well as against international standards and agreements in the areas of Ethics, Labor & Human Rights, Health & Safety, Environment and Management Systems, and related local regulatory requirements (whichever is higher). Audits are carried out either by qualified internal auditors working at PSCI member companies or by professional and independent third-party audit firms. PSCI has approved 15 professional, independent third-party audit firms to perform PSCI audits.

CSL sampled the 49 parent company level suppliers detailed previously in our supply chain (see page 4). For the five readily available audits (two in the US and one each in Switzerland, Germany and the Czech Republic) none had identified any critical findings across any of the assessed domains and there were no major or minor findings across the Labour & Human Rights domain. Four of the five audits were conducted onsite.



- In June 2021, we deployed an improved end-to-end process for the assessment of third parties across a number of risk domains, including the implementation of a new risk management system. Our improved enterprise-wide third party risk management (TPRM) platform will centralise the onboarding of third parties (including suppliers) based on new third-party criteria, delivering significant benefits to our stakeholders including:
  - proactive identification of supplier risks, delivering against our 2030 objective of efficiency and reliable supply, by identifying and remediating a range of risks in our supply chain;
  - standardised risk and performance scoring across suppliers, thus improving compliance and audit readiness;
  - ability to report and revise supplier risk metrics more frequently and more proactively;
  - defined criteria to consistently identify critical (to CSL's supply chain) third parties; and
  - automated integration between existing enterprise systems to enable efficiencies and improved data management.

Labour management is one of the risk domains assessed by the platform. Following an initial self-assessment risk screening exercise, higher-risk suppliers will be directed to also undertake an EcoVadis assessment. Following our pilot of EcoVadis's capability in 2020, the third-party platform was integrated into TPRM to provide enhanced supplier screening across environmental, social, and governance (ESG) parameters and themes (such as labour and human rights, ethics, environmental management). In partnership with EcoVadis, CSL has set relevant thresholds for the individual theme scores and will be continuing to implement and refine the program. If a threshold is exceeded, the supplier will be invited to submit corrective actions to address assessed gaps.

Ultimately, the combination of TPRM and EcoVadis provides a scaleable tool for evaluating the ESG management systems of the large majority of our suppliers, driving corrective actions where necessary and determining whether social audits are required to further identify and remedy risk, including modern slavery.

- In June 2021, CSL approved its first Third Party Code of Conduct. Complementing CSL's Code of Responsible Business Practice and adopting PSCI Principles (which incorporate international labour standards drawn from international human rights conventions, and make these available in multiple languages for suppliers and workers), the new Third Party Code of Conduct makes explicitly clear our expectations for the conduct of CSL business by its third parties/suppliers. Planning has commenced for the communication of the Third Party Code of Conduct to existing and new suppliers.
- In response to the US Department of State Xinjiang Supply Chain Business Advisory issued 1 July 2020, and updated on 13 July 2021 (and similar UK government briefings and statements from the European Union), regarding widespread, state-sponsored forced labor and intrusive surveillance in and related to Xinjiang, CSL has confirmed that none of the 132 suppliers within China for our China operations suppliers operate in the Xinjiang Region. Likewise, business registries showed nothing to suggest that second-tier businesses linked to the suppliers were working in Xinjiang.

### Risks identified in our supply chain

We have determined that the following countries and goods and services within our supply chain may represent areas of modern slavery, in particular forced labour risk.

#### Countries

- We have small amounts of sourcing from and/or small distributor business relationships in countries which our modern slavery risk mapping indicated could have significant to high risks for modern slavery for our sector footprint, such as in warehousing, logistics, manufacturing, or raw materials production (especially for foreign migrant workers). These countries include Thailand, India, Myanmar (Burma), the Russian Federation and China – for significant risk; and Brazil, Malaysia, Italy, Mexico, Philippines, Saudi Arabia, Taiwan and Vietnam – for high risk. We aim to update this country risk mapping to take into account the latest TIP (Trafficking in Persons) Report 2021 and other post COVID-19 data.
- In countries where a larger portion of our suppliers originate, we expect some increasing risk of modern slavery (primarily of foreign migrant workers) in these same industries in our sector and supply chain footprints. These countries include Germany, the UK and the US.

#### Goods and services

- Manufacturing, especially some finished product component providers (glass, vials, personal protective equipment) and machinery.
- Warehousing and third-party logistics.
- Facilities services (e.g. cleaning, construction, capital and equipment).

Within the above sectors, we consider industries and suppliers with a heavy reliance on subcontracting (and less visibility to actual workforce management) and/or the use of foreign/migrant workers recruited through an agent/agencies to represent a potential for higher modern slavery risk.



## Our supply chain continued

### Future focus

Continue training and engaging our internal leadership and teams to understand that modern slavery affects supply chains of all large global businesses, that we have a duty to improve our practices to reduce this risk, how other companies do so, what due diligence laws expect from our business, and to discuss steps we can take or consider piloting for this.

Revisit the country and sector risk mapping exercise undertaken in 2020 to update it (or consider a more 'live' country/sector risk rating service) with intelligence gathered from a diverse set of sources, either government or non-government organisations.

For CSL suppliers:

- Continue to review the performance of CSL's TPRM system and the passage of critical suppliers through the platform and where applicable EcoVadis assessments and subsequent supplier engagement to understand their management of modern slavery risk steps or influence improvement.
- Leverage more fully social audits available in the PSCI audit program platform to inform supplier risk management. Learn more about the nature of risks in our sector in PSCI human rights and other workgroup committee meetings and consider how applying these learnings can assist our risk management and due diligence. If and where necessary (and where PSCI is less relevant), consider tailored deep-dive expert investigative onsite social audit and/or stakeholder engagement partnership monitoring of conditions at higher-risk sites.
- Continue the rollout of CSL's Third Party Code of Conduct (clarifying labour standards expectations including to prevent modern slavery risk) to existing and new suppliers.
- With our sourcing and other leadership, continue exploring how we can integrate due diligence for supplier labour standards monitoring into our purchasing practices, and thereby use our buying leverage to influence and reward good practices in our supply chains.
- Explore opportunities to partner with independent worker/affected persons representative stakeholder organisations to develop, promote and/or encourage suppliers to promote and enable grievance mechanisms reporting back to CSL.

## Our approach to modern slavery

Our approach to modern slavery remains largely unchanged from our disclosure in 2020.

### Policy

CSL's Code of Responsible Business Practice (Code) defines the standards of behaviour expected of all our employees, contractors, suppliers and distributors. Edition 4 of our Code was published on 1 July 2021.

Our Code:

- recognises the right of every child to be protected from economic exploitation (i.e., child labour);
- supports the right of every employee to be legally employed;
- allows employees the right to seek representation (i.e. from a trade [labour] union or employee association) without fear of intimidation, reprisal or harassment;
- ensures employees receive payment that meets or exceeds the legal minimum wage in all jurisdictions;
- prohibits less favourable treatment of a person on the basis of gender, age, race, religion, disability and sexual orientation;
- forbids the solicitation, facilitation or any other activity in connection with modern slavery or human trafficking; and
- requires that no engagement with CSL should deprive individuals of their freedom.

The Code has been made available to employees across several mediums including:

- electronic copies translated into 14 languages available on CSL's intranet and CSL.com;
- printed copies of the Code distributed to offices across our global operations; and
- a newly designed e-learn module of CSL's decision-making framework and updated Code e-learn, available to all existing and new employees.

CSL's Speak Up Policy encourages all of CSL's employees, directors and suppliers and relatives of these individuals to report potential misconduct, which includes any suspected or actual misconduct or improper state of affairs or circumstances in relation to CSL, or an employee, officer, consultant or contractor of CSL. All reports made under Speak Up Policy are received and treated sensitively and seriously and will be dealt with promptly, fairly and objectively. Employees of CSL are required to undertake training on the CSL Speak Up Policy to encourage a safe-to-speak-up workplace.

**Our Values bind the CSL Group of companies together through a shared commitment to:**



## Framework, including due diligence

We are continually looking for opportunities to improve our approach to identifying and mitigating modern slavery risks in our supply chain and looking for opportunities to develop a flexible, robust yet sustainable, integrated framework over the longer term. The diagram below shows our current approach, as initially shared in our 2020 Modern Slavery Statement, to monitoring modern slavery risk and is followed by a summary of our roadmap of action steps. As we undertake activities and learn from our own experiences, and that of our suppliers, and external partners, we will seek to refine our approach.



Area	Roadmap: key focus areas
<p><b>1</b> Policy</p>	<ul style="list-style-type: none"> <li>• Continuously improve our existing policy framework in line with industry and legal expectations</li> <li>• Raise awareness internally of modern slavery to support the identification and management of risk and influence ongoing management systems improvement in line with industry standards and emerging legal expectations</li> <li>• Work collaboratively with suppliers to increase awareness around modern slavery risk management and labour standards requirements</li> <li>• Externally benchmark our due diligence efforts to drive continuous improvement</li> </ul>
<p><b>2</b> Risk mapping</p>	<ul style="list-style-type: none"> <li>• Identify potentially high-risk hotspots across sectors and geographies and hence partners, utilising existing and emerging external sources/platforms, engagement and other best-practice approaches where relevant</li> <li>• Deepen our insights into the nature of existing and emerging hotspot risks (and how they can be prevented) through participation in industry human rights and modern slavery workgroups and committees and as informed by advisors, NGOs, government and other stakeholder reports, etc</li> <li>• Ensure our relevant leadership are regularly, or as needed, briefed on emerging hotspot risks and possible risk management</li> <li>• Assess how we might conduct due diligence on modern slavery and human rights risks in raw materials supply chains and pilot initial approaches</li> </ul>
<p><b>3</b> Risk assessing</p>	<ul style="list-style-type: none"> <li>• Utilise our TPRM platform to generate initial supplier potential risk scores for new and existing suppliers</li> <li>• Utilise our TPRM platform to flag a requirement for additional detailed risk assessments either through deeper online assessment and/or tailored supplier engagement</li> <li>• Work to apply scores in purchasing decisions to integrate into our business practices our due diligence efforts to influence and reward good supply chain labour standards</li> <li>• Assess a sample of labour hire firms through CSL's TPRM</li> <li>• Promote CSL's Speak Up hotline process (via CSL.com) to encourage employees and suppliers to speak up and report information about potential misconduct</li> <li>• Leverage industry-based platforms for conducting risk assessments and influencing corrective actions</li> <li>• For business integration with our purchasing practices, work to weight, preference and in balanced scorecards, reward suppliers who commit to maintaining compliance to our Code, achieve a baseline, and score higher for management of modern slavery and related labour/ human rights risks</li> </ul>
<p><b>4</b> Onsite investigation where needed</p>	<ul style="list-style-type: none"> <li>• Collaborate in industry-based initiatives (such as the PSCI) that undertake social audits, such that resource impacts on suppliers can be minimised</li> <li>• Commission deeper-dive investigative onsite 'social audits' by modern slavery experts where potential risk of modern slavery may be identified and industry collaboration approaches may be insufficient due diligence</li> <li>• Consider worker/affected persons representatives (e.g. modern slavery-focused charities and NGOs, relevant trade unions, etc) to engage with to support training and monitoring of risk on potentially higher-risk sites</li> </ul>

Area	Roadmap: key focus areas
<p><b>5</b> Influencing remediation and continuous improvement</p>	<ul style="list-style-type: none"> <li>• Engage suppliers on Corrective and Preventative Action Plan(s) (CAPA) to influence remediation where modern slavery risks (including gaps in management systems as identified through systems such as EcoVadis and questionnaires, but especially any actual improvement of worker conditions needed) are identified</li> <li>• Support supplier capacity building if needed for remediation (including risk prevention) directly, or in industry collaborations or wider initiatives if more relevant</li> <li>• Monitor through follow-up efforts (in collaboration where possible)</li> <li>• Create and integrate into business practices an updated zero tolerance policy that influences sufficient urgent remediation chances for suppliers yet supports sourcing and purchasing teams to, in the worst cases, exit supplier relationships where CAPA plans are not agreed or ultimately executed to a standard acceptable to CSL, i.e., where serious issues were not remediated despite significant engagement efforts</li> <li>• Continuously improve systems to support reward compliant suppliers with continued fair business</li> <li>• Build internal capability through training, policy refinement and standard operating procedures</li> </ul>
<p><b>6</b> Reporting, oversight, governance and process improvement</p>	<ul style="list-style-type: none"> <li>• Drive operational accountability and cross-functional collaboration to support continuous improvement (e.g. through our Supply Chain Integrity Council and leadership oversight)</li> <li>• Integrate modern slavery risk management efforts into wider supply chain human rights due diligence in line with emerging legislative and stakeholder expectations</li> <li>• Ensure annual public disclosure of performance with sign-off from highest governance body</li> </ul>



## Monitoring and assessing effectiveness

The maturity of our modern slavery program and assessment of its effectiveness will improve as we learn from pilot programs, internal data management capabilities, external good practice, participation in industry-based partnerships and continued dialogue with our suppliers and partners.

For this period, key activities for monitoring effectiveness included the following.

### Governance

- Policy approach
- Employee training
- Feedback loops
- Benchmarking

- We have published a Third Party Code of Conduct adopting the principles from a leading industry association – Pharmaceutical Supply Chain Initiative (PSCI).
- We held a customised training program for our human resources talent acquisition teams.
- We have progressed the rollout of modern slavery contract provisions through the Group.
- We have gathered feedback on our programs' performance by CSL's Supply Chain Integrity Council, CSL Leadership, outside counsel and human rights experts.
- We have continued to provide access to (and monitor reports under) grievance mechanisms for employees and suppliers, and used communications and training to increase awareness of such mechanisms (including the Speak Up hotline).
- We have conducted benchmarking against the modern slavery statement of other reporting entities and industry peers, taking into account feedback and public commentary by modern slavery charities and experts on how companies can improve their efforts.

### Risk assessment

- Screening capability
- Auditing measures

- We have released a new technology platform to improve scalability and understanding of supplier risk across a number of risk domains.
- We have joined the PSCI to improve our ability to screen and assess suppliers and inform the maturity and future needs of our program.
- We have gathered feedback from suppliers following their first use of our platform.
- We have drawn on PSCI's onsite audits to inform supplier risk and need for future social audits.

### Monitoring

- Corrective actions
- Framework effectiveness
- Industry participation

- We have modified thresholds for triggering corrective actions as a result of an EcoVadis assessment.
- A modern slavery expert continues to review our process and framework, and we have also sought advice on leading market practice in modern slavery programs.
- Our staff participated in industry meetings or workgroups, building business understanding of modern slavery.
- Our Supply Chain Integrity Council held meetings throughout the reporting period and evaluated the development of our modern slavery program, upcoming legislation and developments in various markets including Australia, Europe and the US.
- We have reviewed Speak Up hotline reports to identify leads and complaints related to modern slavery.





## Consultation

CSL's Global Leadership Group (GLG), led by the Chief Executive Officer and Managing Director, has oversight of the Group, including each of the reporting entities covered by this Statement and their controlled entities. The GLG is responsible for Group functions such as human resources, risk, ethics and compliance, business technology, legal, and environment health and safety. As a result, consultation with each of the reporting entities covered by the Statement and their controlled entities was undertaken at a leadership and functional level in the process of preparing this Statement. This included providing the Statement to the GLG for comment prior to it being put to the Board of CSL Limited for review and approval.

CSL also operates a centralised sourcing and procurement operating model that supports all functions and business units. The function is organised by category at a regional and local level and does not deviate by business unit.

CSL's Supply Chain Integrity Council, comprised of leaders and heads of function from across the Group, helps steer our efforts to improve and integrate environmental, social and governance risk identification across the enterprise, including in relation to modern slavery.

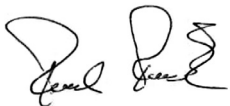
In addition, CSL's published and Board approved 2020 Modern Slavery Statement was circulated to the GLG and all employees. In support of Board approval, this Statement was also reviewed and endorsed by the Board of each of the reporting entities. This process seeks to ensure awareness, oversight and accountability across the business.

## Other information

In April 2021, CSL voluntarily registered our 2020 Modern Slavery Statement with the UK Home Office Modern Slavery Statement Registry. This process was facilitated by the applicable CSL Behring and Seqirus entities operating to similar disclosure requirements to that of Australia within the UK.

## Statement approval

This statement was reviewed and approved for each reporting entity by the Board of Directors of CSL Limited on 7 December 2021 and signed on its behalf by:



Paul Perreault  
CEO and Managing Director  
CSL Limited

## Appendix

This Statement was prepared to meet the mandatory reporting criteria set out under the Australian Modern Slavery Act.

The table below identifies where each criterion is disclosed within the different sections of the Statement.

MSA Criteria	Modern Slavery Statement 2021
Identify the reporting entity	About our Statement, page 1
Describe the reporting entity's structure, operations and supply chains	Organisational structure, pages 1 to 6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or control	Identification of modern slavery risk in our operations and supply chain (including future focus), pages 7 to 11
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	
Describe how the reporting entity assesses the effectiveness of these actions	Monitoring and assessing effectiveness, page 16
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Consultation, page 17
Provide any other relevant information	Our approach to modern slavery, pages 12 to 16