

LABOUR RIGHTS REPORT (AND MODERN SLAVERY STATEMENT) 2024

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#### **Acknowledgement of Country**

We acknowledge and respect the traditional lands and cultures of First Nations peoples in Australia and globally. We pay our respects to Elders past and present and recognise First Nations peoples' longstanding and ongoing spiritual connections to land, sea, community and Country. Appreciation and respect for the rights and cultural heritage of First Nations peoples is essential to the advancement of our societies and our common humanity.

#### About this Labour Rights Report (and Modern Slavery Statement)

This report covers actions taken to identify, assess and address modern slavery and protect labour rights at Ansell Limited (ABN 89 0040 853 30) for the period 1 July 2023 to 30 June 2024. Ansell is legally domiciled in Melbourne, Australia and is listed on the Australian Securities Exchange (ASX: ANN). Ansell has four corporate hubs:

- 1. Melbourne, Australia;
- 2. Brussels, Belgium;
- 3. New Jersey, United States; and
- 4. Cyberjaya, Malaysia.

All disclosures made within the report cover Ansell Limited and the entities it controlled during the reporting period unless otherwise stated. A full list of entities Ansell controlled during the reporting period is set out in our 2024 Annual Report.

On 2 July 2024, we announced the completion of the acquisition of 100% of the assets that constitute Kimberly-Clark's Personal Protective Equipment business (Renamed KBU). Comprehensive disclosures concerning labour rights associated with the newly acquired KCPPE assets will be detailed in our 2025 Labour Rights Report.

In March 2023, Ansell Limited acquired Careplus (M) Sdn Bhd (Careplus), which has been renamed 'Ansell Seremban'. Ansell Seremban data is now reported as part of operational data unless otherwise stated.

The structure and content of this report were reviewed by responsible members of the Ansell Executive team and by the Board's Sustainability & Risk Committee.<sup>1</sup>

This report was prepared in accordance with the criteria set out in the Australian Modern Slavery Act 2018 (the Australian Act), the United Kingdom Modern Slavery Act 2015 (the UK Act), the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2024 (the Canadian Act) and the California Transparency in Supply Chains Act 2010 (the California Act).

It also references the Global Reporting Initiative Standards 2021, as detailed in the GRI index in our 2024 Sustainability Management Approach Report.

This statement was approved by the Board of Ansell Limited, in their capacity as principal governing body of Ansell Limited, on 28 August 2024.

 The report is made pursuant to section 11(4)(b)(ii) of the Canadian Act, and the signature in the Statement from the CEO and Managing Director constitutes evidence of approval.

#### ANSELL LIMITED | LABOUR RIGHTS REPORT (AND MODERN SLAVERY STATEMENT) 2024

### **Statement from the Managing Director and CEO**

At Ansell, our vision, to lead the world to a safer future, encompasses our commitment to creating safe, inclusive, and respectful workplaces for all Ansell employees and employees across our supply base.

**Neil Salmon** Managing Director and Chief Executive Officer

At Ansell, our vision, to lead the world to a safer future, encompasses our commitment to creating safe, inclusive, and respectful workplaces for all Ansell employees and employees across our supply base. We aim to improve the lives of our workers and mitigate risks of modern slavery by enhancing our labour management frameworks, engaging stakeholders, and strengthening our monitoring and assessment processes. This year's Labour Rights Report updates our achievements and also describes the challenges we face in fostering decent work throughout our supply chain.

Since its launch in FY22, our Supplier Management Framework (SMF) has significantly enhanced our visibility into working conditions across our supply chain. Our monitoring and engagement programs have continued to evolve, and in FY24, we assessed over 90% of our in-scope direct suppliers from high risk countries. We also raised our standards for performance assessments of in-scope suppliers as we benchmarked our supply chain standards against best practices and emerging issues.

Building on a successful intervention with finished goods suppliers, we expanded our engagement and recruitment fee remediation support program to packaging suppliers in FY24, identifying and assisting over 750 workers who had paid unjust recruitment fees. To date, more than US\$700,000 has been disbursed to these affected workers, underscoring our commitment to meaningful remediation and continuous support.

With our labour standards and associated risk and control assessment processes now firmly embedded at all Ansell plants, we are expanding our focus to a broader emphasis on ensuring decent work for all workers. Within our operations, 9 out of 14 plants are now successfully observing maximum 60-hour work weeks, which means more than 60% of workers observe and practice 60-hour work-weeks. This is an investment Ansell has made to advance our workplaces in upholding decent work and demonstrates our commitment to ethical labour practices. In-scope direct suppliers from high-risk countries assessed

90%+

9 out of 14 Plants observing maximum 60-hour work weeks

Managing within a maximum 60 hour week can initially increase production cost and reduce our flexibility in responding to changes in customer demand. We are focused on working through these challenges as we optimise production at sites already on a 60 hour week, and develop a go-forward plan to roll out to all Ansell and supplier facilities. In the meantime, all Ansell plants are in compliance with local laws on working hours and rest days.

We know there is still much work ahead of us to ensure that labour rights are upheld throughout our value chain, and we are committed to reporting our progress regularly and bringing greater transparency to our work. On behalf of everyone at Ansell, I look forward to continuing our work with stakeholders to create a world where all people are treated with the dignity and respect they deserve.

Noil Sula Neil Salmon

Managing Director and Chief Executive Officer



# Introduction

This report details Ansell's actions during the year to protect the human rights of every worker in our operations and supply chain. We aim to identify and mitigate risks of modern slavery and dangerous or substandard working conditions, and to provide opportunities for decent work.

Labour rights spectrum

Modern slavery	Dangerous or substandard working conditions	Decent work
Modern slavery exists where workers cannot refuse or cease work because of coercion, threats or deception. Workers may also be deprived of personal freedom.	Dangerous or substandard working conditions exist where the workplace is unsafe, workers are not paid fairly, work excessive hours, or can refuse or cease work, but doing so may lead to detriment.	Decent work exists where workers rights are respected, work can be refused or ceased, wages are fair (at least minimum wage) and the workplace is safe.

Our approach to labour rights is guided by the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organisation (ILO) Core Conventions. We leverage frameworks such as Ethical Trade Initiative (ETI) Base code, and tools such as the Sedex Member Ethical Trade Audit (SMETA) to guide and support implementation in our operations and supply chain. Our commitment to protect workers' rights is embedded in our Global Code of Conduct and Supplier Code of Conduct, which are supplemented by operational and supply chain risk management frameworks.

For further details on our policy framework see page 40 Appendix B: Policies.



# Summary of Ansell's position and progress

Ansell is committed to make a meaningful and measurable impact to improve the lives of our workers and to mitigate risks of modern slavery by continuously elevating our frameworks and strategies, emphasising engagement activities and strengthening monitoring and assessment.

Frameworks and strategies	Continuous performance assessment	Improving workers' lives	Strengthening monitoring and engagement
Our Labour Standards Management Systems and Supplier Management Framework (SMF) standardises the implementation of Ansell's policies and procedures across our operations and supply chain	Assessing annual performance of our operations and supply chain, and reviewing the effectiveness of our programs and frameworks. Based on this information we work to address gaps in our program and improve outcomes.	We improve the lives of workers in our operations and supply chain by executing activities focused on decent work and refining controls to mitigate risks and remediate harms.	We train and upskill our workforce and suppliers to build labour rights awareness and support reporting of non-conformances by providing access to grievance mechanisms in our operations and requiring our suppliers to do the same.
<ul> <li>Operations</li> <li>Identified key learnings from the operational labour rights strategy and our existing framework, enhanced employee engagement, and drove continuous improvement</li> <li>Successfully integrated Ansell Seremban into our operational risk management framework and audit program</li> <li>Supply chain</li> <li>100% of SMF in-scope suppliers engaged on labour rights due diligence, including awareness briefings and direct engagement (representing over 350 suppliers)</li> <li>Completed assessment activities (audits and/ or self-assessment questionnaires [SAQs]) for more than 90% of our in-scope direct suppliers from high risk countries</li> <li>Published Responsible Sourcing Policy outlining Ansell's commitment to socially and environmentally responsible sourcing</li> </ul>	<ul> <li>Operations</li> <li>Ansell plants conduct biannual internal control risk assessments, with 25 high risk indicators identified in FY24 (26 in FY23)<sup>1</sup></li> <li>Supply chain</li> <li>Tightened supplier performance assessment rating criteria, resulting in improved supplier engagement to address recurring non-conformances</li> <li>Against our target of 100% of in-scope suppliers meeting Ansell standards on labour and health and safety by 2027, in FY24 we report:</li> <li>72% of finished goods suppliers were rated 'A' or 'B'</li> <li>69% of raw material suppliers (packaging, yarn and liners, latex and chemicals) were rated 'A' or 'B'</li> </ul>	<ul> <li>Operations</li> <li>In line with ILO standards and ETI Base Code Clause 6, continued implementation of maximum 60-hour work weeks across Ansell plants, successfully achieving this at 9 out of 14 plants<sup>2</sup>, representing over 60% of workers observing and practicing 60-hour work-weeks</li> <li>All Ansell plants are in compliance with local laws on working hours and rest days, and practice at least one rest day within seven days</li> <li>Supply chain</li> <li>Packaging suppliers addressed recruitment fee issues by reimbursing over 750 workers</li> <li>Working with over 20 high risk suppliers to reduce excessive overtime and/or addressed non-compliances related to social insurance</li> <li>Tracked and got commitment from finished goods suppliers to transition to maximum 60 hour work weeks<sup>2</sup></li> </ul>	<ul> <li>Operations</li> <li>Continued the rollout of audits with four Forced Labour Indicator (FLI) audits and eight Sedex Member Ethical Trade Audit (SMETA) audits (six unannounced)</li> <li>More than 78% of workers covered by worker committees, worker appointed representatives, unions and/or collective bargaining agreements at 12 out of 14 plants</li> <li>Engaged workers through wellbeing activities, training and events</li> <li>Resolved 100% of grievance raised via internal grievance channels and the third-party channel managed by LRQA<sup>3</sup></li> <li>Supply chain</li> <li>Increased coverage of monitoring activities in the supply chain with 81 audit completed, and expanded activities to upstream raw material and plant sourcing suppliers</li> <li>130 targeted suppliers briefed on the necessity of effective grievance mechanisms</li> <li>Conducted refresher briefings to 25 high risk suppliers to address common findings and share Ansell's practices</li> </ul>

1. Two plants were included in the first assessment cycle but excluded from the second assessment cycle of FY24 due to plant internal resource restructuring.

2. Maximum 60-hour work weeks include regular working hours and overtime as by the ILO standards on hours of work and weekly rest, and the Ethical Trade Initiative (ETI) Base Code Clause 6.

3. An independent subject matter expert (formerly ELEVATE).

# About Ansell

#### **Business overview**

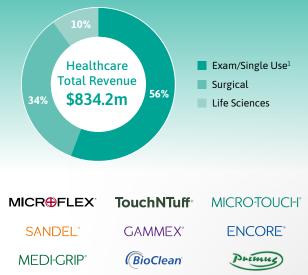
For over 130 years, Ansell has delivered advanced protection solutions to people at work and at home, keeping them out of harm's way. As the safety industry evolves, so does Ansell. We help workers and organisations stay two steps ahead of challenges, from workplace safety to sustainable work practices. We operate across two business segments:



### Healthcare Segment

The Healthcare Segment manufactures and markets innovative solutions for a wide range of customers, including hospitals, surgical centres, dental surgeries, veterinary clinics, first responders, manufacturers, auto repair shops, chemical plants, laboratories and life science & pharmaceutical companies.

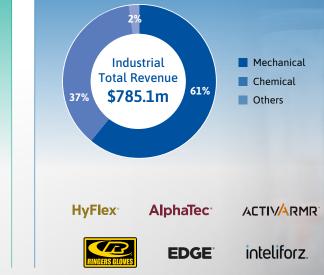
The portfolio includes surgical gloves, single use and examination gloves<sup>1</sup>, and products for life science companies including clean and sterile gloves, garments, and consumables.



### Industrial Segment

The Industrial Segment manufactures and markets high-performance hand and chemical protective clothing solutions for a wide range of industrial applications.

Ansell protects workers in industries including automotive, chemical, metal fabrication, machinery and equipment, food, construction, mining, oil & gas, utilities, logistics, and first responders.



1. Includes single use gloves used by industrial workers in manufacturing, auto repair, chemical, food processing and other industries.

Product sales in over **100 countries** 

# 15,000+ employees<sup>1</sup>

employed in production and professional roles

# 1,000+ suppliers

from over 25 countries

Workforce spanning

55+ countries

000

Protection solutions provided to

25+ industries

# 9 billion gloves a year

1. Headcount inclusive of Ansell Seremban, formerly known as Careplus, for the first time. For more detailed information on our business structure, refer to our 2024 Annual Report.

# About Ansell continued

#### **Our operations**

We hire a broad spectrum of employees across production and professional services. Our production workforce primarily comprises local workers, with a significant migrant workforce in Malaysia and Thailand. These workers face increased vulnerability due to their working status, language barriers and lack of access to social protection systems. Migrant workers are hired directly by Ansell and through third-party labour agents. All production workers are onboarded and subject to Ansell policies and procedures while working with us.

Below we set out our workforce composition as at 30 June 2024.

#### **Our global footprint**



Our corporate hubs are located in Melbourne, Australia; Cyberjaya, Malaysia; Brussels, Belgium; and New Jersey, United States. They are located to manage the global operations and the operations of Ansell manufacturing plants in their corresponding region.

# 14

Manufacturing plants operated by Ansell, with the largest located in Malaysia, Sri Lanka and Thailand, and smaller plants in India, Brazil, China, Lithuania, Portugal and Vietnam. 24

Distribution centres and warehouses located globally to distribute Ansell products across our various markets.

#### Our workforce demographic





**Geographic region** 

 3% Latin America and the Caribbean
 3% North America

#### Production workforce (Ansell plants)

Hired directly by Ansell (local and migrant)





Gender

50.5% Male

**49.5%** Female

#### Supply chain profile

Ansell sources materials and commodities from a network of over 1,000 suppliers in over 25 countries. In recent years we have been working to refine our supplier base to support better engagement and relationship building with suppliers. Our Global Sourcing Team makes decisions around strategic and key suppliers based on expenditure and criticality to the business. Set out below are the types of goods and raw materials and the locations we source from.

#### Ansell's FY24 primary direct-sourcing locations and key product and service categories

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	Australia	Bangladesh	Belgium	Brazil	Canada	China	Germany	India	Indonesia	Italy	Japan	Lithuania	Malaysia	Netherlands	Norway	Pakistan	Portugal	Singapore	South Kor	Sri Lanka	Sweden	Taiwan	Thailand	Turkey	United <b>J</b>	United <b>5</b>	Vietnam
Chemicals	~		~			~	~	~	~	~			~	~	~				~	~		~	~		~	~	~
Equipment, machinery and spare parts	~		~		~	~		~	~	~	~		~				~	~	~	~	~		~		~	~	~
Forest products								~												~			~				
Finished goods suppliers		~			~	~	~	~	~				~			~		~	~	~		~	~			~	~
Packaging						~		~					~					~		~	~		~				~
Logistics and shipping <sup>1</sup>	~		~	~	~	~		~			~	~	~				~					~			~	~	
Support services	~		~			~		~				~	~				~			~			~			~	~
Synthetic latex				~		~				~	~		~						~								
Utilities	~		~			~		~				~	~				~			~			~			~	~
Yarn/Textiles						~		~		~	~		~	~		~			~	~		~	~	~	~	~	~

1. Location for spend category 'Logistics and shipping' is based on contracting parties as opposed to operating countries due to the multiple operating jurisdictions of these suppliers.



# **Operating context**

# Ansell operates in a highly complex globalised industry in which multiple stakeholders – including Ansell – influence the overall risk profile of the industry. Some of the key risk factors are set out below.

Our stakeholders	External risk factors that influence/are influenced by our stakeholders
Customers	Market dynamics
Our customers have significant purchasing power that allows	The price sensitivity of our market puts pressure on costs, including labour and raw materials, which correlates to increased risks for workers.
them to influence market dynamics, but are also	The fluctuation in demand for PPE has flow-on impacts on pricing, revenue and margins.
influenced by these dynamics as individual players within	PPE manufacturing is highly globalised and with some product categories being highly commoditised leading to competition on price.
the broader industry.	Large healthcare providers have strong customer purchasing power that puts pressure

on suppliers to reduce costs and meet high production targets.

#### Workers

Our workers and workers in our finished goods supply chain are influenced by the geographies they reside in and the locations of manufacturing plants, as well as by the broader glove industry and local laws and regulations that shape working conditions and standards.



#### Geographies

Many industry players operate in geographies with known high risks of labour rights abuse.

Modern slavery and abuse of workers is likely to occur in countries with poor enforcement of local laws and regulations by local and national authorities. In these countries there is often instability in government and regulatory bodies, legal and political systems leading to a poor alignment of local laws to international human rights and labour standards.

Migrant workers are often fleeing poverty, or areas with conflict or adverse environmental impacts. They are more vulnerable to exploitation due to discrimination, job insecurity, language barriers, and their inability to access social protections offered to citizens.

Sourcing from areas with political instability or low enforcement of labour and employment related laws and regulations can lead to unsafe conditions for workers.

Workers who come from conditions of poverty are more likely to be exploited, as they may be working to meet basic human needs and therefore have limited bargaining power.

#### **Our stakeholders**

#### Workers continued



#### External risk factors that influence/are influenced by our stakeholders

#### Industry

A large portion of the workforce in the industry is employed as low-skilled production workers, because these jobs require minimal skills, worker tenure does not correlate to increased production and employers have little incentive to offer attractive workplace benefits to retain workers. High turnover and a continual recruitment cycle can mean workers are more vulnerable to exploitation and modern slavery.

In a competitive industry, there is an incentive to drive down wages and reduce benefits, increasing the risk of labour exploitation and human rights violations.

Workers are often employed in short-term contracts through third-party labour agents who can exploit workers using methods such as recruitment fees. Production work is often shift-based, and to maximise production, workers may be subject to harsh conditions such as consecutive work days without rest, excessive overtime, intimidation and restriction of movement, including limited break times and physically prevented from leaving the facility.

Due to their status, migrant workers are dependent on their employers for accommodation. This can lead to longer shifts worked, higher than average rent, sub-standard living conditions and restricted freedom of movement.

#### Value chain workers

Working conditions of workers in our value chain are influenced by lack of transparency and the complexity of industry supply chains.



#### Value chain

Raw materials like natural rubber latex and minerals are often sourced through complex and opaque supply chains, making their origins difficult to trace. Those derived from plantations are high risk for instances of child labour, forced labour, and human trafficking.

# Operating context continued

#### **Our stakeholders**

Ansell engages with a diverse range of internal and external stakeholder groups about labour rights. Our engagement focuses on identifying and addressing stakeholder needs as they relate to labour rights, improving our labour rights approach, building strong partnerships, and sharing our learnings with partners. Engagement is an important tool to support continuous improvement of conditions both within our operations and across the PPE industry more broadly, and also provides a means of keeping ourselves and our key partners accountable.

Stakeholder	Why we engage on labour rights	This year's labour rights engagement
Employees	<b>To create safe and fair work conditions in our operations.</b> In order to support our workers, we need to listen, consult and take action so their needs are met.	<ul> <li>Training sessions and workshops</li> <li>Grievance channels</li> <li>Health and wellbeing activities</li> <li>Worker committees, worker- appointed representatives and unions</li> </ul>
Suppliers	To build and maintain long-term relationships with our suppliers. Engaging with our suppliers enhances our visibility into working conditions within our value chain and encourages two-way engagement on sharing learnings and best practices	<ul> <li>Training</li> <li>Supplier briefings</li> <li>Regular meetings</li> <li>Top to Top engagement</li> <li>Supplier assessment questionnaires (SAQ)</li> <li>Second-party audits</li> <li>Third-party audits</li> </ul>
Customers	To drive, educate and inform our customers on working conditions in our operations and supply chain. We aim to provide customers with the information they need to make informed purchasing decisions, which can foster positive labour rights outcomes throughout the value chain.	<ul> <li>Reporting</li> <li>Ansell website</li> <li>Direct engagement, including during tenders and purchasing</li> <li>Customer questionnaires</li> </ul>
Shareholders	To be transparent and maintain the trust of our shareholders. We want shareholders to have the full picture of their investments, which includes providing accurate and timely information on labour rights issues in our value chain and our management of them.	<ul> <li>Annual General Meeting</li> <li>Direct meetings</li> <li>Reporting</li> <li>Written letters and emails</li> </ul>
Governments	To act both as an industry advocate and engage in dialogue related to regulation and legislation in our operating and distributing regions. Our goal is to navigate regulatory changes and advance progress in areas where we are in a strong position to make a positive impact.	<ul> <li>Local law compliance</li> <li>Import regulations</li> <li>Government representatives at RGA annual meeting</li> </ul>
Auditors	<b>To check independently and identify improvement areas.</b> Audits are an important tool to enhance workplace practices, monitor compliance in the supply chain and drive action.	<ul> <li>Audit preparation and scheduling</li> <li>Audit review and feedback</li> </ul>
NGOs and activists	To maintain our social license to operate and take a role in advocating in our industry about human rights and better conditions for workers. NGOs, activists and whistle-blowers increase our accountability to the public and our workers and can bring important labour rights issues to our attention.	<ul><li>Reporting</li><li>Ansell website</li></ul>
Consultants	To receive independent advice and support. Third-party guidance enables us to evaluate and adapt our program to improving labour rights and ensure we meet our commitments.	<ul><li>Pilot studies</li><li>Internal programs</li></ul>
Industry partnerships	To engage with our peers and suppliers on opportunities to improve labour rights management in our industry. Achieving meaningful, industry-wide change requires collaborative effort, including the establishment of best practices and industry- wide standards.	<ul> <li>RGA founding member and participation in member discussions</li> </ul>

#### **Responsible Glove Alliance (RGA)**

Ansell is one of seven founding members of the Responsible Glove Alliance, launched in 2022 to address escalating labour and human rights issues in the Malaysian rubber glove industry. Since the launch, we have been attending regular meetings with fellow RGA members. One of the goals of the RGA has been to work towards a consistent and consolidated audit standard to ensure onsite compliance verification against the RGA standards and International Labour Organization (ILO). At its inaugural annual membership meeting in September 2023, the RGA unveiled a preliminary draft of its new audit and risk assessment approaches. This draft was shared with over 200 attendees, including representatives from government, regulatory bodies, finished goods manufacturers, and raw material and packaging suppliers. The meeting also addressed key topics such as navigating legislation affecting the glove-making industry, identifying supply chain risks, and strategies to enhance the RGA's impact.



#### **Key reflections**

To drive reform in the PPE manufacturing industry, it is essential to collaborate with a broad range of stakeholders across the value chain. Aligning interests and securing buy-in from these diverse groups is a time-consuming process that requires substantial commitment from all parties involved. Despite the challenges, we remain optimistic that once coordinated actions are agreed upon, they will result in improved conditions for workers throughout the industry.

# Our labour rights governance

Ansell's Board, CEO and Executive Leadership Team (ELT) have oversight of labour rights issues. Plant General Managers and the Global Sourcing Team are responsible for day-to-day management of labour rights risk and implementation of our labour rights program.

#### **Ansell Board of Directors**

Responsible for overseeing and reviewing the management, administration and governance of the Company, including overseeing Ansell's strategic direction.

#### Sustainability & Risk Committee

Oversees the implementation and effectiveness of Ansell's risk management system, and the effectiveness of Ansell's sustainability policies and programs. Reviews social performance metrics of internal operations and supply chain. Monitors risk profile of the Company against risk appetite and risk management framework.

#### Audit & Compliance Committee

Oversees Ansell's internal audit and controls. Reviews internal audit assessments of our internal operations, including labour and social performance.

#### **CEO & Executive Leadership Team**

Implementation and management of labour rights standards is the responsibility of our Chief Human Resources Officer (for Ansell internal operations) and our Chief Operations and Supply Chain Officer (for Ansell internal operations and third-party supply chain). The CEO and wider ELT are accountable for overall implementation of Ansell's sustainability strategy. The CEO and ELT also review performance measures, evaluate proposals for improvement and endorse opportunities for industry collaboration across labour rights.

#### **Labour Rights Committee**

The Labour Rights Committee (LRC) consists of members of the ELT and functional leads of relevant areas of the business. The LRC is responsible for managing modern slavery and labour rights risks in our operations and third-party supply chain. This includes reviewing, testing and challenging labour rights and modern slavery management, and tracking the implementation and assessing effectiveness across metrics such as audit performance, non-compliance follow-up, training, and opportunities for collaboration or sustainable material verification. The LRC provides recommendations to the CEO and ELT.

#### **People Workstream: Internal Operations**

Operations Plant General Managers are accountable for implementing the Labour Rights Program with support and oversight from local human resources teams and global Corporate Social Responsibility (CSR) human resources. Quarterly compliance meetings are run with the SVP of Operations, Plant General Managers and human resources teams.

#### People Workstream: Third-party Supply Chain

Procurement is conducted through Global Sourcing for strategic and primary suppliers, and individual manufacturing plants and local offices for other sourcing.

Our Global Sourcing team is responsible for implementing the Labour Rights Program in our supply chain. The team is overseen by the Supplier Management Framework (SMF) Working Group, an extension of the LRC focused on SMF implementation.

Board

Management

# Shifting our focus from identifying risk to examining our risk identification process

Over the last two years, we have continued to refine the roles and responsibilities of the Sustainability and Risk Committee (SRC) in relation to risk monitoring and assessment, including in respect to labour rights. In previous years, the SRC has focused on addressing identified risks escalated by the Labour Rights Committee. It is now taking a more proactive role, assessing the effectiveness of our program in identifying risks before they lead to substandard working conditions. This has prompted more shared learning between Ansell teams and supports a more dynamic program that is better able to adapt to the complex external risk environment.



# Our inherent risk profile

#### Ansell periodically reviews our inherent risk profile to inform risk management strategies.

In 2020 Ansell conducted its first inherent risk assessment of our operations and third-party supply chain. The assessment, conducted by an independent third party, considered four forms of modern slavery: forced labour (including bonded labour), child labour, human trafficking and forced marriage. The assessment drew on the Global Rights Index, the ILO and the World Bank, incorporating causal relationships with suppliers based on the guidance of the Australian Modern Slavery Act. The assessment covered our operations and suppliers at the time. For full details of the methodology and outcomes, refer to page 9 of our 2020 Modern Slavery Statement.

The risk assessment identified the stages of our value chain that are considered at high risk for labour rights exploitation, driven by the industries and geographies we operate in. To improve our understanding of residual risk and reflect up-to-date information, we periodically reassess risks of our manufacturing facilities and risk factors in our supply chain, as well as risk ratings of our in-scope suppliers. This allows us to develop a more granular understanding of our risks within these value chain stages. For further details on our performance assessments, see page 22.

#### **Manufacturing plants**

Within our manufacturing plants there are a range of risk profiles, as outlined below.

Increasing risk profile	Role	Relevant locations	Risk description
	Professional employees	All Ansell manufacturing plants and office locations	Professional employees are typically highly skilled and well educated, resulting in high bargaining power and high wages. Although geographic risks are elevated due to some of Ansell's manufacturing plants being in regions with less stringent regulations, the impact on professional employees is minimal. This is because they earn wages well above the minimum requirements, are difficult to replace, and possess substantial bargaining power due to their expertise.
	Production workers hired by Ansell	All Ansell manufacturing plants	Production workers are considered high risk due to the low skill, high labour intensity requirements of their roles. Risk is elevated by the jurisdictional challenges of Ansell's manufacturing facilities, where weak enforcement of regulations leads to reduced protections for minimum wage and working hour rights.
	Migrant production workers hired directly by Ansell and indirectly hired local and migrant production workers	Majority at Thailand and Malaysian manufacturing plants	Migrant workers and workers contracted through third-party labour agents face the same risks as production workers, but with additional challenges. For contract workers, Ansell's limited control over the hiring and employment practices of third-party agents increases risk exposure. Migrant workers face potential language barriers, restricted access to social services, and limited legal recourse in some operating jurisdictions. In addition, these workers often need employer-provided accommodation, which can heighten their vulnerability due to living conditions being closely tied to their employment.
	Third-party service providers, such as janitorial, catering and security services	All Ansell manufacturing plants	These workers are considered the highest risk workers at Ansell manufacturing facilities. These workers face risks similar to those of production and migrant workers, compounded by Ansell's limited ability to oversee and control third-party agents' employment practices in areas such as hiring and contracting, monitoring of working hours and overtime, distribution of wages, and provision of accommodation.

#### Addressing risks related to third-party service workers

Ansell relies on third parties for services such as janitorial, catering, and security services. Recent audits highlighted the need for action regarding the employment practices of these agencies.

The majority of risks related to third-party service providers were first raised when we expanded our audit program at selected plants to conduct forced labour indicator (FLI) audits. FLI audits are a comprehensive and stringent assessment of the potential risks and indicators of forced labour at our plants, enabling us to identify and investigate the root cause of these risks. More details on our findings and action taken are on page 32.

#### High risk suppliers by country and industry

Based on our 2020 modern slavery risk assessment and subsequent annual reviews of supplier risk ratings and risk factors from sources such as media, NGOs, supplier input, and regulatory and industry bodies, we have identified high risk sourcing categories and industries within our supply chain. Here, we outline the inherent risk factors that contribute to increased risk levels. It is crucial for us to mitigate these risks by working directly with high risk suppliers and advocating for industry-wide change.

Industry	High risk countries	Inherent risk factors	Risk
Textiles (primarily cotton)	• China • India • Pakistan	In the harvesting of cotton and the production of textiles such as yarn, human rights risks are significantly high. Factors that drive risk upwards include high labour intensity, and reliance on low-skilled and seasonal labour.	<ul> <li>Forced labour</li> <li>Child labour</li> <li>Substandard and exploitative working conditions</li> <li>Excessive overtime</li> </ul>
Finished goods (primarily gloves and PPE) for industrial and healthcare	<ul> <li>China</li> <li>India</li> <li>Indonesia</li> <li>Malaysia</li> <li>Thailand</li> <li>Pakistan</li> <li>Sri Lanka</li> <li>Vietnam</li> </ul>	Manufacturers of healthcare supplies have been linked to several high-profile regulatory cases and media reports highlighting modern slavery and other significant labour rights issues. Risk factors in the healthcare and industrial finished goods manufacturing industries include high labour intensity, low-skilled workers, temporary/contract workforce and migrant labour. Risks are elevated for workers from regions of conflict or political and economic instability.	<ul> <li>Forced labour</li> <li>Debt bondage</li> <li>Substandard and exploitative working conditions</li> <li>Excessive overtime</li> <li>Substandard accommodation</li> </ul>
Packaging	<ul> <li>Malaysia</li> <li>Thailand</li> <li>Sri Lanka</li> <li>China</li> <li>India</li> <li>Vietnam</li> </ul>	Risk factors include migrant labour from countries of economic and political instability, reliance on low-skilled labour, high labour intensity and high frequency of subcontracting workforce through third-party labour agents.	<ul> <li>Forced labour</li> <li>Debt bondage</li> <li>Substandard and exploitative working conditions</li> <li>Excessive overtime</li> </ul>
Forest products (mainly natural rubber latex and biomass fuel)	• Thailand • Sri Lanka • India	Sourcing raw materials such as natural rubber latex involves labour-intensive, seasonal plantation work, often in isolated settings, with children frequently present on family smallholder farms. Opaque intermediaries also elevate supply chain risks.	<ul> <li>Forced labour</li> <li>Child labour</li> <li>Substandard and exploitative working conditions</li> <li>Excessive overtime</li> </ul>
Minerals (primarily salt and stone)	• Thailand • Malaysia	Risk factors include opaque intermediaries and links to upstream conflict in the wider industry.	<ul> <li>Forced labour</li> <li>Child labour</li> <li>Substandard and exploitative working conditions</li> <li>Excessive overtime</li> </ul>

# Our labour rights frameworks and strategies

Ansell takes a risk-based approach to identifying and managing labour rights and modern slavery risks across our operations and supply chain.

This approach is guided by an extensive set of policies, frameworks, strategies, and controls, and bolstered by structured and consistent engagement with our key stakeholders. This engagement legitimises our policies, frameworks and strategies, and helps to establish adherence of Ansell-owned facilities and suppliers to our labour rights standards.

For further details on our relevant policies, please see page 40, Appendix B: Policies.



#### Labour Standards Management System



1. Recruitment

#### Verification of workers' age

We review the identity documents of all potential staff to check that workers are at least 18 years old.

#### **Retention of identity documents**

We do not retain or store any original documents.

#### **Recruitment of prospective workers**

Migrant workers are employed via vetted labour agents who have signed a contract to uphold Ansell's ethical recruitment standards. Migrant workers go through a three-stage process of pre-departure interviews, arrival interviews and interviews that take place three-to-six months after employment begins, in order to identify practices out of line with Ansell's ethical recruitment standards, including payment of recruitment fees. Interviews are conducted in the native language of workers, with a translator present.

#### **Communication of Ansell's policies**

All prospective workers are advised of their working rights and working conditions as set out in Ansell's Labour Standards Policy and Global Code of Conduct. These rights are set out in employment contracts, which are provided in a workers' own languages, and communicated again during onboarding. All workers participate in onboarding during their first month at Ansell.

2. Onboarding and training

#### **Continuous training**

All workers receive job-specific safety instructions before starting work. During their time at Ansell, workers participate in continuous training in accordance with Ansell's plant-specific training programs. This includes training on topics such as safety and emergency preparedness.

#### Additional step for migrant workers

In addition to standard onboarding processes, migrant workers participate in a pre-orientation sessions in their home countries at least five days before departure, to explain their labour rights as set out in Ansell's Labour Standards Policy and Global Code of Conduct.

# Operational labour rights frameworks and controls

Ansell's Labour Standards Management System (LSMS) codifies our approach for labour rights management across our manufacturing facilities. The LSMS draws on our Labour Rights Standards Policy and Global Code of Conduct, which set out Ansell's minimum standards. Our minimum standards align to or exceed local legislation, drawing on international standards such as the United Nations Guiding Principles on Business and Human Rights (Guiding Principles), the International Labour Organisation (ILO) core conventions, the 10 UN Global Compact Principles and the Universal Declaration of Human Rights (UDHR).



### 3. Engagement and remediation

#### Worker engagement

Ansell engages with workers through townhalls and group briefings, worker committees, worker-appointed representatives and/or unions, contact by human resources on specific topics, and a biennial employee engagement survey. We also engage with relevant external third parties, including industry groups, subject matter consultants and NGOs, to collaborate for shared solutions and conduct reviews over the salient components of our Labour Rights Program. Engagement is used to inform the effectiveness of our program.

#### **Provision of grievance mechanisms**

Our Global Grievance Policy sets out policies and approach to grievance mechanisms, including investigations and a no retaliation policy. At Ansell, workers have access to internal and externally managed grievance channels. When an investigation verifies that a legitimate grievance has occurred, Ansell promptly takes steps to resolve the issue, and provide remediation, when needed.

### 4. Monitoring and reporting

#### **Monitoring systems**

Ansell uses several monitoring systems, including internal assessments and audits, to track compliance with local laws and our labour standards.

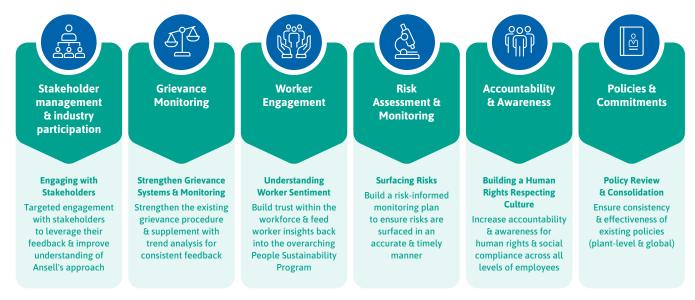
#### **Reporting mechanisms**

Data is collected and reported to senior management via the Labour Rights Committee, Human Resources Leadership Teams meetings and Quarterly Compliance Reviews. The Board SRC is informed via quarterly reporting. We continually reflect on the effectiveness of these reporting mechanisms.

# Our labour rights frameworks and strategies continued

#### **Operational Labour Rights Strategy**

Our Operational Labour Rights Strategy, developed by an independent third party in FY22, focuses on six pillars that apply to all our manufacturing facilities. The program is underpinned by improvement actions essential to driving the success of each pillar.



Initially launched in FY22 with a three-year roadmap, our Labour Rights Strategy has continuously evolved to reflect our operating landscape and business needs. We have identified immediate actions to execute in FY25 across each pillar. We will be building on the progress of our current strategy, and continuing to focus on (a) reinforcing our existing framework, (b) enhancing employee engagement, and (c) driving continuous improvement.

Pillar	Action in FY24	Key learnings
Stakeholder management and industry participation	• External engagement through the RGA has occurred, with work progressing to align on audit standards.	<b>Progress can be slow</b> Working with a broad group of stakeholders is key to reforming our industry; however, aligning interests and securing buy-in from these diverse groups is a time-consuming process that requires substantial commitment from all parties involved.
Grievance monitoring	<ul> <li>Maintained the third-party grievance mechanisms managed by LRQA at six plants, called Suara Kami, Nossa Voz and Xiang Shuo.</li> <li>Significant upheld grievances received are reported to our executive leadership at the Labour Rights Committee.</li> </ul>	<b>Provide avenues for workers to raise concerns</b> In the past few years, we formalised our Global Grievance Policy, grievance tracking, increased awareness of these mechanisms and trailled new third-party hotlines at our plants. We will take the learnings from these implementations to streamline our various grievance hotlines and provide workers with the best options.
Worker engagement	<ul> <li>Continued proactive employee dialogues via town halls and briefings.</li> <li>More than 78% of workers are covered by worker committees, workers-appointed representatives, unions and/or collective bargaining agreements.</li> </ul>	Visibility for our workers is important Ansell respects the right to freedom of association and collective bargaining. Engaging with workers through these forums has been instrumental in maintaining healthy industrial relations and meaningful social dialogue across all Ansell manufacturing plants. Read more on page 32.
Risk assessment and monitoring	<ul> <li>Conducted 8 SMETA audits (6 unannounced) and 4 FLI audits.</li> <li>9 out of 14 plants are observing and practising maximum 60-hour work weeks, representing over 60% of workers at plants.</li> </ul>	Use audits as a continuous learning tool Upon introducing FLI into our plant audit program, we audited our plants against higher standards and emerging best practices. This has brought important enhancements to our processes and risk assessment, and we will continue to review the latest, stringent audit programs and standards.

Pillar	Action in FY24	Key learnings				
Accountability and awareness	<ul> <li>Engagement between ELT, plant leaders and workers has been successful, with increased awareness at the plant level of risk management requirements.</li> <li>Workers continue to get involved in labour rights management through engagement programs, such as town halls and team briefings.</li> </ul>	Worker buy-in is a business necessity It is not enough to establish labour rights policies and implement them solely using a top down approach. For a labour rights program to be successful, all workers need to understand and value the labour rights of their fellow workers. This approach educates workers, increases their use of Ansell's grievance channels and encourages them to protect their peers				
Policies and commitments	• Conducted standards review to improve policies and procedural systems. This led to review of policies across Ansell plants and formalisation of policies for all plants around important topics, such as grievance mechanisms.	<b>Regulation is moving quickly</b> The pace and amount of regulation that needs to be integrated into our policies, procedures and systems is moving quickly. We need to continually reflect on our policies and commitments to support alignment with our ever increasing legal requirements.				

#### **Case study: Ansell Seremban acquisition**

Ansell acquired Ansell Seremban, formerly Careplus, in February 2023. Ansell previously owned a 50% non-controlling interest in the business, and labour rights issues were managed through our SMF, which identified multiple non-conformances related to labour rights. In addition to the commercial case for acquisition, the opportunity for us to address these non-conformances was a key factor in the acquisition of the remaining 50% of the business.

To safeguard and bolster the working conditions of workers who were impacted by the transition, Ansell integrated human rights considerations into the merger and throughout Ansell Seremban's transition plan.

#### **Ansell Seremban acquisition approach**

Pre-acquisition



**Due diligence** Conducted both a secondparty audit and third-party independent audit of the manufacturing facility prior to the acquisition. Conducted 'top-to-top'\* engagement with the previous owners to understand the human rights program that was already in place. Ansell used this information to establish a baseline understanding of modern slavery and broader human rights risk, leveraging our supply chain continuous performance assessment process.

#### **Integration planning**

Using findings from the due diligence and performance assessment, Ansell identified required actions to bring Ansell Seremban in line with our labour rights management standards. These findings were developed into an action plan and roadmap for the new entity.

#### **Engagement and support**

Ansell Seremban is progressing in the rollout of the integration plan. To support the rollout, the human resources team participates in regular engagement with plant leadership, with a focus on setting expectations and providing guidance.

A focus for this engagement and support period is to establish data collection and reporting systems that align with Ansell's existing processes and will enable ongoing monitoring.



**CURRENT STAGE** 

# Assessment and monitoring

Ansell Seremban is partially integrated into our operational monitoring program through completion of third-party audits and self-assessment questionnaires, which are reported to our Labour Rights Committee. We are working towards full integration through Ansell's data systems in FY25. This year, Ansell Seremban completed its first SMETA audit in accordance with Ansell's audit schedule.

\* Engagement between Ansell and supplier leadership.

# Our labour rights frameworks and strategies continued

#### Case study: Ansell Seremban acquisition continued

#### **Key reflections**

Ensuring the rights of workers at the plant was a crucial aspect of this integration. Although we had tracked the plant's compliance under our SMF, our integration plan required increased engagement and onboarding onto our Labour Standards Management Framework. Based on this experience, Ansell has identified opportunities to enhance future labour rights policy implementations by ensuring earlier engagement with plant managers and providing additional upfront support to workers to encourage effective buy-in.

# Supply chain labour rights frameworks and controls

Ansell has developed several tools to codify our labour rights policies and monitor supplier adherence to them. These include our Supplier Code of Conduct (SCOC), which sets out our requirements to respect and uphold human rights. In addition, we recently published a Responsible Sourcing Policy, which demonstrates Ansell's commitments on responsible sourcing. We also utilise our Supplier Management Framework (SMF) to continuously evaluate and monitor supplier compliance with our SCOC. By leveraging these tools and our extensive experience in implementing employment policy changes across various countries where our manufacturing plants operate, Ansell is able to make more informed decisions about supplier engagement, advancing our efforts to protect workers' rights across our supply chain.

#### Supplier management lifecycle

Supplier identification and selection	• Subject matter experts in the global sourcing and quality assurance team conduct screenings during pre-selection of raw materials and finished goods suppliers, respectively. We do this by using the Supplier Evaluation Form or Supplier Self-Assessment Questionnaire (SAQ), which draw on Ansell's Responsible Sourcing Policy and SCOC. The Global HR-CSR team also supports the global sourcing team in reviewing raw material suppliers' SAQs and supporting documents.
	• For high risk suppliers, a third-party audit is required. If a third-party audit cannot be conducted, second-party audits and SAQ are required.
Supplier onboarding	• All direct suppliers must commit to complying with the SCOC as part of signing Ansell's contract terms and conditions. Labour rights conditions are also included in supplier contracts.
On-going management	• Ansell takes a risk-based approach to ongoing supplier management. Suppliers in-scope for the SMF undergo engagement and assessment activities, such as briefings and audits. Metrics are monitored and reported to the Labour Rights Committee and SMF working group.
	• Our executive leadership team engages directly with the executive managements teams of our critical global suppliers to assess supply chain risks and influence adoption of global best practices.
	• When issues are identified, Ansell works with suppliers on remediation and corrective action planning.
Supplier termination	• Ansell prioritises working with suppliers to uplift their labour rights programs to meet Ansell's labour rights standards. Where suppliers are unwilling to work in good faith towards positive change, Ansell will place the supplier on suspension, which may lead to termination. We place these suppliers under our 'banned list' and implemented blocks in our procurement system to prevent our procurement channels from independently placing orders with these suppliers. To work with Ansell in the future, these suppliers must go through the same process as a prospective supplier.

#### **Supplier Management Framework**

The Supplier Code of Conduct and Responsible Sourcing Policy is codified through the Supplier Management Framework (SMF), established in 2021. The SMF takes a risk-based approach to due diligence, assigning appropriate processes to target areas of highest risk. Suppliers are prioritised based on the level of modern slavery risk linked to their industry and sourcing location, together with other factors such as their criticality to business, spend and branding. In-scope suppliers are those who have direct inputs into our finished products and manufacturing operations, and service providers to our internal operations. Roll-out of the SMF commenced in FY22 with a multi-wave approach to broaden the coverage and scope of our due diligence activities (outlined below). In tandem, we have been strengthening our monitoring program, upskilling our workforce to improve the outcomes of our monitoring activities, and increasing accountabilities and oversight. The SMF has been effective in refining and standardising our approach to supplier management and uplifting standards across our supply chain.

#### SMF activities and implementation progress

	Wave 1	Wave 2	Wave 3
Categories of in-scope suppliers	<ul> <li>1A: Finished goods from high risk countries</li> <li>1B: Recruitment agents, packaging, natural rubber latex (NRL), and support services such as cleaning, facilities management and security services</li> </ul>	2A: Liners, non-cotton textiles and yarns, neoprene, synthetic latex from high risk sourcing countries 2B: All other sourcing from high risk countries	All other in-scope sourcing from low-risk countries
Engagement	<ul> <li>Awareness briefings</li> <li>Industry-specific groups for ethical supply chains</li> <li>Top-to-top engagement</li> <li>Ongoing monitoring performance engagement and training</li> </ul>	<ul> <li>Awareness briefings</li> <li>Top-to-top engagement</li> <li>Ongoing monitoring performance engagement and training</li> </ul>	Awareness briefings
Assessment	<ul> <li>Third-party audits</li> <li>Second-party audits</li> <li>Self-assessment questionnaires</li> </ul>	<ul><li>Third-party audits</li><li>Self-assessment questionnaires</li></ul>	We currently require assessment activities for high risk suppliers and monitor voluntary assessment submissions for Wave 3 suppliers
Status <sup>1</sup>	Wave 1A: 100% engagement, 100% assessment Wave 1B: 100% engagement, 83% assessment	Wave 2A: 100% engagement, 87% assessment Wave 2B: 100% engagement, 89% assessment	Wave 3: 100% engagement

1. % KPIs are tracked as per spend coverage.

#### **Key reflections**

The SMF marked a significant evolution in our supplier management program. As the landscape and operating context around Ansell continues to evolve, we adapt the program accordingly. During the year our various governance structures, including the SMF working group and the Labour Rights Committee, were briefed on upcoming regulatory changes and evolving stakeholder expectations. In response, we:

- have been working with suppliers to increase traceability so that we can expand our due diligence programs beyond our direct suppliers
- continually track performance indicators to monitor whether engagement is effective in improving working conditions at our suppliers.

## **Our continuous performance assessment process**

# Ansell has a process in place to continuously assess our suppliers' performance in upholding labour rights, ensuring consistency with our standards and policies.

#### Performance assessments in supply chain

The supplier performance assessment, developed in FY23, applies a consistent risk rating and escalation process to suppliers captured under the SMF. All in-scope suppliers are assigned a rating from A to D (low to high risk) based on our performance assessment criteria, which includes but is not limited to:

- · Industry and country risk factors
- Supplier profiles, including industry and country risk factors and workers' demographics
- Assessments and severity of non-conformances and issues, such as third-party and second-party audits, and performance evaluations
- Inputs from stakeholders and external sources, such as media and NGOs, and regulatory sanctions

Supplier risk ratings are reviewed annually and sometimes on an ad hoc basis when critical information is received. Ratings are instrumental in encouraging suppliers to accelerate close-out of high risk non-conformances, and inform internal decision-making and action for high risk cases through our escalation process.

Using these risk ratings, we have set a target for 100% of our direct suppliers to meet Ansell's labour, health and safety standards by 2027, ensuring decent work for their workers. We measure performance against this target based on suppliers achieving an 'A' or 'B' rating through our performance assessment. This year we raised our performance assessment standards for our in-scope suppliers to benchmark our supply chain standards against best practices and emerging issues, and 72% of finished goods suppliers were rated 'A' or 'B', and 69% of raw material suppliers were rated 'B'. Read more on the next page.

#### Ansell's performance assessment and escalation process for third-party suppliers

Risk rating assigned based on performance assessment	A Low	B Medium	C Medium – High	D High
Approval to trade	Approved to trade.	Approved to trade.	Conditional approval based on action plan to close non-conformances (NC) <sup>1</sup> .	Close-out of action plan required in a stipulated time period, otherwise supplier will be suspended.
Terms of approval	Supplier remains on approved purchasing list.	Supplier remains on approved purchasing list, unless no improvement is shown.	Automatically under probation for up to 12 months.	Automatically under probation for up to 6 months, followed by sanctions if no improvement is shown.
Monitoring and engagement	Continue to monitor the supplier.	Monitor the supplier for improvement, and downgrade to 'C' if no improvement is shown after 12 months.	Supplier is informed of risk rating, and discussion is initiated on commitment and time-bound action plan. Monitor supplier for improvement, and downgrade to 'D' if no action taken.	Supplier is informed of risk rating, and discussion is initiated to gain commitment to a time-bound action plan. Contract will be terminated if no improvement, and immediate sanction is activated if severe non- conformance is found.
Escalation to senior management	Regular updates to LRC.	Notify Vice President of Global Procurement and the business unit, and regular updates to LRC.	Inform Chief Operations and Supply Chain Officer, CFO, LRC members. Continue regular updates to LRC.	Immediately inform Chief Operations and Supply Chain Officer and CEO, who will call emergency LRC.

Findings of zero tolerance<sup>2</sup> or severe NCs or regulatory sanctions would immediately downgrade the supplier to 'D' and escalate to the LRC.

<sup>1.</sup> A non-conformance is a non-compliance with Ansell requirements as guided by the SMETA 4 pillar framework, ETI base code and ILO.

<sup>2.</sup> A finding of zero tolerance are the most severe non-conformances, such as evidence of forced labour and modern slavery, including evidence of child labour and human trafficking.

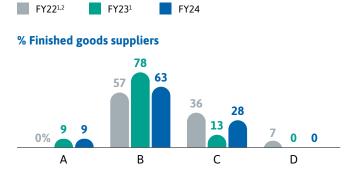
Since the launch of the SMF, we have been working with high risk suppliers to complete remediation and rectification of historically systemic non-conformances in the industry and country of sourcing. Some of these issues are often complex and require extended time to close due to the need for engagement sessions with multiple stakeholders, second and third-party investigations, and allocation of resources for remediation. During this time, we monitor the status and progress of corrective actions and have frequent check-ins with suppliers to ensure our standards are met. While we have observed marked progress, certain non-conformances related to social insurance and local overtime law violations continue to persist with some suppliers. As a result of some of these continued challenges, this year we have escalated the severity categorisation of non-conformances related to social insurance and overtime, thus raising our standards for 'A' and 'B' rated suppliers. This demonstrates Ansell's commitment to continuously benchmark our supply chain standards against best practices and emerging issues, and to apply our long-term knowledge of country and industry context. This change in standards resulted in a re-categorisation of some suppliers from 'A' and 'B' to 'C' risk ratings. This year, 72% of finished goods suppliers were rated 'A' or 'B'. Although this puts us temporarily further from our target, we have raised the bar towards alignment with leading practice standards.

In FY22, we began performance assessment of our raw material suppliers, beginning with packaging and natural latex categories, and progressing to yarn, synthetic latex and chemicals categories in FY23. In FY24, we also re-categorised our raw material suppliers based on our revised performance assessment criteria. Today 69% of raw materials were rated 'B', up from 'C' ratings.

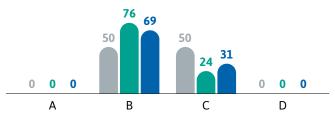
#### **Key reflections**

We depend on partnerships with suppliers to enhance labour rights conditions within our value chain. If a supplier is unwilling to adjust their employment policies and they are not heavily dependent on Ansell's business, we are limited in our ability to influence their behaviour. Achieving significant progress requires systemic change, underscoring the need for industry-wide engagement and collaboration with like-minded partners to improve labour rights more broadly.

#### Percentage (%) of in-scope SMF suppliers rated 'A' to 'D'<sup>1</sup>



% Raw material suppliers<sup>2</sup> (packaging, yarn and liners, latex and chemicals)



- Suppliers that are D-rated are put on probation and required to rectify non-conformances. If rectified, the supplier moves to a 'C' rating during the year. We discuss the outcome of 'D' rated suppliers identified during the year in the case study box on the next page. When suppliers have been terminated, we no longer track their progress and have removed their count from our tracking.
- In FY22, suppliers from yarn and liners, synthetic latex and chemicals categories were not yet formally rated under our SMF. Hence the values reported in FY22 are assessment ratings related to natural latex suppliers.

## Our continuous performance assessment process continued

#### Case study: Taking firm action on non-compliance

In FY23, Ansell began on-boarding in-scope packaging suppliers, representing over 90% of our packaging supplier base and spend, onto our SMF. We conducted supplier engagement sessions, second and third-party audits, and distributed self-assessment questionnaires. These efforts allowed us to identify suppliers committed to meeting Ansell's labour rights requirements as well as those with non-conformances to our labour rights policies.

During this period, we were in the process of rationalising suppliers across our supply chain, and leveraged the tender process for new and existing suppliers to incorporate stricter labour rights requirements. We discovered that many packaging suppliers were unwilling to engage with Ansell to improve their labour practices. Unlike the glove industry, the packaging sector has faced minimal scrutiny for labour rights issues despite supplying to other high profile industries. Since the packaging industry has largely not experienced financial or supply chain pressure to improve labour practices, many had little interest in engaging with Ansell to work in good faith to improve working conditions in their operations and supply chain. Ansell chose not to renew contracts with 25 suppliers that showed no willingness to improve working conditions. We hope this process can serve as a model for companies in other industries seeking to influence suppliers in their value chain to make positive changes in their employment practices.

#### Performance assessments at Ansell plants

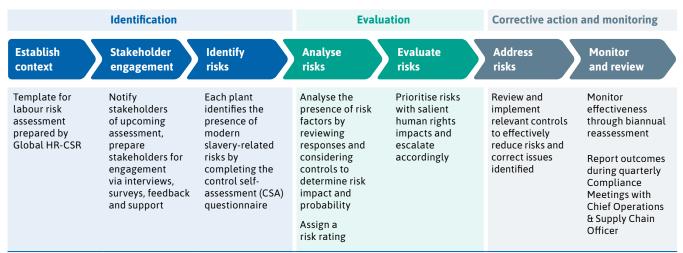
In FY23, we introduced a renewed approach to internal labour assessments at Ansell plants, incorporating insights gained from past learnings. Our risk and control assessment process encompasses our entire on-site workforce, including thirdparty labour agents and service providers such as those offering janitorial, security, accommodation, and transportation services. This comprehensive approach includes risk identification, evaluation, corrective action, and remediation when necessary. In addition, one finished goods supplier we had previously worked with was classified as 'D - High Risk' due to concern around the possible use of forced labour. Meetings with members of the supplier's executive management team did not result in a resolution of Ansell's concerns. In line with our escalation procedures, Ansell's CEO, Chief of Operations and Supply Chain, and LRC were informed about the supplier's reluctance to address non-conformances, and an action plan to exit the supplier was developed and implemented.

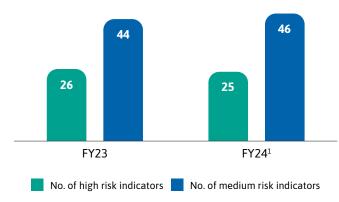
Ansell remains committed to advancing labour practices with our suppliers through meaningful action. In line with human rights expert recommendations and the United Nations Guiding Principle 19, we do not automatically terminate supplier contracts based on allegations of labour rights violations<sup>1</sup>. Instead, we focus on engaging with the executive management teams of our existing suppliers and offer to upskill their organisations to develop the knowledge and capabilities needed to meet Ansell's expectations in line with international frameworks.

1. United Nations Guiding Principle 19, ILO and Malaysian Rubber Council joint publication 'Addressing, preventing and eliminating forced labour in the rubber industry in Malaysia: A practical guide for Malaysian employers' (2022).

The process is based around a biannual questionnaire, referred to as a control self-assessment (CSA), which requires plants to evaluate and identify the risk factors associated with Ansell's worker hiring and engagement process, operational practices and current controls. The questionnaire draws on international standards including SMETA and ILO, and Ansell's Labour Standards Policy. Our global HR-CSR evaluates the risk ratings of plants' responses and works together with them to recommend additional procedures or controls to mitigate the risks.

#### Risk and control assessment process, including control self-assessment





#### Results of risk and control assessment of Ansell plants

1. Two plants were included in the first assessment cycle but excluded from the second assessment cycle of FY24 due to plant internal resource restructuring. Both plants will resume at the next cycle in FY25.

This process has been a useful educational tool to build accountability and shared ownership within plants. The tool has also supported the early identification and resolution of high risk activities, supplementing our audit program.



### Improving workers' lives

Ansell's labour rights programs for operations and supply chain focus on both ends of the labour rights spectrum and provide opportunities for decent work. Decent work is defined as the right to productive work in conditions of freedom, equity, security and human dignity.

#### Improving the lives of workers in our operations

We consistently review our practices against internal standards and emerging guidelines on decent work to ensure the wellbeing of our workforce.

#### Progressing international standards on working hours

We recognise the impairment excessive working hours can have on workers' safety and overall health. Therefore, all our Ansell plants operate with a minimum one rest day a week and all overtime hours are offered on a voluntary basis. Additionally, at many of our plants we operate within a 60 hour maximum working week and our ambition is to achieve this for all our Ansell plants in the coming years. Maximum 60-hour work weeks for production workers are defined as including regular working hours and overtime, informed by the ILO standards on hours of work and weekly rest, and the Ethical Trade Initiative (ETI) Base Code Clause 6.

This year, both of our plants in Sri Lanka have implemented new shift schedules and monitoring to observe maximum 60-hour work weeks, progressing our achievement to 9 out of 14 plants, representing over 60% of workers observing and practicing 60-hour work-weeks. Our focus will be on implementing a 60 hour maximum working week in our Malaysian and Thai plants in the coming years. In the meantime, all Ansell plants are in compliance with local laws on working hours and rest days, and practice at least one rest day within seven days. To uphold these standards across our facilities, we implement a range of measures, including:

- 1. Early shift planning during the year, and where we anticipate periods of high production demand, we invest in additional headcount to prevent excessive overtime hours per worker.
- 2. Line manager briefings and trainings on labour rights policies to promote positive workplace practices.
- 3. Monitoring and regular reporting of monthly working hours to ELT and the Board
- 4. Any incidences of non-compliance are discussed to understand learnings and these learnings are shared with wider plants.
- 5. We are looking at ways to introduce automated preventative measures including upgrading our entry and HR systems to be able to provide additional preventative controls before any breaches have occurred.

In addition to monitoring working hours, we know that wages earned for production and shift-based work can rely heavily on the number of hours worked. Therefore, Ansell regularly reviews remuneration and benefits offered to workers to support their wellbeing. We pay at least minimum wage at all Ansell plants and we also use living wage assessments as an input to these reviews. We are currently updating our assessment of how cost of living changes have affected living wage levels across our manufacturing countries to ensure that our remuneration and benefits meet market standards.

#### Ethical employment for migrant workers in Malaysia

Migrant workers are the most vulnerable workers in our operations because they face unique challenges such as potential language barriers, temporary working rights and lack of access to social protection systems (read more on pages 08 and 14). To support these workers, Ansell has incorporated additional steps and controls in our recruitment process to ensure their ongoing wellbeing during their employment with Ansell.

Migrant workers at Ansell are currently hired directly. We engage vetted third-party labour agents to support the recruitment process. Unethical labour agents historically exploit the vulnerability of these workers through deceptive hiring practices such as providing false job descriptions or charging extortionate and, in some cases, unlawful fees in exchange for finding workers employment. To vet our labour agents, we engage directly with their senior leadership on our requirements as set out in Ansell's Zero Recruitment Fee Policy, Labour Rights Policy and Supplier Code of Conduct. Labour agents sign a contract agreeing to uphold our policies and to remediate workers in the event they are found to have charged recruitment fees. Our internal risk and control assessment process requires a biannual review of third-party agents. Regular reviews of labour agents and their recruitment practices are conducted as part of FLI and SMETA audits at our manufacturing plants. By monitoring practices of these third-party labour agents, we measure improvements in their conduct and the transparency of their services.

To prevent exploitation of potential workers during the hiring process, Ansell has implemented a three-stage Ethical Recruitment Process that is outlined below. Each stage is conducted by Ansell plant human resources professionals, who are assisted by a translator fluent in the worker's native language.

- Pre-Departure Interview: We interview prospective workers in their home countries and communicate Ansell's policies. A pre-orientation session is held in the worker's home country at least five days prior to their planned departure. This session consists of a review of the details of their employment contract and training on Ansell's policies and labour rights standards.
- 2. Arrival Interview: A second interview is conducted once the worker arrives at the Ansell plant where they will be working to confirm that labour agents have used ethical recruitment practices in line with Ansell policies.
- 3. **Follow-Up Interview:** A follow-up interview is held three-tosix months into employment to re-confirm with the worker that they were recruited in ways that comply with Ansell policies and standards.

In 2019, Ansell was one of the first organisations in our industry to reimburse migrant workers from Malaysia who had paid recruitment fees to agents in their home countries. In 2023, Ansell completed an outreach program to remediate recruitment fees incurred by former migrant workers in Malaysia. We commissioned LRQA (formerly known as ELEVATE) to conduct the program in line with best practices, and to verify our remediation. Read more about Ansell's completion and verification of recruitment fee reimbursements for former and current migrant workers in our 2023 Labour Rights Report (and Modern Slavery Statement). We have leveraged our experience in recruitment fee remediation to guide our finished goods and packaging suppliers in their recruitment fee and remediation approaches.

#### Case Study: Transitioning workers to direct employment in Thailand

While Malaysian migrant workers are recruited directly from home countries, Thailand migrant workers are mainly offered employment in Thailand through third-party labour agents. Periodic SMETA audits at Ansell's Bangkok plant identified non-compliances relating to labour agents (in respect to wages and working hours). Despite communicating Ansell's labour standards to the labour agents, as certain issues persisted, Ansell made the decision to transition 1,200 migrant workers (previously employed through labour agents) to become direct Ansell employees. This transition was completed in December 2022. By employing these workers directly, Ansell has been able to oversee all terms of employment and ensure a higher standard of employment conditions, including employment benefits.

#### Navigating complex transitions: Addressing workforce changes among migrant visa holders

As part of an Accelerated Productivity Investment Program (APIP) announced in July 2023, Ansell slowed production at plants in early FY23 and announced a reduction in our production workforce at some plants, including Ansell Bangkok. Some of our workers were notified that their employment would be ending, among them, a small number of migrant workers.

These individuals had been part of a broader group of workers that were employed by third-party agencies when they started work at Ansell Bangkok, but later were hired by Ansell as full-time employees. Ansell disbursed all due payments to these workers, including severance and an additional notice payment.

Some of these migrant workers subsequently filed a claim with the Thai Department of Labour Protection and Welfare, challenging the basis of their severance payment. After considering the claim, the Department ruled that Ansell Thailand had correctly calculated the severance payments, confirming that no further payments were necessary. Even so, Ansell voluntarily paid an additional ex gratia payment to these workers to cover costs associated with renewal of their worker visas and provided support for their search for new employment. Earlier this year, 41 out of the 42 migrant workers who filed this claim had accepted the ex gratia payment. Ansell has been unable to establish contact with the remaining worker.

Understanding how to navigate local laws to best protect the rights of migrant workers in the countries where Ansell operates is a continuous learning journey. This experience taught us that we must do more to evaluate the particular impact of labour decisions and policies on our migrant workforce given the additional challenges these employees have navigating employment laws in foreign countries. We are committed to setting the standard on protecting the rights of all workers in our industry, and work to continuously improve. To this end, we have engaged LRQA (formerly ELEVATE) to provide best practice recommendations for enhancing our future workforce hiring, visa renewals, and off-boarding processes.

# Improving workers' lives continued

#### Improving the lives of workers in our supply chain

Under our SMF, we have been engaging directly with high risk suppliers to remediate and rectify historically systemic non-conformances in our supply chain.

#### Addressing overtime and social insurance

Systemic non

This year, we continue to work with high risk suppliers on non-conformances related to excessive overtime and social insurance. The provision of social insurance for workers is a challenge specific to our suppliers in China. While this is a legal requirement, several factors deter both workers and employers from prioritising the resolution of gaps in social insurance provisions.

As a company navigating overtime and social insurance standards in order to develop more effective policies for our own manufacturing plants, Ansell has developed the experience and credibility to engage suppliers on these issues. Below are some of the actions we have taken to address non-conformances related to excessive overtime and lack of social insurance across our supply chain.

Systemic non- conformance	Actions undertaken with suppliers	How we measure progress
Excessive overtime hours	<ul> <li>Monitoring of working hours on a weekly basis</li> <li>Ansell shares learnings on improving the efficiency of production workers through upskilling and manpower planning to maximise effective hour usage</li> <li>Top to top engagement with some suppliers to get commitment and timeline to correct the issue</li> </ul>	<ul> <li>Establish interim targets and timelines for compliance</li> <li>Assign a responsible person at Ansell to oversee progress</li> <li>Completion of SAQs for monthly tracking of hours</li> </ul>
Inadequate social insurance (China specific)	<ul> <li>Monitor compliance by tracking the regional insurance system monthly to check coverage</li> <li>Ansell shares learnings on promoting employees to take-up social insurance</li> <li>Top-to-top engagement with some suppliers to receive their commitment and timeline to correct the issue</li> </ul>	<ul> <li>Establish interim targets and timelines for compliance</li> <li>Assign a responsible person at Ansell to oversee progress</li> <li>Verify progress towards targets through independent audits</li> </ul>

#### Addressing grievance mechanisms in the supply chain

As set out in our SCOC, we expect suppliers to maintain effective grievance mechanisms that support good faith reporting without fear of retaliation. We also include a link to our Compliance Hotline in our SCOC.

During the year, we held awareness sessions with 130 suppliers on the importance of effective grievance mechanisms and shared Ansell's implementation and investigation approach, referencing our operational Global Grievance Policy. Furthermore, these suppliers are in-scope for our audit program, where we review audit findings related to grievance mechanisms and ensure timely close out of findings.

#### Case study: Promoting maximum 60 hour work-weeks across our finished goods supplier base

Many of our suppliers operate in jurisdictions where the local legal requirements fall short of international leading practice standards for working hours. During the year we engaged with over 40 finished goods suppliers to gain their commitment to work towards the implementation of a maximum 60 hour working week, as guided by ILO and ETI Base Code. We track suppliers' progress in achieving this goal through our Self-Assessment Questionnaires, which record the working hours of our suppliers' workforce on a monthly basis.

#### **Supporting remediation**

We have been working with suppliers who align with our expectations to deliver complete remediation as a priority. After a successful pilot run of our engagement and recruitment fee remediation support program for finished goods suppliers, we expanded our efforts to our packaging suppliers where we identified risks related to recruitment fees. To identify potential recruitment fee issues, we engaged with suppliers from yarn and liners, synthetic latex and packaging categories to understand whether their workforce includes migrant workers. Through this process our packaging suppliers were found to employ significant numbers of migrant workers.

We identified over 750 workers employed by our packaging suppliers who had paid unjust recruitment fees to secure employment. We provided support through shared learnings from our operational remediation program; however, where needed, we have also been helping to ensure suppliers have sufficient funds for timely completion of remediation. For suppliers needing assistance in securing funds for these reimbursements, Ansell has provided support by agreeing to make advance payments on future packaging orders. To date, more than USD \$700,000 has been disbursed to the affected workers. We conduct regular check-ins with these suppliers to ensure they fulfill their remediation commitments.



# Strengthening monitoring and engagement

Ansell has developed a comprehensive monitoring and engagement program. This program is continually evolving to meet the growing demands of our stakeholders and to enhance labour rights standards throughout our operations and supply chain.

# Strengthening monitoring and engagement in our operations

Ansell conducts multiple monitoring and engagement activities across our operations. Monitoring activities include internal assessments and third-party audits. Our workers have access to multiple grievance mechanisms to raise or escalate concerns as they occur.

#### **Third-party audits**

Ansell uses Sedex Member Ethical Trade Audits (SMETA) and Forced Labour Indicator (FLI) audits to conduct point-in-time assessments at Ansell manufacturing plants. The frequency of third-party audits at each plant is determined by risk factors. The audit program is overseen by Ansell's Board Sustainability Risk Committee and Labour Rights Committee, with audit plans and results reported quarterly.

Ansell leverages a mix of announced and unannounced SMETA audits, and unannounced FLI audits. For unannounced audits, plants are provided with a one-month window for a potential audit visit, meaning plant conditions and documentation must be audit ready on an ongoing basis. For FLI audits, the burden of proof shifts from the auditor to the auditee, meaning plants must provide evidence that a forced labour indicator is not present. For further details on the requirements of the FLI audit program, see Ansell's Labour Rights Report 2023, page 29. Audit findings are set out in detail by audit type on the next page.

#### **Key reflections**

Audits provide a point-in-time snapshot of working conditions at Ansell's manufacturing plants. Relying on audit results alone is therefore not sufficient to improve the day-to-day labour rights conditions of workers at our plants. Audits should be used as a tool to increase engagement, build awareness, and strengthen accountabilities, improving performance on an ongoing basis. By engaging with our plant teams during the process, we are able to upskill workers to identify common non-conformances. This supports with proactive, rather than reactive, identification, assessment and remediation of labour rights issues.



#### Case study: Going beyond the audit

To maximise the benefits of plant audits, we focus on the process as much as the results. Our Global Human Resources – Corporate Social Responsibility (HR-CSR) team leads engagement with the plants prior to audits. This has helped to build skills and accountability at our plants, and enables us to seamlessly use audits as a continuous learning tool.

#### 1. Notify

At the start of the fiscal year, plants selected for third-party audits are informed.

#### 2. Coaching, trainings and assessment

Global HR-CSR conducts coaching and training sessions followed by an assessment on the plants' readiness to meet audit standards (SMETA and/or FLI audits).

#### 3. Corrective actions

Plants share corrective action plans within two weeks of the assessment.

#### 4. Review

As corrective actions are implemented they are reviewed by Global HR-CSR, and status is communicated to all colleagues, including plant leadership.

#### 5. External audit

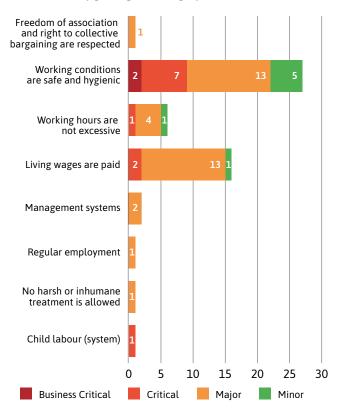
External audit is scheduled and timely implementation of corrective actions and verification of these actions are performed, and reviewed during the next cycle.

#### **SMETA audit results**

We conducted eight third-party SMETA audits of our plants during the year. Of the eight audits conducted, six were unannounced. Plants which did not undergo SMETA audits either underwent FLI audits or will complete audits in FY25 in line with our two-year audit rotation schedule.

SMETA audits are conducted by an independent third-party auditor using the SMETA four-pillar framework, which considers Labour, Health and Safety, Environment, and Business Ethics, with reference to the ETI Base Code, ILO and relevant local laws.

#### SMETA audits by grading and category



#### Number of SMETA critical NCs by category in FY24

Category	FY22	FY23	FY24
Management systems	-	-	-
Regular employment	1	-	-
Working hours are not excessive	_	1	1
Working conditions are safe and hygienic	1	7	<b>9</b> <sup>2</sup>
Living wages are paid	2	1	2
Freedom of association and right to collective bargaining are respected	1	_	_
Child labour (system)	_	_	1
Total critical non- conformances	5	9	13

 The severity of an audit finding is determined by the third-party auditor using the SMETA audit methodology, grading on a scale from minor to business critical. A business-critical non-conformance relates to a critical breach of the Ethical Trade Initiative Base Code or local law which presents a critical or imminent risk to workers' safety or human rights.

2. This year we report two Business Critical NCs under 'Working conditions are safe and hygienic' category, as identified by the auditor. No Business Critical NCs were identified in prior year.

This year, SMETA audits identified two business critical nonconformances (NCs) related to emergency staircase and fire certificates, which have been addressed through building and safety upgrades. We will complete verification of the corrective action during follow-up audits scheduled in FY25. One critical non-conformance was identified at our plant for the absence of documentation of processes for age verification during workers' hiring processes. Although no practices of child labour were identified, the SMETA auditor classified this finding as 'Child labour (system)' because the plant was not able to provide the necessary age verification documents during the audit. All plants implement processes and procedures in accordance with Ansell's Labour Standards Policy and HR employees are trained on labour standards and 11 indicators of forced labour<sup>1</sup>. Corrective actions were completed by the plant and verified by the third-party auditor. Altogether, 69% of all NCs identified in audits this year have been closed to date. Other open NCs primarily relate to ETI Base Code on maximum 60-hour work weeks, which Ansell has committed to address. In addition, non-conformances in the 'Living Wages' category were identified from malpractices of our third-party services providers. Read more on the next page for details of findings and corrective actions taken.

# Strengthening monitoring and engagement continued

#### Forced Labour Indicator (FLI) audit results

During the year we conducted four FLI audits. FLI audits assess Ansell operations, accommodation, and third-party labour agents, onsite third-party service providers such as security and janitorial services and third parties managing employee accommodation and transport. FLI audits use a red, orange, yellow and green flag system to assess the presence of risk of ILO's 11 Forced Labour Indicators.<sup>1</sup> The presence of one or more red flags indicates increased risk, requiring further investigation and action to assess the presence of forced labour.

We saw an improvement in the performance of plants that completed a second FLI audit in FY24 following an initial audit in FY23, with all findings being low risk indicators. Plants which completed FLI audits for the first time this year were able to apply learnings from audits conducted at other Ansell plants, thereby reducing the likelihood that high and medium risk indicators would be identified.

#### Audits in action – Third-party service providers

During initial FLI audits of selected plants in FY23, the majority of risks identified related to employment practices of third-party service providers engaged by Ansell to provide services such as janitorial, security and canteen management. Our findings included some limited examples where the third party employers were not observing the correct working hours (no rest day over a seven day period), and examples of unacceptable withholding of wages.

Our initial challenge was that these third party service providers were often small businesses with few resources and very low awareness of labour rights. This resulted in slower than expected implementation of actions to comply with Ansell policies.

As a first step, we engaged with these agencies to educate them on labour rights policies. For example, we briefed them about Ansell's labour policies, emphasised industry best practices and adherence to local laws regarding working hours, rest days, and employment contracts. We then assessed their williness to comply with our standards.

In parallel, we implemented enhanced due diligence activities at our plants, including reviewing employee contracts and work permits to ensure proper legal documentation, and conducting monthly checks on pay slips.

Insights from the FLI audits have been used to improve our internal assessment processes, as well as our pre-audit coaching and evaluation discussions with plant managers.

#### **Internal assessments**

Internal assessments are used as an ongoing tool to monitor compliance with Ansell standards. Audits involve a walkthrough of documents and interviews with plant managers. Physical audits also include interviews with workers. These audits are effective as a tool for engagement and collaboration on issues at plants, and provide increased visibility of ongoing labour rights conditions at plants.

#### **Freedom of association**

Ansell respects the right to freedom of association and collective bargaining. Workers, without exception, have the right to join or form trade unions of their own choosing and to bargain collectively. Ansell has established a Freedom of Association and Collective Bargaining Policy on a site-by-site basis, to reflect national laws, that draws on our group-wide commitment set out in the Labour Standards Policy. All Ansell migrant workers have the option to access collective representation.

In Malaysia and Thailand, the establishment of workerappointed representatives in FY23 has led to greater engagement and increased awareness among migrant workers about their working and living rights. We have also seen an increased willingness to raise concerns without fear of retaliation. As of 30 June, more than 78% of workers are covered by worker committees, worker-appointed representatives, unions and/or collective bargaining agreements at 12 out of 14 plants. Engaging with workers through these forums has been instrumental in maintaining healthy industrial relations and meaningful social dialogue across all Ansell manufacturing plants.

#### **Grievance mechanisms and remediation**

We provide all workers with access to grievance mechanisms. We recognise that raising issues in any workplace can be difficult, particularly when there are different ranks of personnel involved. Workers need to feel safe to raise any complaints or issues at Ansell plants. As a result, our employees have access to a range of grievance mechanisms, including secure and anonymous options. We have a no-retaliation policy to reassure our workforce that there are no adverse consequences for reporting concerns in good faith.

<sup>1.</sup> ILO Indicators of Forced Labour (ILO.org)

#### **Reporting channels**

Employees are encouraged to share their feedback with the HR department through various channels available at each site, such as Gemba Walk, HR Shopfloor Corner and email. Employees may also approach their plant managers and supervisors.

The Ansell Compliance Hotline is managed by an independent third party. Callers to the hotline can remain anonymous and the service is available to all Ansell stakeholders in a language of their choice.

A third-party hotline (called Suara Kami in Malaysia, Xiang Shou in China, and Nossa Vox in Brazil) is managed independently by LRQA and is available at six plants. The service can be easily accessed through toll-free phones, WhatsApp and Facebook Messenger.



Our aim is to ensure employees are able to raise any issues that they encounter easily and without fear of retaliation.

Our policies and procedures for grievance mechanisms and investigation are in our Global Grievance policy, which covers Ansell employees and contractors. Procedures for investigation and close of grievances raised through third-party channels, Suara Kami, Nossa Voz and Xiang Shou, are set by LRQA.

#### **Grievance escalation process**

Forum	Plant level	Externally managed
Grievance mechanism	Investigation and identification of remedial actions	Remedial actions are implemented, verified and communicated
Internally managed	Grievance is escalated to plant human resources for closer examination. Grievance is assessed as substantiated, partially substantiated, or unsubstantiated, then assigned a description. Plant HR conducts the investigation and identifies relevant actions to be taken.	Grievance raiser is notified of planned corrective actions before we roll out corrective actions. Plant HR ensures completion of actions and verifies closure. Grievances are recorded in the centralised Non-Hotline Grievance Tracker, with limited access provided to HR Leadership Team and appointed HR custodian at the plant.
Externally managed – Compliance Hotline	Complaints are directed to Ansell's Compliance team and, where applicable, HR for closer examination.	When the grievance raiser provides sufficient details to identify the manufacturing plant, this is assigned to plant HR and follows plant-level remedial actions. When grievances cannot be identified, this will be referred back to the Legal department for close out.
		Tracking and close-out are monitored and recorded by Legal.
Externally managed by LQRA	LRQA assigns a severity level and description to the grievance raised. Head of Global HR-CSR, who is not a member of plant management, will be notified	The corrective action is reviewed by the external hotline operators, who verifies acceptance of corrective actions by the grievance raiser.
	of the grievance raised. Head of Global HR-CSR investigates and recommends corrective actions.	Details of tickets raised and close-out are recorded in the third-party system

Monitoring of grievances, including details of critical grievances and the status of corrective actions are shared with LRC monthly. Ansell personnel who investigate the grievances ensure that the grievance raisers' details remain confidential.

# Strengthening monitoring and engagement continued

Ansell tracks grievances raised across both the externally managed hotline and through the plants. All tickets raised in FY24 were closed out with corrective actions communicated to grievance raisers.

#### Grievance case raised through internally managed grievance mechanisms in FY24

Category	Description	Number of cases raised	Number of cases closed
Management and leadership	Poor leadership issues, misconceptions, and miscommunications.	3	3
Harassment and discrimination	Unprofessional behaviour between employees and supervisors.	8	8
Total		11	11

Data reported is from Ansell's centralised tracker and this year, the data excludes cases raised at Ansell Seremban. Ansell's grievance mechanisms are implemented at Ansell Seremban and cases raised are monitored by regional and plant HR.

#### Third-party grievance channel outcomes in FY24

Category	Description	Number of tickets raised	Number of tickets closed
Medium risk/ critical issues	These issues are categorised as medium risk by SMETA, such as discrimination, excessive working hours, dangerous or substandard working conditions.	3	3
Low risk/ non-urgent	Non-urgent issues include salary or benefit complaints, leave requests and healthcare-related inquiries.	3	3
Total		6	6

In FY24, no tickets raised were categorised as 'High risk/Zero tolerance', which is defined as issues with the most severe non-conformances such as forced overtime, human-trafficking, forced or child labour, threats or violence. Please refer to page 33 on our process to conduct investigations into grievances.

#### **Key reflections**

Providing multiple grievance hotlines has been effective in providing workers alternative avenues to raise complaints. However, running multiple hotlines has proven to confuse some employees, be inefficient, and generate additional work for Human Resource teams who must track and respond to grievances raised. To address this, we are working towards streamlining our various grievance hotlines into one access point for workers. This will support visibility and transparency for identifying and addressing grievances in the future.

# Strengthening monitoring and engagement in supply chains

The Supplier Code of Conduct requires all suppliers to comply with the standards and expectations set out by Ansell, in addition to their obligations under local law. We assess alignment to these standards through our monitoring program, which comprises second- and third-party audits and supplier assessment questionnaires (SAQs). We also seek to partner with suppliers to uplift standards, using audits and SAQs as tools for engagement, in addition to conducting ongoing training.

#### **Third-party audits**

We require in-scope SMF suppliers to undergo regular thirdparty audits. Our third-party audit lifecycle sets out actions to help suppliers prepare for, and address issues arising from, third-party audits.

#### **Key reflections**

Establishing partnerships and working with suppliers is the most effective way to improve labour rights conditions in our value chain. Audits are used as a tool to reflect on conditions and identify improvement opportunities with suppliers. Throughout the audit lifecycle, we work with suppliers to better understand their risks and provide support to develop and roll out corrective action plans. Not only does this improve working conditions within our supply chain, but it also improves our relationships with suppliers. This is evident from supplier feedback highlighting Ansell's proactive engagement throughout the audit process, in contrast to the approach of their other customers, who focus only on audit completion.

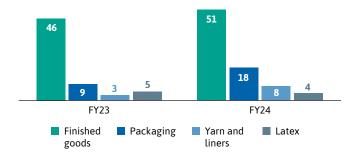
#### Ansell's third-party audit life cycle

Prepare	Audit	Share and address	Follow-up
Ansell's responsible sourcing and quality assurance teams engage with suppliers to plan for audits. Ansell conducts upskilling sessions with supplier teams on audit frameworks and systemic non-conformances to look	Suppliers engage with an accredited third-party auditor to assess compliance with Ansell's SCOC, local laws and other applicable standards. Ansell requires suppliers to utilise a recognised audit	Suppliers are required to share audit results with Ansell's responsible sourcing and quality assurance teams, who review findings. Ansell teams review suppliers' corrective action	Suppliers undergo follow-up audits as required by the third-party auditor. These time limits are reflected in our SMF escalation framework. We track close-out status
out for. We require suppliers to complete SAQs to support early identification of risks. In some instances, Ansell conducts second-party audits to support early identification of likely non-conformances. This helps suppliers to implement corrective actions in a timely manner.	standard and methodology, such as SMETA 4-Pillar, Business Social Compliance Initiative (BSCI), Social Accountability International SA8000, Worldwide Responsible Accredited Production (WRAP), Forced Labour Indicators (FLI) or equivalent framework for audits.	plans (CAPs). We support suppliers by sharing learnings and practices adopted by our internal operations.	and corrective actions verified through third-party audits under the SMF and report results to senior leadership.

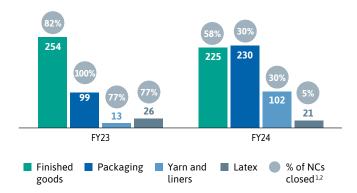
# Strengthening monitoring and engagement continued

While we have spent many years developing our auditing program with finished goods suppliers, in the last two years we expanded our audit program to in-scope raw material suppliers of packaging, yarn and liners, and latex categories. Finished goods suppliers completed 51 audits, up from 46 in FY23. We identified 225 non-conformances, down from 254 in FY23 with a close-out rate of 58%. The increase in audits paired with the reduction of non-conformances is a promising indicator that our supplier base is improving compliance with labour rights standards. Many of our finished goods suppliers have undergone multiple audit cycles with Ansell, and we have seen an improvement in proactive identification of risks and implementation of corrective action plans, resulting in a reduction in audit findings. Our teams continue to engage with these suppliers, emphasising identification of risks and timely close out as the priority.

#### Number of supplier audits completed



#### Number of identified and closed NCs from suppliers' audits



- 1. NCs shown are those identified during the fiscal year during audits. When NCs from a previous year are not closed, they are reviewed the next year and – if still not closed – shown as an 'identified' NC in the chart the following fiscal year.
- 2. The FY24 close-out rate is primarily due to reporting cut-off, as follow-up audits are scheduled in FY25.

Raw materials suppliers completed 30 audits, up from 17 in FY23. We identified 353 non-conformances. Many of our raw material suppliers underwent audits for the first time in FY24, and the number of non-conformances was predictably high. Ansell spent significant time working with the suppliers to prepare for audits through training sessions, sharing findings and recommended corrective actions from SAQs/second-party audits, and top-to-top engagement. After audits were completed, we worked with the suppliers to address findings through corrective action plans.

Ansell requires follow-up audits by third-party auditors to verify suppliers' corrective actions and close out non-conformances. Follow-up audits are scheduled to allow suppliers sufficient time to implement corrective actions. This is typically six to twelve months after the initial audit, depending on the severity and number of non-conformances identified. Therefore, we are able to report an increase in the FY23 close-out rate for NCs identified among our finished goods suppliers, rising from 60% reported last year to 82%. The majority of audits conducted in FY24 have follow-up audits scheduled for FY25, hence we report a lower FY24 close-out rate to-date.

#### **Second-party audits**

Ansell conducts second-party audits when:

- suppliers are unable to organise timely third-party audits, or
- there is a need to assess allegations received via formal or informal channels, or
- we have categorised a supplier as 'C ' or 'D', or
- · to support preparation for third-party auditing.

Second-party audits are conducted by Ansell in line with the SMETA four-pillar framework. We use second-party audits as a stop-gap to inform our risk profile with suppliers, as well as an opportunity to visit suppliers' locations and engage in person.

#### Case study: Raw material supply chains

In addition to engaging and assessing suppliers in the natural rubber latex category as part of our SMF activities, a priority focus area for FY24 has been improving the traceability of the upstream supply chain. This is driven in part due to the roll out of the SMF, in addition to the upcoming implementation of the European Union Deforestation Regulation (EUDR). A cross-functional working group with team members from Global Sourcing, QA and Regulatory Affairs, Manufacturing, Planning, Logistics, Marketing and Finance are working to implement product traceability and expand our supply chain due diligence program to include information collection, risk assessment and risk mitigation to adhere to EUDR regulations.

#### Self-assessment questionnaires (SAQs)

To supplement our audit program, we utilise SAQs. We have two tiers of SAQ: the due diligence SAQ, which covers a broad range of systemic non-conformances; and topic-specific SAQs, which have been developed to address systemic non-conformances previously identified in Ansell's supply chain. Where relevant, issues are identified in the due diligence SAQ and topic-specific SAQs will also be provided to the supplier. SAQs are based on international frameworks including the ETI Base Code and the ILO, in addition to standards such as SMETA.

We use SAQs to engage with suppliers on specific issues and closely monitor systemic non-conformances. We emphasise to our suppliers the importance of providing accurate information and verify the details through supporting documentation and audits. Ansell communicates the process as a tool for suppliers to support early identification and monitoring of issues that will improve audit results.

#### No. of suppliers assessment per topic-specific SAQ

SAQ topic	Frequency	Number of suppliers	Questionnaire details
Due diligence	Annual/ As required	68	The due diligence questionnaire collects information on a supplier's risk profile and controls, and recommends subsequent corrective actions based on supplier responses. Risk profile questions consider the presence of migrant workers, workers engaged through labour agents, young workers and worker gender. The controls assessment considers pre-employment, employment and post-employment practices in line with FLI, and also queries supplier management practices. The corrective action plan recommendations are reviewed by the supplier's senior management and Ansell.
Responsible recruitment	As required	25	The responsible recruitment questionnaire collects information on suppliers' recruitment fee policies, whether any recruitment fee cases exist and, if so, what are their remediation plans and timeline.
Accommodation	As required	20	The accommodation checklist collects information to determine whether a supplier's hostel provides safe and adequate living conditions for workers. The questionnaire considers occupancy density, safety processes, bedding and other amenities, in line with local legislation and ILO standards.
Working hours	Weekly/ monthly	7	The working hours questionnaire queries overtime and total hours worked.

# **Appendix A: Alignment matrix**

This Labour Rights Report (and Modern Slavery Statement) was prepared in accordance with the criteria set out in the Australian Modern Slavery Act 2018 (the Australian Act), the United Kingdom Modern Slavery Act 2015 (the UK Act), the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2024 (the Canadian Act) and the California Transparency in Supply Chains Act 2010 (the California Act).

Response to reporting criteria	This section addresses the requirements of:	Further details:
<b>Identify the reporting entity</b> This report is made on behalf of the reporting entity Ansell Limited (ABN 89 0040 853 30). This statement sets out the actions taken by Ansell and its owned or controlled entities (collectively 'Ansell') during the 12 months ending 30 June 2024 to prevent modern slavery and human trafficking in our business and supply chains. Ansell's subsidiaries are listed in our 2024 Annual Report. For the purposes of the Canada Act, the relevant entity is Ansell Canada Inc.	Australian Act s16(1)(a)	n/a
<b>Structure, operations and supply chain</b> Ansell Limited ('Ansell') is a global protective solutions company employing more than 15,000 people in over 55 countries. Ansell is legally domiciled in Melbourne Australia	Australian Act s16(1)(b) UK Act 54(5)(a)	Pages 4-7 About Ansell
and is listed on the Australian Securities Exchange (ASX: ANN). Ansell has four corporate headquarters: Melbourne, Australia; Brussels, Belgium; New Jersey, United States; and Cyberjaya, Malaysia.	Canadian Act s11(3)(a)	
Ansell operates 14 manufacturing facilities, 24 distribution facilities/warehouses and four corporate hubs, with several offices. Ansell's manufacturing facilities are in 9 countries. Ansell procures goods and services from over a thousand suppliers in over 25 countries, across a wide range of sourcing categories.		
On 2 July 2024, we announced the completion of the acquisition of 100% of the assets that constitute Kimberly-Clark's Personal Protective Equipment business (Renamed KBU). Comprehensive disclosures concerning labour rights associated with the newly acquired KBU assets will be detailed in our 2025 Labour Rights Report.		
Risk of modern slavery in our operations and supply chain	Australian Act s16(1)(c)	Pages
In FY20 we engaged a third party to conduct a detailed inherent modern slavery risk	UK Act 54(5)(d)	14-15
assessment of our operations and supply chain. The risk assessment drew on country and industry risks across human trafficking, child labour and forced labour (including debt bondage).	Canadian Act s11(3)(c)	
<ul> <li>Ansell's operations range from low-risk corporate hubs and offices to high risk manufacturing plants.</li> </ul>		
• Ansell's supply chain includes a number of high risk procurement categories including textiles, packaging, forest products, minerals and finished goods. Textiles, forest products and minerals are high risk for forced labour and child labour. Finished goods are high risk for forced labour debt bondage.		
We conduct a continuous performance assessment to refine our understanding of risks in our manufacturing operations and for high risk suppliers.		

Response to reporting criteria	This section addresses the requirements of:	Further details:
Actions taken to assess and address identified risks, including due diligence and remediation Ansell takes a risk-based approach to assessing and addressing modern slavery, human trafficking, child labour and forced labour (including debt bondage) risk. We have an extensive set of policies which codify our approach across operations and supply chain.We utilise our Labour Standard Management Framework (LSMF) and Supplier Management Framework (SMF) to monitor compliance with these expectations. Ansell does not require suppliers to certify that materials incorporated into products comply with the laws of the country or countries in which they do business, except for conflict minerals. We take a collaborative approach to improving labour rights standards across our supply chain. However, where suppliers are not committed in good faith to progress toward alignment with our labour rights commitments, we review potential options, including finding alternate sources for procurement and terminating supplier relationships. Ansell determines on a case-by-case basis whether remediation for loss of income is required where measures taken to eliminate the use of forced labour or child labour		
occurs in our activities and supply chains. Assess the effectiveness of actions taken We continually re-assess the effectiveness of our actions through internal reviews of our operational and supply chain labour rights programs. In FY24 this was done by tracking key performance indicators, which are reported to the LRC and SRC. The LRC reviews indicators to make informed decisions about areas of our program that are working effectively and opportunities for improvement. The LRC communicates the status of the key indicators up to the SRC, ELT and Board through regular meetings. Key performance indicators include audit findings and close-out rates, status of corrective actions, number of workers and suppliers participating in engagement activities and number of high risk suppliers and manufacturing facilities as determined through continuous performance assessments. Within operations, hours worked and grievances raised and resolved are also tracked and reported. In addition to tracking of performance indicators we engaged third-party LRQA to review elements of our program including working hours, remediation and vulnerable worker management.	Australian Act s16(1)(e) UK Act 54(5)(e) Canadian Act s11(3)(g)	Page 16 onwards
<b>Consultation</b> Ansell and its subsidiaries operate as a single integrated group. Many of the entities owned and controlled are accounting structures that do not have separate corporate governance structures that can be consulted or engaged for the purposes of this report. As such, consultation was focused on engaging both internal and external stakeholders.	Australian Act s16(1)(f)	n/a
<b>Other relevant information</b> We conduct training to upskill our operational teams and suppliers on modern slavery and human rights related topics. During the year we ran briefings for relevant plant staff on the FLI and in-scope suppliers on labour rights topics, as covered in our SCOC.	Australian Act s16(1)(g) UK Act 54(5)(f) Canadian Act s11(3)(f) California Act 1714.43(c) 5	n/a

# **Appendix B: Policies**

Ansell has an extensive policy framework which lays the foundation of our commitment to protect human rights.

Document	Overview	Policy in action	Status
Business-wide poli	cies		
Human Rights Statement	Outlines Ansell's commitments as an employer to defend human rights in our operations and supply chain.	The commitments set out in our Human Rights Statement are codified and enacted through our Code of Conduct and Responsible Sourcing Policy.	Reviewed and updated FY24
Labour Standards Policy	Defines our minimum expectations of Ansell's internal operations and third- party contractors with respect to labour standards, child labour, forced labour, human trafficking, freedom of association and collective bargaining.	The minimum expectations set out in our Labour Standards Policy are codified and enacted through our Code of Conduct and Supplier Code of Conduct.	Reviewed and updated FY22
Whistleblower Policy	Describes the procedure for stakeholders to make whistle-blower claims, and for Ansell's process of investigating a claim in line with the Whistle-blower Protection Scheme under the Corporations Act 2001 and the Taxation Administration Act 1953.	The Whistleblower policy is communicated to internal and external stakeholders via the Code of Conduct and Supplier Code of Conduct. The policy is utilised by grievance raisers to make complaints and Ansell to follow escalation and close out procedures.	Reviewed FY23
Conflict Minerals Policy	Outlines Ansell's policy relating to conflict minerals and procedures related to sourcing from areas of conflict.	Procurement teams communicate the policy requirements with suppliers. Suppliers verify compliance through signing the Supplier Code of Conduct, which includes provisions on the Conflict Minerals Policy. In-scope suppliers for potential conflict minerals are required to conduct due diligence activities. This includes reviewing the necessity of goods and raw materials sourced that contain conflict minerals, conducting inquiries, and undertaking appropriate action, working with suppliers to rectify any non-compliances and reassessing our business relationship with them.	Reviewed and updated FY24
Diversity, Equality and Inclusion Policy	Describes Ansell's commitments to Diversity, Equality and Inclusion (DEI).	Ansell's People Program includes activities executed under the DEI policy. Initiatives for Ansell employees include DEI workshops, cultural trainings, social events and celebrations. The Diversity and Inclusion Committee oversees these activities and monitors compliance with the policy. We expect suppliers to integrate DEI considerations into their operations, as set out by the Supplier Code of Conduct.	Reviewed and updated in FY24

Document	Overview	Policy in action	Status
Operational polici	es		
Ansell Code of Conduct	Defines our minimum expectations of Ansell employees, directors and officers and provides a code of ethics when representing and carrying out Ansell business operations. Includes provisions	The Ansell Code of Conduct is communicated to employees during onboarding, with directors and workers undergoing a refresher every two years.	Reviewed and updated in FY24
	relating to fair employment and forced and child labour.	We monitor compliance with the Code of Conduct through employee engagement surveys, direct feedback from employee representatives via trade unions and Works Councils, tracking of compliance complaint referrals, and assessment and performance reviews. Within our manufacturing operations, compliance is further monitored through our Labour Standards Management Framework (LSMF).	
		Where we identify violations of the code, disciplinary action and in some cases, termination will ensue.	
Global Grievance Policy	Describes the various channels available to workers to raise grievances and concerns.	The Global Grievance Policy is provided to workers during onboarding. Ansell advertises use of the policy via bulletin boards and provides regular briefings via townhall meetings and plant specific trainings. The policy is used by grievance raisers to make complaints. The policy is used by managers and Global HR-CSR to guide escalation and close out of grievances.	Established in FY22
Hostel Policy	Describes Ansell's commitments to create safe and adequate living conditions for workers staying at hostels and onsite accommodation. It outlines the obligations plants must follow to mitigate the risks of unfair working and living conditions associated with workers in accommodation, including addressing overtime, limited breaktimes and freedom of movement.	The Hostel policy is provided to plant managers and workers to establish expectations for worker accommodation. Compliance with the policy is monitored through our audit program.	Established in FY24
Supply chain polic	ies		
Supplier Code of Conduct	Defines our minimum expectations of our direct suppliers while they are contracted with Ansell with respect to the treatment and human rights of their workers, human trafficking, health and safety, bribery and corruption and data protection.	The Supplier Code of Conduct is integrated into the initial supplier contracting stage, via supplier briefings and other supplier engagement activities.	Reviewed in FY24
Responsible Sourcing Policy	Outlines the expectation on suppliers to address value chain risk with respect to forced labour, child labour, ethical recruitment, human trafficking, coercion, discrimination, environmental protection and ethical conduct regarding product, sales and our customers.	The Responsible sourcing policy is used by our procurement teams to guide sourcing decisions. In-scope suppliers are required to confirm compliance with the requirements set out in the policy as a condition of engagement. Supplier compliance is assessed through the SMF monitoring and engagement program.	New in FY24



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