

ENSIGN

LABORATORIES 

Custom and Contract Manufacturing Chemists since 1955

MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2023-2024

Introduction

Ensign Laboratories Pty Ltd

490-500 Wellington Road

Mulgrave, Victoria 3170

ABN 11 004 395 242

Ensign Laboratories is pleased to comply with the anti-slavery initiative as prescribed in the Modern Slavery Act 2018.

The Australian Government's Modern Slavery initiative is fundamental for the establishment and maintenance of basic human rights and through our concerted interrogation of the company's supply chains, any evidence of exploitation, human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and child labour may be exposed.

Who Are We?

Ensign Laboratories Pty Ltd is a privately held, family-owned, single-site Australian contract manufacturer of therapeutic medicines, medical devices, personal care, food, and cosmetic products. The business is located in the eastern suburbs of Melbourne Australia and currently employs approximately 500 employees.

Ensign Laboratories, as defined in the Modern Slavery Act 2018, is a reporting entity whose governance is under the management of the Board of Directors in association with a designated senior management team whose expertise includes but is not limited to:

- Human Resources
- Quality and Regulatory Assurance
- Supply Chain Management
- Engineering management
- Production Management
- Financial Governance
- Commercial and Demand Management

While Ensign Laboratories does not own or control other entities, internal consultation is conducted across key departments to ensure consistent implementation and monitoring of modern slavery practices across all operations.

Our Operations and Supply Chain

Ensign Laboratories provides a complete contract manufacturing solution to our customers including product development, manufacturing, and filling of therapeutic medicines, medical devices, personal care, food, and cosmetic products in a variety of different packaging formats. These packaging formats include bottles, pump packs, tubes, aerosols and sachets.

In order to achieve this, Ensign Laboratories purchases a significant quantity of goods and services. This includes goods such as raw materials, consumables, and equipment, as well as services such as transport, labour services and use of specialist contractors. Due to our diverse product range and stringent quality requirements, we are required to source goods from a number of different countries.

At Ensign Laboratories, we recognise that there is a potential for human rights abuses within our supply chain network and that failing to undertake due diligence of our suppliers may result in a failure to identify and remediate any instances of modern slavery within our supply chains.

A process of risk assessment was undertaken to evaluate the risks associated with the supply chain of goods and services, giving consideration to the product category, region of origin, and reasonable steps that could be taken by Ensign Laboratories to ensure compliance.

Due Diligence and Processes

Key stakeholders developed the Modern Slavery Reporting Policy and included a specific category within the Supplier Site Audit Questionnaire regarding Modern Slavery.

Through the company's vendor assurance program, the audit questionnaire is distributed to our current suppliers, both local and overseas. Vendor assurance is an integral component of the company's quality assurance management.

As of September, 2024:

- 143 Total active/approved individual local suppliers and direct manufacturers.
- 99 Confirmed Modern Slavery Act compliance via completion of EDF2600 Supplier Site Audit questionnaire
- 13 Confirmation on compliance still pending
- 1 Stated compliance with similar local law
- 14 Confirmed NOT to be aware of Forced Labour practices in its supply chain, but did not confirm compliance to the Modern Slavery Act 2018.
- 16 Provided Modern Slavery/ Ethical Statements

Completed responses received are reviewed by the Vendor Assurance team and any declarations of Human Rights abuse as described in the Act, will be forwarded to senior management for review.

The Vendor Assurance team is continuing to work with companies that have outstanding responses and those who have been non-compliant through an escalation process to relevant managers.

To ensure ongoing compliance with modern slavery policies, Ensign Laboratories has implemented a monitoring and tracking system. This includes reviews of supplier adherence to our Site Supplier Questionnaire and Vendor Assurance Program. Key stakeholders meet to assess the effectiveness of actions through bi-annual meetings where supplier audit findings are shared, and corrective actions are reviewed.

Supplier Remediation Process

In the event that a supplier is found to be non-compliant with our modern slavery requirements, Ensign Laboratories is committed to engaging in a remediation process. We will collaborate with the supplier to develop a corrective action plan aimed at addressing any gaps in compliance. This process will include clear timelines for improvements, regular check-ins, and support to ensure that modern slavery risks are mitigated. Should the supplier fail to show progress after an agreed period, Ensign may escalate the issue, potentially leading to the termination of the relationship.

Non-compliant suppliers are given a three-month timeline to address identified gaps. Failure to demonstrate progress will result in escalation to senior management, with potential suspension of the business relationship.

Governance and Training Efforts

Ensign Laboratories is committed to fostering a responsible and ethical business environment that aligns with the principles of the Modern Slavery Act.

Our approach includes comprehensive governance practices and clear communication of our expectations to employees and suppliers.

All staff are required to acknowledge and sign off on several key policies upon commencement and periodically thereafter. These policies reinforce our commitment to ethical business practices and include, but are not limited to:

- **OHS068 Business Code of Conduct:** Outlining expectations for ethical behaviour in all business dealings.
- **OHS069 Product Manufacturer & Supplier Code of Conduct:** Setting standards for responsible practices within our supply chain.
- **TRA10 Manufacturing Employee Handbook:** Providing guidance on operations and workplace standards.
- **TRA010A Policies & Procedures Handbook:** Detailing comprehensive procedures to uphold compliance and integrity.
- **POL073 Business Ethics Policy:** Establishing the foundation for ethical decision-making and accountability.

These policies are critical to maintaining alignment with the Modern Slavery Act and are integrated into our governance framework. Regular updates to these documents ensure they remain relevant and reflect current legislative and ethical standards.

Additionally, modern slavery considerations are embedded into our Vendor Assurance Program and Supplier Code of Conduct, which are shared with our suppliers and contractors to ensure alignment across all business interactions.

Additional Governance

Ensign Laboratories has a comprehensive suite of Human Rights Policies and Procedures in place to ensure that our employment practices meet the ethical standards and requirements of Australian employment laws and the expectations of our business partners.

Ensign is an active contributor to a range of Social Accountability platforms including Ecovadis and Sedex. In addition, in September, 2023 completed a Walgreens social audit, which included a full payroll, site tour, and policy assessment.

Communication

Whilst Ensign Laboratories does not have any subsidiaries, Modern Slavery and Ethical Sourcing values are communicated to all employees during their induction and are revisited on a two-year cycle when all employees are required to undertake mandatory Human Rights training including:

- Equal Opportunity
- Prevention of Bullying and Harassment
- Modern Slavery
- Discrimination
- Whistle Blower protection
- Grievance Reporting

Furthermore, our expectations of our suppliers and contractors are communicated to the relevant parties through our Supplier Code of Conduct.



Grant Wyatt
Human Resources Manager
Date: 11/02/2025

This Modern Slavery Statement has been approved by the Board of Directors of Ensign Laboratories.



Josh Thornborrow
Chief Executive Officer
Date: 11/02/2025