



Modern Slavery Statement 2020

Respecting Human Rights

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1. Introduction

This statement is made on behalf of the reporting entity Ansell Limited pursuant to the Australian *Modern Slavery Act 2018*, the United Kingdom *Modern Slavery Act 2015* and the California *Transparency in Supply Chains Act 2010*. This statement sets out the actions taken by Ansell during the 12 months ending 30 June 2020 ('FY20') to prevent modern slavery and human trafficking in our business and supply chains. This statement was approved by the Board of Ansell Limited on 2 November 2020.

Ansell Limited and its subsidiaries and affiliates ('Ansell') form a leading global organisation providing innovative and superior health and safety protection solutions that enhance human well-being. For over 125 years, Ansell has delivered the most advanced protection solutions to millions of people at work and at home, keeping them out of harm's way. Our expertise, innovative products and advanced technology give our customers peace of mind and confidence no other brand can deliver. Ansell's mission is to provide innovative safety solutions in a trustworthy and reliable manner.

During the extraordinary circumstances related to COVID-19, we have remained focused on our mission to provide critical personal protective equipment to those on the frontlines in healthcare and other essential services, while taking measures to keep workers – both in our operations and supply chain – safe.

Ansell is committed to operating in accordance with all applicable laws as well as the Universal Declaration of Human Rights. We do not tolerate any form of modern slavery or human

trafficking and we are committed to maintaining and improving systems and processes to prevent modern slavery within our business and supply chains.

Ansell has evolved its heritage from an Australian rubber latex products manufacturer to one of the world's most advanced safety solutions providers. Over the years, our business has undergone significant growth and evolution, fuelled by numerous acquisitions and expansions. While this process has been instrumental in shaping our business into what it is today, it has also changed how we do business, and the way in which we manage and monitor our operations and supply chains. Our shift from an Australian-based manufacturing business to a global healthcare and industrial manufacturing business has also changed our relationship to modern slavery risks. Over the last five years, we have seen a significant evolution of our approach to identifying, assessing and addressing these risks. Our journey through this process, and our forward ambitions, are set out in this statement.



Magnus Nicolin
Managing Director and CEO
Ansell Limited

Our modern slavery and labour rights journey

Phase	Preliminary	Define	Implement	Extend	Lead
Period	Prior to 2015	2015–2016	2017–2019	2020–2021	2022 and beyond
Focus	Primarily commercial focus Initial identification of labour rights as area for development	Develop a baseline understanding of our position Initial work to understand compliance requirements Reactive approach to addressing critical compliance issues Limited proactive engagement Human rights statement released Initial ESG materiality assessment completed	Improved approach to labour rights management Strong focus on improving compliance in high-risk operations Established corporate CSR policies Started work to develop due diligence processes for critical suppliers External interest and scrutiny over labour rights issues Initial partnerships with civil society organisations Human rights impact assessment at three largest plants Established 'Labour Standard Management System' at all plants Training and capacity building Policies and procedures at all Ansell plants Started using SMETA 4-Pillar Social Audits over Asian plants and a selection of critical suppliers Worker remediation process launched regarding recruitment fees Zero Recruitment Fee Policy adopted Updated Human Right Policy framework	Seek to ensure we 'do no harm' Compliance within operations Data-driven risk analysis and formalising a risk-based approach to due diligence Implementation of Ethical and Responsible Recruitment Process for Foreign and Contract Workers Independent review of our due diligence systems with recommendation to strengthen our approach to be rolled out over FY21 and beyond Enhance supplier risk assessment and performance management	Seek to have a 'positive impact' Leading practice in operations Proactive engagement with suppliers to drive performance beyond compliance Lead engagement with civil society and affected parties Seek to better understand and manage supply chains beyond tier 1 suppliers

Through continued investment in our systems and processes, we have made considerable advances in developing our modern slavery and labour rights due diligence system for both our operations and supply chain. In FY20, we continued to build upon this work during challenging circumstances to conduct a diverse program of work including a comprehensive risk assessment over our operations and tier 1 (direct) supply chain and a review of our modern slavery due diligence approach.

In FY21, we will focus our efforts on enhancing our approach to modern slavery risk management within our operations and extending the scope of our current due diligence system to cover a larger proportion of our tier 1 (direct) supply chain.

In preparing this statement, we have sought to apply the principles of balance, clarity and comparability, and to focus on clearly defining the boundaries of our due diligence activities.

A focus on Global Sourcing

Our procurement is conducted through three channels: Global Sourcing, corporate hubs and offices, and individual manufacturing plants. Many of our critical suppliers – determined by expenditure or by business reliance – are managed by the Global Sourcing Team. To date, the majority of our work and effort has been on Global Sourcing suppliers, including supplier screening, audits and ongoing supplier performance monitoring. This has been our focus as we believe this is the area of greatest risk for modern slavery and labour rights violations, and where we have the most leverage to influence the behaviour of our suppliers.

While we are proud of the work we have undertaken to date, we recognise there is more for us to do in improving our ability to identify, assess and address risks of modern slavery within our operations and supply chain. As we look towards the future, we are driven by an ambition to build on the work we have done to date and do the right thing by those within our business.

Snapshot of our work in FY20

- Conducted an in-depth modern slavery risk assessment over our supply chains and operations.
- Undertook a critical analysis of our existing governance structure, strategy, policies and procedures to understand the strengths of our current approach and identify opportunities for improvement.
- Began work to revise and update our Supplier Code of Conduct, with the revised version signed off by the Ansell Board in August 2020 (FY21).
- Updated and revised key human rights policies including the Human Rights Statement, Corporate Social Responsibility Policy and the Labour Standards Policy.
- Continued to work internally and with the Ethical Trade Initiative to finalise plans to remediate those migrant workers who paid recruitment fees to agents in their home country before working (in a manufacturing plant) with Ansell.
- Delivered on-site training to prospective migrant workers on Ansell's 'Zero Recruitment Fee Policy'.

2. About Ansell

Structure and operations

Ansell Limited owns and controls a large number of subsidiaries, listed in full in our Annual Report 2020. This statement applies to all entities wholly owned by Ansell Limited, in addition to entities over which Ansell has majority ownership or control (or significant influence) (collectively 'Ansell'), unless expressly stated otherwise.

Ansell Limited is legally domiciled in Melbourne, Australia, and listed on the Australian Stock Exchange (ASX: ANN). It is led from four main headquarters: in Melbourne, Australia; Brussels, Belgium; New Jersey, USA; and Cyberjaya, Malaysia. In addition, entities owned and controlled by Ansell operate in, and as companies registered in:

- a. the United Kingdom for the purposes of the *UK Modern Slavery Act 2015* – this includes Ansell UK Limited, Ansell Microgard Limited, Nitritex Limited and Ringers Technologies UK Holdings Limited.

- b. California for the purposes of the *California Transparency in Supply Chains Act 2010* – this includes Ansell Healthcare Products LLC, Ansell Sandel Medical Solutions LLC and Ringers Technologies LLC.

Ansell and its subsidiaries market and manufacture a range of hand, arm and body protection solutions for customers in over 100 countries. We operate across two main business segments, Industrial and Healthcare.

Ansell’s activities principally involve the development, manufacturing, sourcing, distribution, marketing and sale of hand, arm and body protection solutions for the industrial and healthcare markets. Ansell also operates intra-group supply arrangements and maintains business partnerships with some key distributors. These arrangements typically operate in our mature business markets.

Ansell Value Chain



2. About Ansell continued



We operate across two main business segments, Industrial and Healthcare.

Industrial Global Business Unit

The Industrial GBU manufactures and markets high-performance hand and Chemical Protective Clothing solutions for a wide range of industrial applications. Ansell protects workers in almost every industry, including automotive, chemical, metal fabrication, machinery and equipment, food, construction, mining, oil & gas and first responders.

HyFlex® AlphaTec® EDGE®

ACTIVARMR® RINGERS GLOVES

Healthcare Global Business Unit

The Healthcare GBU 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 pharmaceutical companies.

GAMMEX® MICROFLEX® TouchNTuff®

SANDEL® ENCORE® BioClean® EDGE®

Across these functions, we employ more than 13,000 employees in 54 countries around the world. Our operational sites are set out in the map above. In FY20, we began work on our Russian manufacturing plant, which will produce products for the Industrial Global Business Unit, with the site to begin commercial production in 2021.

In some of our manufacturing sites in Asia, a proportion of our workforce is made up of migrant workers. Migrant workers have travelled from their country of residence to work in other countries.

They are often at greater risk of exploitation than their peers with permanent migration status. We discuss our management of risks relating to our workforce under Section 5 within this statement.

We also use contract/outsourced labour at our manufacturing sites in Sri Lanka, Malaysia, Vietnam and Portugal.

We continue to review the appropriate resourcing mix and make decisions based on a business need and risk based approach. For example, in Sri Lanka, we have been increasing our permanent employee numbers (and decreased contract/outsourced labour).

2. About Ansell continued

Non-operated joint ventures

In addition, in FY20 we entered into a 50/50 joint venture with one of our suppliers – Careplus (M) Sdn Bhd (Careplus), a Malaysian manufacturer of surgical as well as latex and nitrile powder-free examination gloves. The joint venture provided Ansell with additional capacity to continue to grow and satisfy the increasing global demand for surgical gloves as well as support the rapid growth of our Industrial single use products. Both Ansell and Careplus share similar values including a commitment to delivering high-quality products while maintaining high labour practice standards in our manufacturing facilities.

Labour rights and modern slavery issues were considered as part of the acquisition process, and included due diligence questions and a third party ethical audit. We continue to work with the facility to close out the non-conformances detected as part of that audit and plan to engage with Careplus on their operations and supply chain risk management.

Our supply chains

Throughout this statement, we use the term **'tier 1 suppliers'** to describe suppliers from whom Ansell directly purchases goods and services. These are suppliers that we have a direct trading relationship with.

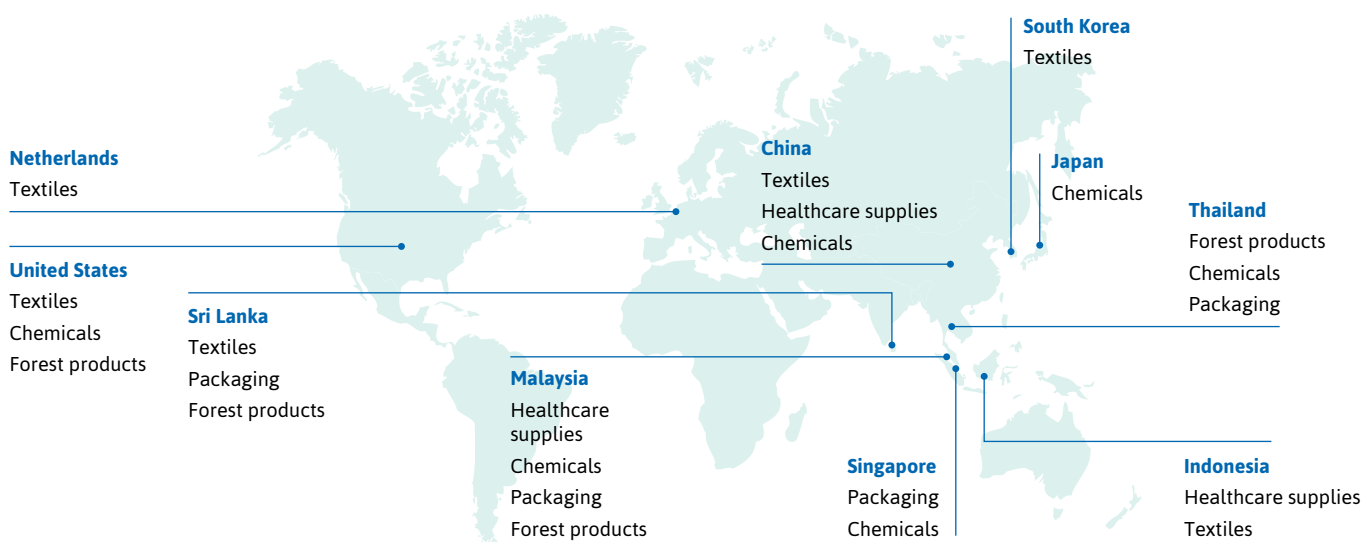
As a global company, we have complex and global supply chains through which we procure:

- **raw materials for use in our production** – such as latex, cotton, nylon and petro-chemicals including nitrile, polyisoprene and neoprene, as well as packaging materials
- **finished goods for resale** – including gloves, body protection suits and other body protection products
- **goods and services to support our offices and operations worldwide** – including stationary and cleaning, catering and maintenance services.

Across the business, procurement is conducted through three channels: Global Sourcing, corporate hubs and offices, and individual manufacturing plants. Most of our critical suppliers – determined by expenditure or by business reliance – are managed by the Global Sourcing Team.

We enter into contractual arrangements with suppliers ranging from one-off transactional purchase orders governed by standard terms and conditions, through to multi-year, large-value fixed-term contracts.

Through these three channels, we procure goods and services from more than 1,000 tier 1 suppliers in more than 25 countries. The following map displays some of our top tier 1 sourcing countries by expenditure and some of the key product categories sourced from each of these locations.



During FY20, we procured goods and services across a wide range of categories. The table below sets out some of the categories that typically make up our largest categories of spend.¹

Healthcare supplies	Includes finished goods for resale, such as single-use gloves and masks
Textiles	Such as cotton, nylon and polyester yarn, knitted and dyed fabrics, elastic and zippers
Chemicals	A wide range of chemicals used in the manufacturing of our products, including petro-chemicals including nitrile, polyisoprene and neoprene
Forest products	Predominantly raw materials such as woodchips for biomass and natural rubber latex
Packaging materials	Includes packaging material made of natural wood products such as pallets, boxes and paper, as well as plastic components such as polybags and shrink film

1. Not all example products and services in each product category detailed in this table will be procured from each sourcing location.

3. Our approach to managing modern slavery risks

Our suppliers are critical partners in our success, and disruptions to our supply chain are a key risk for our business. It is in the nature of our business that there can be sudden surges in demand driven by disasters or epidemics, and that when these occur, the provision of our goods may be critical to the health of large numbers of people. Our experience under COVID-19 has underscored the value of having robust business continuity plans, including measures to ensure continuity of supply of our key inputs.

Our approach is guided by a robust set of policies which set out our expectations for performance in our business and supply chains with regard to modern slavery, oversight from our Executive Leadership Team and the Ansell Board (through the Sustainability and Risk Committee) and, most recently, a high-level review of the structure, function and efficacy of our due diligence systems.

Ansell is committed to operating in accordance with all applicable laws and respects human rights as set out in the Universal Declaration of Human Rights. Our commitment to respecting human rights extends to our supply chain, and we seek to engage with suppliers and contractors who aspire to do the same.

In FY20, we engaged a third-party advisor to conduct an assessment over our human rights due diligence systems for both operations and supply chains, to evaluate aspects of our system which worked well and areas for future development. This strategic review was intended to give us a point-in-time assessment of our system maturity and to provide us with a framework to guide our future program of work.

The review identified that at a high level, processes to identify, assess and address modern slavery risks in our operations are more advanced than those pertaining to our supply chain. Positive attributes of our system identified that we have made

strong commitments to preventing and combatting modern slavery and have a well-developed policy framework, as well as good systems in place to monitor and track performance in our operations.

In addition, the review flagged several areas for improvement including:

- further developing our systems for identifying and assessing risk
- formalising and standardising our processes to manage and mitigate risk across our supply chain management channels
- taking a more risk-based approach to due diligence.

As documented throughout this statement, we have undertaken an operational and supply chain risk assessment and have made commitments to formalise and standardise our controls and to take a risk-based approach to due diligence. We recognise that work to strengthen our due diligence system is an ongoing process, and we are dedicated to the task of continuing to make significant improvements in coming years.

Policy framework

We have a comprehensive set of policies and procedures which guide our approach to modern slavery and human trafficking by setting out our values and our expectations of employees, suppliers and business partners. These policies are available on our website at www.ansell.com. Our corporate social responsibility (CSR) and sustainability policies and procedures are updated regularly in line with our CSR and sustainability policy review schedule. Several policies were updated in FY20, including the Human Rights Statement, Corporate Social Responsibility Statement and the Labour Standards Policy.

Business-wide policies and procedures

Human Rights Statement	Sets out Ansell's commitment to respecting human rights through its purchasing and sourcing activities and as an employer.
Labour Standards Policy	Sets the minimum expectations for the business' operations, suppliers and contractors with regard to labour standards, including child labour, forced and compulsory labour, human trafficking, freedom of association and collective bargaining.
Whistleblower Policy	Outlines the process for making and investigating a disclosure in line with Whistle-blower Protection Scheme set out under the <i>Corporations Act 2001</i> and the <i>Taxation Administration Act 1953</i> .
Corporate Social Responsibility Statement	Defines Ansell's approach to corporate social responsibility through our Responsible and Responsive Strategy and Purpose.
Conflict Minerals Policy	While Ansell does not have a responsibility to report under s 1502 of the <i>Dodd-Frank Act</i> , the policy sets out Ansell's Conflict Minerals Procedure.
Diversity & Inclusion Policy	Formalises our commitment to diversity and inclusion.

Operational policies and procedures

Global Code of Conduct	Our Code sets out our expectations of employees, officers and Directors and serves as a guide to ethical principles and business conduct at Ansell. This code includes provisions relevant to fair employment and forced, child and involuntary labour.
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Supply chain policies and procedures

Supplier Code of Conduct	Sets out our minimum expectations for our tier 1 (direct) suppliers in relation to human rights, human trafficking, environmental protection, health and safety, bribery and corruption and data protection.
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3. Our approach to managing modern slavery risks continued

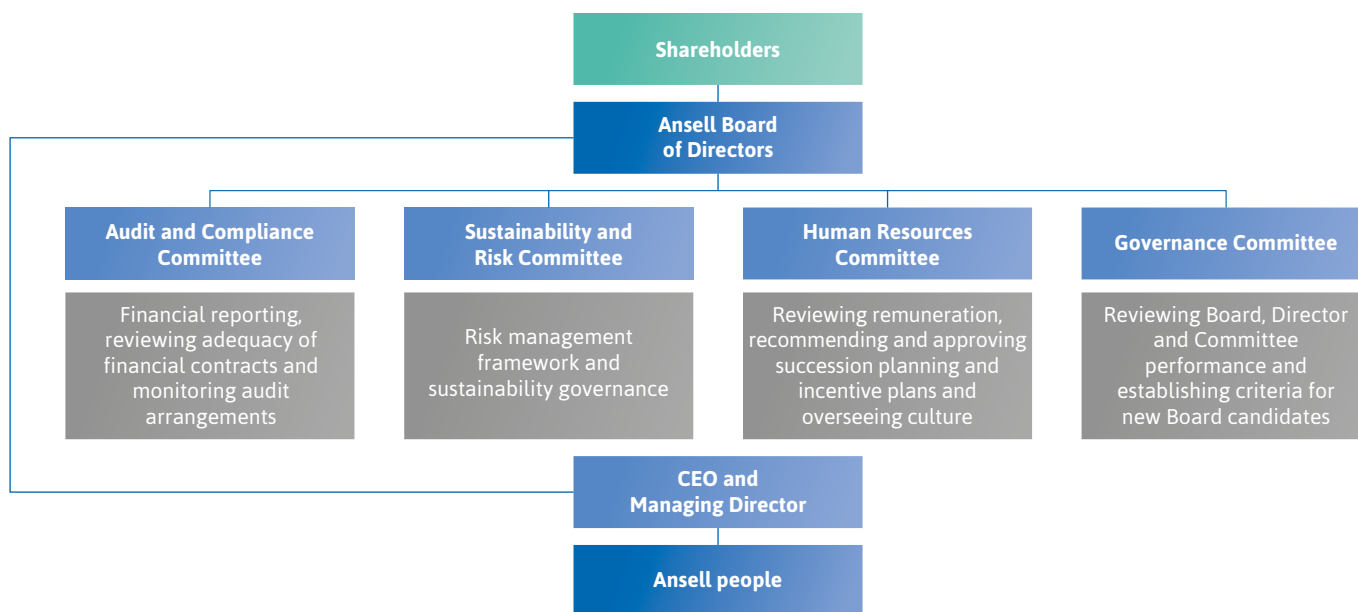
Governance

Ansell is committed to effective corporate governance. Ansell’s Board takes ultimate responsibility for the Company’s governance of labour rights and modern slavery, supported by the Sustainability and Risk Committee. As set out in its Charter, the Sustainability and Risk Committee is responsible for the Company’s corporate social responsibility and sustainability policies and practices, including those relating to modern slavery. The Committee met periodically in FY20 and discussed matters including Ansell’s ongoing management of modern slavery risks.

To ensure oversight of modern slavery risks and monitoring of our progress internally, Ansell’s Executive Leadership Team and Sustainability and Risk Committee are provided with periodic updates on the status of due diligence activities and the performance of our plants and some suppliers.

To further support these functions, in FY19 we created a cross-functional CSR & Sustainability Council (‘the Council’). The Council is responsible for the development and operational implementation of Ansell’s strategic approach to sustainability-related risks and opportunities. The Council provides updates to the CEO and the broader Executive Leadership Team. We are committed to continuous appraisal and improvement in how the Council operates and will continue to test and evaluate new structures to establish what best suits the needs of the business.

Commitment: In FY21, we will review the structure and function of the CSR & Sustainability Council to ensure it continues to meet its purpose.



4. Our modern slavery risks and impacts

In FY20, Ansell engaged an independent third-party advisor to conduct a detailed risk assessment of our operations and tier 1 suppliers. While we had previously conducted a high-level human rights risk assessment and had focused on risks in our Sri Lankan and Malaysian operations and key suppliers, we wanted to develop a more detailed understanding of our overall risk profile. The risk assessment covered the majority of our supply chain, but did not include all sourcing conducted by our corporate offices or plants. We may revisit this assessment in future years to include a more complete assessment of our corporate procurement as we continue to improve our approach.

Our FY20 risk assessment focused on four types of modern slavery: forced labour (including bonded labour), child labour, human trafficking and forced marriage. The assessment included:

- Determining a risk rating for each operational activity and supplier based on the inherent risk within the industry and the country of operation.
- A causation analysis to identify Ansell’s potential causal relationship to the risk in accordance with Australian Government guidance.

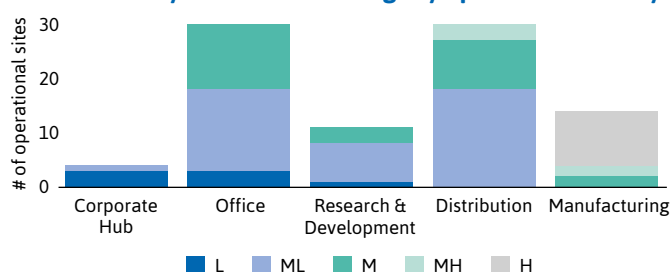
The methodology underpinning this assessment draws on well-established human rights databases, indexes and reports from globally recognised bodies, including the Global Rights Index, the International Labour Organisation and the World Bank.

Operations

In our own operations, the majority of our activities are considered inherently low-to-medium risk for modern slavery. Sites in these risk categories primarily include corporate hubs, offices, research and development facilities, as well as most distribution centres. Due to risks associated with the countries and industries in which we operate, some of our sites have a higher risk of labour violations. Inherent risks relating to these sites are set out in the table below.

We believe the controls we have in place (set out in Section 5) go some way to mitigate many of the risks set out below. While we will continue work to improve our management of these and any emerging risks, we believe the work we have done to date has significantly reduced risk of modern slavery-like practices in our operations.

Modern slavery inherent risk ratings by operational activity



Type of inherent risk or impact	Relevant operations	Description
Forced labour including debt bondage	Manufacturing plants in Malaysia and Thailand	Some of our manufacturing sites were assessed as having an elevated risk of forced labour due to the industry’s high labour intensity and reliance on migrant workers, relatively low skill level and low level of regulation. Further, in 2019, we identified instances of some migrant workers in our Malaysian operations having paid recruitment fees to agents in their home country prior to working for us. Ansell began formal remediation payments relating to these fees in early FY21. We have introduced a set of robust controls to mitigate this risk and to minimise the likelihood of its reoccurrence. Further detail on these controls is set out under Section 5.
Child labour	Manufacturing sites in Thailand, Vietnam, Brazil, Malaysia, China and planned site in Russia Distribution sites in Colombia and Mexico	Some of our manufacturing and distribution sites were assessed as having exposure to heightened risks of child labour. This risk assessment was based on known issues in the broader medical goods industry and risks associated with many of the countries in which these facilities are based. Despite known issues in the broader healthcare supply industry, we believe the risk of child labour in our own operations is low. We have a series of controls to manage risks relating to child labour in our manufacturing facilities, and plan to roll these controls out to our distribution facilities in FY21, as set out in Section 5.
Human trafficking	Manufacturing sites in Thailand, China, Brazil, Vietnam and planned site in Russia	Some of our manufacturing sites were assessed as having an increased risk of human trafficking due to the industry relying on migrant and lower-skilled workers, having a high labour intensity and a relatively low level of regulation. For sites in China and Thailand, this risk also reflects a higher incidence of human trafficking in these countries. We believe the controls we have in place to manage other risks of modern slavery, such as controls relating to recruitment (Section 5) and grievance mechanisms (Section 7), go some way to controlling the risk of human trafficking in our operations.
Poor working conditions	All manufacturing sites	There are known issues relating to poor working conditions such as excessive overtime, insufficient rest days, unsatisfactory hostel accommodation and unsafe working environments in parts of the healthcare manufacturing industry in countries in which we operate. While poor working conditions may not constitute modern slavery in their own right, they can be signs of more severe forms of exploitation and a precursor to forms of modern slavery. In our own operations, we have made significant progress in improving our monitoring and controls around conditions such as overtime and missed rest days. These controls have led to significantly improved compliance on overtime and rest days in our manufacturing plants. We have also increased standards and monitoring of hostel accommodation to ensure migrant workers have adequate housing facilities. Relevant controls are detailed under Section 5.

4. Our modern slavery risks and impacts continued

Supply chain

In our supply chain, the risk assessment identified that a large amount of our expenditure is in inherently high-risk industries and geographies, although with only a small number of suppliers. A selection of high-risk product types sourced from our tier 1 (direct) suppliers that have been assessed as having an inherent high risk of modern slavery is set out in the table below. There are

known risks of modern slavery including forced, bonded and child labour in the textiles, forest products, minerals and healthcare supplies industries. Given the nature of the relationship with these suppliers, we acknowledge there may be a risk that we are directly linked to these risks through our business relationships, but we do not believe that we are causing or contributing to these risks.

Products	High risk source countries	Description
Textiles such as fabric, yarn, liners, labels, cut and sew and dipping	Mexico, Thailand, Vietnam, Pakistan, India, Malaysia, China and Indonesia	There are well-known labour and human rights issues relating to the textiles industry, including in a number of countries from which we source, such as China and Pakistan. Issues relating to textiles supply chains span from the production and harvesting of raw materials such as cotton to the manufacturing, cutting and sewing process. Seasonal work is considered a risk factor of modern slavery. While the production elements of textile supply chains are not seasonal, the agricultural segments of textile supply chains are highly seasonal. Other modern slavery risk factors in the textile industry include a low level of regulation, a high level of labour intensity and a reliance on low-skilled and migrant labour.
Forest products such as natural rubber latex	Thailand, China and Malaysia	There are known issues relating to forced labour and child labour within forest products industries including rubber plantations. Modern slavery risk factors including a low level of regulation, a high reliance on low-skilled migrant labour, seasonal nature of the work and the presence of opaque intermediaries are common in the industry elevating the level of risk. Further the three sourcing countries on the left are all associated with an inherent risk of modern slavery.
Minerals such as salt and stone	Thailand and China	While the minerals industry has a low level of reliance on migrant workers and some level of regulatory oversight, mining supply chains can contain opaque intermediaries and there are known issues relating to forced and child labour in mining supply chains. Both China and Thailand are associated with a high risk of human trafficking, while Thailand also has a high risk of child labour.
Healthcare supplies such as disposable gloves, masks and PPE	Thailand, Vietnam, China, Indonesia and Malaysia	The healthcare supplies industry is inherently high risk for forced and child labour. The industry has several modern slavery risk factors including a low level of regulation, high level of labour intensity, a reliance on low-skilled migrant labour and a well-documented history of issues relating to worker exploitation. Issues within the healthcare supplies industry include the systemic use of recruitment fees and poor labour practices including the withholding of passports and excessive overtime.

While many of these high-risk product categories are raw materials, the associated country refers to the country of our tier 1 supplier and may not represent the location from which the raw material was harvested or mined. To date, Ansell's focus has been on mapping and engaging with our tier 1 (direct) suppliers.

The assessment additionally identified that while all three of our supplier management channels manage some high-risk suppliers, of those suppliers assessed, Global Sourcing, which has the strongest controls, manages a majority of these suppliers by expenditure.

Many of our suppliers were assessed as medium or medium-low risk due to the geographies and industries in which they operate. Medium and medium-low risk suppliers provide goods and services including financial services, telecommunications, IT, real estate, utilities, chemicals and consulting services across North America, Europe, Australia and Japan.

5. Operational due diligence

Our operational systems and controls

Across the organisation, we are committed to operating in accordance with all applicable national laws, including those pertaining to employment. Ansell is committed to treating its employees with dignity and respect. Our Code of Conduct states that we must treat one another fairly and comply with all applicable laws concerning employment and workplace conditions. A failure to comply with the Global Code of Conduct, including its provisions relating to fair employment and human rights, may lead to disciplinary action, up to and including termination consistent with local law. Violations by an individual may also subject Ansell and/or its officers to civil and/or criminal liability.

We utilise a wide range of controls to assess and mitigate risks relating to modern slavery and broader labour rights violations across our operations. Many of these controls are described in our policies referred to in Section 3, with additional controls to assess and address modern slavery risk described below.

We consider modern slavery risks when reviewing acquisition opportunities in industries we believe to be of higher risk.

Our Labour Standards Policy sets out our minimum labour standards, including:

- **Working hours:** we comply with applicable national laws and regulations on working hours (including overtime and rest periods) and holiday entitlements as a minimum standard.
- **Child labour:** a prohibition on the hiring of workers under the age of 18 and requiring proof of age documentation in the hiring process.
- **Pay and benefits:** we comply with applicable national laws and regulations regarding wages and benefits. We are seeking to ensure a fair wage for fair hours of work for all its workforce.
- **Forced labour:** we do not tolerate nor engage in or support the use of forced or compulsory labour. Throughout the recruitment process, we work with prospective employees to ensure they understand the terms and conditions of their employment. We do not require that employees surrender any government-issued identification, such as a passport, to the Company as a condition of employment.
- **Foreign worker recruitment:** a 'Zero Recruitment Fee Policy', working with recruitment agencies who have agreed to conduct ethical recruitment and conducting interviews with migrant workers to determine whether they have paid recruitment fees.

Controls for our higher risk operations

While our most recent risk assessment reaffirmed our view that our operational risks are centred in our manufacturing plants, it also highlighted the need for us to expand the focus of our proactive risk management in operations to other jurisdictions and to other operational activities, such as our distribution centres. It is our intention to extend these controls to the remainder of our higher risk operations in the coming years.

In addition to risk-specific controls, we utilise other mechanisms to **assess, address** and **monitor** risks of modern slavery within our manufacturing sites. These controls include the use of tools

to track sites' performance over time, third-party audits, active monitoring of non-conformance close-outs and working with plant managers to design effective corrective actions.

Building on the digital tools we implemented in FY19, one of the major avenues through which we monitor operational performance is through use of our monthly CSR Workplace Impact Tracker ('the Tracker'). The Tracker is used to monitor the performance of each of our manufacturing plants against a range of labour rights related metrics including:

- overtime hours
- compliance to rest days
- use of contract labour over the month
- absenteeism
- the number of grievances raised and resolved at each site
- number of workers onboarded
- training provided.

While the Tracker helps us to monitor trends in sites' performance over time, we also use it to proactively identify and mitigate emerging issues. For example, we use the Tracker to identify where a site is getting close to its monthly legal threshold on overtime and restructure staffing rosters or provide additional staffing support as necessary to avoid excessive overtime.

In 2019, after becoming aware that some migrant workers in our Malaysian manufacturing sites paid recruitment fees to agents in their home country, we launched an investigation into recruitment practices by agents and sub-agents in those countries responsible for engaging foreign workers for our Malaysian manufacturing sites. We took several actions to remediate the payment of these fees, as set out under Section 7. To manage the reoccurrence of this issue, Ansell implemented a Zero Recruitment Fee Policy, and in FY20 brought in a new policy to hire migrant workers only through vetted recruitment agents. Vetted agencies are those who have signed a contract with Ansell to uphold ethical recruitment standards. To ensure the integrity of agencies throughout the process, we conduct frequent spot checks both before workers depart from their home country and upon arrival at Ansell manufacturing sites as part of our onboarding process.

Audits

We conduct third-party audits over our 10 Asian manufacturing plants at least every two years. In addition to audits of these plants, in our FY19 modern slavery statement we outlined a plan to roll out third-party audits to our remaining manufacturing plants in Brazil, Lithuania and Portugal in FY20. However, due to the challenges of COVID-19 we were unable to undertake these audits in FY20. We will endeavour to conduct audits over these three plants, in addition to an audit over our new Russian manufacturing plant, in FY21.

Commitment: In FY21, we will conduct independent third-party audits over manufacturing sites in Brazil, Lithuania, Portugal and Russia, subject to ability given challenges of COVID-19.

5. Operational due diligence continued

We actively monitor and track non-conformances and corrective actions arising from third-party audits, with our human resources function working closely with plant managers to ensure timely close out of any non-conformances. In responding to any non-conformances, our in-country human resources functions work closely with plant managers to design effective controls. Across our sites audited to date, the introduction of third-party audits has led to continual improvement in performance relating to labour rights in our operations.

We will continue to review the appropriateness of audits of our other sites outside our manufacturing facilities in locations which are considered higher risk by virtue of the risks associated with the industry and country in which they operate.

Training

In FY20 we provided Global Code of Conduct training to all of our professional level staff. 2,887 (97%) employees (including the Board of Directors) completed the Global Code of Conduct training in FY20. The Global Code of Conduct training included questions relating to human rights and modern slavery. In addition, we provided modern slavery training to all employees in the Human Resources team and/or management positions at all our Asian manufacturing sites, and all new employees at our Asian manufacturing sites complete on-boarding training which includes a modern slavery module. In FY21, we will look to enhance our human rights and modern slavery training across the organisation.

Further to training we conducted for our employees, in FY20 we also conducted training for prospective Nepali migrant workers looking to join our Malaysian manufacturing plants. The session, conducted in Nepal, focused on raising awareness of Ansell's Zero Recruitment Fee Policy. The session was run as a pilot and COVID-19 impacted our ability to expand this training further in FY20. We plan to deliver more events like this in from FY21 onwards to ensure migrant workers understand that no recruitment fees will ever be required.

Case study: Impact of COVID-19

The COVID-19 pandemic presented a unique challenge for our business. As the pandemic unfolded globally in the second half of FY20, demand surged for our key healthcare, single-use and Chemical Protective Clothing products. At the same time, we worked to keep our critical manufacturing plants open, implement best practice guidelines to keep workers in our supply chains and operations safe, and ensure supply of our products reached key markets and customers.

Following concern from NGOs and human rights specialists that the pandemic was increasing the risks of exploitation for workers in the personal protective equipment business, Ansell took steps to minimise the pressure on our plants and existing suppliers working to meet increased demand for our products. For example, in our own operations we hired additional staff to work in our healthcare manufacturing sites and entered into supply agreements with additional suppliers across our outsourced healthcare business to reduce pressure on our existing suppliers.

Impact on our due diligence activities

The COVID-19 pandemic and resulting movement control orders had the impact of limiting third-party auditors' access to some of our own and our suppliers' manufacturing facilities.

Within our own operations, this meant we were unable to conduct audits over our Brazilian, Portuguese and Lithuanian sites as planned in FY20. Pending the ongoing delays to audits as a result of the pandemic, these audits will be conducted as a matter of priority in FY21.

Based on the forward schedule of planned audits for our supply chain, delayed and cancelled audits caused by the pandemic affected a number of our planned audits of suppliers. Throughout this period, our operational managers have continued to engage closely with management at our major suppliers to ensure the continuation of discussions on any outstanding and any emerging labour rights issues. Following the easing of restrictions on auditing in FY21, we will move to have any delayed audits conducted as a matter of priority when third-party audits resume at these locations. In the event COVID-19 continues to disrupt our audit plans, we will consider the use of virtual audits. Ansell will continue to evaluate guidance and tools developed by our partners, such as SEDEX and local governments, to manage the impact of COVID-19 on workers in our operations and supply chain and implement as appropriate.

Health and safety of our workers and those in our supply chain

In the earliest days of the COVID-19 outbreak, we formed a global crisis team which supported the team at our Xiamen manufacturing plant in China to quickly implement extensive precautions to prevent the spread of the virus among our workforce. The best practices and safe operations developed in Xiamen have been leveraged across our manufacturing operations and shared with our suppliers to ensure the health and safety of manufacturing workers in our operations and supply chains. These actions, policies and systems included:

- Putting in place travel restrictions for all employees, and encouraging remote working wherever possible.
- Taking steps to ensure all Ansell manufacturing operations met or exceeded WHO and local requirements for containment of COVID-19.
- Establishing social distancing and enhanced cleaning protocols in all operating facilities that remained open and providing additional PPE for employees.
- Closely supervising the health of all workers and training teams to ask for help if they notice co-workers who may be showing signs of illness.
- Providing workers in our operations with access to paid leave should they require self-isolation or need to look after a family member.
- Requiring written acknowledgement from our suppliers that they are following WHO and local requirements to protect employees from COVID-19 transmission.
- Engaging with the senior management of all major suppliers to ensure alignment on employee protection during COVID-19.
- Sharing Ansell's best practice COVID-19 precautions with our supply partners.

6. Supply chain due diligence

As we have continued to roll out our supplier due diligence process across FY20, we have focused our efforts on the highest spend, critical suppliers managed centrally by our Global Sourcing Team. We have chosen to focus our initial efforts on these suppliers, where we have greatest leverage and responsibility to act. The following controls are specific to suppliers managed by our Global Sourcing Team, which control the majority of our supply by expenditure.

Some sourcing is also conducted at site level by our corporate hubs, offices and manufacturing plants. In coming years, Ansell intends to implement a comprehensive, risk-based approach to supplier management, and plans to extend our due diligence to other suppliers in our supply chain. This work will begin in FY21 with the development of a Supplier Management Framework. This framework will guide our due diligence approach, from supplier selection to ongoing management in future years and will include efforts to standardise processes relating to the identification, assessment and management of modern slavery risks across our supply chain management functions.

Commitment: In FY21, we will develop a comprehensive Supplier Management Framework.

Supplier screening and onboarding

Prospective suppliers managed by Global Sourcing are currently required to complete a supplier evaluation form that includes questions on modern slavery, previous CSR audits, quality, environment and health and safety.

In addition, some prospective Global Sourcing suppliers are subject to an internal quality audit, during which we consider several factors including human rights and labour risks. We have identified an opportunity to strengthen the human rights component of the quality audit to improve this control and will be looking to review training provided to our quality auditors.

Some of our Healthcare GBU finished goods suppliers have a third-party audit as a pre-condition prior to onboarding.

Commitment: We will review the training provided to our quality auditors on human rights and will provide additional training as necessary to increase quality auditors' capability to detect potential labour violations and signs of modern slavery.

Finally, all Global Sourcing suppliers are required to commit to Ansell's Supplier Code of Conduct as part of their contractual agreement. While Ansell does not require direct suppliers to certify materials incorporated into the products comply with the laws of the country or countries in which they do business, the Supplier Code of Conduct requires all direct global sourcing suppliers to comply with their obligations under local law as well as the standards and expectations set out by Ansell. The Code includes requirements around prohibition of modern slavery,

respect of human rights and fair labour practices as well as other expectations around health and safety, environment, privacy, and corruption. We also encourage suppliers to extend similar requirements to their own suppliers.

Ongoing supplier management

Some of our suppliers engaged by Global Sourcing are subject to ongoing monitoring based on the size of Ansell's spend with them and other risk factors including location, industry and previous performance. These selected suppliers are required to undergo a SMETA, BSCI or SA8000 (announced) at least every 2 years. Many suppliers managed by Global Sourcing also undergo audits by Ansell's quality team.

Extending the scope of our audit program

In our FY19 modern slavery statement, we signalled our intention to expand the scope of our third-party audit program as follows:

- all new Global Sourcing suppliers are required to have a third-party audit prior to becoming a supplier of Ansell
- all existing Global Sourcing suppliers are required to have a third-party audit every two years, and more frequently where non-conformances are detected.

We reaffirmed our goal for existing suppliers to undergo regular audits every two years through our latest Supplier Code of Conduct, released in August 2020. We continue to work towards both goals.

Commitment: Extend the use of third-party auditing to more comprehensively monitor the management of risks in operations and supply chains.

Suppliers' audit performance, and any non-conformances, are monitored by the relevant team within Global Sourcing. While all teams undertake work to review audit reports, interpret findings and track corrective actions, we are working to standardise the approach across Global Sourcing. We track supplier performance on labour issues alongside quality and commercial issues during quarterly or half-yearly performance reviews, using a supplier score card.

Commitment: In FY21 we will enhance the business' approach to reviewing and monitoring the outputs of third-party audits.

6. Supply chain due diligence continued

The audit progress and performance of the top 10 strategic suppliers in each of our global business units, Healthcare GBU and Industrial GBU, is regularly reported to the Board's Sustainability & Risk Committee. This includes a traffic light dashboard of audit performance across key risk areas for each supplier and follow up actions.

While audits are a useful tool in assisting us to assess risks and any actual harm in our supply chains, we recognise that there is value in continuing to build a diverse due diligence system, in which audits are just one component.

Comments on ongoing performance issues in the Malaysian glove industry

We note there have been allegations raised again this year regarding the treatment of workers in our supply chain, regarding some finished goods suppliers in Malaysia. In line with best practice guidance on remediation, we have been engaging with these suppliers on how to improve their approach and are monitoring their performance closely through regular discussions. While we plan to continue to engage with these suppliers on these issues, we note they are complex and systemic issues that will take time and multi-party collaboration to fully address. For these suppliers in Malaysia, we require regular audits of the factory's performance against the SMETA/BSCI standards and proactively monitor the close out of non-conformances raised through those processes.

Non-conformances detected through the third-party audit process have typically fallen into two categories: charging of recruitment fees and excessive overtime. The majority of these have been corrected over the course of 2019 and 2020. In agreement with our suppliers, changes have been made to ensure these non-conformances do not reoccur and ongoing compliance with labour laws is assured, these changes include:

- Suppliers putting in place agreements with recruitment agencies to ensure workers are not charged migration recruitment fees, which can lead to excessive debts (or in extreme cases, debt bondage).
- Suppliers paying recruitment fees themselves for workers from countries at higher risk of deceptive requirement practices, such as Indonesia, Nepal and Myanmar.
- Suppliers committing to reimburse those workers who had previously paid a recruitment fee.
- Significant reductions in the number of overtime hours worked.

In line with recommendations of human rights and labour experts, we prefer to work with suppliers to improve their practices to provide secure employment and improved conditions for the workers in our supply chain, rather than reactively cancelling supplier contracts in response to specific events or allegations. We know that systemic and industry-wide change takes time, and we are proactive participants in that change. In the most extreme circumstances, where a supplier is found to not complete its corrective actions and not work towards improvement in good faith, we will terminate the relationship.

7. Grievance mechanisms and remediation

We respect the rights of individuals who seek to defend human rights, especially in relation to modern slavery, and do not tolerate threats, intimidation, or attacks against these individuals. To support this, we provide grievance mechanisms for concerns and complaints to be raised confidentially and/or anonymously.

All of our employees have access to grievance mechanisms in the form of a Compliance Hotline which operates 24/7 in all of Ansell's community languages, allowing employees to report any suspected breaches of Ansell policies or practices on an anonymous basis. The Compliance Hotline is operated by an independent third party, and Ansell has adopted a no-retaliation policy, ensuring that

there can be no adverse consequences for reporting concerns regarding non-compliance on a good faith basis. Metrics regarding the Compliance Hotline are reported annually to the Ansell Board of Directors in the annual compliance report.

Through our Supplier Code of Conduct (SCoC), we require Global Sourcing suppliers to maintain a confidential grievance platform that is easily accessible to all workers, and to encourage workers to report any non-compliance with Ansell's SCoC without fear of retaliation. Under the SCoC, a supplier is to investigate any reports made and take corrective actions as necessary.

Remediation of recruitment fees paid by workers in our operations

Migrant workers in global supply chains have historically confronted this choice: pay illegal or unethical recruitment fees to unscrupulous agents or sub-agents in their local countries for employment abroad, or go without work altogether. To finance these 'hidden' costs, workers may take out loans, often without receiving documentation, which leaves them vulnerable to debt bondage, one of the most common forms of modern slavery. Bonded labour has existed for hundreds of years in countries around the world, including India, Africa, the Caribbean, and Southeast Asia.

In FY20, Ansell advanced its ethical recruitment commitment, a decision from our Executive Leadership Team to retroactively reimburse migrant workers in Ansell's employ for 'hidden fees' incurred during their recruitment period.

In 2019, after becoming aware that some migrant workers in our Malaysian manufacturing sites paid recruitment fees to agents in their home country, Ansell launched an investigation into recruitment practices by agents and sub-agents (in countries including Bangladesh, Nepal, Myanmar and Indonesia) responsible for engaging foreign workers for Ansell's Malaysian manufacturing sites. Throughout this investigation, Ansell actively engaged with affected rights holders and the Ethical Trading Initiative to establish a fair and consistent payment schedule and to validate Ansell's remediation plan.

The first payments relating to the reimbursement were made to affected migrant workers in September 2020 and the remaining payments will be made in January 2021.

The work conducted in the period from 2018 has led to our establishing a Zero Recruitment Fee Policy and a migrant worker recruitment program built on systematic ethical recruitment policies and procedures. Today, Ansell exclusively hires migrant workers through vetted recruitment agents who have signed our contract to uphold ethical recruitment standards. To ensure the integrity of this process, we have imposed several spot checks, both before workers depart from their home country and upon arrival at Ansell manufacturing sites, as part of our onboarding process for migrant workers.

As a leader in the personal protective equipment industry, we believe that by sharing our actions to remedy recruitment fees, we will foster progressive ethical recruitment policy implementation among manufacturers in our industry. While we are proud to have met this milestone, we recognise there is more for us to do in continuing to facilitate discussions on the remediation of recruitment fees with its suppliers and others in the Malaysian glove industry.

Information on the additional controls we have brought in to manage the risks around hidden recruitment fees are detailed in Section 5 above.

8. Monitoring progress and assessing our effectiveness

We recognise that even the most mature modern slavery due diligence systems are in a constant state of evolution and adaptation, as businesses refine and revise their approach to assessing and addressing risks of modern slavery. To support this process, we use three primary mechanisms to measure the effectiveness of our approach: track, report and review. Over the coming years we will continue to explore new ways to finesse our approach to measuring the effectiveness of our actions.



Track

Monitoring our progress over time enables us to evaluate the effectiveness of new controls such as policies and procedures, and to adjust our approach as necessary.

To date, our efforts to track our performance have focused primarily on our manufacturing sites and some suppliers. As we continue to mature our modern slavery due diligence and governance system, we will look to define clear targets and KPIs for our broader due diligence system and to track progress against these targets over time. In our operations, one of the key mechanisms through which we track progress is our ‘CSR Workplace Impact Assessment Tracker’, described in Section 5. The impact assessment is a monthly tracker of performance at all of our manufacturing plants against a range of metrics, and assists us to measure the effectiveness of our controls.

To track supplier performance, many of our critical suppliers are subject to a quarterly or half-yearly supplier performance review, which includes consideration of a supplier’s performance with regard to corporate social responsibility. Through these reviews, we consider performance on labour issues alongside quality and commercial metrics. This regular review process assists us to identify any emerging risk areas, and the effectiveness of our controls to manage risks related to a specific supplier or group of suppliers.

Report

Internal reporting up to our Executive Leadership Team and the Board’s Sustainability & Risk Committee enables our leadership to make informed decisions about the aspects of our program which are working best, and those areas which require revision.

The process of reporting on our actions and performance assists us to reflect on our progress and can bring to light new ideas and feedback. The ELT and Sustainability & Risk Committee use the information to assess the effectiveness of the approach and to inform their decisions around our due diligence program.

Members of our ELT are provided with regular updates based on the CSR Workplace Impact Assessment Tracker. We also report on the performance of our audited manufacturing plants and strategic suppliers to the Sustainability & Risk Committee. This typically takes the form of a dashboard with traffic lights and identifies which of our manufacturing plants and relevant suppliers have been assessed to be compliant and which are underperforming and may require additional monitoring and in some cases support.

Review

Seeking feedback and assessments over the structure, function and efficacy of our approach to managing modern slavery helps us to continually improve.

The reviews we conduct over our systems and processes vary depending on our business needs in the reporting period. As a general mechanism, however, we find both internal and external reviews provide an important avenue through which we can seek feedback on the structure, function and efficacy of our due diligence system.

Following our internal review of labour standards in FY19, in FY20 we engaged a third-party advisor to conduct an assessment over our human rights due diligence systems for both operations and supply chains and to identify aspects of our system which worked well and areas for future development.

In addition, we regularly seek feedback from employee representatives, trade unions and workers to identify emerging risks, to test the effectiveness of our controls and to identify new or emerging risks. As an example, we periodically engage with new cohorts of migrant workers at our manufacturing operations to understand whether they have paid recruitment fees to agents in their home country. This process assists us to test the effectiveness of our policies and the procedural controls we have in place to manage this risk.

9. Stakeholder engagement and consultation

Ansell is committed to meaningful stakeholder engagement, built on the foundations of trust, transparency and accountability. Our stakeholders include our employees and wider workforce, customers and end users, investors, regulators, suppliers and the community. This statement, together with other means of formal and informal communication, including investor roadshows, the Annual General Meeting and the Annual Report, are a key part of communicating Ansell’s strategy and actions in this area. Throughout the year we also communicate through media statements, Company publications and our website.

Ansell operates and is managed as an integrated Group with overarching policies, systems and processes that are consistently applied by all entities across the Group. This statement has been prepared in consultation with our key teams that collaborate to deliver our human rights and modern slavery risk identification, assessment and management processes for our own operations and supply chain.

Commitment: We will proactively and transparently communicate our work on labour rights.

10. Further improvements in FY21

We recognise that there is more for us to do to manage the risks of modern slavery in our supply chains and operations and are committed to systematically improving our systems and procedures for identifying, assessing and addressing these risks on an ongoing basis.

Below sets out a list of forward commitments we have made in our FY20 statement which describe activities the business will undertake in FY21. We will report on our progress in implementing these commitments in our future modern slavery statements.

FY21 Commitments

		
<p>Review the structure and function of the CSR & Sustainability Council to ensure it continues to meet its purpose</p>	<p>Develop a comprehensive Supplier Management Framework.</p>	<p>Conduct independent third-party audits over manufacturing sites in Brazil, Lithuania, Portugal and Russia in FY21, subject to ability given challenges of COVID-19.</p>
		
<p>Extend the use of third-party auditing to more comprehensively monitor the management of risks in operations and supply chains.</p>	<p>Enhance the business’ approach to reviewing and monitoring the outputs of third-party audits.</p>	<p>We will review the training provided to quality auditors on human rights, and as necessary will provide additional training to increase quality auditor’s capability to detect potential labour violations and signs of modern slavery.</p>

Appendix

This Modern Slavery Statement was prepared in accordance with the criteria set out in the Australian *Modern Slavery Act 2018*, the United Kingdom *Modern Slavery Act 2015* and the California *Transparency in Supply Chains Act 2010*.

The table below outlines where information related to each mandatory reporting criteria can be found:

Australian Modern Slavery Act mandatory reporting criterion	UK Modern Slavery Act recommended reporting criterion	California Transparency in Supply Chains Act required reporting criterion	Location of information
Identify the reporting entity Describe the structure, operations and supply chains of the reporting entity	Organisation's structure, its business and its supply chains.	N/A	Section 2 – About Ansell
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	N/A	Section 4 – Our modern slavery risks and impacts
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains.	Describe to what extent the manufacturer: <ul style="list-style-type: none"> Engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery. Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. Requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking 	Section 3 – Our approach to managing modern slavery risks Section 6 – Supply chain due diligence
Describe how the reporting entity assess the effectiveness of such actions	Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Describe to what extent the manufacturer maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking	Section 8 – Monitoring progress and assessing our effectiveness
Describe the process of consultation with any entities that the reporting entity owns or controls	N/A	N/A	Section 9 – Stakeholder engagement and consultation
N/A	The training about slavery and human trafficking available to its staff.	Describe to what extent the manufacturer provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.	Section 5 – Operational due diligence
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	N/A	N/A	Section 9 – Stakeholder engagement and consultation



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