



YOUR  
SMILE.  
OUR  
VISION.

SDI LIMITED ACN 008 075 581 | ABN 27 008 075 581  
HEAD OFFICE 3-15 BRUNSDON STREET, BAYSWATER. PO BOX 314, VICTORIA, 3153 AUSTRALIA.  
TOLL FREE 1800 337 003 | TELEPHONE +61 3 8727 7111  
FAX +61 3 8727 7222 | info@sdi.com.au | www.sdi.com.au

## Modern Slavery Statement

### Contents

1	Introduction	1
1.4	What is modern slavery?	2
1.5	Impact of modern slavery	3
2	Mandatory reporting criteria for this Statement	3
2.1	Reporting entity (Criteria 1)	3
2.2	The structure, operations and supply chains of SDI (Criteria 2)	3
2.3	The risks of modern slavery practices in SDI's operations and supply chains (Criterion 3)	4
2.4	The actions taken by SDI to assess and address these risks (Criterion 4)	5
2.4.2	Risk assessment	5
2.4.3	Due diligence processes	6
2.4.4	Remediation processes	6
2.4.5	Supplier engagement	8
2.4.6	Policies & procedures	8
2.4.7	Risk-based engagement with suppliers	9
2.5	How SDI assesses the effectiveness of the actions under Sect. 2.4 (Criterion 5)	9
2.5.2	Annual Review	9
2.5.3	Regular monitoring, tracking & continuous improvement	9
2.5.4	Working with suppliers to assess their progress	10
2.6	SDI's process of consultation with the entities SDI owns or controls (Criterion 6)	10
2.7	Other relevant information (Criterion 7)	10
2.7.1	Future plans	10
3	Approval & signing	11
	ANNEXURE	12

### 1 Introduction

- 1.1 This Modern Slavery Statement ("Statement") relates to SDI Limited and its subsidiaries ("SDI") and describes, among other things:
- the risks of modern slavery practices in SDI's operations and supply chains
  - the actions taken by SDI to assess and address these risks, and
  - how SDI assesses the effectiveness of these actions.
- 1.2 SDI is committed to preventing modern slavery practices in SDI's operations and supply chains. This commitment has, at its heart, a commitment to individuals in Australia and overseas who are impacted by modern slavery.

1.3 This Statement is SDI Limited's first Statement pursuant to the Modern Slavery Act 2018 (Cth) (the "Act") and applies to the reporting period 1 July 2022 to 30 June 2023. As this is SDI's first Statement it describes SDI's modern slavery initiatives relating to the year ended 30 June 2023 and prior.

#### 1.4 What is modern slavery?

1.4.1 The term "modern slavery" is defined in the next paragraph and is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Coercion, threats and deception can sometimes involve clear physical indicators, such as physical confinement or confiscation of identity and travel documents. Often, however, coercion, threats and deception are more subtle and harder to identify. Perpetrators often use subtle threats and psychological pressure to control victims.

1.4.2 The Act defines modern slavery as including eight types of serious exploitation, which are listed and described below:

- **Trafficking in persons** - the recruitment, harbouring and movement of a person for exploitation through modern slavery
- **Slavery** - situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way
- **Servitude** - situations where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work
- **Forced marriage** - situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony
- **Forced labour** - situations where the victim is either not free to stop working or not free to leave their place of work
- **Debt bondage** - situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined
- **Deceptive recruiting for labour or services** - situations where the victim is deceived about whether they will be exploited through a type of modern slavery, and
- **The worst forms of child labour** - situations where children are:
  - exploited through slavery or similar practices, including for sexual exploitation, or
  - engaged in hazardous work which may harm their health, safety or morals, or
  - used to produce or traffic drugs,which can occur in a variety of contexts and industries and may include orphanage trafficking and slavery in residential care institutions, as well as child labour in factories and manufacturing sites, mining and agriculture. The worst forms of child labour do not mean all child work.

1.4.3 Modern slavery can happen in any industry and any country. Modern slavery victims are often vulnerable to exploitation due to their background, migration status or structural factors like poverty. Both adults and children can be victims of modern slavery. Women and children are often especially vulnerable. Australia is not immune from modern slavery; modern slavery can occur in multiple industries and sectors, including hospitality, security, cleaning, domestic work. These industries and sectors can have high modern slavery risks because they often have a widespread use of low skilled labour and a reliance on outsourcing.

1.4.4 "Modern slavery" is only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal or harmful and may be present in some situations of modern slavery. These practices may also escalate into modern slavery if not addressed.

- 1.4.5 The Act established Australia's national modern slavery reporting requirement. The Annexure to this Statement summarises how and where this Statement satisfies these reporting requirements.

## **1.5 Impact of modern slavery**

- 1.5.1 Modern slavery has severe consequences for victims. It involves grave abuses of human rights and serious crimes. Often modern slavery disproportionately impacts women and girls.
- 1.5.2 If not addressed, modern slavery in SDI's operations and supply chains can lead to corporate risks for SDI, for example reputation risk, which may lead to a loss of customer confidence and loyalty, damage to SDI's commercial relationships, supply chain interruptions etc.
- 1.5.3 In Australia, slavery is also a criminal offence under federal law. To varying degrees slavery is also proscribed by various States and Territories of Australia.

## **2 Mandatory reporting criteria for this Statement**

### **2.1 Reporting entity (Criteria 1)**

SDI Limited is the reporting entity for the purposes of this Statement.

### **2.2 The structure, operations and supply chains of SDI (Criteria 2)**

#### **2.2.1 Structure**

The legal and organisational form of SDI Limited and its subsidiaries is described below:

- SDI Limited is a publicly listed company in Australia and its registered office is at 3 – 15 Brunsdon Street, Bayswater, Victoria.
- SDI Limited fully owns the following operational subsidiaries, which are incorporated in the countries mentioned in brackets below:
  - SDI Germany GmbH (Germany)
  - SDI Dental Innovations Limited (United Kingdom)
  - SDI (North America), Inc. (USA)
  - SDI Brasil Industria e Comercio Ltda (Brazil).

These subsidiaries don't have subsidiaries themselves.

- SDI does not have joint venture partners or other entities that it controls.

As at 30 June 2023, SDI had:

- 222 employees in Australia – 94% were full-time and the remainder were part-time or casual, and
- 103 employees overseas – 96% were full-time and the remainder were part-time or casual.

SDI also hires contractors to assist in SDI's operations in Australia and overseas.

#### **2.2.2 Operations**

The activities undertaken by SDI to pursue SDI's business objectives and strategy in Australia and overseas are described below:

- SDI is primarily involved in the research and development, manufacturing and marketing of specialist dental products. SDI's products are a combination of innovation and excellence to provide the ideal restorative materials for the dental profession. Information on SDI's range of products can be found at: <https://www.sdi.com.au/au/products/>.
- SDI's products and services are marketed in over 100 countries globally. SDI's products are manufactured in Victoria, Australia (except for a small percentage of products manufactured in China), and sold via third-party distributors and dealers in Australia and around the world. In Australia, SDI's products are also sold directly to dentists.

- SDI Limited has its Head Office in Victoria, Australia, where it also has its Sales, Marketing, Research & Development, Quality Control, Finance, Human Resource, Information Technology and Finance departments.
- In general terms, SDI Limited's overseas subsidiaries are involved in the following activities:
  - SDI Germany GmbH:
    - Sales & distribution
    - Warehousing of finished goods, to supply the EU and UK markets
  - SDI Dental Innovations Limited:
    - Sales & distribution
  - SDI (North America), Inc.:
    - Sales
    - Distribution, via a third-party logistics company
  - SDI Brasil Industria e Comercio Ltda:
    - Sales & packaging
    - Distribution, via a third-party logistics company.

### 2.2.3 Supply chains

The expression “supply chains”:

- refers to the products *and* services, including labour, that contribute to SDI's own products and services, e.g. products and services supplied *directly* to SDI by SDI's tier 1 suppliers
- includes products/services sourced in Australia or overseas, and
- includes products/services supplied *indirectly* to SDI e.g. by tier 2 suppliers who supply to SDI's tier 1 suppliers, by tier 3 suppliers, and so on along the supply chain.

SDI has complex supply chains relating to:

- the manufacture of SDI's dental products involving, for example:
  - raw materials and components which SDI sources for SDI's dental products from tier 1 suppliers around the world, including Australia, and
  - raw materials and components which SDI's tier 1 suppliers source from their suppliers (SDI's tier 2 suppliers), and so on regarding suppliers further along the supply chain, and
- SDI's operations involving, for example:
  - goods and services that help SDI operate, which SDI sources from tier 1 suppliers, such as IT equipment, stationery, cleaning services, security services, and
  - goods and services supplied to SDI's tier 1 suppliers and other tiers.

As at 30 June 2023, SDI procured goods and services from approximately 151 tier 1 suppliers in 19 countries. SDI's tier 1 suppliers are located in various countries, including: Australia, Belgium, Brazil, Canada, China, Germany, Hong Kong, India, Italy, Japan, Liechtenstein, New Zealand, Poland, Singapore, South Korea, Sweden, Switzerland, Taiwan and USA.

SDI usually enters into stable, long-term relationships with its tier 1 suppliers.

## 2.3 The risks of modern slavery practices in SDI's operations and supply chains (Criterion 3)

### 2.3.1 Purpose of this section

This section describes the risks of modern slavery practices in the operations and supply chains of SDI Limited and any entities that SDI Limited owns or controls i.e. SDI's subsidiaries.

The expression “risks of modern slavery practices” refers to the potential for SDI Limited and its subsidiaries to:

- **cause** “modern slavery” (as defined in Sect. 1.4 above)
- **contribute** to modern slavery, or

- be **directly linked** to modern slavery through SDI's operations and supply chains.

The nature and extent of modern slavery means there is a high risk that it may be present within SDI's operations and supply chains. Modern Slavery can occur in every industry and sector.

### 2.3.2 Risk Assessment

Since 2019, SDI has undertaken a risk assessment of SDI's supply chain risks, including modern slavery risks. These risk assessments have helped SDI assess the risk of modern slavery within SDI's operations and supply chains.

During the year ended 30 June 2023, SDI began assessing, with greater granularity, the risk that SDI might be directly linked to, contributing to or causing modern slavery. The results of this assessment are described below.

In the context of SDI's operations and supply chains:

- SDI is not aware of a risk that SDI's own operations may **cause** modern slavery – i.e. conduct by SDI that directly results in modern slavery.
  - The vast majority of SDI's staff in Australian and overseas are employed directly – either full-time, part-time or casual - which lowers the risk of modern slavery within SDI's direct workforce.
  - SDI also engages contractors, including through third-party labour providers. As SDI has less visibility regarding contractors and the labour they engage, there is a risk that SDI could be **directly linked** to modern slavery in relation to such contractors and the labour they use.
- SDI is not aware of a risk that it may **contribute to** modern slavery – i.e. facilitate or incentivise modern slavery. In the vast majority of SDI's dealings with suppliers, SDI is the smaller party and a price taker rather than a price setter. SDI strives to avoid insisting that suppliers meet unrealistic pricing and deadline requirements. SDI's tier 1 suppliers have advised of price increases, and SDI has agreed to these increases where necessary. SDI does not believe its actions and practices are contributing to modern slavery.
- There is a risk that SDI may be **directly linked to** modern slavery – i.e. connected with modern slavery through the activities of SDI's direct and indirect suppliers, not just the activities of tier 1 suppliers that SDI has a contractual relationship with (e.g. the third-party labour providers mentioned above). For example:
  - SDI's dental products contain components supplied by SDI's tier 1 suppliers, and SDI's tier 1 suppliers may use raw materials supplied by their suppliers i.e. SDI's tier 2 suppliers. SDI would be directly linked to modern slavery if SDI's tier 2, 3 etc suppliers were involved in modern slavery.

## 2.4 The actions taken by SDI to assess and address these risks (Criterion 4)

2.4.1 This section describes the actions taken by SDI and any entities that SDI owns or controls – i.e. SDI's subsidiaries – to assess and address the risks of modern slavery practices, including due diligence and remediation processes.

### 2.4.2 **Risk assessment**

As mentioned above, in 2019 SDI developed a Risk Treatment Plan regarding SDI's supply chains (which SDI now refers to as the "Modern Slavery RTP"), which included an assessment of the risks of modern slavery.

SDI's Modern Slavery RTP assesses whether particular countries, industries, products or services are at risk of modern slavery. The Modern Slavery RTP sets out and uses indicators to help assess modern slavery risks in SDI's operations and supply chains.

During the year ended 30 June 2023, SDI:

- reviewed and updated SDI's Modern Slavery RTP and:
  - developed a clearer focus on modern slavery that SDI might cause, contribute to or be directly linked to

- enhanced SDI's due diligence processes – refer Sect. 2.4.3
- assessed whether the impacts of COVID-19 or other pandemics might increase the vulnerability of workers in SDI's operations and supply chains to modern slavery
- developed remediation processes – refer Sect. 2.4.4
- enhanced its processes regarding engaging with SDI's key suppliers on modern slavery issues – refer Sect. 2.4.5, and
- introduced additional policies and processes – refer Sect. 2.4.6.

### 2.4.3 **Due diligence processes**

In 2019, SDI implemented a due diligence process (including training) regarding new suppliers, and regular reviews of existing suppliers, to minimise supply chain risks including risks relating to slavery and human rights abuses. The due diligence processes included:

- mapping SDI's supply chains, to help understand who SDI's suppliers were
- setting up a process to review the supply chain risks, including modern slavery risks, regularly
- evaluating the risks of new and existing suppliers, and
- setting up a process to conduct supplier assessments, audits and monitoring.

During the year ended 30 June 2023, SDI enhanced its due diligence processes in the following ways:

- SDI began to focus on four key parts of due diligence:
  - Identifying and assessing actual and potential modern slavery abuses
  - Taking appropriate action within SDI to address the risks identified
  - Assessing SDI's performance in addressing these risks
  - Communicating what SDI is doing via this Statement.
- SDI fine-tuned its existing due diligence processes to:
  - consider the following:
    - the risk that SDI might be “directly linked to”, “contributing to” or “causing” modern slavery
    - whether particular countries, industries, products or services are at risk of modern slavery
    - which countries SDI's suppliers are based, particularly new countries that SDI hasn't dealt with before, and
    - COVID/pandemic-related risks, which increase the risk of modern slavery, and
  - take into account the following information and resources:
    - countries that have a higher prevalence of modern slavery (source: Modern Slavery Index 2018)
    - products that have a higher risk of modern slavery (source: Modern Slavery Index 2018)
    - goods produced using child or forced labour, by production sector (source: US Dept of Labor List of Goods Produced by Child or Forced Labor 2022).
- SDI extended its due diligence processes to organisations providing goods and services to SDI's *operations* generally e.g. cleaning, labour hire, security (i.e. not just organisations that supply goods and services to SDI's manufacturing function).
- SDI is concentrating on its tier 1 suppliers initially and has a lack of visibility regarding the lower tiers of suppliers.

### 2.4.4 **Remediation processes**

During the year ended 30 June 2023, SDI introduced the following remediation processes:

- SDI introduced a grievance mechanism for its Australian and overseas employees, which is a way for employees to safely raise concerns about the

impact SDI may be having upon them or others, which may or may not amount to modern slavery. In relation to this grievance mechanism:

- In Australia and overseas, if employees have concerns regarding the impact SDI may be having on them or others, which may or may not amount to modern slavery, they may contact SDI's Global HR Manager. This grievance mechanism is brought to the attention of employees via SDI's Employee Handbooks.
- In Australia, the grievance mechanism also applies to non-employees providing labour or services to SDI – e.g. contractors working for a labour hire company – which is brought to the attention of non-employees via an induction process. SDI's overseas non-employees will be covered at a future date.
- If SDI identifies cases where it has **caused** or **contributed** to modern slavery, as these cases will be rare each case needs to be considered separately. For each case, SDI's approach to remediation will take into account the following:
  - SDI should generally try to “make good” the adverse impact on the individual, by seeking to restore the victim to the situation they would be in if the adverse impact did not occur
  - Remediation can take many forms, including steps to ensure the harm cannot recur, formal apologies, compensation, or stopping certain activities.
  - SDI may be able to respond more effectively if it is able to:
    - engage directly with key stakeholders who understand the local operating context e.g. NGO's, worker representatives, and
    - build trusted relationships with key stakeholders
  - SDI will consider if it should verify that modern slavery is occurring – e.g. if SDI's suspicions are based on media reports
  - SDI will generally not attempt to resolve the situation by itself and, to minimise the risk of further harm to victims, SDI will consider seeking support from:
    - international and local organisations
    - government, or
    - SDI's trusted partners
  - SDI strives to ensure that:
    - SDI's actions are in the best interests of the suspected victim/s, including to prevent further harm – e.g. deportation, blacklisting by the employer – and to achieve the best possible outcome for the victim/s
    - it recognises that it may not be aware of all the victims involved or the extent of the exploitation, as SDI's actions could have unintended consequences
  - SDI will consider whether and how to involve law enforcement e.g. in Australia:
    - reports of suspected modern slavery should be reported to the Australian Federal Police, and
    - triple zero (000) should be called if someone is at risk of immediate harm, and
  - SDI should:
    - carefully consider the consequences of ending SDI's relationship with a supplier, and
    - should only consider ending the relationship if the supplier refuses to address the issue and there is no real prospect of change.
- If SDI has identified that it is **directly linked** to the exploitation, SDI will consider using SDI's leverage to work with the organisation that caused the harm, to prevent or mitigate its recurrence.

During the year ended 30 June 2023, SDI also fleshed out its escalation and general procedures should SDI's suppliers indicate a possible or actual modern slavery issue in their operations or supply chains.

SDI's Whistleblower Policy is also relevant. It mentions that a failure to comply with, or a breach of, legal or regulatory requirements – e.g. slavery, slavery-like and

human trafficking offences – could be disclosable matters covered by SDI’s Whistleblower Policy.

SDI aims to continue to improve on the above processes.

#### 2.4.5 **Supplier engagement**

SDI strives to engage and work closely with SDI’s suppliers to help assess and address SDI’s modern slavery risks. For example:

- **Communicating SDI’s expectations:** SDI seeks to clearly communicate SDI’s expectations to suppliers and to encourage honest two-way engagement. To this end:
  - In 2019 SDI issued a Supplier Code of Conduct to SDI’s suppliers, which SDI expects SDI’s suppliers to agree to, which includes commitments from suppliers that:
    - they will not engage persons to assist in the operation of their businesses under conditions that would amount to modern slavery, and
    - they will do their best to ensure their suppliers and service providers conduct their businesses in accordance with the Code.
  - During the year ended 30 June 2023, SDI decided to formalise, in the near future, a process to follow up suppliers who don’t respond to SDI’s request for them to agree to SDI’s Supplier Code of Conduct.
- **Improving supplier awareness:** SDI seeks to improve supplier awareness of modern slavery risks and how they may contribute to modern slavery through awareness-raising and training. To this end:
  - The Supplier Code of Conduct that SDI commenced using in 2019 includes a commitment from suppliers that they agree to train their employees and agents to act in accordance with the requirements of the Code
  - During the year ended 30 June 2023, SDI decided that it would, in the near future, include modern slavery-related wording within its Purchase Orders to improve supplier awareness.
- **Meaningful partnerships with suppliers:** SDI strives to build supportive, transparent and collaborative relationships with suppliers, including encouraging suppliers to be open with SDI about modern slavery risks. SDI seeking the agreement of suppliers to SDI’s Code of Conduct is an example of this.

#### 2.4.6 **Policies & procedures**

In 2019 SDI introduced the following policies and procedures:

- a Supplier Code of Conduct which expects SDI’s suppliers to:
  - adhere to very high standards of ethics
  - demonstrate they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour, and
  - ensure they, and their suppliers, are not involved in slavery or human rights abuses, andincludes a commitment from suppliers that they agree to train their employees and agents to act in accordance with the requirements of the Code
- a Modern Slavery and Human Trafficking Statement to, among other things, comply with UK privacy requirements, and
- a section in SDI’s Employee Handbooks dealing with modern slavery and human rights abuses.

In 2021 SDI issued a Whistleblowing Policy that included a reference to reporting possible incidents of slavery and human rights abuses.

During the year ended 30 June 2023:

- SDI decided to send the Supplier Code of Conduct in the near future to:
  - the suppliers of *services* to SDI, and
  - the third-party logistics companies used by SDI Limited’s subsidiaries in the US and Brazil
- SDI completed presentations to SDI’s staff in the EU, UK, USA & Brazil regarding the roll-out of the Supplier Code of Conduct to their key suppliers, and

- SDI introduced a Code of Conduct for SDI's staff, which includes material on modern slavery.

Also, this Statement is reviewed and approved by SDI's Board.

#### 2.4.7 ***Risk-based engagement with suppliers***

During the year ended 30 June 2023, SDI commenced to adopt a risk-based approach to SDI's engagement with suppliers, which prioritises high risk and larger suppliers. This approach is reflected in SDI's Modern Slavery RTP.

### 2.5 **How SDI assesses the effectiveness of the actions under Sect. 2.4 (Criterion 5)**

#### 2.5.1 This section describes:

- *how* SDI assesses the effectiveness of the actions it is taking to assess and address the risks of modern slavery practices in SDI's operations and supply chains, and
- *how* SDI assesses the effectiveness of the actions taken by SDI's subsidiaries to assess and address the risks of modern slavery practices in their operations and supply chains,

including due diligence and remediation processes.

#### 2.5.2 ***Annual Review***

During the year ended 30 June 2023, SDI set up an annual review process involving senior managers from SDI Limited to:

- assess and measure the effectiveness of SDI's actions in assessing and addressing the modern slavery risks described in Sect. 2.3, including SDI's due diligence and remediation processes
- in simple terms, assess whether SDI's actions to address modern slavery risks are working
- assess whether any trends are being observed, which may warrant additional or different mitigation measures
- receive updates from SDI's overseas subsidiaries regarding their actions in assessing and addressing modern slavery risks (this will occur in 2024)
- assess whether staff or contactors have raised any modern slavery-related concerns via SDI's grievance mechanism, and
- review and comment on this Statement and future releases of this Statement (this occurred in the 2<sup>nd</sup> half of 2023).

The next annual review (in relation to the year ended 30 June 2024) will include senior managers representing SDI's overseas subsidiaries.

#### 2.5.3 ***Regular monitoring, tracking & continuous improvement***

SDI has processes to regularly monitor and track the effectiveness of SDI's actions in assessing and addressing modern slavery risks.

To assist with the above annual review during the year ended 30 June 2023, SDI has begun to measure the effectiveness of its actions in assessing and addressing modern slavery risks – for example, by:

- tracking the number of suppliers who agree to SDI's Supplier Code of Conduct
- tracking the number of suppliers who are audited
- tracking any issues raised by SDI's suppliers, and
- tracking and dealing with responses from SDI's suppliers regarding SDI's Supplier Code of Conduct.

During the year ended 30 June 2023, SDI also implemented a 6-monthly review of SDI's Modern Slavery RTP, which will involve senior managers from SDI Limited and senior managers representing SDI's overseas subsidiaries, to:

- monitor and track SDI's actions in assessing and addressing modern slavery risks, including SDI's due diligence and remediation processes, and
- monitor and track the progress of action items in the Modern Slavery RTP.

As a part of SDI assessing the effectiveness of its actions in assessing and addressing modern slavery risks and SDI striving for continuous improvement:

- SDI will continue to develop and strengthen its response to modern slavery over time and future reporting cycles, and
- SDI intends to assess and implement the initiatives mentioned in Sect. 2.7.1.

Based on the results of the above monitoring, SDI seeks to adapt and strengthen SDI's actions to continually improve SDI's response to modern slavery.

#### 2.5.4 ***Working with suppliers to assess their progress***

SDI works with SDI's suppliers:

- to monitor any processes the suppliers have put in place to address modern slavery risks, where these processes have been brought to SDI's attention, and
- to monitor the resolution of any outstanding action items which the suppliers may have committed to.

During the year ended 30 June 2023, SDI decided to add, in the near future, modern slavery-related questions to SDI's existing Supplier Audit Checklist, which is used when SDI engages new suppliers.

## 2.6 **SDI's process of consultation with the entities SDI owns or controls (Criterion 6)**

This section describes *how* SDI consults with the entities SDI owns or controls – i.e. SDI's subsidiaries.

SDI Limited adopts a risk-based, collaborative approach with SDI's subsidiaries to help ensure SDI's subsidiaries:

- are aware of:
  - SDI's modern slavery processes, and
  - what is expected of them, and
- assess and address modern slavery risks within their operations and supply chains.

To this end, during the year ended 30 June 2023, SDI completed presentations to SDI's staff in the EU, UK, USA & Brazil regarding the roll-out of SDI's Supplier Code of Conduct to their key suppliers.

During the year ended 30 June 2023, SDI Limited also agreed to:

- involve senior managers representing SDI's subsidiaries in the annual review mentioned in Sect. 2.5.2, and
- involve senior managers representing SDI's subsidiaries in the 6-monthly review mentioned in Sect. 2.5.3,

both of which will occur in 2024.

## 2.7 **Other relevant information (Criterion 7)**

### 2.7.1 ***Future plans***

As a part of SDI's striving to improve its modern slavery processes, SDI has future plans for the following initiatives:

- In relation to SDI's Supplier Code of Conduct, SDI intends to:
  - implement a process to follow up suppliers who don't respond to SDI's request for them to agree to SDI's supplier Code of Conduct
  - ensure that the Supplier Code of Conduct is issued to new suppliers
  - introduce a process for sending the Supplier Code of Conduct to organisations who supply goods and services to SDI's overseas offices, including new suppliers, and relevant protocols regarding this process
  - translate the Supplier Code of Conduct into other languages, where this is assessed to be necessary, and
  - introduce an annual review of the roll out of the Supplier Code of Conduct to the suppliers of raw materials to SDI.
- In the case of organisations providing goods and services to SDI's operations – e.g. cleaning, labour hire, security, SDI intends to map these organisations and implement a process of risk-rating these organisations and to decide which of these organisations should receive SDI's Supplier Code of Conduct.
- SDI intends to include modern slavery-related wording within its Purchase Orders to improve supplier awareness.

- SDI also intends to add modern slavery-related questions to SDI's existing Supplier Audit Checklist, which is used when SDI engages new suppliers.

### **3 Approval & signing**

- 3.1 This Statement was approved by the Board of SDI Limited in its capacity as the principal governing body of SDI Limited on 21 December 2023.
- 3.2 This Statement is signed by Samantha Cheetham in her role as Managing Director of SDI Limited on the date below:



21/12/2023

\_\_\_\_\_  
Samantha Cheetham  
Managing Director

## ANNEXURE

### MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

#### Principal Governing Body Approval

This Modern Slavery Statement (the “Statement”) was approved by the principal governing body of SDI Limited, as defined by the Modern Slavery Act 2018 (Cth)<sup>1</sup> (“the Act”) on 21 December 2023.

#### Signature of Responsible Member

This Statement is signed by a responsible member of SDI Limited, as defined by the Act<sup>2</sup>, at page 11 of the Statement.

#### Mandatory criteria

The page number/s of the Statement that addresses each of the mandatory criteria in Section 16 of the Act are detailed below:

<i>Mandatory criteria</i>	<i>Page number/s</i>
a) Identify the reporting entity. SDI Limited is the reporting entity.	3
b) Describe the reporting entity’s structure, operations and supply chains.	3 & 4
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	4 & 5
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	5 - 9
e) Describe how the reporting entity assesses the effectiveness of these actions.	9 & 10
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	10
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.*	10 & 11

\* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

<sup>1</sup> Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

<sup>2</sup> Section 4 of the Act defines a responsible member as: (a) an individual member of the entity’s principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.