

Modern Slavery & Human Trafficking Statement

17 October 2019

Introduction

This statement sets out the approach taken by SDI Limited ("SDI"):

- to deal with modern slavery risks related to its business, and
- to put in place steps aimed at ensuring there is no slavery or human rights abuses – including human trafficking - in its own business and its supply chains.

SDI is primarily involved in the research and development, manufacturing, and marketing of specialist dental materials across the world.

SDI is committed to preventing slavery and human rights abuses in its corporate activities and to ensuring that its supply chains are free from slavery and human rights abuses.

Organisational structure and supply chains

This statement covers the activities of SDI and its subsidiaries.

SDI is a leading manufacturer of specialist dental products, marketed in over 100 countries globally. All of SDI's products are manufactured in Victoria, Australia, and sold via third-party distributors and dealers around the world.

SDI sources the raw materials and components for its dental products from around the world. SDI's suppliers would in turn source raw materials and components from their suppliers, and so on.

Countries of operation and supply

SDI's products are sold through third-party distributors and dealers in over 100 countries. SDI has offices and warehouses in the following locations: Australia, UK, USA, Germany, and Brazil.

SDI's suppliers are located in various countries, including Australia, Belgium, Brazil, China, Hong Kong, South Korea, Germany, Canada, India, Japan, Liechtenstein, USA, Singapore, Switzerland, and Taiwan.

Risk assessment

SDI assesses whether particular activities or countries are high risk in relation to slavery or human rights abuses by:

- considering whether countries or industries that supply SDI have a history of slavery or human rights abuses, and
- taking into account the type of product being supplied and assessing whether it might be susceptible to slavery – for example, slave labour being used for basic product assembly.

Responsibility

Responsibility for SDI's initiatives against slavery and human rights abuses is as follows:

- SDI's Logistics Manager and SDI's Chief Quality & Compliance Officer have day-to-day responsibility for SDI's initiatives, reporting to SDI's Chief Operating Officer & Finance Director. These responsibilities include:
 - conducting and updating a risk assessment of which countries, industries and activities are at high risk of slavery or human rights abuses
 - implementing a due diligence process (including training) regarding new suppliers, and regular reviews of existing suppliers, to minimise supply chain risks including risks relating to slavery and human rights abuses. For example:
 - mapping SDI's supply chains, to understand who SDI's suppliers are and, where possible, who is working for SDI's suppliers
 - setting up a process to review the supply chain regularly
 - evaluating the risks of new and existing suppliers
 - setting up a process to conduct supplier assessments, audits and monitoring, and
 - taking appropriate steps (including training) to improve substandard supplier practices, including known or suspected slavery or human rights abuses
 - SDI's Chief Operating Officer & Finance Director is responsible for:
 - incorporating SDI's objectives regarding anti-slavery and human rights abuses within SDI's Employee Handbook
 - SDI's Whistleblower Policy, which mentions that a failure to comply with, or a breach of, legal or regulatory requirements – e.g. slavery, slavery-like and human trafficking offences – could be disclosable matters covered by SDI's Whistleblower Policy, and
 - SDI's Supplier Code of Conduct, which expects SDI's suppliers to:
 - adhere to very high standards of ethics
 - demonstrate they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour, and
 - ensure they, and their suppliers, are not involved in slavery or human rights abuses
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