



# Modern Slavery Statement 2022

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2San Pty Ltd  
ABN 93 641 633 141

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## A Statement From Our Directors

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The Directors at 2San Pty Ltd are committed to delivering **quality, affordable, accessible and sustainable healthcare products** sourced from reputable and ethical suppliers and alliance partners to our clients in government, retail, private health and blue-chip corporate company sectors.

We seek to be leaders in our industry and our mantra “**Better Care, Better Life**” flows from head office through our sourcing, warehousing and operations ensuring we source from likeminded suppliers and all staff and contractors are cared for in a supportive, inclusive and open environment.

Human trafficking is a scourge and by ensuring our supply and operations complies is a small step to help remove this and **improve the lives of others**.

Thank You, from the Directors

# Section One

## Identify The Reporting Entity

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# The Entity

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2San Pty Ltd

ABN 93 641 633 141

2San Pty Ltd is a leading distributor of high quality, fully certified Medical Consumables & Personal Protective Equipment (PPE). We are committed to preventing slavery and human trafficking in our operations and supply chains. We have taken steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2022.

This is 2San Australia first modern slavery statement in response to the Act, which reflects on the actions we have taken to identify and address modern slavery risks in our Australian operations and supply chain during 2022, and outlines opportunities where we can improve in the future.

We are aware that modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

This statement has been published in accordance with the Modern Slavery Act 2018 (the Act). It provides an update on the progress that 2San Pty Limited (2San Australia) have made during the financial reporting year ending 31 December 2022, and will continue to make, to prevent Modern Slavery in its businesses and supply chains. Unless otherwise specified, all references to 2San are references to both 2San Australia and 2San globally.

## **Section Two**

# The Entity, Operations, & Supply Chains

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# The Entity, Operations, & Supply Chains

2San Australia has offices in Melbourne and Sydney, with a total head count of 12 in 2022.

We are a trusted global Tier 1 supplier of high-quality innovative healthcare products and solutions that Clean, Protect and Test. We provide infection control technologies, diagnostic testing kits, medical grade PPE, and fully certified medical consumables to governments, healthcare entities and large corporate clients across government, retail, private health and large corporates. We specialise in being fast and nimble with a truly global reach.

Our suppliers of products for the 2022 was largely manufacturers of rapid antigen tests, with other products sourced through suppliers operating in Australia for other products such as medical PPE and other medical consumables.

We establish a relationship of trust and integrity with all our suppliers. Our supplier selection and on-boarding procedure includes due diligence on supplier's reputation, operations respect for the law, compliance with health, safety and environmental standards, and references.

We have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.



# Reporting Structure





## **Section Three**

# Modern Slavery Risks In Our Operations & Supply Chains

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# Modern Slavery Risks In Our Operations & Supply Chains

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## Our Operations

We assess the potential for our operations to cause, contribute to, or be directly linked to modern slavery on an ongoing basis. We consider the overall risk of modern slavery in our operations is moderate namely, the lower prevalence of modern slavery in Australia and the robust processes we have in place in relation to workplace relations.

We follow set protocols in the way we recruit people into the company via our recruitment practices. For example, we verify qualifications, conduct reference checking on prior experience, and verify the right to work in our country. We continue to monitor and engage with our staff on issues such as work hours and overtime, to ensure they are adequately compensated, and we monitor work patterns.

## Supply Chains

We have also assessed the potential for our business to cause, contribute to, or be directly linked to modern slavery via our supply chains. Given the nature of our procurement categories and practices in the pandemic as described in further detail below, it is unlikely that we have caused or contributed to modern slavery in our procurement of goods or services for our operations during the reporting period. There is, however, the latent risk that we may be connected to modern slavery practices through the activities of our suppliers and their supply chains.

# Modern Slavery Risks In Our Operations & Supply Chains

Our supply chain comprises the following main categories and we recognise that modern slavery risks exist in each one of them by virtue of the industry risk profiles and the globalised and often complex supply chains supporting the provision of goods or services:

Category	Generally known modern slavery risks
<b>Product / Medical Device Supply Chain:</b>	
<b>Manufacturing</b>	Medical consumables and PPE are manufactured in factories. The manufacturing sector is identified in the 'Walk Free Foundation's Global Slavery Index 2018' (as referred to in Appendix 5 of the Australian Government's 'Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities' (the Guidance) as a high-risk industry for modern slavery.
<b>Medical consumables (incl. generic &amp; volume based, low-cost clinical consumables and diagnostics)</b>	There is a presence of complex multi-tiered supply chains which may occur in high-risk countries and potential exploited labour identified in the 'Walk Free Foundation's Global Slavery Index 2018' (as referred to in Appendix 5 of the Guidance).
<b>PPE/Uniform</b>	It is well documented the higher risk of modern slavery in the supply chains supporting the garment industry and mass-produced items manufactured in higher risk countries with components from numerous locations.
<b>Shipping, logistics including postal and courier pick-up and delivery services</b>	The use of subcontractors and agents together with the potential use of vulnerable workers places suppliers in this category at greater risk of being directly linked to modern slavery.
<b>Operations Supply Chain:</b>	
<b>Recruitment and contractors:</b>	The use of recruitment agencies and contractors can lead to exploitation or less visibility on the supply chain. Labour-hire is identified in the 'Walk Free Foundation's Global Slavery Index 2018' (as referred to in Appendix 5 of the Guidance) as a high-risk area for modern slavery.
<b>IT equipment, software and telephony</b>	Modern slavery risks are present in the supply chains that provide tech companies with the necessary materials to produce electronic goods, and parts of those goods. The manufacture of IT equipment has also been linked to modern slavery.
<b>Travel services</b>	The potential use of a vulnerable workforce supporting these industries in some instances combined with complex supply chains could result in greater modern slavery risks.
<b>Postal, courier pick-up and delivery services</b>	The use of subcontractors and agents together with the potential use of vulnerable workers places suppliers in this category at greater risk of being directly linked to modern slavery.

# Modern Slavery Risks In Our Operations & Supply Chains

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## Geographic risks

The operations and supply chains of the Reporting Entities are involved in the following regions which may be at risk of modern slavery:

- **Asia:** We procure and assemble most of the PPE and medical consumables components from manufacturing sites based in China and India. The Asia and the Pacific region is identified in the 'Walk Free Foundation's Global Slavery Index 2018' (as referred to in Appendix 5 of the Guidance) as a region with a high-risk for modern slavery.
- **Global:** Our suppliers manufactured or procured goods and/or services from a range of countries including Australia, the United States, the United Kingdom, the Philippines, China and India. Of these countries, the Global Slavery Index (GSI) ranked, Philippines, 30th of 167, China 111th of 167 and India 53rd of 167 for the prevalence of modern slavery.

## **Section Four**

# Actions Taken to Assess & Address The Risks of Modern Slavery

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# Risk Assessment

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In the past year, we conducted a risk assessment of our supply chain by considering:

- Intertek workplace conditions assessment of key manufacturing sites indexed against industry benchmarks.
- UK Cabinet Office Modern Slavery Assessment.

Those assessments determined our response and the risk controls that we implemented.

# Policies

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2San Australia has implemented the following policies published on our website for identifying and preventing slavery and human trafficking in our operations and supply chain:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery, exploitation or human trafficking.
- Anti-Slavery & Human Trafficking Policy - our policy encourages employees and other stakeholders to do the right thing by clearly stating the actions and behaviour expected of them to eradicate modern slavery and exploitation.
- Ethical Sourcing Policy and Supplier Code of Conduct - our Code and supplier contracts make specific reference to tackling slavery and human trafficking.

# Supplier Due Diligence & Contracting

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2San Australia conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Monitoring and reviewing employment practices
- Exiting relationships with suppliers or sanctioning suppliers that fail to improve their performance in line with our requirements.

2San Australia's contracts contain up-to-date anti-slavery and exploitation provisions and we are committed to tackling these issues.

## Awareness

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2San Australia has raised awareness of modern slavery issues by making training mandatory as part of the induction process for staff and freelance contractors. The training reinforces:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

## Training

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In addition to the awareness programme, 2San Australia will incorporate relevant content in the all-staff communications as part of the communication programme to raise awareness, monitoring and detection

# Section Five

## Assessing Effectiveness

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# Measuring How We Are Performing

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2San expects its suppliers to abide by all applicable laws and regulations and maintain the highest ethical standards. Over the next financial year, 2San will develop a set of key performance indicators and controls to monitor modern slavery and human trafficking risks in our organisation and supply chain.

These will focus on:

- Updated staff training to build ongoing and continued awareness and understanding of modern slavery risks across the business.
- Continual assessment and regular reporting to the board.
- Implement supplier questionnaire completion tracking
- Conduct manufacturing supply chain audits linking to our Quality Management System with a risk-based approach for selecting, evaluating, approving, and monitoring direct suppliers.
- Conduct pulse thematic surveys to raise awareness of exploitation identification, reporting and monitoring.
- Continue to review and update our relevant policies to improve our response to modern slavery risks.
- Continue to review and improve transparency and accountability within our procurement practices in relation to modern slavery risk in our supply chain.

# Conclusion

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# Consultation and Approval

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The Reporting Entities do not own or control any other entities. Board of director approval from 2San Pty Limited was obtained for this statement and approved by the board of 2San Australia at the board meeting January 2022.

This statement is signed by the Australian Director of 2San Pty Limited for the reporting period December 2022.

Signed by

**Raymond Lee**  
Director – Australia  
2San Pty Ltd



**2SAN**

Better care. Better life.