



right solutions.  
right partner.

# Modern Slavery Statement 2022



## A message from the CEO



**RAJ NARAN**  
Chief Executive Officer

### Our position on modern slavery is clear – it has no place in our business and contradicts our core values.

As a leader in our industry, with over 18,500 employees and operations in over 70 countries, we have a responsibility to ensure that we are not complicit in any form of modern slavery and that we assist and guide our employees and our suppliers to join us in our efforts to uphold, respect and promote the human rights of every individual.

We are proud to present our FY2022 Modern Slavery Statement. This statement outlines the actions we have taken during the year to assess and address modern slavery risks

in our operations and supply chains. At ALS, assessing and addressing these risks is a journey of continuous improvement where, year on year, our ongoing efforts build upon our earlier actions in order for us to contribute to the eradication of modern slavery. This year, our focus was on continuing to build our capability to identify and assess modern slavery through the development and rollout of our online Modern Slavery Awareness Course, to more closely examine our existing governance structures as to their suitability and effectiveness, and to deepen our understanding of our supply chains to enable us to make meaningful strides towards combating modern slavery.

Modern Slavery is a complex global issue, and we are committed to playing our part to support a world free from modern slavery. We will continue to take a collaborative approach with our employees, suppliers and other stakeholders so that we continue to contribute to the eradication of modern slavery.

This statement is made for the financial year ending 31 March 2022, and was approved by the Board of ALS Limited on 20 September 2022. This statement will be reviewed and updated by the Board annually.

**Raj Naran, Managing Director and CEO**  
20 September 2022

## About this statement

This Modern Slavery Statement (Statement) is for the financial year commencing 1 April 2021 and ending 31 March 2022 (FY2022). This Statement is made on behalf of ALS Limited (ABN 92 009 657 489)<sup>1</sup> and the entities it owns and controls, including Australian Laboratory Services Pty Ltd (ABN 84 009 936 029) and ALS Industrial Pty Ltd (ABN 21 006 353 046)<sup>2</sup>, collectively referred to in this Statement as “ALS” or “the Group”<sup>3</sup>. This Statement is made for the purposes of the

Australian Modern Slavery Act 2018 (Cth) (the Australian Act) and section 54 of the United Kingdom’s Modern Slavery Act 2015 (the UK Act) and has been approved by the Board of ALS Limited.

The table below sets out where the mandatory reporting requirements under the Australian Act and the recommended criteria under the UK Act have been addressed in this Statement.

Australian Act mandatory reporting requirements	UK Act recommended reporting criteria	This Statement
Identify the reporting entity; and Describe the structure, operations and supply chains.	Organisation’s structure, its business and its supply chains.	Pages 2, 4-6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and the entities it owns and 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.	Pages 7-11
Describe the actions taken by the reporting entity and any entities that the reporting entity owns and controls to assess and address these risks, including due diligence and remediation processes.	Organisation’s policies in relation to slavery and human trafficking; and its due diligence processes in relation to slavery and human trafficking in its business and supply chains.	Pages 3, 8-11, 13
Describe how the reporting entity assesses the effectiveness of these 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.	Page 12
Describe the process of consultation with the entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).		Page 14
Any other relevant information.		Pages 3, 15
	Training about slavery and human trafficking available to all staff.	Pages 9, 11

- 1 ALS Limited is a publicly listed company on the Australian Securities Exchange (ASX:ALQ), with corporate headquarters in Brisbane, Australia and global operations headquartered in Houston, Texas.
- 2 Australian Laboratories Services Pty Ltd (ABN 84 009 936 029) and ALS Industrial Pty Ltd (ABN 21 006 353 046) are wholly owned subsidiaries of ALS Limited, and together with ALS Limited comprise the reporting entities under the Australian Modern Slavery Act 2018 (Cth) (the Australian Act). Australian Laboratory Services Pty Ltd is 100% directly owned by ALS Limited, with ALS Industrial Pty Ltd being 100% indirectly owned by ALS Limited. This Statement is made as a joint statement under the Australian Act for these entities.
- 3 A list of owned and controlled entities in the ALS Group is included at Note 5b Global operating entities and ultimate parent in the ALS FY2022 Annual Report.



# Our commitment

ALS is committed to ethical and responsible business conduct, including respecting and protecting the human rights of our employees, our customers, our suppliers and their staff, our business partners, and those in the communities in which we operate.

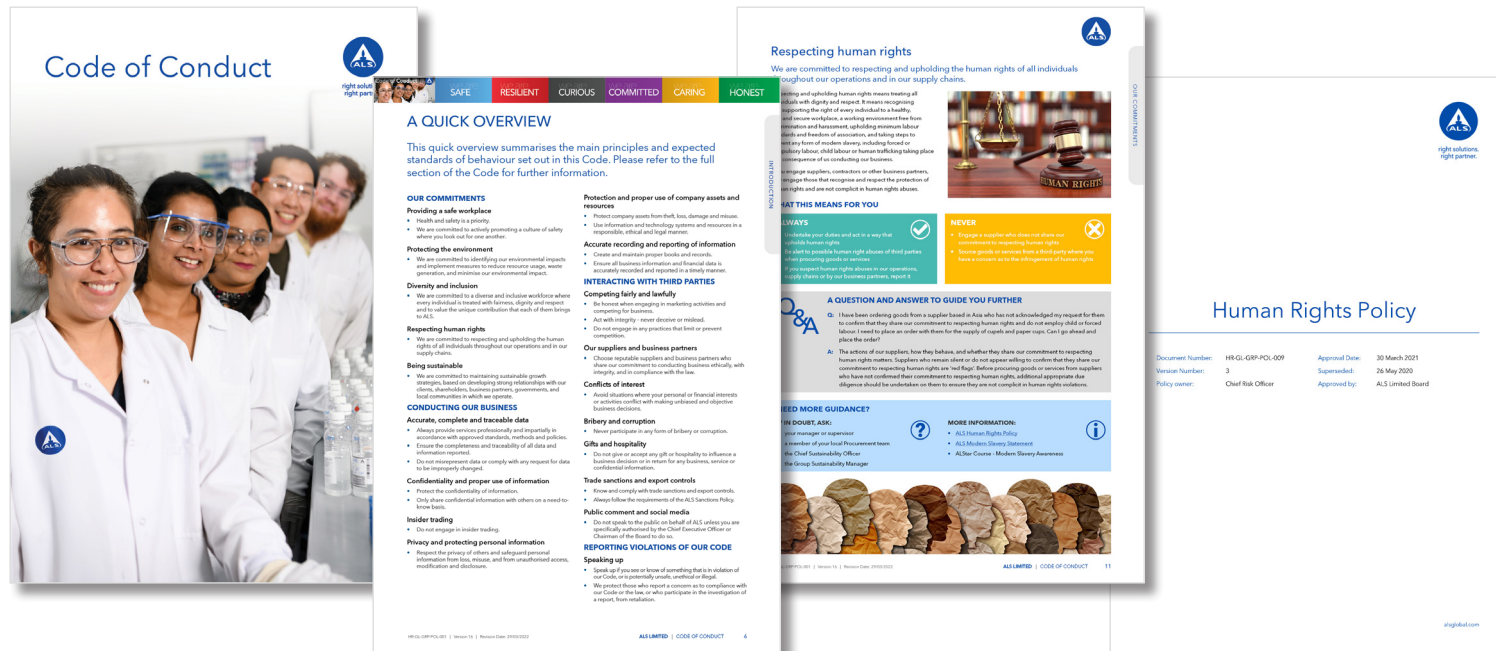
We recognise that the risk of modern slavery<sup>4</sup> exists throughout our supply chains and may also be present in our operations and that for us to contribute to the eradication of modern slavery, it is important for us to understand

and manage this risk through a collaborative approach with our employees, our suppliers and other stakeholders so that we are not complicit in human rights abuses.

Our position on modern slavery is clear – it has no place in our business and contradicts our core values. Our commitment to this position includes continually seeking to maintain our diligence around understanding how we might cause, contribute to, or be directly linked to modern slavery practices.

We believe in treating our employees, those who work in our supply chains and those living in the communities in which we operate with dignity and respect, and seek to engage with third parties that respect the protection of human rights and demonstrate sound ethical performance. We expect our employees and all individuals who work for us or on our behalf to respect and uphold the human rights of all others and to partner with us in combating modern slavery.

## Our commitment to respecting human rights is expressed in our Code of Conduct and Human Rights Policy.



## ALS CORE VALUES

Living our core values supports our commitment towards combating all forms of modern slavery.



SAFE



RESILIENT



CURIOUS



COMMITTED



CARING



HONEST

<sup>4</sup> ALS considers situations of modern slavery to be those where coercion, threats or deception are used by offenders to exploit victims and undermine their freedom, including human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and the worst forms of child labour.



## Our structure and operations

ALS is one of the world's largest analytical and testing services businesses, servicing multiple industries globally, with a workforce of more than 18,500 people operating from more than 350 sites in over 70 countries across Africa, Asia, Australia, Europe, the Middle East and the Americas.

For more than 40 years, we have provided testing and technical solutions to clients in a wide range of industries all over the world, building our global reputation by embracing the latest technologies and innovative methodologies to deliver high-quality testing services to our clients.

With global operations headquartered in Houston, Texas and corporate headquarters in Brisbane, Australia we are listed on the Australian Securities Exchange (ASX Code: ALQ), being an ASX100 company with a multibillion-dollar market capitalisation.

Our mission is to use the power of testing to solve complex challenges, and with our passion for science, to serve clients with data-driven insights for a safer and healthier world. We are committed to integrity, reliability, and innovation, which supports our delivery of the highest level of quality work and customer service.

### ALS GLOBAL OPERATIONS

**70+**

Countries

**350+**

Locations

**40+**

Years of strong performance

**18.5k+**

Staff worldwide

**2.1b+**

Global revenue

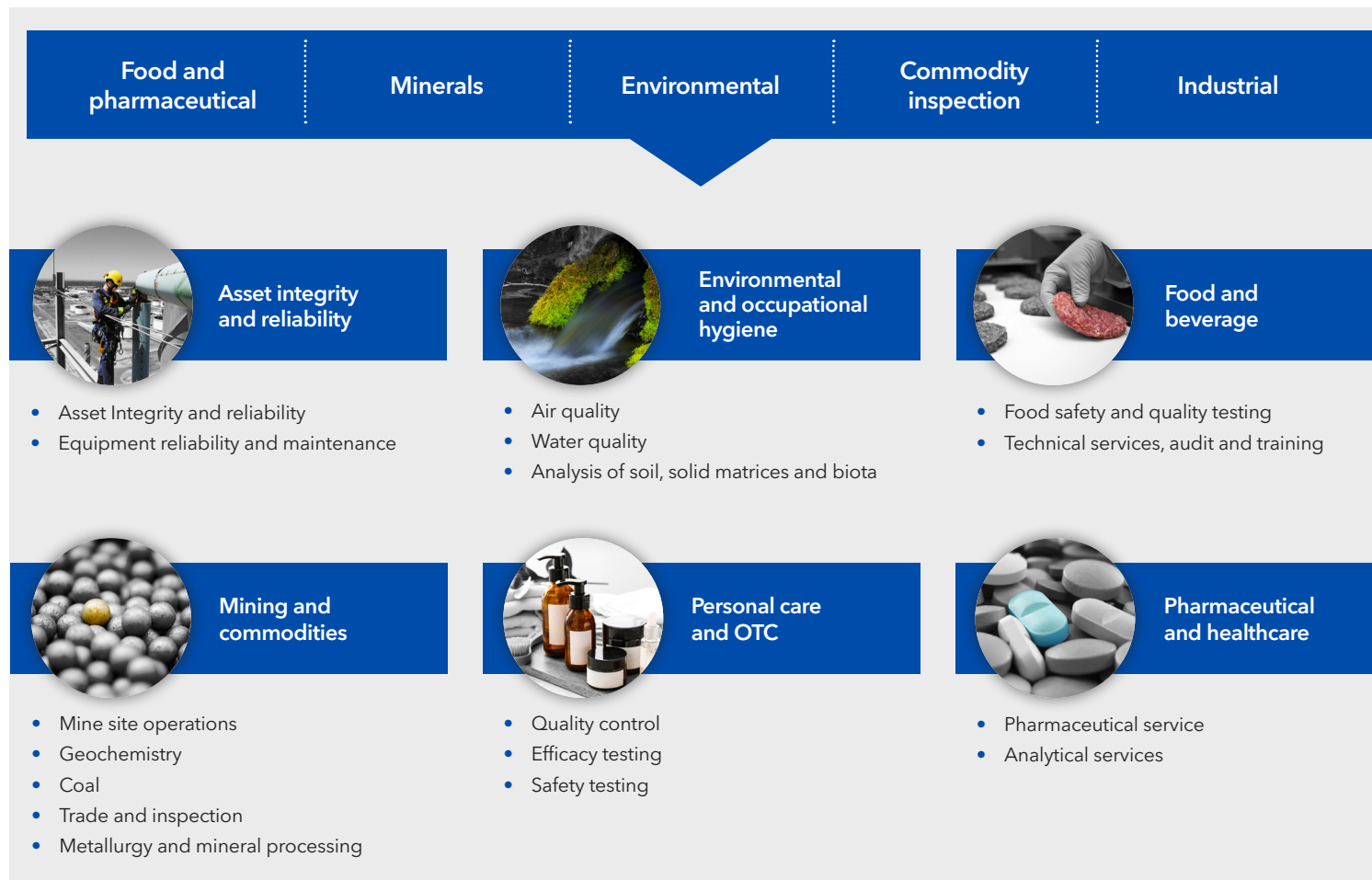




Our principal operations include the laboratories we own and operate and the people we employ across the globe. Our operations are organised into five Business Streams (Food & Pharmaceutical, Minerals, Environmental, Commodity Inspection, and Industrial) based on our General Executive Management structure reporting to the Group's Managing Director and

Chief Executive Officer. Through our Business Streams, our operations deliver analytical and testing services spanning Asset Integrity and Reliability, Environmental and Occupational Hygiene, Food and Beverage, Mining and Commodities, Personal Care and Over-The-Counter (OTC), and Pharmaceutical and Healthcare.

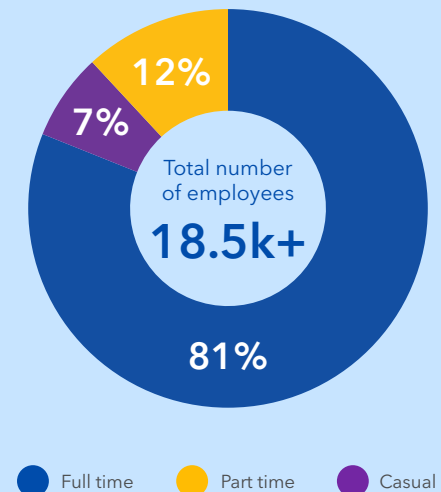
The Group's website ([alsglobal.com](https://alsglobal.com)) provides further information on the range of services provided by the Group, as well as the industries that we provide services to.



## OUR WORKFORCE

We leverage a multifaceted international team in delivering our services while remaining agile enough to provide local expertise and personalised solutions to each and every one of our clients.

Our highly-skilled and diverse team of over 18,500 delivering our services span the globe. As at 31 March 2022, approximately 15,000 of our employees were directly employed full-time, with approximately 1,300 employed on a part-time basis and 2,200 employed casually. The majority of our employees are based in Australia, Canada, the United Kingdom, Brazil and the United States. Our employees in these countries, together with those in Mexico, the Czech Republic, Peru, Russia, Thailand, Spain, Chile, Ireland and Sweden comprise approximately 80% of our workforce.







# Our supply chains

The Group's supply chains include the various goods and services procured that contribute to the Group's service offerings as outlined on page 5. Our supply chains include the supply of goods and services in all of the regions in

which we operate, with the majority of goods and services being procured locally or nationally to the operations those goods and services support. Broadly, these fall into the categories of equipment, consumables, property and utilities,

transport and freight, and facilities management and maintenance services. The Group also procures the services of various professional advisers and other services, such as those provided by finance and banking institutions.

From time to time the Group procures labour through sub-contractors, agency staff and recruitment agencies.

Specifically the main supplies for each of our service offerings include:



## Environmental and occupational hygiene

- Solvents
- Acids
- Hydrogen peroxide
- Laboratory plasticware
- Laboratory glassware
- Syringe filters and other flat filters
- Aluminium dishes
- Certified reference materials
- Analytical instrument consumables
- Microbiological media
- PPE including labcoats and gloves
- Gas - Argon, Nitrogen and Helium



## Mining and Commodities

- Lead oxide flux
- Acids
- Crucibles and cupels e.g. clayware, ceramic, graphite
- Consumables for jaw crushers and pulverisers
- Laboratory plasticware
- Wet strength, plastic and calico bags for samples
- PTFE laboratoryware
- Certified reference materials
- Analytical instrument consumables
- Platinumware
- XRF flux
- Metallographic consumables
- PPE including labcoats and gloves



## Asset integrity and reliability

- NDT film
- NDT aerosols
- Metallographic consumables
- PPE including gloves and uniforms
- Copolymer containers for oil samples
- Plastic tubing for oil samples
- Cardboard boxes for oil samples
- Plastic bags for sample returns



## Food and beverage

- Microbiological media
- Petri dishes
- Analytical instrument consumables
- Solvents
- Ethanol
- Sterile plastic containers
- Sterile swabs
- PPE including gloves



## Pharmaceutical and healthcare

- Microbiological media
- Petri dishes
- Analytical instrument consumables
- Solvents
- Ethanol
- Sterile plastic containers
- Sterile swabs
- PPE including gloves



## Personal and OTC

- Sterile plastic and glass sample containers
- Sterile laboratory plasticware e.g. serological pipettes, well plates, petri dishes
- Filter cups
- Media
- Solvents
- Ethanol/viraclean
- Cultures, LAL
- Sterile swabs
- Sterile filter paper
- Reference materials
- Instrument consumables
- PPE including gloves

## SUPPLIER SPEND

Our total supplier spend for FY2022 was approximately AUD482M, with the spend for Group entities comprising 75% of the Group's total revenue for FY2022 being approximately AUD330M.



# Risks of modern slavery in our operations and supply chains

As a provider of professional services, the Group does not operate in a sector or industry identified as having high modern slavery risks. This however does not mean that we are not diligent in our efforts to examine our operations and supply chains to understand the potential for modern slavery practices to arise.

## OUR OPERATIONS

Given our employees are core to our business, our commitment to respecting human rights and having no tolerance for modern slavery practices starts in understanding the risks of modern slavery in our operations. Our enterprise-wide Risk Management Framework supports this understanding by allocating responsibility across all levels for identifying and managing risks, including modern slavery risks.

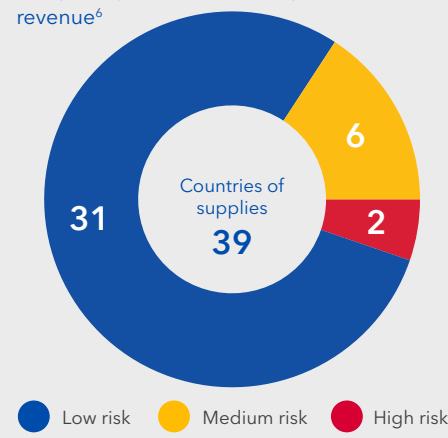
This allocation of responsibility, combined with the procedures and processes that form part of our enterprise-wide Risk Management Framework and the specific actions we take as part of our modern slavery response, means that the likelihood of modern slavery practices occurring in our operations is currently assessed as 'unlikely'. We do however remain aware that given the geographical spread of our operations and with a workforce spanning 70+ countries, and with 4 of these countries being in the top 10 countries with the largest estimated absolute number of people in modern slavery, that we must remain alert to the possibility, however remote we consider that to be, for modern slavery practices to arise in our operations.<sup>5</sup>

## OUR SUPPLY CHAINS

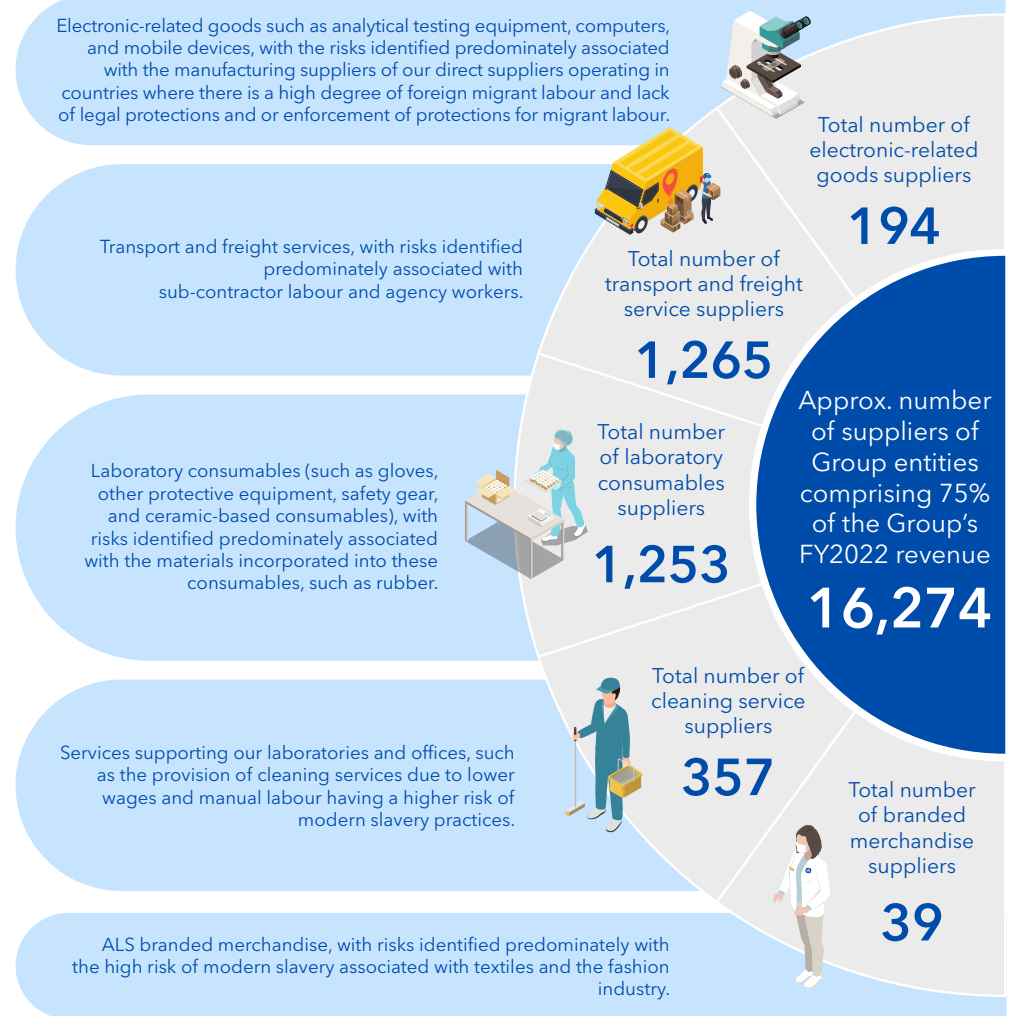
When it comes to our supply chains, the Group procures goods and services likely to have high modern slavery risks due to their nature, or how these goods or services are manufactured or provided. The risks of modern slavery are then heightened where goods or services are provided or sourced from countries with a high prevalence of modern slavery.

For FY2022, the approach taken to understand the risk for the Group to cause, contribute to, or be directly linked to modern slavery practices through our operations and supply chains continued to consider the location of our operations and our supply chains in the context of spend; volume of supply (excluding suppliers of property and utilities, and finance and banking facilities); and country of export.

Risk-level assessment based on country information of supplies for Group entities comprising 75% of the Group's FY2022 revenue<sup>6</sup>



The outcome of our assessment following this approach identified the greatest potential for modern slavery practices is associated with our procurement of electronic-related goods, transport and freight services, laboratory consumables, services supporting our laboratories, and branded merchandise.



<sup>5</sup> According to the Walk Free Foundation's Global Slavery Index 2018, the "10 countries with the largest estimated absolute numbers of people in modern slavery include some of the world's most populous. Collectively, these 10 countries – India, China, Pakistan, North Korea, Nigeria, Iran, Indonesia, Democratic Republic of the Congo, Russia, and the Philippines – account for 60 percent of people living in modern slavery and over half the world's population." As at 31 March 2022, the Group had 969 employees located across 4 of these countries.

<sup>6</sup> Risk-level assessment based on information contained in Walk Free Foundation's Global Slavery Index 2018.



# Our actions to assess and address modern slavery risks

## GOVERNANCE AND POLICIES

The ALS Limited Board Sustainability and Innovation Committee retain oversight of the Group's management of its modern slavery risks through the Committee's oversight of the Group's Sustainability Program. Management oversight of the Group's response to modern slavery sits primarily with the Group's Sustainability Team, led by our Chief Sustainability Officer. The Sustainability Team's focus is on devising the Group's strategy to address the risk of modern slavery in our operations and supply chains, policy development, education and awareness, and incident management and remediation. To ensure that the Group's strategy and response to modern slavery risks are inclusive and able to be achieved, our Chief Sustainability Officer consults with the Group's CEO and Executive Leadership Team as to the strategy and periodically reports as to the implementation and outcome of our modern slavery risk management activities.

Fundamental to our approach to assessing and addressing the risks of modern slavery in our operations and supply chains are leadership; building competency and capabilities; documenting policies, procedures and processes; legal and compliance; facilitating incident management; monitoring and assessing effectiveness; and reporting. This approach is supported by our Code of Conduct; Human Rights Policy; Human Rights and Modern Slavery Awareness training; Modern Slavery Questionnaire and supplier due diligence risk assessments; Supplier Code of Conduct; contractual protections; our compliance certification processes; and our Whistleblower Policy, and ALS Business Integrity Helpline and ALS Your Voice Helpline.

### LEADERSHIP

- Commitment to, and leadership in, addressing modern slavery risks in our operations and supply chains from ALS Limited's Board, CEO, and our Executive Leadership Team.
- Communication of our commitment to addressing the risks of modern slavery in our operations and supply chains to our employees and our suppliers.



### BUILDING COMPETENCY AND CAPABILITIES

- Raising awareness and educating our employees having oversight of, and responsibility for, the procurement of goods and services as to the risks and signs of modern slavery, undertaking modern slavery risk assessments and actions to monitor for signs of modern slavery practices.
- Engaging with external bodies as to the challenges and lessons learned in managing modern slavery risks.
- Understanding the expectations of our stakeholders in relation to our response to addressing modern slavery.



### DOCUMENTING POLICIES, PROCEDURES AND PROCESSES

- Comprehensive policies and procedures to support a safe and fair working environment for our employees and those of our suppliers, including procedures and processes to assess modern slavery risks prior to entering into contracts to procure goods and services.
- Ensuring recruitment policies and procedures that support upholding the fundamental rights and freedoms of all individuals.



### LEGAL AND COMPLIANCE

- Undertaking due diligence.
- Embedding expectations into contracts.



### FACILITATING INCIDENT MANAGEMENT

- Making available an independent, externally provided reporting mechanism (where anonymous reports can be made) to our employees and the employees of our suppliers.
- Ensuring a process to remediate identified modern slavery risks or reported modern slavery practices.
- Disclosing incidents of modern slavery practices identified or reported, remedial actions undertaken and lessons learned.



### MONITORING AND ASSESSING EFFECTIVENESS

- Meaningful engagement with our suppliers on modern slavery risks and practices.
- Monitoring and assessing the effectiveness of our modern slavery risk management actions.



### REPORTING

- Reporting publicly as to the progress of our response to modern slavery:
  - Modern Slavery Statement
  - Sustainability Report



### ALS CODE OF CONDUCT

Articulates the standards of behaviour that ALS expects of all of those that work for, or on behalf of, ALS. Our Code of Conduct contains specific content on respecting human rights, with practical guidance as to expected standards of behaviour.

### ALS HUMAN RIGHTS POLICY

Sets out our commitment and communicates our stance on, and the fundamental elements of our approach to, the protection of human rights. Our Human Rights Policy was first published in March 2018, is reviewed annually, and is available to all employees on our intranet.

### HUMAN RIGHTS AND MODERN SLAVERY AWARENESS TRAINING

Fundamental to our assessing and addressing modern slavery risks in our operations and supply chains is raising the awareness of all of our employees through our Code of Conduct online training course, and supplementing this with specific modern slavery awareness training for those of our employees involved in procuring the goods and services needed for our continued operation.

### MODERN SLAVERY QUESTIONNAIRE AND SUPPLIER DUE DILIGENCE RISK ASSESSMENTS

Providing the tools to assess our suppliers as to the risk of adverse human rights impacts, with a focus on our highest-risk goods and services suppliers.

### SUPPLIER CODE OF CONDUCT

Setting out the standards of behaviour we expect of our suppliers in respecting and upholding human rights in a Supplier Code of Conduct, requesting our suppliers' written acceptance and commitment to, and agreement to adopt, the principles and requirements contained in the code.

### CONTRACTUAL PROTECTIONS

Contractual terms (including representations and warranties) in relation to respecting internationally recognised human rights incorporated into standard terms and conditions for the supply of goods and services.

### COMPLIANCE CERTIFICATION PROCESSES

Annual internal certification process as to awareness of modern slavery and the need to report any suspected instances of modern slavery or infringement of human rights in our operations and supply chains.

### WHISTLEBLOWER POLICY, AND ALS BUSINESS INTEGRITY HELPLINE AND ALS YOUR VOICE HELPLINE

Encouraging our employees, our suppliers and their employees to speak up and feel that they can safely report suspected or actual conduct that does not support ethical and responsible business conduct.



## RISK IDENTIFICATION, ASSESSMENT AND MANAGEMENT

We identify and manage all risks that the Group is exposed to, including modern slavery risks, by applying our overarching enterprise-wide Risk Management Framework. This Framework applies to all parts of our business and supporting functions globally. Our Board's Audit and Risk Committee monitors and, at least

annually, reviews the effectiveness of the Group's systems of risk management and internal control. Detailed information in relation to our enterprise-wide Risk Management Framework is contained in the ALS Risk Management Policy, available at [alsglobal.com](https://alsglobal.com).

Our Group Risk Appetite Policy, which is approved by the ALS Limited Board, contains a suite of risk appetite statements covering our material business risks. The policy includes approved statements as to the Group's risk tolerance limits for our material operational risks, including modern slavery risks.

## ACTIONS TAKEN TO ADDRESS RISKS IN OUR OPERATIONS

Our annual risk assessment process focuses on the identification and management of the risk of modern slavery in our operations, which include:

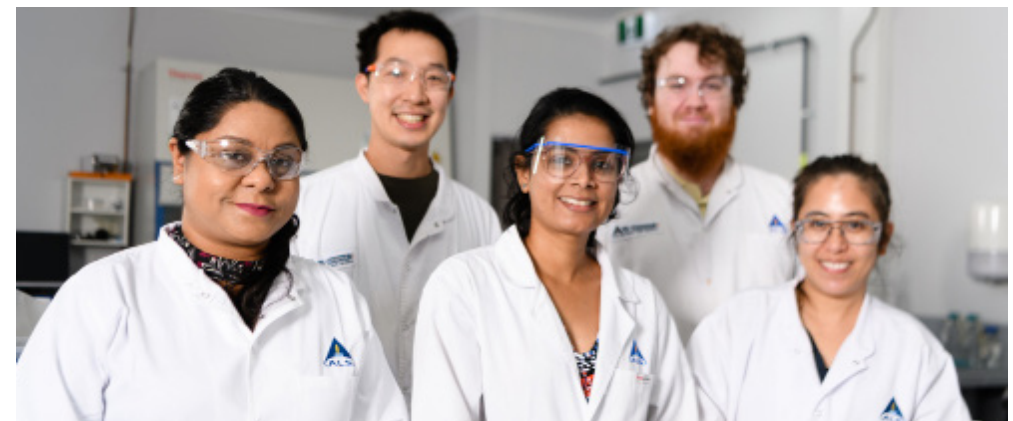
- Mapping our key policies, programs and activities that support our Human Rights Policy to assist us in ensuring that we have in place a comprehensive framework to mitigate adverse human rights impacts arising in our operations. Active policies, programs and activities supporting our commitment to respecting and protecting human rights cover diversity and inclusion; labour standards, wages and benefits; freedom of association and collective bargaining; health, safety and security; forced labour, human trafficking and child labour; and reporting mechanisms.
- Incorporating into our employee onboarding process:
  - training in relation to our Code of Conduct, which highlights the Group's commitment to respecting and protecting the human rights of all individuals and not engaging in any form of modern slavery; and
  - the reporting mechanisms available to employees for reporting any actual or suspected behaviour not in line with our Code.

Our Code of Conduct training is available online and face-to-face and is mandatory training upon joining ALS and every two years thereafter. The training is periodically reviewed and refreshed to ensure our employees receive the required level of training. Records of completion are retained as part of each employee's employment record.

- Providing specific and practical guidance in our Code of Conduct on assessing and upholding human rights.
- Requiring each of our site and office locations to display on employee noticeboards the ALS Business Integrity Helpline and ALS Your Voice Helpline poster to which reports as to behaviour not in line with our Code can be made, with the ability for individuals to report anonymously should they wish to do so.
- Requiring each site manager of our 350+ sites to specifically confirm, as part of our annual certification processes, that they and their staff are aware of the need to report any suspected instances of modern slavery or infringement of human rights in our operations and supply chains.

- Investigating all reports of actual or suspected adverse human rights impacts in our operations or supply chains, including protecting the privacy and confidentiality of those that report.

Our Helpline poster is required to be displayed on employee noticeboards at each of our 350+ sites and office locations.



5,305 employees successfully completed Code of Conduct training during FY2022



## ACTIONS TAKEN TO ADDRESS RISKS IN OUR SUPPLY CHAINS

Our suppliers are critical to our business. We seek to work with suppliers aligned with our core values, who are committed to acting ethically, who respect the protection of human rights, and who are committed to improving their environmental and social impact.

We take a collaborative approach to managing the risks of modern slavery in our supply chains

by engaging with our suppliers throughout the duration of our relationship with them to enable the timely identification and remediation of modern slavery practices and adverse human rights impacts. We recognise that a key challenge in implementing our response to addressing modern slavery is in assessing and addressing modern slavery risks in our

supply chains, including where modern slavery risks may be present in our extended supply chains below our tier one suppliers. Regular engagement with our suppliers facilitates us in addressing this challenge.

Our supplier due diligence process focuses on obtaining and reviewing relevant information in

relation to our suppliers and forming a view as to whether modern slavery practices are present, or have the potential to arise, that would result in us causing, contributing to, or being directly linked to modern slavery practices should we procure goods or services from them.

More specifically, our approach involves:

1

### DESKTOP RESEARCH

Consideration of the existence and content of a supplier's code of conduct, corporate social responsibility policy, modern slavery statement, human rights policy or sustainability report.



2

### SUPPLIER ENGAGEMENT

Having meaningful discussions with a supplier to understand their level of awareness as to modern slavery practices and their approach to addressing modern slavery and adverse human rights impacts in their operations and supply chains.



3

### SUPPLIER QUESTIONNAIRES

Having a supplier complete due diligence questionnaires and reviewing the breadth and depth of their responses focused on human rights and modern slavery.



4

### SUPPLIER CODE OF CONDUCT

Providing the supplier with the ALS Supplier Code of Conduct and requesting their commitment in writing to its requirements, and understanding any hesitation in providing this commitment.



5

### SUPPLIER CONTRACTS

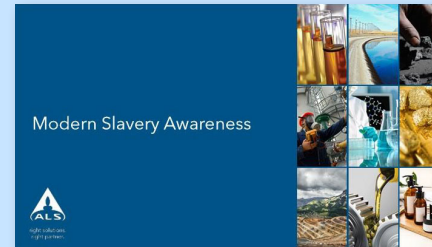
Ensuring clauses in relation to modern slavery and respecting human rights in supplier contracts, and discussing any reluctance as to the inclusion of these clauses.



## FY2022 ACTIONS

In FY2022, to advance our response to assessing and addressing modern slavery risks in our operations and supply chains, our actions focused on:

- Reviewing and revising our existing strategy to address the risk of modern slavery in our supply chains, and how we communicate our strategy and actions taken to ensure alignment with the expectations of our stakeholders.
- Further examining our supply chains and collating information across the Group to gain insights as to the footprint of our suppliers in our highest-risk categories of supply to inform future management activities. This examination focused on the suppliers of those entities within the Group comprising 75% of the Group's total revenue for FY2022 supplying the goods or services identified in previous years as having the greatest potential for modern slavery practices.
- Reviewing our supplier due diligence documentation so that it generates deeper insights into our supply chains, including the supply chains of our suppliers, through the development of a more targeted modern slavery questionnaire.
- Engaging with external service providers as to third-party provided platforms available for the Group to manage and improve working conditions in supply chains and to source responsibly.
- Introducing a technology solution as part of our supplier onboarding process to enhance our due diligence process and continual monitoring of selected suppliers.
- Continuing our focus on increasing our knowledge by participating in third-party provided information sessions hosted by investor groups, legal firms, providers of integrated corporate social responsibility products and services, and educational bodies to gain insights into the trends, challenges and best practice in supply chain risk management and ethical procurement and supply. Information sessions participated in included those by the Australian Council of Superannuation Investors, Informed 365, the Governance Institute of Australia, and those involving speakers from Australian Border Force and Pillar Two.
- Building the awareness and capability of our employees by developing a Modern Slavery Awareness course targeting employees involved in the procurement of goods and services.
- Incorporating modern slavery management activities into executive management scorecards.
- Updating our internal management compliance certifications to elicit responses specific to the identification and reporting of modern slavery practices in our operations and supply chains.
- The continued rollout of our Supplier Code of Conduct, which states the expectation we have of our suppliers to be committed to respecting and upholding the human rights of their employees and workers in their supply chains and to not be complicit in human rights abuses.
- Continued dialogue and periodic reviews with a range of our key suppliers to foster open communication about modern slavery risks and business ethics.
- The continued provision of an independent confidential multilingual external reporting hotline, with a review of its operation to highlight the hotline as a reporting mechanism for the reporting of suspected modern slavery practices and behaviour or actions not respecting and protecting human rights.



Our Modern Slavery Awareness course includes information on:

- slavery and slavery-like practices, child labour, forced labour, human trafficking, debt bondage, servitude, and deceptive recruiting
- distinguishing modern slavery from other forms of exploitation
- the prevalence of modern slavery
- legal regimes to combat modern slavery
- the importance of addressing modern slavery
- our approach to modern slavery, including risk assessments, taking action, monitoring and reporting
- modern slavery due diligence
- high-risk supplier categories, and
- undertaking modern slavery risk assessments.



# 100%

of nominated employees involved in the procurement of goods and services successfully completed the ALS Modern Slavery Awareness course\*



\*at date of publication.



# Assessing the effectiveness of our actions

Assessing the effectiveness of the actions we take to manage modern slavery risks is critical to advancing and refining our approach to identifying and remedying modern slavery practices in our operations and supply chains. We acknowledge that, given our global footprint and complexity of our business, assessing the effectiveness of our actions is involved and challenging. We recognise that as part of our modern slavery strategy, we must focus on developing and implementing a comprehensive fit-for-purpose effectiveness assessment program that is meaningful; takes into account both qualitative and quantitative measures; and highlights opportunities for us to continually evolve and strengthen our approach to accurately identifying instances of modern slavery.

The assessment as to the effectiveness of our modern slavery risk management actions undertaken in FY2022 extended beyond our considerations in the prior year. As part of our Sustainability Program, our effectiveness assessment for FY2022 included:

Undertaking a comparative analysis of our actions against those being taken by our industry peers and various other ASX100 companies having submitted modern slavery statements, to gauge the suitability and scope of our actions in order to determine what additional actions we can take going forward to mature our approach.

Assessing our level of engagement and collaboration with external stakeholders as to our response in light of stakeholder expectations.

Examining best practice responses and findings of separate analyses of modern slavery statements from information and reports produced by Australian Border Force, the Australian Council of Superannuation Investors and the Monash Centre for Financial Studies to assess their relevance and suitability to the Group in order to integrate leading practices into our strategy.

Reviewing the capabilities and sufficiency of current resourcing (human and technology) targeting our response to modern slavery to determine additional resourcing that might be needed in future years.

Reflecting on our ability to establish a successful cross-functional working group to assist in driving a cohesive and centralised approach to implementing our response, including an integrated approach as to how we collect and collate data (such as the percentage of contracts in place with modern slavery clauses and the number of suppliers providing responses to modern slavery questionnaires) to more readily monitor and measure the effectiveness of our performance.

Understanding the number of detailed modern slavery risk assessments undertaken across the Group in relation to high-risk category suppliers and the level of engagement of these suppliers in providing responses.

Considering the achievement of key performance indicators included in business management scorecards and targets in the Group's sustainability scorecard, and assessing whether or not these key performance indicators are sufficient to meaningfully measure the effectiveness of our efforts.

Understanding the number of employees trained as to the Group's commitment to respecting and protecting human rights and our response to modern slavery, and considering employee feedback as to whether the training increased their awareness of modern slavery.

Assessing the knowledge and understanding of our employees charged with responding to modern slavery questionnaires and providing modern slavery tender responses through their ability to readily to articulate responses.

Assessing the increase in the level of inquiry and engagement of our employees with the Group's Sustainability Team, and our suppliers with our Procurement personnel as to our approach to addressing modern slavery.

Considering the extent to which supplier responses to our modern slavery questionnaire is centralised and shared across the Group and how this feedback informs our future actions.

Looking at the extent of our internal audit activities to test the robustness of responses provided by site management personnel as part of our annual certification process as to awareness of modern slavery risks and the reporting of suspected human rights impacts in our operations and supply chains.

In addition, our efforts to assess the effectiveness of our actions continued to include efforts undertaken in prior years, including:

- Interactions with our Board as to the expectations of stakeholders, requirements and obligations of modern slavery legislation, and our policies and practices that support the implementation of our Human Rights Policy.
- Reporting annually to the Board's Sustainability & Innovation Committee on human rights (including modern slavery).
- The quantity and quality of engagement of our suppliers in our due diligence processes to identify, prevent and mitigate modern slavery practices.
- Regular review and assessment of the effectiveness of our Code of Conduct, our Supplier Code of Conduct, and associated policies, procedures and processes as part of our risk management framework.
- Analysing concerns raised, grievances received, and reports made under our Whistleblower Program as to possible adverse human rights impacts, including modern slavery practices.

The actions we undertook during the year as part of our response to combating modern slavery, did not identify any instances of modern slavery practices taking place in our operations and supply chains.



## INVESTIGATION AND REMEDIATION

Our commitment to respecting and protecting human rights includes taking steps to ensure we are positioned to identify and remediate modern slavery practices and incidents that may occur in our operations and supply chains, particularly where we may be directly linked to modern slavery practices or other practices causing harm.

Our whistleblowing hotlines, the ALS Business Integrity Helpline and ALS Your Voice Helpline, play a vital role in the identification and remediation of modern slavery practices by assisting those subjected to modern slavery practices to report and hold those engaging in modern slavery practices accountable.

The hotlines enable our employees, our suppliers, and employees of our suppliers to report unethical, illegal, or improper practices (including modern slavery) safely and anonymously (if desired). All reports received via the hotlines are taken seriously and are handled in accordance with the ALS Whistleblower Policy and associated Investigations Procedure.

When a report is received, it is assessed and investigated. Any allegation of modern slavery, behaviour contrary to respecting the protection of human rights or substandard working conditions in our operations or supply chains would be the subject of investigation. Depending upon the nature and seriousness of a report, it may be referred to the relevant local authorities with the details of the allegations made.

The process followed after receiving a report is, in summary, to:

- 1 Record the report in the hotline platform if not received via the ALS Business Integrity Helpline or ALS Your Voice Helpline.
- 2 Acknowledge the report and engage with the reporter to the extent possible to keep the reporter apprised as to the steps being taken to action the report.
- 3 Where warranted, refer the report to the relevant local authorities along with any details as to the allegations made. This determination would be made following consideration of the detail provided, and the seriousness of the allegations received.
- 4 Maintain the privacy and confidentiality of the reporter unless requested by the reporter to do otherwise.
- 5 Protect the reporter from reprisal to the extent possible.
- 6 Depending on the determination as to referral to the relevant local authorities, investigate the allegations made. The investigation may be undertaken by an external provider or by an authorised person within the Group, with the investigation undertaken by acting impartially and objectively.

Where an allegation has substance, we are committed to acting in the best interests of those impacted and would seek to work with the supplier to develop and implement a plan to reduce the harm caused to those affected and to improve practices to eliminate the issue. Termination of a supplier relationship would usually only occur after reasonable attempts to improve practices, with the supplier failing to adhere to our Supplier Code of Conduct and not engage in modern slavery practices.

Should the identification of modern slavery practices in our supply chain become known via a member of the public or media reports, we would seek to engage with the implicated supplier to address these reports, following the steps for the investigation of reports outlined herein.

While no incidents of modern slavery practices were identified or received in FY2022, our reporting hotlines will continue to remain available and accessible to our employees, our suppliers and the employees of our suppliers.







# Our process of consultation and collaboration

## CONSULTATION

The entities owned and controlled by ALS Limited all operate under the direction and governance of the Board of ALS Limited and share the same Executive Management Team. These owned and controlled entities are managed as an integrated Group with overarching Group-level policies designed to be consistently applied across the Group, with the Group's strategy for addressing modern slavery risks in our operations and supply chains communicated throughout the Group from our Chief Sustainability Officer via the Group's Executive Management Team.

During the reporting period, there was active engagement and consultation with owned and

controlled entities via the Group's Executive Management Team in relation to legislative reporting requirements, information regarding the actions needing to be undertaken to implement our strategy and further our response to addressing the risks of modern slavery in our operations and supply chains, including providing the tools needed for these actions to be undertaken.

This Statement has been prepared with input from employees of those functions within the Group whose positions cover sustainability, compliance, risk, internal audit, procurement, human resources and finance, and various other employees involved in our day-to-day

operations. The directors of the owned and controlled entities that are reporting entities pursuant to the Australian Act, which include members of the Group's Executive Management Team, have been consulted in relation to this Statement.

Prior to going to the Board for review and approval, this Statement was reviewed by our Chief Sustainability Officer; Group Sustainability Manager; and the ALS Board Sustainability and Innovation Committee, who retain oversight of the Group's management of its modern slavery risks through the Committee's oversight of the Group's Sustainability Program.

## COLLABORATION

We acknowledge that our approach to addressing modern slavery risks goes beyond compliance and requires us to take our employees and suppliers with us on a journey of learning and understanding that involves being open and transparent in sharing lessons learned and challenges faced in implementing our response to protecting and upholding the human rights of all individuals.

In doing so, knowledge gained from shared insights and common challenges in identifying and remediating modern slavery practices, and understanding the success of varied approaches in overcoming these challenges is crucial. Our engagement during the year with our employees, our suppliers, investor groups, educational associations, ESG rating agencies and technology solution providers, has assisted

us in considering how we continued to refine our strategy so that it is increasingly aligned with best practice approaches and the United Nation's Guiding Principles on Business and Human Rights. As we go forward with our efforts to combat modern slavery, we will continue to engage and work collaboratively with these third parties to improve our response.



# Our focus for FY2023

To further address the risks of modern slavery in our operations and supply chains, we will continue to refine further and evolve our modern slavery risk management approach. Our focus in the coming year will be to:

- **Strengthen our governance:** Strengthening our governance by clarifying responsibilities and accountabilities to implement our strategy and response to modern slavery risks.
- **Explore technology solutions:** Further exploring technology solutions for greater consistency and accuracy in the collection of metrics that assist us in measuring the effectiveness of our actions.
- **Focus our supplier engagement:** Continue to engage our highest-risk suppliers to complete our modern slavery questionnaire, discussing and addressing any concerns or issues that arise.
- **Build awareness and capability:** Continue to raise the awareness of our employees as to our approach in addressing modern slavery risks in our operations and supply chains, and their role in partnering with us to identify modern slavery practices and the timely escalation of any 'risk to people' concerns.
- **Collaborate:** Collaborate with customers, suppliers, peers and peak bodies to identify best-practice approaches to protect and support vulnerable workers in our operations and supply chains.

More specifically, our actions will be to:

- More closely examine the human rights position and modern slavery stance of the suppliers we identified during the year as

being our highest-risk suppliers by obtaining additional information such as the location of their manufacturing facilities, and reliance on sub-contracted or third party labour.

- Undertake an extended training needs analysis across the Group to further build the awareness and capabilities of our employees to understand and manage modern slavery risks with existing and new suppliers; undertake continual due diligence; and monitoring supplier performance to our requirement for our suppliers to commit to respecting and protecting human rights and not engage in modern slavery practices.
- Develop an onsite supplier audit checklist that incorporates assessment of modern slavery risks, and a supplier onsite audit program to commence onsite supplier audits in future years.
- Given our global footprint and strategy for continued expansion, our country entry due diligence process will be reviewed to incorporate consideration of the risk of adverse human rights impacts.

We acknowledge that combating modern slavery throughout the world requires a continuing, dedicated and collaborative effort and that we must do what we can to assist in eradicating modern slavery. We are committed to continuous improvement in our approach to addressing modern slavery risks to ensure a practical and effective framework to protect those within our operations and those who work in our supply chain.





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