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Annual Modern Slavery Statement

Introduction

Diagnostica Stago Pty Ltd (referred to as “Stago”) is a member of the Stago Group, (referred to as the “Group”) managing the sales, distribution and service for Australia and New Zealand.

This Statement is made pursuant to the *Modern Slavery Act* (2018) (hereafter the “Act”) and sets out the steps that Stago has taken and is continuing to take in order to ensure that modern slavery is not taking place within our operations or supply chain. Modern slavery encompasses criminal offences relating to deprivation of civil liberties, human trafficking, forced marriage and child labour.

Stago fully supports the aims of the Act and is committed to operating free from forced labour, slavery and human trafficking. We have a zero tolerance approach to all forms of modern slavery in our operations and supply chain.

As part of the Stago Group, sustainable practices are firmly anchored in our corporate culture based on our company values. We apply globally-binding principles that require employees and managers to behave in an ethical, law-abiding manner.

This Statement is made pursuant to section 13 of the Act in respect of the financial year ended 31 December 2024.

This Statement has been approved by Stago’s Directors and is structured in line with the mandatory criterion set out in the Act.

Our reporting entity

This annual modern slavery statement relates to Diagnostica Stago Pty Ltd (ACN 130 555 949).

Stago is privately owned and headquartered in Forest Hill, Victoria, Australia. It has a presence in most states of Australia, as well as both islands of New Zealand.

Our organisation, operations and supply chains

Stago is a wholly owned subsidiary, whether directly or indirectly, of Stago International (France).

Operations

The Stago Group was a pharmaceutical laboratory, founded in 1945, which now operates in the In Vitro Diagnosis (IVD) industry, wholly dedicated to the exploration of haemostasis and thrombosis.

Stago’s global operations are headquartered in France. There are six Research and Development Centres across France, Ireland, the Netherlands and the US. There are five Manufacturing Plants across France, Ireland, Germany, the US and China (for the Chinese market only). There are six Logistics Centres across Australia, Brazil, France, Germany, the UK, and the US.

Locally, Stago is the market leader for the public sector in the supply of haemostasis products within the ANZ market. Our mission is to provide health professionals with reliable, powerful and innovative haemostasis



diagnostic tools in looking for a way to improve prevention, understanding, diagnosis, treatment and follow-up of coagulation-related pathologies.

You can read more about our global business on our website [here](#) and our Australian business [here](#).

Supply Chain

Our local Supply Management Team is responsible for purchasing products and services mainly from our Manufacturing Plants based in France, Germany and Ireland, and the main Logistics Centre based in France. Once received in our local warehouse, they organise delivery of those products to our customers and run the day-to-day operations of our business.

Stago's supply chain includes suppliers mainly in France and Europe. Activities involve the supply of instruments, reagents and consumables manufactured by the Group, office supply, cleaning service, building rental, accounting, service contractors, calibration service, cold-room maintenance.

Stago's supply chain structure supports the complexities of global supply and manages associated risks, including compliance with regulatory directives and monitoring suppliers' performance and financial stability. The local supply chain structure includes a procurement team who procure orders directly from within the Group and other managers who do the same within their field of expertise.

Stago's modern slavery risks in our operations and supply chains

Stago understands that certain goods and services may pose higher risks of modern slavery due to the types of activities being associated with established risk factors.

Accordingly, we are proposing to develop a modern slavery risk matrix that we will apply across our business operations and supply chain. This risk matrix will enable us to identify specific features of our operations and environment that present higher risks of slavery.

The risk matrix includes risk categories of:

Risk Category	Indicators may include
Sector and industry risks	<p>Certain sectors and industries, such as the manufacturing industry (medical equipment) in which we operate, may have higher modern slavery risks because of the nature of the industry characteristics, products and processes.</p> <p>The complex and process intensive functions within the manufacturing industry associated with its reliance on specialised componentry and materials in global supply chains, highlights the industry as one vulnerable to modern slavery risks.</p> <p>In mapping our first-tier suppliers we are working to identify slavery risks associated with these process intensive materials and assessing the geographic region associated with production (as referred to below).</p>
Product and services risk	<p>Certain products and services may have higher modern slavery risks because of the way they are grown, produced, provided or used.</p> <p>We consider that the complex and process intensive functions used to manufacture our products and reliance on (electronic) componentry and materials is a risk factor of slavery in our operations.</p>
Geographic risk	<p>In respect of supply chain functions overseas, we recognise that some countries may have higher risks of modern slavery, including due to poor</p>

Risk Category	Indicators may include
	<p>governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.</p> <p>Indicators may include where the country is reported to have weak rule of law by international organisations or NGOs, including due to corruption, conflict and/or political instability.</p> <p>We have mapped our local first-tier suppliers and identified the geographic regions in which they are based. This information has assisted us identify those suppliers that may have higher risks of slavery due to the geographic region in which they operate.</p> <p>Our main supplier being the Group operations in Europe, we do not consider them to present high risks of modern slavery because of our visibility over compliant labour practices and conditions. We have assessed that the risks are limited. Similarly we have assessed there to be limited risks of modern slavery in respect of the Group's operations and suppliers based in the United States of America.</p> <p>The Group has also commenced manufacture of products in China and soon India for their respective local markets, and to the extent that those operations involve any third parties in those locations, we will continue to address any potentially elevated risk of modern slavery in that context by utilising the Stago Group Third Party Assessment Procedure and Diligence Questionnaires.</p>
Entity risks	<p>We are aware that some entities in our industry may not have formalised or systematic approaches to addressing labour management practices or modern slavery risks.</p> <p>This may be attributed to the prevalence of smaller businesses we work with who do not have extensive resources to periodically produce evidence of due diligence in identifying modern slavery risks, or who may not have comprehensive systems in place because of their size.</p> <p>We will not initiate business dealings or enter into a contract with a business partner without first verifying their reputation, skills and activities using the Stago Group Third Party Assessment Procedure and a due Diligence Questionnaire as well as formalising through a written contract the terms and conditions of the business relationship and verifying that this contract includes the clauses listed in the Procedure referred to above.</p> <p>The Third Party Assessment Procedure will apply exclusively to all of Stago contractors, distributors, agents and other commercial intermediaries, customers and first-tier suppliers, in relation to both the initial selection of such business partners, and their ongoing regular monitoring and risk assessment throughout the duration of the business relationship including in the event of a significant change in their situation (for example a merger or acquisition) or a report or disclosure in relation them. The Third Party Assessment Procedure will not apply to all contracts regulated by the Public Procurement Code.</p> <p>Similarly, we will not initiate business dealings or enter into a contract with an intermediary without formalising through a written contract the terms</p>



Risk Category	Indicators may include
	<p>and conditions of the business relationship and verifying that this contract includes the clauses listed in the Third Party Assessment Procedure.</p> <p>If a risk is identified throughout the course of an existing business relationship, this will be managed on a case-by-case basis, with the required steps to be taken to address the risk dependent upon the circumstances and level of risk.</p>

To assist in identifying risks, Stago refers to public and credible sources of modern slavery data, including the:

- Walk Free Global Slavery Index (GSI);
- UN Guiding Principles for Business and Human Rights; and
- Australian Border Force.

In addition to applying our risk matrix, we propose to prepare a range of due diligence measures to reduce risks of modern slavery.

We set out below more details on the actions taken by Stago to assess and address the risks of modern slavery practices.

Stago's actions taken to assess and address modern slavery risks, including due diligence and remediation processes

Stago continues to expand its due diligence and remediation efforts to assess and address modern slavery risks. Our efforts are targeted to help our employees, suppliers and other business partners identify, report and address modern slavery risks as well as prevent or remove those risks.

We seek to mitigate these risks as appropriate based on our policies and standards, which may include remediation based on the level of involvement with a particular supplier. Importantly, we are also engaging with our local procurement team and suppliers to get in-depth local understanding of available resources and remediation options, in those regions associated with higher modern slavery risks. In particular, we do this through the following actions set out below.

Stago Code of Business Ethics

Stago has an internal and external facing Code of Business Ethics for Australia and New Zealand shared with its employees, customers, suppliers and the world more broadly.

This Code sets out our work ethos, and highlights fundamental requirements with respect to workers' rights, and in dealings with our suppliers which promote honesty, integrity and to act with care and diligence.

The Code can be found [here](#).

Ethics Committee

An Ethics Committee has been created at Stago International's headquarters in Asnières, France. A local Compliance Officer has also been designated for the different Stago entities within the Group.

Stago Employees who report a concern in good faith about an alleged Code violation are protected from any form of retaliation.

Reporting

Each employee of the Group may alert the Ethics Committee if they observe a breach of applicable law including the Act or any type of behavior which is contrary to the Act ("whistle-blowing mechanism").



The Group has implemented an internal and external whistle-blowing mechanism intended to compile employee-generated or customers' alerts of the existence of conduct or situations contrary to Stago's Code of Business Ethics and protect employees who operate those alerts.

The Group has a Group Ethic Committee, to whom all concerns regarding modern slavery should be addressed.

In Australia, Stago's Whistleblowing Mechanism, provides employees with the comfort that they can make reports anonymously.

In the context of modern slavery, we believe that this can be an important asset in assisting employees to come to us if they perceive there to be a risk of modern slavery practices.

Business Partner and Intermediary Engagement

As referred to above, we have an internal detailed *Stago Group Third Party Assessment Procedure* and a *Due Diligence Questionnaire* for dealing with business partners and intermediaries which require employees to:

- refrain from initiating business dealings or entering into contracts without first verifying their reputation, skills and activities;
- ensure ongoing regular monitoring throughout the duration of an existing business relationship to which the Third Party Assessment Procedure applies, including in the event of a significant change in the business partner's situation or otherwise a relevant disclosure or report against them; and
- utilise internal documentation such as the Third Party Assessment Procedure to identify and manage risk.

The Third Party Assessment Procedures specifically mentions that the Group needs to ensure the respect of Human rights (prevention of modern slavery and child labor).

The Third Party Assessment Procedure has been implemented to ensure that the third parties the Group deals with provide sufficient guarantees in terms of integrity and ethics. These assessments are defined and based on the risk mappings the Group has performed, and they are carried out in compliance with the General Data Protection Regulation and any other local applicable laws regarding personal data.

There are three assessment methods that may be used under the Third Party Assessment Procedure, depending on the level of individual risk the third party poses to the Group:

- The Altares database which screens the third parties entered in it and generates a compliance score and a report on them;
- The Urios Database which makes it possible to identify in more detail the origin of the alert on the concerned third party; and
- An in-depth assessment procedure when required in addition to the reports generated by the Altares and Urios databases consisting of:
 - a questionnaire entitled "Due Diligence Questionnaire";
 - a summary note, which may recommend the implementation of mitigation measures (inclusion of a compliance clause and/ or an audit clause in the agreement, etc.); and
 - in extreme cases, a more detailed report on the complete business environment of the assessed third party by a company named Adit.

In addition, as a participant in the health sector, Stago is subject to several specific Australian laws, regulations and codes designed, generally speaking, to prevent conflicts of interest and the risk of corruption involving health professionals (eg. *Health Insurance Act 1973* (Cth)).

Training

Stago has also implemented a training mechanism for management and employees who are most vulnerable to the risks of corruption and influence peddling.



We are providing a training session to our senior management team, and specialist procurement and operations team. During that training, we go over the Modern Slavery Act and educate our team members on the specific assessment areas and actions they can take to mitigate modern slavery risks occurring in Stago's supply chain or operations.

We also encourage our management team to regularly attend webinars on Modern Slavery as provided by the Australian Catholic Anti-Slavery Network (ACAN) and HealthShare Victoria (HSV).

Remediation

Stago's collection of policies and associated processes referred to above inform our approach to address and remediate any instance of modern slavery uncovered. This is in addition to our responsibilities to report relevant disclosures to policing authorities. In relation to any instance of actual or suspected modern slavery uncovered in its supply chain or operations, Stago is committed to a remedial and victim-centric approach in working with affected suppliers or persons.

How Stago assesses the effectiveness of its actions in addressing modern slavery risks

Stago will assess the effectiveness of its contractual obligations and internal processes via the following practices:

- regular reviewing and updating of Stago's standard supplier contractual terms to include a requirement that the supplier aligns with modern slavery obligations;
- implementing regular and systematic reviews of our business and supply chain operations with respect to modern slavery risks and practices;
- identifying and tracking whether our suppliers can demonstrate to us their modern slavery awareness and due diligence processes;
- recording and assessing the nature and volume of any complaints or information about modern slavery risks through our established policy communication channels, including our Whistleblowing Mechanism and our Group Ethic Committee; and
- benchmarking our approaches with other due diligence practices reported by comparable businesses in our industry, as reported in their modern slavery statements and leading practice material shared by the Australian Government.

Consultation with any entities Stago owns or controls

This annual modern slavery statement relates to Diagnostica Stago Pty Ltd as the reporting entity.

Stago engages in formal and informal communication processes with our branch in New Zealand which is fully managed from Australia. We will apply the Third Party Assessment Procedure to our local suppliers as well

Stago commitment

This Statement has been approved by the Director(s) of Stago being Manuel Mayer and signed by a responsible member of Stago, being Sandrine Richard (General Manager and Managing Director).

Signed:

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Name: Manuel Mayer

Position: Director

Date: 25.11.2024 | 10:21 CET



Signed:

DocuSigned by:

Sandrine RICHARD

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Name: Sandrine Richard

Position: General Manager & Managing Director

Date: 25.11.2024 | 15:50 AEDT

Stago