



Modern Slavery Statement

Financial Year: 1 July 2022 – 30 June 2023

The Reporting Entity

This statement is made by Aspen Asia Pacific Pty Ltd on behalf of its 100% owned subsidiaries, Aspen Pharmacare Australia Pty Ltd and Aspen Pharma Pty Ltd (**Aspen Australia**).

Structure, operations and supply chains

Aspen Pharmacare Australia Pty Ltd and Aspen Pharma Pty Ltd are the Australian trading entities of the Aspen Group. Headquartered in South Africa, Aspen is a multinational pharmaceutical company with an extensive range of pharmaceutical products that provide treatment for a broad spectrum of acute and chronic conditions experienced through all stages of life, with established business operations in over 50 countries and territories, supplying specialty and branded pharmaceuticals in more than 115 countries.

Globally, Aspen Group employs over 9,000 people in some 50 countries, comprising of approximately 48% women and 52% men.



Aspen Pharma Pty Ltd ACN 096 239 958 manufactures and packages oral solid dose and semi-solid dose pharmaceutical products in its TGA-approved manufacturing site at Dandenong, Victoria. To do so, Aspen Pharma obtains direct inputs: raw materials such as active pharmaceutical ingredients (APIs) and excipients; packaging materials such as cartons, labels, bottles, blister trays and foils; production support including machinery, parts and other equipment and services such as regulatory approval, maintenance, contract laboratory services, freight, logistics, utilities, telecommunications and IT systems, and cleaning and waste management.

Aspen Pharmacare Australia Pty Ltd ACN 004 118 594 supplies pharmaceutical products in Australia and New Zealand and exports pharmaceutical products to other countries. These pharmaceutical products

come from a variety of sources: the Dandenong manufacturing site, Aspen Group (some produced at Aspen manufacturing sites and others in-licensed from other pharmaceutical companies), or in-licensed from or contract manufactured by local and overseas pharmaceutical companies. Aspen Pharmacare Australia obtains goods and services from regulatory agencies, consultants, freight-forwarders, warehousing and other transport and logistics suppliers, power, telecommunications and IT service providers, marketing and sales support suppliers including point of sale materials, marketing and advertising agencies, travel agencies, conference organisers, and general support including car fleet, couriers, cleaning and other office services and consumables.

The registered office of both reporting entities is 34-36 Chandos Street, St Leonards, New South Wales 2065, Australia. Together, the entities employ approximately 560 permanent employees, and engages approximately 45 seasonal, contract or otherwise non-permanent workers.

There has been no change since 2022 - Aspen Australia’s direct suppliers of goods and services were located in 35 countries¹. Over 93% of these direct suppliers are domiciled in Australia.

Top 10 supplier locations based on total spend	
1	Australia
2	Switzerland
3	Israel
4	New Zealand
5	India
6	Italy
7	Germany
8	USA
9	Finland
10	United Kingdom

Risks of modern slavery practices in our operations and supply chains

Having regard to the highly regulated nature of the pharmaceutical industry, human rights risks within Aspen Group’s employed workforce and the workforces of non-Aspen suppliers of pharmaceutical products are assessed to be low as they are largely made up of skilled workers who undertake work in controlled and regulated environments that operate under established policies and procedures and are often subject to government and contract partner audits.

Aspen Australia’s modern slavery risk exposure could exist in the engagement of suppliers and service providers in higher risk sectors and jurisdictions. Suppliers of non-regulated inputs who operate in countries that do not adequately protect human rights could also pose a modern slavery risk.

¹ Based on the location of the companies where payments for goods and services were made.

Based on the **International Labour Organisation's Global Estimates of Modern Slavery 2022** (ILO 2022), there are a number of general risk factors which are relevant to Aspen Australia's supply chain.

Proximity

Asia and the Pacific has the highest prevalence of forced labour in the world, based on the total number of people. Aspen Australia's location within the region means that materials and other services from within that may be more susceptible to risk may be more likely to be a part of our supply chain, compared to similar risk in another region.

Manufacturing

The manufacturing sector accounts for nearly one-fifth of all forced labour exploitation of adults. This risk impacts almost every part of Aspen's business, from finished products we purchase, but also as a large component of our business relates to contract manufacturing it is a consideration that applies to our operations.

Looking specifically at the categories of goods Aspen Australia purchases against those identified as having an increased risk of modern slavery based on the **Global Slavery Index 2023 Importing Risk** and ILO 2022, risks could arise in relation to:

- electronics if sourced from Malaysia and China;
- uniforms if sourced from Argentina, Bangladesh, Brazil, China, India and Malaysia;
- construction;
- raw materials in the agriculture sector; and
- services including transport and hospitality.

Actions taken to assess and address risks of modern slavery practices in our operations and supply chains

Risk Assessment

In earlier reporting years, Aspen Australia assessed the risk of modern slavery in our own operations, which are all within Australia and New Zealand, as low to very low, given the highly regulated nature of the pharmaceutical industry. The workforce is largely made up of skilled individuals who undertake work in controlled and highly regulated environments that operate under established policies and procedures. That remains the case. This also applies to most of our Tier 1 suppliers.

We also seek input from Aspen Group as to any heightened modern slavery risks identified at a Global level.

During the period from 1 July 2022 to 30 June 2023, we did not identify any heightened modern slavery risk.

We are still working on ensuring all of our Tier 1 suppliers have been assessed for risk. We will look into Tier 2 suppliers (suppliers that supply to Tier 1 suppliers) in later years, or earlier as specific risks are identified in the supply chain of a particular Tier 1 supplier.

Aspen Group is taking steps to further enhance responsible supply chain management across the Group by developing a Group-wide supplier sustainability risk assessment and due diligence program. This program aims to enable Aspen to monitor sustainability performance on a routine basis through reliable sustainability assessments and engage with suppliers to achieve continual improvement and advancement of supplier performance on relevant sustainability aspects. This aligns to Aspen Group's goal of striving to review, with an aim to improve, procedures to support the identification and prevent risks of modern slavery across the business.

In 2022 a Group Sustainability Management Framework was developed, and an Executive Sustainability Forum was established to oversee the sustainability strategy development and monitor its implementation. The development of our Group sustainability strategy is progressing according to key milestones under the oversight of the Executive Sustainability Forum, chaired by the Group Chief Operations Officer.

Addressing risks

Aspen Australia considered what policies and procedures it has in place that address modern slavery risks and whether they could be improved. The business strategy, Codes of Conduct, Third Party Due Diligence Procedure and the Whistleblowing policy are all relevant Aspen Group (global) policies that apply to all Aspen Group affiliates, including Aspen Australia.

Our sustainable business strategy

We recognise that doing business in a sustainable and responsible manner is integral to ensuring our future viability. Sustainability considerations underpin our strategy and are integrated into the way we do business. One of our 5 strategic objectives is to be a good corporate citizen by conducting our business in a responsible inclusive and sustainable way. Our sustainability commitment to society is to strive to operate an ethical and responsible business underpinned by our shared values and governance structure; we uphold the dignity, fundamental freedoms and human rights of our employees, contractors and the communities in which we live and work, and others affected by our activities.

As a signatory to the United Nations Global Compact, Aspen has committed to support the 10 principles on human rights, labour, environment and anti-corruption, including principles 4 and 5 which call for the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.

In 2023, Aspen maintained its inclusion in the top 30 FTSE/JSE Responsible Index Series and in the FTSE4Good Index Series, which recognises companies with strong ESG practices measured against global standards.

Aspen Code of Conduct

All employees are required to confirm annually that they will comply with the Aspen Code of Conduct, Section 9 (Human Rights, Labour and Employment Practices) of which states that all employees are responsible for ensuring that Aspen upholds the elimination of all forms of forced and compulsory labour and upholds the effective abolition of child labour.

Aspen Supplier Conduct, Compliance and Ethical Undertakings

Aspen requires all suppliers and service providers to agree to contractual obligations with respect to key ethical and compliance matters, including obligations not to engage in slavery, forced labour or human trafficking. This is done via incorporation of mandatory ethics and compliance clauses in supplier contracts or by requiring suppliers to sign a separate compliance and ethical undertakings document. Aspen's supplier contracts and the separate undertakings documents, require each supplier to warrant, to the best of its knowledge, that in relation to the performance of its obligations for Aspen:

- It does not use, engage in or support child labour practices in its own operation, or its supply chain
- It does not engage in or support slavery, human trafficking or any form of forced labour in its own operation, or its supply chain
- It provides a safe and healthy workplace; any housing supplied to employees is safe for habitation; access is provided to proper sanitation and clean water, and emergency healthcare is provided in case of workplace accidents or incidents
- It does not engage in or support the use of corporal punishment, mental, physical, sexual or verbal abuse, and does not use cruel or abusive disciplinary practices in the workplace
- It pays employees at least the minimum wage, or a fair representation of the prevailing industry wage (whichever is the higher) and provides employees with all legally mandated benefits
- It complies with laws on working hours and employment rights in the countries in which it operates and is respectful of employees rights to join and form independent trade unions and freedom of association

The Code requires suppliers to have ethical and human rights policies and an appropriate complaints procedure to deal with any breaches of such policies. Material complaints are to be reported to Aspen with the proposed remedy. It also requires suppliers to undertake to reinforce these standards further down their supply chains.

Suppliers are required to permit Aspen to perform audits of their facilities, records and business processes to verify compliance with the Code. Material breaches of the Code may result in termination of any business relationship with Aspen and disqualification as an Aspen supplier. Given the pandemic, our ability to conduct site visits and audits would be very limited.

Suppliers (as well as employees and others) are encouraged to use the **Tip-Off service** to report suspected unethical behaviour on the part of anyone related to Aspen's business - as described in Aspen's **Whistleblowing Policy**.

Annual reminder letter to suppliers

We send a letter to our suppliers every year, reminding them of the contact details for the Tip-Off line that they can use to report (anonymously or not) any suspected unethical behaviour on the part of any Aspen employee or anyone related to Aspen's business. We give anti-competitive behaviour, fraud and bribery as examples of unethical behaviour. In the 2023 letter we called out Modern Slavery as an example of a reportable subject.

Due diligence

Aspen screens third parties using a global database of intelligence on heightened risk individuals and organisations. The data is sourced from the public domain including global media research in over 60 languages, covering 240 countries.

High risk suppliers are requested to complete a Due Diligence Questionnaire which includes further questions related to various risk areas, including a section specific to modern slavery risks. The responses are then internally assessed by Aspen and should any concerns be raised, or a supplier refuse to complete the questionnaire, further investigation will follow.

Aspen Australia is working to introduce a more comprehensive risk-based Due Diligence procedure for new suppliers.

The planned implementation by **Aspen Group of a Group-wide supplier sustainability risk assessment and due diligence program** will further enhance our due diligence processes.

Targeted Due Diligence

In 2023, Aspen Australia initiated conducting targeted due diligence in particular industries based on areas we identified as having a heightened modern slavery risk. The industries selected were based on a review of official published reports, information made available to the public, as well as based on bans by US Customs.

The industries selected, and suppliers of which were subsequently requested to complete a Due Diligence Questionnaire, were:

- Construction;
- Garments; and
- Freight/transport/shipping.

Where no response was received, we reviewed the supplier's most recent Modern Slavery Statement available to view on the Online Register for Modern Slavery Statements and are satisfied with the actions they report are being taken.

As an action for 2024, we intend to contact any suppliers who have submitted inadequate responses to the Due Diligence Questionnaire to obtain further information and clarification on their responses to give Aspen comfort regarding their modern slavery practices.

Training

Mandatory ethics training is conducted with all employees on commencing employment with Aspen and on an annual basis to ensure that the principles of ethical business conduct – including the elimination of all forms of forced and compulsory labour and abolition of child labour - are understood and implemented.

Aspen Australia informally trains employees involved in procurement to ensure that the risks of modern slavery in our supply chains are understood and that the processes we are developing to assess and address these risks are implemented.

Remediation processes

None undertaken as no modern slavery was identified. If we identify a risk, our aim will be to work with the supplier to address the risk. We will ultimately move away from the supplier where possible if they are unable or unwilling to give us confidence that they are working towards eliminating the risk.

How we assess the effectiveness of the actions taken to assess and address risks

The Aspen Code of Conduct details Aspen Group's commitment to fundamental human rights and the Social and Ethics Committee monitors the effectiveness of ethics management globally. Aspen's Ethics and Compliance programme requires each business unit to assess risks associated with violating human rights, child labour as well as slave or compulsory behaviour. No business in the Group identified heightened risks and there were no substantiated incidents of discrimination, slave labour or compulsory labour reported.

Aspen can seek to use its contractual audit rights to conduct an audit if we assess there may be a heightened risk with a particular supplier or if we reasonably suspect a supplier is engaging in modern slavery practices, or to assess the effectiveness of a corrective action plan.

We have not identified any instances of modern slavery and have had no reason to suspect any supplier is engaging in modern slavery practices.

Process of consultation between reporting entities


Aspen Pharmicare Australia Pty Ltd and Aspen Pharma Pty Ltd share two directors and the CEO of both entities is the same person. As previously described, Aspen Pharma Pty Ltd is the manufacturing arm.

Other relevant information

Other Aspen Group companies are also required to comply with Modern Slavery laws (eg in UK and Canada). Each country reports in to Aspen Group compliance so that information is able to be shared.

Approved by the Board of Aspen Asia Pacific Pty Ltd on 23 December 2023

Signed by



Trevor Ziman
Director of Aspen Asia Pacific Pty Ltd

