



CSL's Statement on Modern Slavery

1 July 2022 to 30 June 2023

About our Statement

This Statement on Modern Slavery (the Statement)¹ describes:

- the structure, operations and supply chains of CSL;
- where CSL believes there may be risks of modern slavery in our operations and supply chains;
- the actions we have commenced to assess and address those risks; and
- how we evaluate the effectiveness of these actions.

The Statement is a joint statement in relation to the reporting period 1 July 2022 to 30 June 2023 prepared by and for CSL Limited (ABN 99 051 588 348) and also for the reporting entities CSL Behring (Australia) Pty Ltd (ABN 48 160 734 761) and Seqirus (Australia) Pty Ltd (ABN 66 120 398 067).

For the purposes of this Statement, 'CSL', 'we', 'us' and 'our' collectively refers to CSL Limited and its key businesses, CSL Behring, CSL Plasma, CSL Seqirus and CSL Vifor (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'). For a list of CSL Limited's subsidiaries and where they are incorporated, refer to page 151 of the 2023 Annual Report.

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 > Sustainability](#)

¹ The Statement has been prepared for purposes of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada), *Modern Slavery Act 2018* (Cth), *United Kingdom Modern Slavery Act 2015* and the *California Transparency in Supply Chains Act 2010*.

Organisational structure

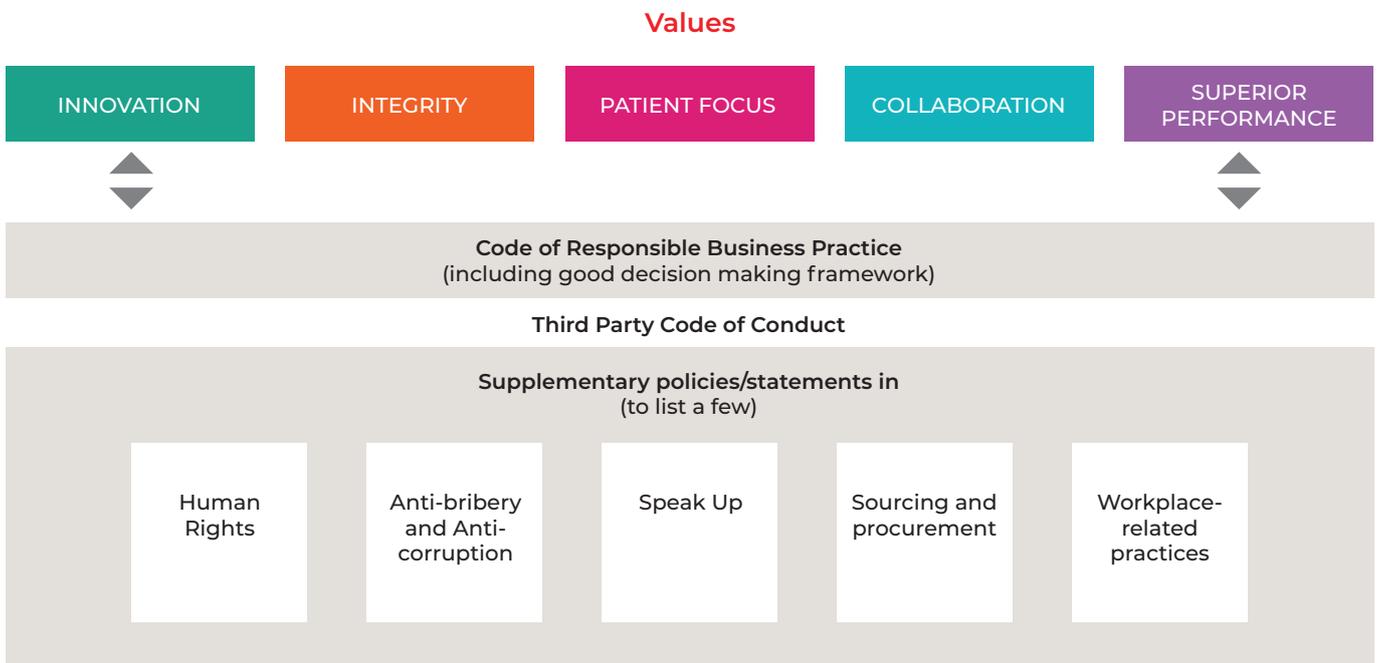
CSL Limited is the parent of the CSL Group and is headquartered in Melbourne, Australia. It is incorporated in Australia, listed on the Australian Securities Exchange (ASX) and is a constituent of the S&P/ASX 20 index.

CSL is a global biotechnology company with a dynamic portfolio of life-saving medicines, including those that treat haemophilia and immune deficiencies, vaccines to prevent influenza, and therapies in iron deficiency and nephrology. Since our beginning in 1916, we have been driven by our promise to save lives using the latest technologies. Today, CSL provides life-saving products to more than 100 countries and employs 32,065 people in 43 countries². 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.

In August 2022, we successfully closed the acquisition of Vifor Pharma Ltd (now CSL Vifor), with the integration of CSL Vifor into the CSL group well advanced.

Our policy approach

CSL's Group Values, the Code of Responsible Business Practice and related policies shape CSL's approach to responsible business conduct.



Our Code of Responsible Business Practice is available to employees across several mediums including:

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

Our locations



* CSL Plasma operates 342 plasma collection centres in the United States, Europe and China.

CSL Group includes the following businesses

CSL Behring

CSL Behring is a global biopharmaceuticals leader driven by CSL's promise to save lives. Focused on serving patients' needs by using the latest technologies, CSL Behring discovers, develops and delivers innovative therapies for people living with conditions in the immunology, haematology, cardiovascular and metabolic, respiratory, and transplant therapeutic areas. CSL Behring uses three strategic scientific platforms of plasma fractionation, recombinant protein technology, and cell and gene therapy to support continued innovation and continually refine ways in which products can address unmet medical needs and help patients lead full lives.

CSL Behring operates CSL Plasma, one of the world's largest plasma collection networks.

CSL Seqirus

As one of the leading influenza vaccine providers in the world, CSL Seqirus is a major contributor to the prevention of influenza globally and a transcontinental partner in pandemic preparedness.

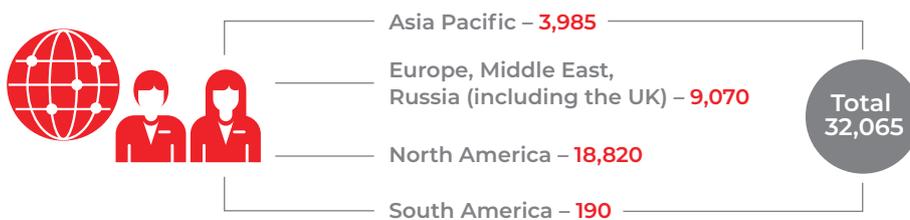
CSL Seqirus operates state-of-the-art production facilities in the US, the UK and Australia and uses both egg-based and cell-based manufacturing technologies as well as a proprietary adjuvant. It has leading research and development (R&D) capabilities, a broad and differentiated product portfolio and commercial operations in more than 20 countries.

CSL Vifor

CSL Vifor is a global partner of choice for pharmaceuticals and innovative, leading therapies in iron deficiency and nephrology. CSL Vifor specialises in strategic global partnering, in-licensing and developing, manufacturing and marketing pharmaceutical products for precision healthcare, aiming to help patients around the world lead better, healthier lives. Headquartered in St Gallen, Switzerland, CSL Vifor also includes the joint company Vifor Fresenius Medical Care Renal Pharma (with Fresenius Medical Care).

Our workforce breakdown

(headcount as at 30 June 2023)



Our value chain

We achieve value creation through high-quality, focused innovation capabilities, operational excellence and global commercial strength. Plasma donors provide critical raw material for our protein-based therapeutics, while partners and collaborators support innovation and CSL's portfolio diversification. Employees and a diverse range of third parties enable value creation by facilitating and driving our business activities.



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

Our operations at a glance

CSL's key business and unique capabilities are as follows:

CSL Limited

Headquarters
Australia



Total headcount³

625



Key operations and activities

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

CSL Behring

Central office
US



Total headcount³

11,188



Key operations and activities

- Sourcing
- Research and Development (R&D)
- Product manufacturing – five facilities located in Australia, China, Germany, Switzerland and the US
- Contract manufacturing
- Warehousing, transport and logistics
- Commercial operations
- Key products: PRIVIGEN[®], ALBUREX[®], HIZENTRA[®], IDELVION[®], KCENTRA[®], HAEGARDA[®]

CSL Plasma

Central office
US



Total headcount³

14,990



Key operations and activities

- Sourcing
- Plasma donor management
- Product manufacturing – plasma collection centres located in China, Germany, Hungary and the US
- Warehousing, transport and logistics
- Commercial operations

CSL Seqirus

Central office
UK



Total headcount³

3,354



Key operations

- Sourcing
- R&D
- Product manufacturing – three facilities located in Australia, the UK and the US
- Contract manufacturing
- Warehousing, transport and logistics
- Commercial operations
- Key products: FLUAD[®], FLUCELVAX[®], AFLURIA[®]

CSL Vifor

Central office
Switzerland



Total headcount³

1,908



Key operations and activities

- Sourcing
- R&D
- Product manufacturing – one facility in Switzerland
- Contract manufacturing
- Warehousing, transport and logistics
- Commercial operations
- Joint company with Fresenius Medical Care to form Vifor Fresenius Medical Care Renal Pharma⁴
- Key products: KORSUVAR, VELTASSAR[®], VELPHOROR[®], FERINJECTR[®], VENOFERR[®]

Supporting our businesses are CSL's enabling functions, consisting of: Finance; Human Resources; Sourcing and Procurement; Legal; Information & Technology (I&T); and Corporate & External Affairs.

CSL does not undertake external financing activities.

³ As at 30 June 2023

⁴ Vifor Fresenius Medical Care Renal Pharma (VFMCRP) has combined Vifor Pharma's (now CSL Vifor) expertise in pharmaceuticals with the skills and infrastructure of Fresenius Medical Care (FMC). Its business model involves the licensing of pharmaceutical products and commercialisation via FMC patient access and additional partners. The joint company has no headcount, with all employees being transferred to Vifor Pharma in 2017. Joint company ownership sits at 55% CSL Vifor and 45% FMC, with all services being provided under service level agreements being CSL Vifor the first line service provider.

Our supply chain

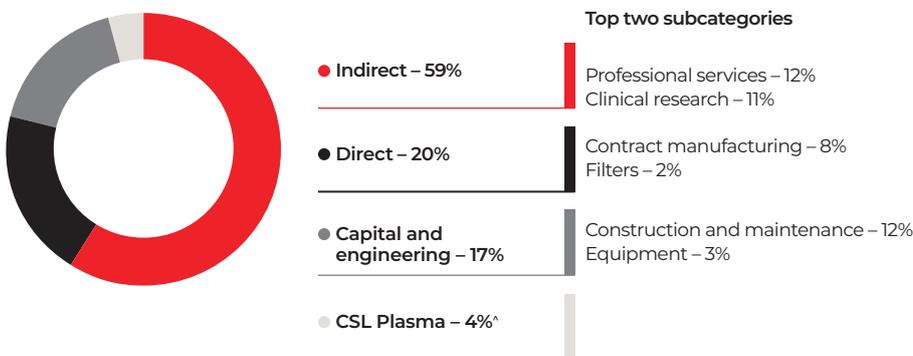
Across our global operations we work with more than 26,000 suppliers in the following categories:

- **indirect** – refers to expenses incurred for materials, services (including clinical trials) and maintenance required to operate the business, such as professional services, facilities management services (including cleaning services and security 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 manufacture and/or production of goods and/or services that CSL manufacture, such as packaging, chemicals, medical devices, filters, gels and ingredients; and
- **capital and engineering** – 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.

Our relationships with our suppliers vary from short-term engagements to long-term contractual agreements, as guided by our supplier management plan.

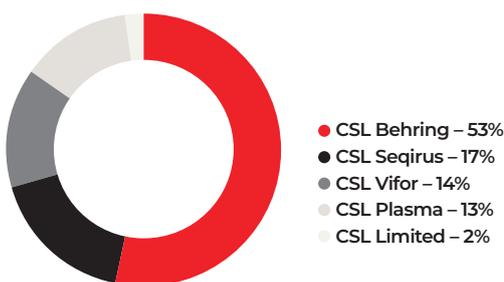
[You can find more information on CSL, our operations and our strategic priorities, including our recent financial and non-financial performance in our 2022/23 Annual Report, on CSL.com.](#)

Spend by category*



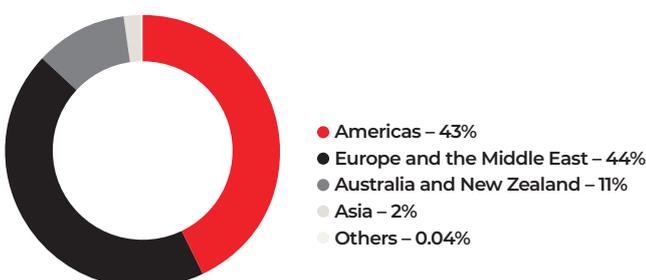
* Using 2023 financial year invoice data spend. Indirect includes Corporate Services, Professional Services and Corporate Spend.
[^] Incorporates services and products that support plasma collection and does not include plasma donor payments.

Spend by business unit*



* Using 2023 financial year invoice data spend. Due to rounding percentages do not equal 100.

Spend by region*



* Using 2023 financial year invoice data spend. Others includes items with no country/region assigned in spend data. Due to rounding percentages do not equal 100.

Identification of modern slavery risk in our operations and supply chain

CSL is committed to identifying and mitigating where possible the risk of modern slavery in its operations and supply chains. In support of developing appropriate foundations for continued and deeper due diligence across modern slavery and other human rights elements, in December 2022, CSL's Audit and Risk Management Committee of the Board approved CSL's first standalone Human Rights Statement. The Statement builds on the rights of key stakeholders detailed in CSL's Code of Responsible Business Practice and sets out our approach for human rights due diligence.

We continue our program of refining available technology and processes to support investigation of new suppliers and for existing suppliers and other partners. Over the reporting period, we conducted the following activities to identify possible modern slavery risks in our own operations and supply chains and have taken actions to assess and address those risks.

Our operations

The composition of CSL's direct workforce remains unchanged since our first modern slavery statement. More than 90% of our direct workforce are permanent employees, with a minority on fixed-term employment contracts due to the seasonal nature of manufacturing for some of our product lines (such as influenza vaccines).

Irrespective of an employee's location or business unit, employment practices are governed and managed by human resources. Supervisors/managers are supported by regional centres of excellence when contracting employees and have access to a broad library of approved practices (tools, guidance documents and standard operating procedures) for the recruitment, hiring, management and retention of directly supervised employees.

At a number of our sites, some workers are members of independent trade unions or works councils 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 oversight and control we have over the Group's direct workforce, we do not consider our own operations to be a significant area of modern slavery risk.

Actions taken to assess and address risks in CSL's operations

On World Day for Safety and Health at Work – a United Nations day of observance on 28 April 2023 – we shared with all employees CSL's Human Rights Statement reiterating our commitment to responsible employee working conditions, employee relations and business conduct across our supply chain.

CSL is committed to ensuring that employees, contractors, suppliers and business partners are able to raise concerns regarding any potential misconduct and to have such concerns appropriately investigated. This commitment is implemented through CSL's Speak Up Policy. The Speak Up Policy contains mechanisms, including a global 24/7 telephone and internet hotline service available on CSL.com, for employees, contractors, suppliers and business partners to raise concerns in a confidential and anonymous (where permissible by law) manner without being subject to any form of detriment or retaliation. CSL's Speak Up hotline can be accessed by toll-free numbers or online and is promoted periodically through employee communications and trainings.

In December 2022, CSL updated the Speak Up Policy to introduce new categories of reportable concerns such as tax evasion/money laundering and human rights violations in response to recent external regulatory developments such as the German Supply Chain Due Diligence Act, which requires companies to provide to third parties mechanisms to raise concerns on human rights violations. In addition to this, the Speak Up policy update covered further detail on the definition of a reportable concern versus a routine human resource grievance and information that a reporter may provide in the context of anonymous versus confidential reporting.

Over the reporting period all employees were required to undertake training on CSL's Speak Up Policy, including employees from CSL Vifor.

During the reporting period, no reports related to human trafficking or slavery and forced labour in our global operations were received. As a result, CSL did not need to undertake measures to remediate the loss of income to the most vulnerable rightsholders in our activities and supply chains.

 Visit [CSL.com](https://www.csl.com) for more information on: [CSL's Human Rights Statement](#), [Speak Up Policy](#), [Speak Up Hotline](#)

Our supply chain

Unlike our direct workforce, CSL has reduced visibility and control over other workers who are not directly supervised by CSL supervisors/managers. These workers may be less aware of their rights and, consequently, susceptible to exploitation.

CSL recognises that with a supplier base of more than 30,000 constituents across a diverse set of industries and geographies there is a potential for modern slavery risk. As a result, our efforts and commitment to continuous improvement is enduring.



Countries at risk

Modern slavery risk mapping previously undertaken and updated this year indicates CSL could have very high risks for modern slavery in sectors such as warehousing, logistics, manufacturing, or raw materials production (especially where foreign migrant workers are utilised). Countries identified include Bahrain, Bangladesh, China, Colombia, Egypt, Guatemala, Honduras, Hong Kong, India, Indonesia, Iran, Iraq, Jordan, Kazakhstan, Kuwait, Lebanon, Malaysia, Myanmar (Burma), Russian Federation, Saudi Arabia, South Korea, Sri Lanka, Thailand, Turkey, Vietnam and Yemen.

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 recognised at risk

We believe the following sectors are of high risk to modern slavery:

- warehousing and third-party logistics;
- manufacturing, especially some finished product component providers (glass, vials, personal protective equipment) and machinery; and
- facilities services (e.g. cleaning, construction, capital and equipment).

Within the above sectors, we consider industries and suppliers with a heavy reliance on subcontracting where there is less visibility of labour practices and/or the use of foreign/migrant workers recruited through an agent/agencies to represent a potential for higher modern slavery risk.

CSL regularly updates our understanding of country and sectors of highest risk using available information from EcoVadis and other external sources, such as the Global Slavery Index and insights from the Business & Human Rights Resource Centre. Our partnership with EcoVadis provides access to data points resulting from worldwide assessments and interrogation of external data sources relevant to ESG aspects evaluated by the platform.



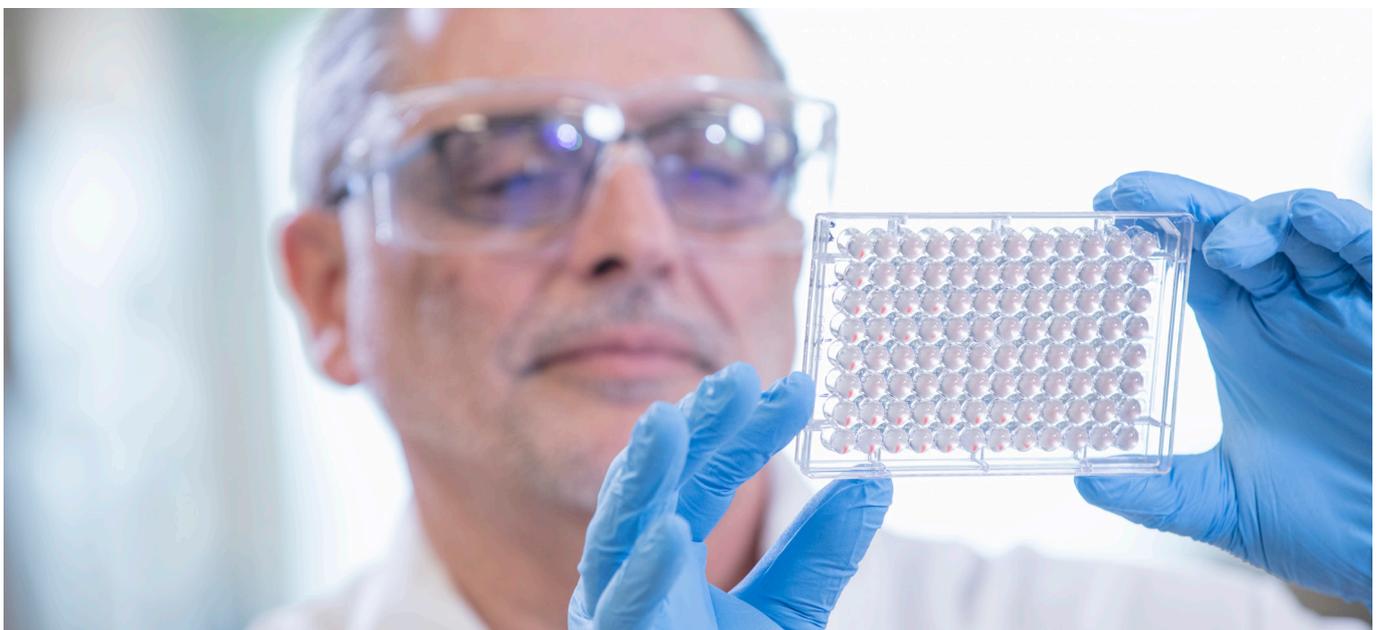
Actions taken to assess and address risks in CSL's supply chain

To support risk management practices and integral to our due diligence approach across our supply chain, CSL operates an end-to-end process for the assessment of high-risk and critical third parties across a number of risk domains (e.g. trade compliance, data privacy, anti-bribery and anti-corruption, cyber security, environmental, social and governance (ESG) risks), including the implementation and ongoing refinement of a risk management system. Our enterprise-wide third-party risk management (TPRM) platform centralises the onboarding of third parties (including suppliers) based on new third-party criteria.

CSL's TPRM Working Group oversees day to day operations of the platform and its workflows. The TPRM Governance and Oversight Committee, which is chaired by CSL's Chief Procurement Officer and comprises functional specialists from across the organisation provides decision-making support and monitors performance across the platform and interconnected elements. This Committee is charged with ensuring clear processes and escalation mechanisms are endorsed and in place for the management of third parties, so that all can be appropriately screened and assessed in line with specified criteria before conducting business with CSL.

Over the reporting period, the following activities were undertaken to identify and manage (assess and action) identified risks.

- We advanced the use of the TPRM tool and have now loaded 480 vendors with assessments across all risk domains since implementation in 2021. The on-boarding process of CSL's most critical incumbent vendors has also started, none of whom is categorised as high risk.
- CSL's Supply Chain Integrity Council evolved to focus its efforts on incoming environmental and human rights legislation developments out of Europe. The resulting working group met 12 times over the reporting period to bolster risk assessment and management practices; for example, by expanding the ESG risk domain questions asked of suppliers as detailed below.
- We have evolved our TPRM platform by means of additional questions for environment, health and safety and human rights screening, including:
 - four health and safety related questions added and/or enhanced by means of expanded criteria;
 - three environmental questions added; and
 - three modern slavery related questions added and/or enhanced by means of expanded criteria. For example, new suppliers must now: list country of operations for the manufacture of products supplied to CSL; detail the extent to which the supplier subcontracts third parties; and detail whether any incidents of modern slavery have been identified in their business and/or supply chain.



Our supply chain continued

- We renewed our partnership with EcoVadis – an industry leading provider of enhanced supplier screening across environmental, social, and governance (ESG) parameters and themes (such as labour and human rights, ethics, environmental management) and adopted additional functionality to assist with risk screening/assessments of existing suppliers.
- We continue monitoring the corrective actions of suppliers assessed by the EcoVadis platform (eight for the reporting period). Suppliers are required to undertake an EcoVadis assessment if initial TPRM screening thresholds have been reached. Following an EcoVadis assessment, suppliers can voluntarily address recommended corrective actions (such as policy/procedural gaps) identified by EcoVadis over a period of 12 to 18 months.
- We have updated CSL's Speak Up Policy to introduce new categories of reportable concerns available via our hotline (phone and web-based at CSL.com).
- We have updated CSL's Global Sourcing and Procurement Policy to incorporate responsible sourcing needs related to human rights and modern slavery.
- We have collaborated with an external ESG supply chain expert to enhance our standard operating procedures for responding to reported modern slavery incidents. Further, guidance received will enable CSL to actively pursue social audits as a means for identifying risks and seek to remediate actual incidents beyond those self-reported by suppliers.

In addition, all employees involved in the assessment of new vendors were required to undergo training in CSL's TPRM framework/technology. The training provides detailed context on the risk domains being assessed and the levels of accountability across the organisation for the identification and management of supplier risk.



Partnerships

In addition to technology partners such as EcoVadis, to further enhance our approach to supplier risk, CSL is 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 labour standards, health, safety and environmentally 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. CSL participates in a number of topic teams, such as Environment and Human Rights. These teams share knowledge and undertake a range of projects to advance best practice and address emerging issues/topics. As a member, CSL has access to member-based audits of suppliers. These audits supplement our TPRM and EcoVadis risk management processes.



Monitoring and assessing effectiveness of actions

Assessing effectiveness of our efforts helps to inform areas for improvement and drive quality outcomes. We have made modest progress since reporting began and recognise the opportunity for deeper risk assessments and interrogation of our supply chain. Future efforts to assess risk across our existing supply chain will enhance our practices and build greater capability across the organisation.

How we monitored progress and assessed effectiveness.



Governance

- Policy approach
- Employee training
- Feedback loops
- Benchmarking

- Developed a standalone Human Rights Statement outlining our commitments across a number of stakeholders and human rights.
- Supported CSL's dedicated working group with legislative developments and external subject matter expertise on best practice approaches.
- Participated in industry associations (such as the PSCI) to inform our approach to addressing modern slavery and program maturity, and contributed to broader industry-based initiatives that enhanced responsible practices.



Risk assessment

- Screening capability
- Auditing measures

- Continually strengthened our TPRM system and supporting processes to achieve scalable and sustainable throughput of supplier risk assessments.
- Improved analysis and data reporting of TPRM workflow outcomes, including governance of risk management practices at the functional level.
- Leveraged available auditing regimes to inform and scale our own risk management practices, such as the PSCI's audit program.



Monitoring

- Corrective actions
- Framework effectiveness
- Industry participation

- Addressed recommendations from an internal audit of CSL's TPRM framework.
- Renewed our partnership with EcoVadis and secured additional technology to scale-up the assessment of existing suppliers.
- Obtained investor feedback on performance and expectations for the mitigation of modern slavery, particularly across CSL's existing supplier base.
- Participated in and received organisation specific (in confidence) insights based on the Australian Council of Superannuation Investors (ACSI's) 2023 review of modern slavery reporting for ASX200 companies. We recognise greater progress is required, specifically the identification and management of risks. Further, CSL along with other Australian companies was subject to a multi-year collaborative research project by academics and civil society organisations aimed at improving responses to modern slavery and access to remedy for affected workers. The publication *Broken Promises: Two years of corporate reporting under Australian Modern Slavery Act* indicated a modest improvement in reporting in the second year versus the first.



Consultation

We continue our practice of providing oversight for our efforts via CSL's management team. 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 Directors 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.

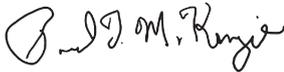
CSL's Supply Chain Integrity Council/Working Group, comprised of leaders and heads of function from across the Group, helps steer our efforts to improve and integrate environmental, social and governance risk identification across the enterprise, including in relation to modern slavery. In support of Board approval, this Statement was also reviewed and endorsed by the Board of each of the reporting entities listed. This process seeks to ensure awareness, oversight and accountability across the business.

Other information

Each year, we voluntarily register our Statement on Modern Slavery with the UK Home Office Modern Slavery Statement Registry. This process is facilitated by the applicable CSL Behring and CSL 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 8 December 2023 and signed on its behalf by:



Paul McKenzie
CEO and Managing Director

CSL Limited