



Modern Slavery Statement



PAUL HARTMANN PTY LIMITED

June 2024

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1. Introduction

This statement describes the steps taken by Paul Hartmann Pty Limited to assess and address the risks of modern slavery including human trafficking, child labour, forced labour, slavery, servitude, debt bondage, and deceptive recruiting for labour or services in our business and in our supply chain.

This Modern Slavery Statement has been developed by, and is published by, Paul Hartmann Pty Limited (ABN 35 000 099 589) in accordance with Modern Slavery Act 2018. This statement relates to the calendar year ending 31 December 2023 and sets out the approach taken by us to prevent modern slavery in our operations and supply chains.

2. Reporting Entity (criteria 1)

This is a single statement of Paul Hartmann Pty Limited (ABN 35 000 099 589) pursuant to the Australian Modern Slavery Act 2018.

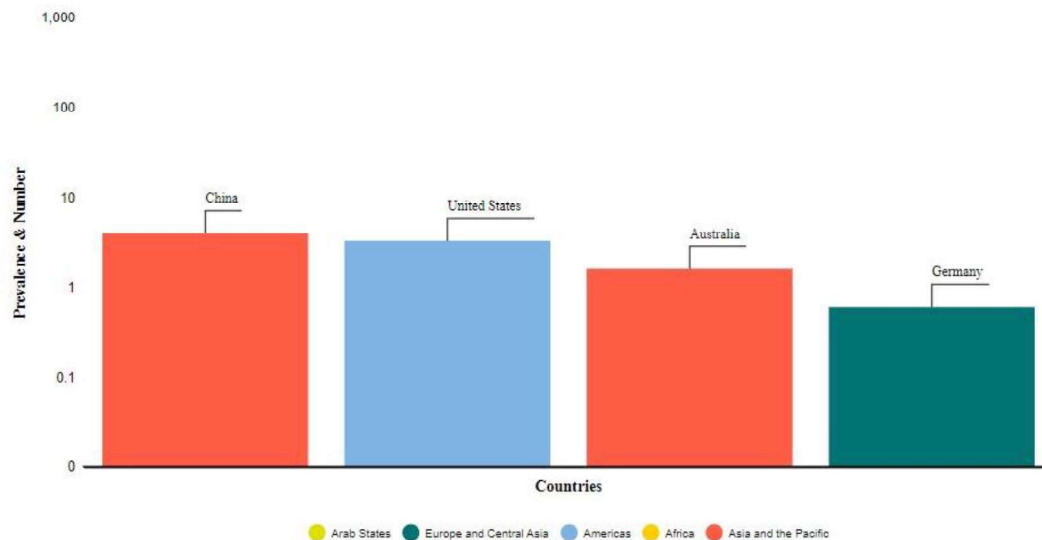
3. Structure, Operations, and Supply Chain (criteria 2)

With over 200 years of experience, HARTMANN is a leading provider of healthcare solutions in Australia and around the world. We are known for our commitment to quality and care, delivering innovative products and solutions to hospitals, clinics, and homes. We believe that health can empower people to make a positive difference in the world.

HARTMANN's product portfolio is across its three business areas of Wound Management, Incontinence Management and Skin Care. Our direct suppliers of products and service are located in Germany, China, USA and Australia and we distribute products nationally through our 3rd party logistics provider.

4. Risk in Supply Chain and Operations (criteria 3)

Prevalence & Number



Walk Free 2023. Global Slavery Index 2023. Minderoo Foundation. Available from: <https://www.walkfree.org/global-slavery-index/map/#mode=data:dimension=rp:compare-countries=AUS-CHN-USA-DEU;prevalence-unit=per-thousand>



HARTMANN Australia

HARTMANN Australia conducts its operations with integrity and honesty. The principles are embodied in the Code of Conduct, which establishes the guidelines for the behaviour of HARTMANN Australia employees. Every employee at HARTMANN Australia is required to respect and comprehend applicable laws, the Code of Conduct, and relevant Group and company policies and procedures. The risk of modern slavery practices within HARTMANN is low due to the fact that employees are hired directly, and frequent evaluations are conducted to verify that our working conditions and remuneration match regulatory standards.

Warehousing and Logistics Provider in Australia

Our warehousing and logistics supplier in Australia has a large owner-driver network in addition to subcontractors, agencies, and external suppliers. The risk at our supplier's activities is that they will create or contribute to modern slavery by employing workers in nations with less labor rights or by using third-party labour-hire providers. However, the services are generally managed by its subsidiaries in each state. They have a better understanding of processes and can implement change more effectively, reducing overall exposure to modern slavery risks. Our 3PL service provider aims to decrease the usage of labor hire providers and instead use only licensed suppliers where possible to avoid any modern slavery issues.

Manufacturer in China

One of our wound care product manufacturers is in China, which lacks modern slavery legislation that prohibits servitude. However, regulations linked to forced employment can be

found in article 244 of the Criminal Law, which prohibits forcing anyone to work by depriving them of their personal freedom. According to the 2023 Global Slavery Index, an estimated 4.0 out of every thousand persons in China were subjected to modern slavery in 2021, ranking the country 111th globally in terms of prevalence. Our supplier does not employ subcontractors for recruitment, has independent whistleblower protection, and conducts ongoing screening and evaluation to ensure compliance with the People's Republic of China's Labour Law. However, the organization does not have a responsible team or individual to supervise modern slavery risks, and employees are not trained to detect, analyze, and respond to modern slavery threats.

Manufacturer in the United States

In the United States, the prevalence of modern slavery is among the lowest in the Americas, but the projected total number of persons enslaved is the largest in the area. Discrimination against migrants and minority groups contributes significantly to vulnerability. Our supplier in the United States has confirmed that their operations comply with US employment regulations. They do not, however, have a responsible person or team in place to regularly monitor the risks of modern slavery. Furthermore, they may not have a policy, training, or independent whistleblowing in place to address modern slavery, which may result in limited insight in their operations and supply chains.

Manufacturer in Germany

Our main supplier of incontinence, wound care, and skin care products in Germany has a mechanism or policy in place to guarantee that the company complies with legislation such as German Labour Law and the German Supply Chain Due Diligence Act. Furthermore, the organization has a designated team to supervise modern slavery risks, and staff are trained on how to recognize, analyze, and respond to modern slavery.

5. Actions to Assess Risks (criteria 4)

Annual questionnaires

Issuing an annual Modern Slavery Statement Questionnaire to important suppliers, track completion, and follow up for further information as needed.

Monitoring existing suppliers

Monitoring current suppliers' social responsibility, which includes human rights, discrimination, workforce disputes, and health and safety concerns. We rely on continuous analysis, monitoring, and risk-based approach.

Verifying new supplier

Assessing new suppliers' compliance with social responsibility standards concerning workplace conflicts, human rights, discrimination, and health and safety issues.

Mandatory clause in contracts

Including modern slavery model clauses in all contracts with suppliers to prevent and address modern slavery risks.

6. Actions to Address Risks (criteria 4)

Code of Conduct

Our Code of Conduct applies to all HARTMANN employees and establishes the expectations of employee behavior.

Whistleblower Policy

HARTMANN Australia has a Whistleblower Policy, which allows employees to submit issues directly with the Global Compliance Management process. HARTMANN Australia encourages its employees and other relevant disclosers to feel comfortable raising concerns by providing them with access to an objective and confidential reporting and inquiry procedure in which they are protected from reprisal.

Ethical Sourcing and Modern Slavery Policy

This policy applies to all HARTMANN Australia employees in any capacity, including contractors, consultants, and third-party representatives, to ensure that HARTMANN complies with applicable laws and regulations, sources products and services in accordance with legal obligations, and takes steps to prevent and mitigate modern slavery in our operations and supply chains.

Training and Communication

We assign mandatory training to employees for completion using our online learning management system, which is accessible to all HARTMANN Australia employees.

7. Assessment of Effectiveness of Actions (criteria 5)

During the 2023 reporting period, we aimed to obtain a deeper knowledge of our modern slavery risks and how they might be prevalent in our operations and supply chain. At this early point, we are unable to evaluate the efficiency of the steps we have implemented. However, we have begun and will continue to work on developing frameworks and processes to allow us to evaluate the effectiveness of the activities we are taking to assess and address modern slavery threats in our operations and supply chains.

8. Consultation (criteria 6)

In preparing this statement, our supply chain and operations teams collaborated with relevant senior management to continue raising awareness of modern slavery, regulatory developments, and evolving social expectations that may be relevant to our business. HARTMANN Australia's internal operations and supply chain experts met with the Leadership Group of each reporting period and other important stakeholders to reflect on the reporting period, our actions, this statement, and potential for improvement in future reporting periods.

As a result of our modern slavery risk assessment, we are making efforts to consult broadly across all levels of our organization throughout the reporting period, believing that this ongoing conversation will have a compounding effect.

9. Future action plan

HARTMANN Australia works diligently to find areas for enhancement and improvement in our global compliance programs. We will continue to examine our performance and procedures in relation to modern slavery and human trafficking, as well as comply with the Modern Slavery Act 2018 (Cth).

10. Approval

The Board approves this Modern Slavery Statement for publication by Directors Resolution dated:

Jennifer Luke

[Jennifer Luke \(Aug 8, 2024 18:06 GMT+10\)](#)

Jennifer Luke
Managing Director