

Final Statement

Complaint submitted by Mr Andy Hall on behalf of affected individuals concerning Ansell Limited

24 March 2026

Disclaimer

The information contained within this document is intended to inform the reader of the general processes and undertakings arising from a specific instance complaint raised with the Australian National Contact Point for Responsible Business Conduct. It is made available on the understanding that the Australian Treasury, as a result of providing this information, is not engaged in providing professional or legal advice, nor does it accept any responsibility for the accuracy or completeness of any material contained herein. Readers should exercise their own judgement with respect to interpretation. This material includes the views of third parties, which do not necessarily reflect the views of the Commonwealth, or indicate its commitment to a particular course of action. Links to other websites and listings of other people or organisations are included for convenience and do not constitute endorsement of those sites, products or services. The Commonwealth Government respects the privacy of personal and commercially sensitive information provided by parties, as per the requirements of the *Privacy Act 1988* and the *Freedom of Information Act 1982*.

© Commonwealth of Australia 2026

This publication is available for your use under a [Creative Commons Attribution 3.0 Australia](http://creativecommons.org/licenses/by/3.0/au/legalcode) licence, with the exception of the Commonwealth Coat of Arms, the Treasury logo, photographs, images, signatures and where otherwise stated. The full licence terms are available from <http://creativecommons.org/licenses/by/3.0/au/legalcode>.



Use of Treasury material under a [Creative Commons Attribution 3.0 Australia](http://creativecommons.org/licenses/by/3.0/au/legalcode) licence requires you to attribute the work (but not in any way that suggests that the Treasury endorses you or your use of the work).

Treasury material used ‘as supplied’

Provided you have not modified or transformed Treasury material in any way including, for example, by changing the Treasury text; calculating percentage changes; graphing or charting data; or deriving new statistics from published Treasury statistics — then Treasury prefers the following attribution:

Source: The Australian Government the Treasury

Derivative material

If you have modified or transformed Treasury material, or derived new material from those of the Treasury in any way, then Treasury prefers the following attribution:

Based on The Australian Government the Treasury data

Use of the Coat of Arms

The terms under which the Coat of Arms can be used are set out on the Department of the Prime Minister and Cabinet website (see www.pmc.gov.au/government/commonwealth-coat-arms).

Other uses

Enquiries regarding this licence and any other use of this document are welcome at:

Manager
Media Unit
The Treasury
Langton Crescent
Parkes ACT 2600
Email: media@treasury.gov.au

Contents

- Executive summary1**
- Final Statement.....3**
 - Parties3
 - Complaint and outcomes sought by the notifier3
 - Enterprise’s response to the allegations.....4
- AusNCP proceedings6**
 - Initial Assessment process6
- Application of the OECD Guidelines7**
 - Relevant OECD Guidelines7
 - Assessment criteria.....8
 - Good faith.....9
 - Criterion 1: Identity of the party concerned and its interest in the matter15
 - Criterion 2: Material and substantiated15
 - Criterion 3: Enterprise covered by the OECD Guidelines16
 - Criterion 4: Link between the enterprise’s activities and the issues raised16
 - Criterion 5: Applicable law and/or parallel proceedings.....16
 - Criterion 6: Contribution to the OECD Guidelines’ purposes and effectiveness.....17
- Conclusion20**
- Annexes23**
 - Annex A: Schedule of events.....23
 - Annex B: Schedule of emails25
 - Annex C: Publications31
 - Annex D: Institutional arrangements33
 - Annex E: Governance.....34

Executive summary

1. In August 2025, the Australian National Contact Point for Responsible Business Conduct (**AusNCP**) received a complaint from Mr Andy Hall (**the notifier**), submitted on behalf of affected individual workers, regarding Ansell Limited (**Ansell**).
2. The complaint concerns allegations of labour rights breaches, including forced labour and debt bondage, at MediCeram Sdn Bhd (**MediCeram**), a Malaysian-based, now-suspended supplier of Ansell, which is reportedly in the process of being wound up based on advice from the parties and media reporting.¹ The Independent Examiner acknowledges the gravity of these allegations.
3. The Initial Assessment finds that the complaint satisfies the first five of the admissibility criteria, as set out in paragraphs 30.1 to 30.5 of the AusNCP complaint procedures,² establishing that the issues raised are both bona fide and relevant to the implementation of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (**OECD Guidelines**).³ Specifically:
 - 3.1. the notifier has established a clear interest in the matter by providing signed authorities to act on behalf of some of the approximately 233 migrant workers whom he claims to represent (as at 19 November 2025)⁴ and whom he alleges are victims of forced labour
 - 3.2. the allegations regarding debt bondage, wage theft and the risk of forced repatriation are serious and material to the OECD Guidelines. These claims are supported by extensive documentation, including worker statements on visa hardship. Ansell itself has also validated the materiality of these claims, acknowledging that its own due diligence had identified ‘*labour rights compliance issues*’ at a few Malaysian ceramic former suppliers⁵
 - 3.3. Ansell, which describes itself as a ‘*global company employing ... people in over 55 countries*’, is a multinational enterprise within the meaning of the OECD Guidelines⁶
 - 3.4. there is an established link between Ansell’s activities and the issues raised. Ansell has advised the AusNCP that MediCeram was a supplier and that, under the United Nations Guiding Principles on Business and Human Rights (**UNGPs**) and the OECD Guidelines, this business relationship may ‘directly link’ it to alleged adverse impacts on affected workers⁷
 - 3.5. although parallel proceedings involving the same or closely related issues exist or have been proposed, they alone would not preclude the AusNCP from handling this complaint.

¹ e.g. see [Australian Broadcasting Corporation reporting](#) from 17 February 2026, accessed February 2026.

² Australian National Contact Point for Responsible Business Conduct (**AusNCP**), [AusNCP complaint procedures](#), Department of the Treasury, Australian Government, April 2024 (**AusNCP complaint procedures**).

³ Organisation for Economic Co-operation and Development (**OECD**), *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*, OECD Publishing, 8 June 2023, doi:[10.1787/81f92357-en](#).

⁴ Notifier, *Email correspondence with the AusNCP Secretariat of 19 November 2025*, 19 November 2025.

⁵ Ansell Limited (**Ansell**), *2025 Annual Report*, Ansell, 25 August 2025, p 12, accessed January 2026; Ansell, *Preliminary Response to AusNCP Complaint 38*, Ansell, 19 October 2025, p 1 (**Ansell Preliminary Response**).

⁶ Ansell, *2025 Annual Report*, p 4.

⁷ Ansell, *Ansell Preliminary Response*, p 5.

4. Notwithstanding that several admissibility criteria have been met, the Independent Examiner has decided not to accept this complaint for further consideration, for the following reasons:
 - 4.1. **good faith and procedure:** a fundamental tenet of the AusNCP process is that all parties must act in 'good faith' throughout the handling of their AusNCP complaint. The AusNCP complaint procedures define 'good faith' as, *inter alia*, maintaining confidentiality where appropriate, refraining from misrepresenting the issues and the process (particularly in public communications), and genuinely engaging in the procedure with a view to finding a solution that is compatible with the OECD Guidelines.⁸ The Independent Examiner found that the notifier's style of engagement persistently breached these 'good faith' principles, rendering a non-adversarial AusNCP dispute resolution process and outcome untenable
 - 4.2. **contribution to the OECD Guidelines:** evidence provided by Ansell reflects an informed awareness of its responsible business conduct expectations, including its use of leverage and provision of support to encourage remediation under a 'directly linked' scenario, as well as its commitment to an independent third-party review of its supply chain due diligence approach.⁹ Taken together, these clear commitments and the identified 'good faith' concerns led the Independent Examiner to also find that accepting this complaint would not meaningfully further the purposes and effectiveness of the OECD Guidelines.
5. In reaching this decision, the Independent Examiner balanced the gravity of the forced labour allegations against the challenges of progressing an AusNCP dispute resolution process in light of the notifier's conduct. The decision not to accept the complaint does not diminish the validity or severity of the alleged human rights and labour rights concerns. Rather, it is a determination that, despite the gravity of the situation, dispute resolution facilitated by a National Contact Point (**NCP**) cannot function effectively without 'good faith' engagement on the notifier's part.
6. The Independent Examiner also took into account Ansell's actions to date and its demonstrated commitment to meeting the expectations of the OECD Guidelines, such as by using and building its leverage to mitigate harm. This statement highlights Ansell's measures to illustrate the types of actions encouraged of enterprises where they may be 'directly linked' to adverse impacts.
7. Notwithstanding these actions by Ansell, the decision not to accept this complaint is not a finding that Ansell has acted consistently with the OECD Guidelines. It is also not a finding that the issues raised are not substantive. Ansell has acknowledged that adverse impacts occurred in its supply chain, with implications for the OECD Guidelines' human rights, labour rights and due diligence expectations, and is committed to improving its alignment with the OECD Guidelines.
8. This statement is available on the AusNCP website at www.ausncp.gov.au.

Shiv Martin

Independent Examiner

Australian National Contact Point for Responsible Business Conduct

Email: secretariat@ausncp.gov.au

⁸ AusNCP complaint procedures, April 2024, Glossary definition 'good faith', p 19.

⁹ Ansell, *Further Preliminary Submissions to AusNCP Complaint 38*, Ansell, 4 December 2025, pp 1-2 and pp 3-7 (**Ansell Further Preliminary Submission**).

Final Statement

Parties

9. The notifier is Mr Andy Hall, an independent migrant worker rights activist. On 13 August 2025, he submitted a complaint to the AusNCP concerning Ansell on behalf of approximately 233 migrant workers in Malaysia¹⁰ who were employed at MediCeram and had authorised him to represent them. While the notifier submitted documentation regarding the conduct of other suppliers to illustrate broader due diligence concerns, he has explicitly clarified that he does not represent the workers of these other suppliers for the purposes of this AusNCP complaint.
10. The enterprise is Ansell, a global company employing more than 15,000 people. Ansell is legally domiciled in Melbourne, Australia, and is listed on the Australian Securities Exchange (ASX).¹¹ Ansell is named in this Final Statement, as the enterprise has already been publicly identified in relation to this matter.

Complaint and outcomes sought by the notifier

11. The complaint alleges that migrant workers at MediCeram, a Malaysian supplier of ceramic formers used in Ansell's glove production, were subjected to forced labour. Specific allegations include high recruitment fees to secure employment (allegedly US\$5,200 per worker), which led to debt bondage, wage theft, passport confiscation and poor accommodation conditions.¹²
12. The complaint further alleges that a number of migrant workers were unjustly terminated and deported without notice or compensation, in retaliation for engaging in industrial action over unpaid wages.¹³ The notifier contends that Ansell failed to undertake adequate due diligence to identify, prevent and remedy the alleged harms in this matter, contrary to the OECD Guidelines, and further asserts that several other provisions of the OECD Guidelines are implicitly engaged by the issues raised.
13. The notifier sought various outcomes,¹⁴ including:
 - 13.1. **compensation and remediation:** financial remediation for recruitment costs, lost wages and distress, as well as facilitating the re-employment of workers who were dismissed
 - 13.2. **systemic change:** an independent investigation into Ansell's supply chain, specifically requesting improvements to risk assessments and the frequency of third-party audits
 - 13.3. **public apology:** a public statement from Ansell formally acknowledging its involvement in alleged forced labour practices through its supplier, MediCeram.

¹⁰ As at 19 November 2025, see para [3.1].

¹¹ Ansell, *2025 Annual Report*, p 4.

¹² Notifier, *Original complaint submission*, Notifier submission, 13 August 2025, p 1.

¹³ Notifier, *Original complaint submission*, p 1.

¹⁴ Notifier, *Original complaint submission*, pp 4-5, 7; Notifier, *Notifier Response to Ansell's 19th October Preliminary Response*, pp 13-16.

14. Throughout the Initial Assessment phase, the notifier engaged in a pattern of high-frequency correspondence, sending emails to the AusNCP, Ansell and external stakeholders on a weekly (and often daily) basis. This correspondence introduced new allegations and altered the remedies sought, making it difficult to clearly define the scope of the requested outcomes.
15. While the original complaint submitted to the AusNCP in August 2025 focused on the repayment of recruitment fees, wages and visa renewals, the notifier's demands evolved significantly over time, and included:
 - 15.1. **disengagement:** initially, the complaint included a request that Ansell '*immediately re-engage with MediCeram ... or not disengage*' to avoid an irresponsible exit.¹⁵ However, on 12 November 2025, the notifier altered this position, demanding that Ansell '*immediately disengage from MediCeram*' and '*make a statement as such*'¹⁶
 - 15.2. **direct employment:** in a submission dated 16 November 2025, the notifier introduced a new demand that Ansell consider '*re-employing the victims of this case through its subsidiaries and suppliers in Malaysia*'.¹⁷ Ansell noted that this was not a responsibility it held under the OECD Guidelines and that it could not employ these workers directly¹⁸
 - 15.3. **human rights defender policy:** in a submission dated 16 November 2025, the notifier added a proposal that Ansell develop and implement a '*formal policy for the protection and support of human rights defenders*' as part of this NCP process¹⁹
 - 15.4. **legal costs:** on 16 December 2025, the notifier introduced a demand for Ansell to '*support or contribute to workers legal costs, through a direct and transparent payment*', setting a deadline of '*close of business tomorrow*'.²⁰
16. Ansell has noted that the notifier's approach has involved updated demands being included in responses at late stages of the Initial Assessment process, and has requested clarity on which workers were being represented and what specific outcomes were being sought, given that the primary remediation (fee repayment) was nearing completion.²¹

Enterprise's response to the allegations

17. In its Preliminary Response dated 19 October 2025, Ansell stated that upon being notified of the allegations in March 2025 by the notifier, it '*acted swiftly to investigate the issues and engage with MediCeram*' to encourage the supplier to '*mitigate and remediate the harm*'.²² Ansell, recognised that it may be 'directly linked' to the activities of MediCeram, and emphasised that its strategy was to exercise leverage rather than immediately disengage, stating that it '*seek[s]*

¹⁵ Notifier, *Original complaint submission*, p 7.

¹⁶ Notifier, Email correspondence with the AusNCP Secretariat of 12 November 2025, 12 November 2025; Notifier, *Notifier Response to Ansell's 19th October Preliminary Response*, p 20.

¹⁷ Notifier, *Notifier Response to Ansell's 19th October Preliminary Response*, p 15.

¹⁸ Ansell, *Ansell Further Preliminary Submission*, p 4.

¹⁹ Notifier, *Notifier Response to Ansell's 19th October Preliminary Response*, p 16.

²⁰ Notifier, *Email correspondence with enterprise of 16 December 2025*, 16 December 2025.

²¹ Ansell, *Ansell Preliminary Response*, p 6.

²² Ansell, *Ansell Preliminary Response*, p 1.

*to work constructively with impacted suppliers to address concerns; it is only if [Ansell] cannot see any meaningful commitment to improvement that [it] will consider terminating the relationship’.*²³

18. Regarding specific remediation measures, Ansell submitted that it provided financial support to MediCeram to help facilitate its remediation of the identified harms and to put it in a position to make reimbursements to workers. This support included an *‘advance payment for 12 months’ supply of goods* and an agreement to pay *‘cash on delivery ... to support MediCeram’s cash flow and remediation actions’*.²⁴ Ansell also confirmed that the efforts of the Responsible Business Alliance and the Responsible Glove Alliance resulted in a repayment plan, followed by *‘a further agreement [on 2 October 2025] ... in which MediCeram committed to paying all remaining recruitment fee instalments by 20 October 2025, three months earlier than the initial [plan]’*.²⁵
19. In addition, Ansell advised that its approach to engaging with MediCeram subsequently evolved due to MediCeram’s termination of its workers and its dealings with Ansell on this issue, stating that on 4 November 2025, *‘Ansell wrote to MediCeram to inform the company that Ansell was suspending its relationship given ongoing concerns’*, and that it *‘would need to demonstrate that it had appropriately addressed these concerns in order to be reinstated as a supplier’* to Ansell.²⁶
20. In its Further Preliminary Submission dated 4 December 2025, Ansell addressed systemic improvements sought by the notifier, stating that it is *‘committed to engaging an expert third party to undertake a comprehensive review of its supply chain due diligence approach’*.²⁷ Ansell acknowledged that MediCeram had previously fallen outside the scope of its internal Supplier Management Framework because MediCeram was classified as a *small indirect supplier* (representing less than 0.1 per cent of Ansell’s total global supplier spend).²⁸ Ansell noted that, as a result of the issues identified at MediCeram, it initiated a review (separate from its regular review) of the scope of its Supplier Management Framework to help assess human rights risks across its entire supply base, including with its smaller suppliers and manufacturers.
21. Ansell has indicated that its operations and supply chain management are governed by a framework of international standards and internal policies. Specifically, Ansell has affirmed its commitment to respecting human rights in line with the UNGPs²⁹ and the OECD Guidelines, and its expectation that its suppliers adhere to these same standards. To operationalise these commitments, Ansell uses a published Supplier Code of Conduct³⁰ that all of its suppliers are required to sign. This code sets out clear expectations regarding the prohibition of forced labour, repayment of recruitment fees by suppliers and compliance with applicable laws on wages, working hours and safe accommodation.

²³ Ansell, *Ansell Preliminary Response*, p 2.

²⁴ Ibid.

²⁵ Ibid.

²⁶ Ansell, *Ansell Further Preliminary Submission*, p 3.

²⁷ Ansell, *Ansell Further Preliminary Submission*, pp 3, 4, 6, 7.

²⁸ Ansell, *Labour Rights Report (and Modern Slavery Statement) 2025*, Ansell, August 2025, p 30, accessed January 2026 (**Labour Rights Report**); Ansell, *Ansell Preliminary Response*, p 4; Ansell, *Ansell Further Preliminary Submission*, p 9.

²⁹ Ansell, *Human Rights Statement*, Ansell, 22 October 2025, p 1, accessed January 2026.

³⁰ Ansell, *Supplier Code of Conduct*, Ansell, April 2025, accessed January 2026.

- 21.1. Furthermore, Ansell applies a Supplier Management Framework to conduct risk-based due diligence, supplier screening and auditing to monitor compliance with these standards. Its broader policy framework also includes a Human Rights Statement, Labour Standards Policy and a Global Grievance Policy, as detailed in Appendix B of its 2025 Labour Rights Report (which doubles as its Modern Slavery Statement).³¹

AusNCP proceedings

22. In accordance with paragraphs 32, 34 and 58 of the AusNCP complaint procedures, where a complaint is not accepted following an Initial Assessment, a Final Statement will be prepared explaining the reasons why the complaint was not accepted, without making any findings about whether the relevant enterprise has complied with the OECD Guidelines.

Initial Assessment process

23. On 13 August 2025, the AusNCP received the complaint from the notifier regarding the activities of Ansell. The AusNCP formally acknowledged receipt of the complaint on 15 August 2025, and notified Ansell and the AusNCP Governance and Advisory Board (**AusNCP Board**) on 29 August 2025.
24. After the Independent Examiner was appointed to handle this complaint, an initial meeting was held with the notifier on 4 September 2025, followed by a meeting with Ansell on 9 October 2025.
25. From the commencement of the Initial Assessment phase, the notifier began copying and blind copying the AusNCP Secretariat and the Independent Examiner into external correspondence related to, or tangential to, the issues of the complaint, beginning with emails to the CEO of the CeramTec Group (which is another supplier to Ansell) in August and September 2025. This was outside the scope of the complaint.
26. On 15 October 2025, the Independent Examiner wrote to the notifier explaining and reiterating the ‘good faith’ expectations and obligations of parties participating in an AusNCP complaints process, explicitly instructing the notifier to cease blind copying the AusNCP on emails to third parties (such as investors) and to ensure that submissions were provided in a proper form.
27. Ansell provided its Preliminary Response to the allegations on 19 October 2025, which was subsequently shared with the notifier.
28. Despite clear instructions to the contrary, the notifier continued to include the AusNCP in external correspondence, including emails to investors and the media.
29. On 19 November 2025, the Independent Examiner facilitated a joint meeting with both parties to discuss procedural matters, such as obligations of ‘good faith’ and confidentiality, and requested their final submissions on the Initial Assessment admissibility criteria.

³¹ Ansell, *Labour Rights Report*, August 2025, p 48, accessed January 2026.

30. Ansell provided its Further Preliminary Submission on the Initial Assessment admissibility criteria to the AusNCP on 4 December 2025, and the notifier provided a response to that submission on 13 December 2025.
31. In the final stages of the Initial Assessment process, the notifier issued demands to Ansell for the payment of workers' legal costs, requiring a response from Ansell within 24 hours, and included the AusNCP in mass emails soliciting donations for an emergency legal fund.
32. The Independent Examiner has decided that the notifier's complaint will not be accepted for AusNCP-facilitated dispute resolution (see the '*Good faith*' and '*Criterion 6*' sections below), and will not proceed to any subsequent examination.

Application of the OECD Guidelines

Relevant OECD Guidelines

33. The following chapters of the OECD Guidelines are relevant to this complaint:
 - 33.1. **Chapter II (General Policies):** the complaint alleges that Ansell failed to undertake due diligence to identify, prevent, and properly mitigate and remedy labour rights breaches within its subcontracting chain, including forced labour and reprisals through worker dismissals.³² The notifier specifically referenced the obligation to refrain from, and take steps to, prevent the use of reprisals against persons who report concerns about adverse impacts.³³ Additionally, the complaint raises issues regarding responsible disengagement.
 - 33.2. **Chapter III (Disclosure):** the notifier asserted that Ansell should communicate responsible business conduct information, citing the OECD Guidelines' disclosure principles, and specifically calling for the disclosure of Ansell's plans for implementing due diligence, its identified areas of significant risks and its performance records regarding remediation.³⁴
 - 33.3. **Chapter IV (Human Rights):** the notifier alleges adverse human rights impacts in Ansell's supply chain, including forced labour and debt bondage associated with high recruitment fees.³⁵ The notifier asserted that Ansell has a responsibility under the OECD Guidelines to identify, prevent, mitigate and remediate these alleged breaches of human rights.³⁶
 - 33.4. **Chapter V (Employment and Industrial Relations):** the complaint details alleged breaches of labour rights, including wage theft, passport confiscation and poor accommodation conditions.³⁷ The notifier further alleged that MediCeram workers were terminated from their employment in retaliation for engaging in industrial action and/or making demands.

³² Notifier, *Original complaint submission*, p 2.

³³ Notifier, *Original complaint submission*, pp 2-4. See also OECD Guidelines, *II. General Policies*, p 17, para [14].

³⁴ Notifier, *Original complaint submission*, pp 3, 6 and 8. See also OECD Guidelines, *III. Disclosure*, p 21, para [3].

³⁵ Notifier, *Original complaint submission*, p 1.

³⁶ Notifier, *Original complaint submission*, p2. See also OECD Guidelines, *IV. Human Rights*, p 25, paras [3] and [5].

³⁷ Notifier, *Original complaint submission*, pp 1-2.

Assessment criteria

34. The OECD Guidelines and the AusNCP complaint procedures require an ‘Initial Assessment’ of a complaint to determine if the issues raised are bona fide (real or authentic) and relevant to the implementation of the OECD Guidelines. This does not require a full examination or fact-finding, including on the merits of issues raised or an enterprise’s consistency with the OECD Guidelines.
35. In deciding whether to accept a complaint, paragraph 30 of the AusNCP complaint procedures makes it clear that an Independent Examiner must determine whether the AusNCP complaint is:
- 35.1. firstly, made in ‘good faith’, because if accepted, the AusNCP will offer its dispute resolution (or ‘good offices’) process,³⁸ which ‘relies on parties acting in good faith’³⁹
- Under the OECD Guidelines’ Implementation Procedures, NCP-facilitated dispute resolution is intended to be ‘consensual and non-adversarial ... such as mediation or conciliation, to assist the parties in resolving issues’.⁴⁰ This requires, among other things, maintaining the confidentiality of the proceedings.⁴¹ For the meaning of ‘good faith’ in the AusNCP context, see paragraph 38 of this statement below.
- 35.2. secondly, related to the implementation of the OECD Guidelines.⁴²
36. If an AusNCP complaint is made in ‘good faith’, the Initial Assessment considers whether it is related to the implementation of the OECD Guidelines and merits further consideration based on the following six admissibility criteria (drawn from paragraphs 30.1 to 30.6 of the AusNCP complaint procedures), which are interrelated and necessitate examination as a whole:⁴³
- the identity of the party concerned and its interest in the matter
 - whether the issue is material and substantiated
 - whether the enterprise is covered by the OECD Guidelines
 - whether there seems to be a link between the enterprise’s activities and the issue raised in the complaint
 - the extent to which applicable law and/or parallel proceedings limit the ability of the AusNCP to contribute to the resolution of the issue and/or the implementation of the OECD Guidelines
 - whether consideration of the issue would contribute to the purposes and effectiveness of the OECD Guidelines.

³⁸ AusNCP complaint procedures, April 2024, paras [33] and [33.3].

³⁹ AusNCP complaint procedures, April 2024, para [37].

⁴⁰ OECD Guidelines, *I. Commentary on the Procedures for NCPs*, p 71, para [38].

⁴¹ OECD, *Guide for National Contact Points on Confidentiality and Campaigning when handling Specific Instances*, 31 January 2019, accessed January 2026, p 9.

⁴² AusNCP complaint procedures, April 2024, para [30].

⁴³ *Ibid.*

Good faith

37. The OECD Guidelines set out the expectations of ‘good faith’ in the context of a specific instance (or NCP complaint) in the following terms:

*‘[G]ood faith engagement by all parties involved in the proceedings is expected. Good faith engagement ... means responding in a timely fashion, maintaining confidentiality where appropriate and consistent with the NCP’s case-handling procedures, refraining from misrepresenting the issues and the process, notably in public communications, and from threatening or taking reprisals against parties involved in the procedure, or against the NCP itself, and genuinely engaging in the proceedings with a view to finding a Guidelines-compatible solution to the issues raised, including giving serious consideration to any offer of good offices made by the NCP’.*⁴⁴

38. As a non-judicial dispute resolution mechanism, the AusNCP expects notifiers and enterprises to act in ‘good faith’ throughout each phase of the AusNCP complaints process.⁴⁵ The AusNCP complaint procedures – consistent with the OECD Guidelines’ expectations of ‘good faith’ in paragraph 37 of this statement – define ‘good faith’ behaviour, in the context of engagement in the AusNCP process, as:⁴⁶

- responding to the AusNCP in a timely fashion
- acting consistently with the AusNCP complaint procedures, including by:
 - maintaining confidentiality where appropriate
 - refraining from misrepresenting the issues and the process, particularly in public communications
 - not threatening or taking reprisals against other parties or against the AusNCP itself
 - genuinely engaging in the proceedings, with a view to finding an OECD Guideline-compatible solution to the issues raised. This includes giving serious consideration to any offer of dispute resolution made by (or on behalf of) the AusNCP.

39. For the purposes of this complaint, the Independent Examiner has formed the view that ‘good faith’, as set out in the OECD Guidelines and defined by the AusNCP, has not been observed in communications from the notifier.

40. The Independent Examiner did not reach this view without careful and thorough consideration, nor without reflecting on the importance of *‘strik[ing] a balance between transparency and confidentiality in order to build confidence in the [NCP] process and to promote the [OECD Guidelines]’ effective implementation’* (per the OECD Guidelines’ Implementation Procedures).⁴⁷

⁴⁴ OECD Guidelines, *I. Commentary on the Procedures for NCPs*, p 68, para [26].

⁴⁵ AusNCP complaint procedures, April 2024, pp 6 and 8.

⁴⁶ AusNCP complaint procedures, April 2024, Glossary definition ‘good faith’, p 19.

⁴⁷ OECD Guidelines, *I. Commentary on the Procedures for NCPs*, p 72, para [47].

However, the Independent Examiner considers that an appropriate balance in this regard was not achieved in the notifier's communications during the Initial Assessment phase.

41. It is necessary to clarify at the outset that:

41.1. '[w]ith respect to communication with the public or third parties about [a complaint], ... information or documents shared by the other party ... will be confidential unless otherwise agreed by the parties'.⁴⁸ The OECD Guidelines' Implementation Procedures further state that parties 'may not disclose at any time facts and arguments shared during the proceedings by the other party or by the NCP itself (including ... an external mediator or conciliator) that [are] not already in the public domain without the consent of the other party or the NCP respectively'.⁴⁹ 'In the interest of predictability, trust and confidence, NCPs may seek ... assurances from the parties ... in this regard',⁵⁰ as provided by the OECD Guidelines' Implementation Procedures

41.2. the AusNCP complaints process is available only to parties that are prepared to comply with its procedures (including those relating to confidentiality) and engage in 'good faith', which is a requirement that underpins each phase of the process and is critical to building trust.⁵¹ The AusNCP Secretariat and the Independent Examiner informed the notifier of these expectations early on in the process, conveying confidentiality arrangements on 25 August 2025 and outlining broader 'good faith' obligations on 4 September 2025.

- The AusNCP complaint procedures were updated in 2024 to outline 'expectations of good faith engagement in the [AusNCP] process and what happens if an [I]ndependent [E]xaminer finds that either party has breached this expectation'.⁵²

42. Contrary to 'good faith' expectations, the notifier has sent emails throughout the Initial Assessment phase with a level of frequency, volume, tone and disclosure of information that has created difficulties for the AusNCP's proper handling of this complaint. Since receiving the complaint on 13 August 2025, the AusNCP has received more than 100 emails from the notifier. The Independent Examiner considers that the content of a significant number of these emails inappropriately disclosed confidential information that was not otherwise in the public domain, misrepresented the issues and/or the process, did not constitute genuine engagement in the procedure, and/or contained statements that could be interpreted as threats to other parties.

42.1. To substantiate the 'good faith' issue and the Independent Examiner's reasoning, while also ensuring confidence in the Initial Assessment process for this complaint, some limited information about the nature of these emails is provided at [Annex B](#).

⁴⁸ OECD Guidelines, *I. Commentary on the Procedures for NCPs*, p 72, para [49].

⁴⁹ Ibid.

⁵⁰ Ibid.

⁵¹ Under the AusNCP complaint procedures, a lack of 'good faith' engagement by a party may result in a complaint either concluding with a Final Statement that makes no findings about an enterprise (where a notifier has not acted in 'good faith'), or progressing to an examination and a determination of whether an enterprise has acted consistently with the OECD Guidelines (where an enterprise has not acted in 'good faith').

⁵² AusNCP, *2024 AusNCP complaint procedures – Comparison of the 2024 and 2022 versions*, Department of the Treasury, Australian Government, July 2024, p 6.

43. By way of example, in November 2025, the AusNCP Secretariat received 39 emails from the notifier, including up to six emails per day on multiple occasions. In addition to the frequency of emails, the notifier has also copied and blind copied third parties who are not involved in the AusNCP complaints process and with whom it is inappropriate to share details of the complaint. These parties have included Ansell's investors, government agencies and the media.
44. The tone and hyperbolic language used by the notifier in correspondence was also detrimental to developing an open, facilitative relationship with Ansell. A large proportion of the notifier's emails often made unreasonable demands, unverified assertions that misrepresented the nature of the AusNCP process, and allegations about Ansell that were sent to other bodies without verification. Such correspondence is not consistent with the requirement for parties to refrain from misrepresenting the issues and the AusNCP process, particularly in public communications, and to refrain from threatening or taking reprisals against other parties.
45. As outlined at paragraphs 46 to 56 of this statement, the notifier continued this pattern of behaviour, despite being advised on multiple occasions by the AusNCP to refrain from doing so.

Timeline

46. The expectations of and the need for 'good faith' engagement were first raised with the notifier on 4 September 2025, during an initial meeting with the AusNCP. At this meeting, the AusNCP Secretariat and the Independent Examiner outlined the AusNCP's expectations of 'good faith' behaviour and what this entailed. The Independent Examiner highlighted examples of conduct that would constitute a lack of 'good faith' engagement and explained the consequences of engaging in this behaviour, including the potential to undermine the AusNCP process. The Independent Examiner also emphasised the need to maintain confidentiality and noted that doing so would support transparency throughout the process and help build Ansell's confidence to engage and share information. In response, the notifier acknowledged these expectations of 'good faith' behaviour and indicated an interest in developing trust with Ansell.
47. In this context, the Independent Examiner encouraged the notifier to consider how to best engage with Ansell to increase the likelihood of achieving meaningful outcomes at an early stage. This included, for example, reflecting on the way that they share information and how this could affect the ability of the parties to reach and settle mutually agreeable outcomes.
48. The Independent Examiner also confirmed during the initial meeting on 4 September 2025 that the notifier had provided sufficient information to the AusNCP for Ansell to consider whether it would be willing to engage in the process, and requested that the notifier refrain from sending more materials. The Independent Examiner advised that further information was not needed at this stage and that the notifier would have an opportunity to respond to issues raised by Ansell.
49. On 15 October 2025, the Independent Examiner explicitly instructed the notifier to cease blind copying the AusNCP Secretariat on emails to third parties, such as investors, noting that such conduct was '*not helpful*' or in keeping with procedural fairness (by denying Ansell a fair opportunity to respond).⁵³

⁵³ Independent Examiner, *Letter from the Independent Examiner to the notifier*, 15 October 2025.

50. Despite this instruction, the notifier:
- 50.1. provided a response on 16 October 2025 that disagreed with the Independent Examiner’s direction, stating that not sharing developments ‘*feels like silencing*’, and indicating an intention to continue sharing information in the manner he had been to date⁵⁴
 - 50.2. continued to include the AusNCP in external correspondence to investors and the media throughout late 2025 and early 2026. Specifically, the AusNCP Secretariat was blind copied⁵⁵ into 40 emails from the notifier between 15 October 2025 and 24 March 2026. In addition, there were further emails in which the AusNCP was openly copied.⁵⁶
51. The notifier then began to issue demands with unreasonable deadlines (for example, requesting that Ansell confirm within 24 hours whether it would provide financial support to cover the legal costs of MediCeram workers⁵⁷) and to solicit donations for a legal fund, using the AusNCP complaint as context in mass emails. This conduct fundamentally misunderstands the AusNCP’s independent, dispute resolution role.
52. On 5 November 2025, the AusNCP Secretariat again requested that the notifier refrain from copying it into external emails. In response, the notifier stated that he felt it was ‘*essential to keep the NCP informed*’, and would use the ‘*BCC or FWD function*’,⁵⁸ contrary to the AusNCP Secretariat’s request and the instruction in the Independent Examiner’s 15 October 2025 letter.
53. In this same email, the notifier stated that he would, however, ‘*agree to respect that [request] should [the AusNCP Secretariat] insist*’,⁵⁹ in line with its 5 November 2025 email. The AusNCP Secretariat replied to the notifier on the same day, stating that it ‘*would be grateful if you [the notifier] could please respect our earlier request, as per your previous email*’.⁶⁰
54. The notifier did not respond to the AusNCP Secretariat after this correspondence, and continued to include the AusNCP in emails directed at external stakeholders to apply pressure on Ansell,⁶¹ including:
- 54.1. **investor communications:** on 1 and 4 November 2025, the notifier emailed representatives of a major investor in Ansell, blind copying the AusNCP, warning them they were ‘*directly linked*’ to forced labour.⁶² The sharing of this allegation and this email – whose contents were not in the public domain – with a major investor who is not a party to the complaint, and potentially with other third parties, demonstrated a clear disregard for meaningful engagement with the complaints process, including the obligation to refrain from threatening reprisals.

⁵⁴ Notifier, *Email correspondence with the AusNCP Secretariat of 16 October 2025*, 16 October 2025.

⁵⁵ The Independent Examiner was also separately blind copied into emails from the notifier.

⁵⁶ Some of these are listed at Annex B of this statement.

⁵⁷ Notifier, *Email correspondence with Ansell of 16 December 2025*, 16 December 2025.

⁵⁸ Notifier, *Email correspondence with the AusNCP Secretariat of 5 November 2025*, 5 November 2025.

⁵⁹ Ibid.

⁶⁰ AusNCP, *Email correspondence with the notifier of 5 November 2025*, 5 November 2025.

⁶¹ The last email received by the AusNCP from the notifier, which concerned Ansell, was on 14 March 2026.

⁶² Notifier, *Email correspondence with the AusNCP Secretariat of 1 November 2025*, 1 November 2025; Notifier, *Email correspondence with the AusNCP Secretariat of 4 November 2025*, 4 November 2025.

- 54.2. **media/public relations:** on 12 and 17 November 2025, the notifier copied the AusNCP into emails regarding a *'coordinated slur campaign'* that he alleged had been carried out by Ansell's public relations firm (including emails the notifier sent to a newspaper), while also threatening defamation action and to add that firm and one of Ansell's investors to his AusNCP complaint.⁶³ On 17 February 2026, the notifier copied Ansell and others, and blind copied the AusNCP, into three emails that circulated a link to a media article which referred to this complaint and included statements from the notifier about Ansell being *'responsible for this situation'* (in relation to alleged forced labour and debt bondage).⁶⁴
- 54.3. **mass communications:** on 23 December 2025, the notifier sent a mass fundraising email for an *'Emergency Legal & Protection Fund'*, using the AusNCP complaint as context and copying in the AusNCP, which created a risk that this communication could be publicly misconstrued as implying that the AusNCP supported the fundraising campaign.⁶⁵
55. On 19 December 2025, the notifier circulated two emails to multiple recipients, including the Australian Anti-Slavery Commissioner. These emails contained private email correspondence from a senior representative of Ansell. The first email blind copied various parties, while the second openly copied the AusNCP, the representative of Ansell and others. This disclosure was made without Ansell's consent and directly violated the expectation that information shared between the parties as part of the AusNCP process would be kept confidential, unless otherwise agreed. This occurred after the Independent Examiner's formal written reminder to the notifier about ensuring the observation of 'good faith' principles.
56. On 19 January 2026, the notifier blind copied the AusNCP (and possibly others) into his latest reply to an officer of a registered Australian legal aid charity. The full email chain, which dates back to 7 November 2025, consists of 29 emails, including correspondence intended only for the AusNCP (marked *'Strictly Confidential, Not for Sharing Onwards'*), emails to Ansell's major investor and public relations firm, and emails that misrepresented the AusNCP process.
- 56.1. Without disclosing confidential information, the Independent Examiner notes that, in the email chain, the officer of the charity indicated that she had *'received a number of emails from [the notifier] ... which are addressed to others, including the NCP examiners'*, and specifically requested that she and her colleagues *'not be copied on correspondence that [the notifier is] sending to third parties on these matters ... to ensure that any duties of confidentiality [the notifier] ha[s] in relation to these matters are protected.'*⁶⁶

Considerations

57. As noted in paragraphs 38 and 41.2 of this statement, 'good faith' is a core principle that governs how parties must interact with an Independent Examiner, the AusNCP Secretariat and with each other, and the AusNCP complaint procedures expressly define acting in 'good faith' as including an obligation to maintain confidentiality where appropriate. This requires parties to:

⁶³ Notifier, *Email correspondence with the AusNCP Secretariat of 12 November 2025*; Notifier, *Email correspondence with the AusNCP Secretariat of 17 November 2025*, 17 November 2025.

⁶⁴ see Australian Broadcasting Corporation reporting from 17 February 2026.

⁶⁵ Notifier, *Email correspondence with the AusNCP Secretariat of 23 December 2025*, 23 December 2025.

⁶⁶ Notifier, *Email chain concerning pro bono assistance*, 19 January 2026.

- refrain from sharing sensitive information exchanged during the process with external third parties without consent⁶⁷
 - ensure that correspondence provided to the NCP is not simultaneously used as a tool for public campaigning or external pressure in a way that could undermine the neutrality and consensual nature of the NCP process⁶⁸
 - refrain from misrepresenting the issues and the process, particularly in public communications.⁶⁹
58. The notifier’s persistent unauthorised sharing of private correspondence, and his continued inclusion of the AusNCP in external campaign emails despite express instructions to stop, undermines this obligation and the trust required for a dispute resolution process to proceed.
- 58.1. Confidentiality is not merely an administrative rule – it is essential to procedural fairness and the effectiveness of the AusNCP’s non-judicial dispute resolution mechanism. The AusNCP dispute resolution stage relies heavily on each party’s willingness to engage in open, honest, and often sensitive discussions. If parties believe the details of their mediation or their private communications will be instantly broadcast to investors, media or the public, they cannot engage genuinely or safely, rendering the process ineffective.
- 58.2. There are also ‘good faith’ expectations regarding how proposed requests, remedies and outcomes are to be communicated during dispute resolution, and parties are required to articulate and hold these positions genuinely. In some instances, when the notifier’s urgent and unreasonable requests were not met by Ansell (as detailed above at paragraphs 31 and 51 of this statement), the notifier asked the AusNCP to ‘note’ this, seemingly to imply that Ansell may have acted improperly. This further indicates that some of the demands may also have been made for the purpose of reprimanding Ansell, rather than to resolve the issues raised.
59. The AusNCP must operate impartially. Being included in external campaigning – whether by being copied or blind copied – puts the AusNCP into a position that may compromise, or appear to compromise, its neutrality. This is particularly relevant where the notifier has, in external emails copied to the AusNCP, misrepresented the issues or the AusNCP process, or disclosed information and arguments intended only for the notifier and the AusNCP. Despite clear instructions and warnings, the notifier has repeatedly failed to observe the AusNCP’s ‘good faith’ obligation of confidentiality.
60. Consequently, the Independent Examiner has determined that the notifier did not engage with the AusNCP process in ‘good faith’, meaning the complaint will not be accepted.

⁶⁷ AusNCP complaint procedures, April 2024, para [94].

⁶⁸ OECD, *Guide for National Contact Points on Confidentiality and Campaigning when handling Specific Instances*, 2019, pp 11 and 22. Some strategies to place pressure on an enterprise to engage in an NCP process and resolve issues may be acceptable while an NCP is conducting an Initial Assessment, but ‘publicly disclos[ing] information, including correspondence, documentation, or opinions that are learned or exchanged during the process’ is generally not considered to be one of them.

⁶⁹ AusNCP complaint procedures, 2024, Glossary definition ‘good faith’, p 19.

60.1. However, this does not mean that the material and substantiated human rights risks identified at the MediCeram facility are not serious issues under the OECD Guidelines.

61. The Independent Examiner acknowledges that under the OECD Guidelines and the AusNCP complaint procedures, the principle of ‘accessibility’ centres on easy access to the NCP process for all parties⁷⁰ – particularly vulnerable groups such as migrant workers – by removing barriers related to language, cost or logistics to ensure the mechanism is available to those who need it.

61.1. In the context of this complaint, the Independent Examiner emphasises that while not accepting the current submission may appear to limit access to the AusNCP process, enforcing the AusNCP’s ‘good faith’ provisions – particularly those relating to confidentiality – is essential to preserving the mechanism’s long-term effectiveness and integrity as a trusted, non-adversarial dispute resolution process.

61.2. The extent to which the affected workers (effectively, the complainants) have had visibility of the notifier’s conduct is unclear, and it is likely they have had neither visibility nor direct control over the notifier’s specific engagement strategies. The decision not to accept this complaint aims to uphold accessibility for the affected workers by ensuring that the notifier’s conduct is not attributed to them, while also continuing to assess the issues raised against the Initial Assessment criteria for completeness⁷¹ (see below).

Criterion 1: Identity of the party concerned and its interest in the matter

62. The notifier is Mr Andy Hall, an independent migrant worker rights activist. The notifier asserts that he represents approximately 233 Bangladeshi migrant workers (as at 19 November 2025,⁷² with some signed authorities provided to the AusNCP), who were employed at MediCeram and are alleged by him to be victims of forced labour. The Independent Examiner is satisfied that:

62.1. these workers are current or former employees of the MediCeram facility in Malaysia, who have a valid interest in the matter

62.2. the notifier holds the requisite authority to represent affected workers in this complaint.

Criterion 2: Material and substantiated

63. The complaint alleges serious labour rights breaches, including debt bondage, excessive recruitment fees, and passport confiscation at MediCeram in Malaysia. These issues are material to the OECD Guidelines, specifically Chapter IV (Human Rights) and Chapter V (Employment and Industrial Relations).

64. By Ansell’s own admissions, the issues raised are plausible and related to the application of the OECD Guidelines. Ansell acknowledged the allegations in March 2025 and confirmed that remediation plans, including the repayment of recruitment fees, were being implemented.

⁷⁰ OECD Guidelines, *I. Commentary on the Procedures for NCPs*, p 65; AusNCP complaint procedures, pp 5-6.

⁷¹ In line with the *Guide for National Contact Points on the Initial Assessment of Specific Instances*, p 5, the Initial Assessment ‘criteria should be applied in a manner which promotes accessibility ... to the extent possible’.

⁷² See para [3.1].

Criterion 3: Enterprise covered by the OECD Guidelines

65. Ansell is an Australian-based and ASX-listed multinational company legally domiciled in Melbourne, Australia. It employs over 15,000 people in more than 55 countries.⁷³ As such, Ansell meets the definition of a multinational enterprise and operates from an adhering country, making it subject to the OECD Guidelines.

Criterion 4: Link between the enterprise's activities and the issues raised

66. The complaint alleges that Ansell is a key buyer from MediCeram, but did not undertake sufficient due diligence to prevent forced labour within its supply chain.⁷⁴ Ansell has confirmed that MediCeram supplied ceramic dipping formers to one of its manufacturing plants, until its suspension by Ansell on 4 November 2025. In this instance, Ansell itself considers that it may be 'directly linked' to the adverse impacts alleged by the notifier (namely, forced labour) through its supply chain arrangement with MediCeram.⁷⁵ Accordingly, there is a clear link between Ansell's operations (the sourcing of its products) and the issues raised in this complaint (labour rights violations at its supplier's facility) by way of a business relationship.

Criterion 5: Applicable law and/or parallel proceedings

67. The notifier engaged other parties, including lawyers in the United States (US), who had earlier issued a demand letter to Ansell regarding potential liability under US laws. The notifier has since provided evidence that a judicial complaint against Ansell has been heard in the US. In addition, the notifier indicated an intent to file a complaint under Germany's Act on Corporate Due Diligence to Avoid Human Rights Violations in Supply Chains in relation to another supplier.
68. There are also multiple related proceedings currently before Malaysia's court system, including proceedings initiated on behalf of individuals who are represented by the notifier. While these parallel proceedings exist or have been proposed, they do not automatically preclude the AusNCP from handling this complaint.
- 68.1. The Independent Examiner notes that the complaint sought specific remedies relating to the visa status, migration status and repatriation of workers in Malaysia. These matters fall within the jurisdiction of Malaysia's immigration authorities and legal system.
- 68.2. The Independent Examiner further notes that the OECD Guidelines do not substitute for or override domestic law, nor do they function as a commentary on the decisions or administrative processes of national immigration authorities.
- 68.3. To the extent that the requested remedies depend on the exercise of statutory powers by Malaysian authorities, such as granting visas or halting deportation, these specific legal determinations fall outside the scope of the OECD Guidelines. However, Ansell's responsibility to use leverage to mitigate adverse human rights impacts remains relevant.

⁷³ Ansell, *2025 Annual Report*, p 4.

⁷⁴ Notifier, *Original complaint submission*, p 2.

⁷⁵ Ansell, *Ansell Preliminary Response*, p 5.

Criterion 6: Contribution to the OECD Guidelines' purposes and effectiveness

69. For the reasons outlined below, the Independent Examiner does not consider that continuing this complaint would meaningfully contribute to the purposes and effectiveness of the OECD Guidelines, given the enterprise's use of its leverage, the notifier's failure to engage in good faith, and the enterprise's conduct throughout the AusNCP process. This is not to say that Ansell is cleared of any wrongdoing. Rather, the Independent Examiner's view is that further consideration of this complaint would not further the purposes of the OECD Guidelines.
70. In a September 2021 AusNCP Final Statement concerning the activities of BHP Group Limited, the Independent Examiner declined to accept a complaint from the Port Hedland Community Progress Association Inc, despite confirming a clear link between the enterprise's activities and the alleged adverse impacts.⁷⁶ This is because it was *'not apparent that offering good offices ... between the parties would contribute to the purposes and effectiveness of the OECD Guidelines'*, as it was unclear what could be meaningfully advanced through the AusNCP's involvement.⁷⁷
71. Similarly, although a link has been established between Ansell and the labour rights violations at MediCeram in relation to this complaint, the matter is not accepted for further consideration under Criterion 6. This reflects the Independent Examiner's finding that the notifier's failure to act in 'good faith' renders an AusNCP dispute resolution process untenable, and that Ansell's ongoing remediation efforts and OECD Guidelines-compliant commitments limit the utility of further AusNCP involvement. Consistent with the referenced complaint concerning BHP Group Limited, this decision is based on the inability of the AusNCP process to add value in the specific circumstances, rather than on any conclusion that Ansell is not connected to the issues raised.

Enterprise's use of its leverage

72. Although there is no evidence to indicate that Ansell has 'caused' or 'contributed to' the adverse impacts alleged by the notifier, where there is a 'direct link' to these impacts, such as via a supplier relationship, the OECD Guidelines expect an enterprise to use its leverage to influence the entity causing the adverse impact to prevent, mitigate or remediate that impact.⁷⁸
73. In this instance, Ansell indicates that upon identifying the adverse impacts, it utilised:
- 73.1. **leverage:** by directly engaging with MediCeram management to encourage remediation, and by developing a corrective action plan and sharing guidance on corrective actions
 - 73.2. **support:** by taking steps (including an advance payment for orders) to support MediCeram's financial situation to help it provide remediation
 - 73.3. **collaboration:** by working with other MediCeram buyers and with the Responsible Business Alliance and the Responsible Glove Alliance, including encouraging a formal Responsible Business Alliance recruitment fee investigation.

⁷⁶ AusNCP, *Final Statement: Complaint by Port Hedland Community Progress Association regarding BHP*, Department of the Treasury, Australian Government, 1 September 2021.

⁷⁷ Ibid, p 21.

⁷⁸ OECD Guidelines, *Commentary of Chapter II: General Policies*, p 19, para [23].

74. Enterprises are also expected to carry out risk-based due diligence to identify, prevent and mitigate actual and potential adverse impacts.⁷⁹ Ansell acknowledged that MediCeram initially fell outside the scope of its Supplier Management Framework because it was classified as a *small indirect supplier*. However, given the likelihood of forced labour risks in the manufacturing sectors of certain jurisdictions and product lines, the OECD Guidelines expect due diligence systems to be robust enough to detect such risks. Ansell has since committed to reviewing the scope of its Supplier Management Framework (along with a reassessment of audit thresholds) to help it assess human rights risks across its entire supply base, including smaller suppliers.
75. Regarding the notifier’s demand for Ansell to pay compensation for ‘*lost wages*’ and ‘*mental distress*’,⁸⁰ the Independent Examiner notes that under a ‘directly linked’ scenario, the OECD Guidelines do not assign direct financial liability to an enterprise (that is the acquirer of goods and/or services) to fund such compensation, but an enterprise must use its influence to urge its relevant supplier to do so.⁸¹
76. The OECD Guidelines indicate that disengagement should generally be a last resort, considered only after failed attempts at mitigation, specifically outlining that:
- ‘Appropriate responses with regard to the business relationship may include continuation of the relationship throughout the course of risk mitigation efforts; temporary suspension of the relationship while pursuing ongoing risk mitigation; or, as a last resort, disengagement from a business relationship either after failed attempts at mitigation, or where the enterprise deems mitigation not feasible, or because of the severity of the adverse impact.’⁸²*
77. Ansell initially chose to remain engaged, citing concerns that terminating the relationship would remove its ability to encourage appropriate actions by MediCeram and would not be in the best interests of its workers.⁸³ Ansell’s subsequent suspension of its relationship with MediCeram on 4 November 2025,⁸⁴ pending demonstration of appropriate action by the supplier, aligns with the expectation to disengage if there is no meaningful commitment to improvement.
78. The OECD Guidelines also expect that enterprises communicate responsible business conduct information publicly.⁸⁵ Ansell has utilised its 2025 Labour Rights Report to disclose its due diligence approach and the identification of risks at MediCeram.⁸⁶ While the notifier claims there has been a lack of effective engagement with worker representatives, Ansell submits that it has demonstrated engagement through site visits and collaboration with independent auditors. Ansell has also directly engaged with the notifier as part of the Initial Assessment of his AusNCP complaint, and continues to engage with third-party organisations and authorities that the notifier has addressed or copied correspondence to during this process.

⁷⁹ OECD, *OECD Due Diligence Guidance for Responsible Business Conduct*, OECD Publishing, 1 February 2018, doi:[10.1787/15f5f4b3-en](https://doi.org/10.1787/15f5f4b3-en); OECD Guidelines, II. *General Policies*, p 14, para [A.11].

⁸⁰ Notifier, *Notifier Response to Ansell’s 19th October Preliminary Response*, p 14.

⁸¹ OECD Guidelines, *Commentary of Chapter II: General Policies*, p 19, para [23].

⁸² OECD Guidelines, *Commentary on Chapter II: General Policies*, p 19, para [25].

⁸³ Ansell, *Ansell Further Preliminary Submission*, p 3.

⁸⁴ Ansell, [Ansell suspends supplier relationship with Mediceram](#), Ansell, 12 November 2025, accessed January 2026.

⁸⁵ OECD Guidelines, III. *Disclosure*, p 21, para [3]; and IV. *Human Rights*, p 25, para [4].

⁸⁶ Ansell 2025, *Labour Rights Report*, pp 17 and 30.

79. On the basis of this available evidence, Ansell appears to have taken the actions within its means and leverage, and it is not clear whether there are additional steps required of Ansell under the OECD Guidelines that could be taken to meet the notifier's demands in any AusNCP-facilitated dispute resolution process.

Notifier's failure to engage in good faith to reach an OECD Guidelines-compatible solution

80. The notifier's further remedy requests and continuous email correspondence to Ansell throughout the Initial Assessment phase includes demands for remedies outside of the expectations of the OECD Guidelines, such as the reimbursement of legal fees incurred in migration challenges and the re-employment of workers. The notifier has made these demands on an ad hoc and public basis, often copying several other parties, including government oversight bodies and investors, and in doing so has misrepresented the requirements of the OECD Guidelines. These ad hoc, continually evolving demands, made through public and misleading correspondence, are not consistent with, and would not be workable within, a consensual and non-adversarial AusNCP dispute resolution (or 'good offices') process.
81. While the issues raised are material and Ansell is an enterprise is covered by the OECD Guidelines, the Independent Examiner considers that offering dispute resolution (or 'good offices'), in accordance with the OECD Guidelines and the AusNCP complaint procedures, would not contribute to the purposes and effectiveness of the OECD Guidelines. This assessment reflects the notifier's approach to the complaint, the demands that have been made, and, in particular, the notifier's failure to adhere to the 'good faith' requirements outlined in paragraph 38 of this statement above.

Enterprise's conduct throughout the AusNCP process

82. The Independent Examiner also considered the notifier's conduct in the context of the Ansell's actions and engagement to date. In this case, Ansell has remained engaged throughout the AusNCP process and has demonstrated a willingness to address the substantive issues raised, while adhering to all instructions provided by the Independent Examiner and the AusNCP Secretariat in a timely manner.
83. Ansell has indicated a proactive approach to fulfilling its responsible business conduct obligations. The enterprise recognised the alleged adverse impacts to which it may be 'directly linked' and commenced efforts to use and build its leverage to prevent and mitigate the harm and encourage remediation, including prior to the complaint being submitted in August 2025 (for example, making advance payments for MediCeram goods to support the supplier in facilitating fee reimbursement).⁸⁷
84. Ansell has been actively responding to events on the ground, as evidenced by site visits, audits and monitoring of corrective action plans.⁸⁸ Ansell has also demonstrated engagement with independent organisations, including collaborating with the Responsible Business Alliance to oversee the recruitment fee investigation and remediation process.⁸⁹

⁸⁷ Ansell, *Ansell Preliminary Response*, p 2; Ansell, *Ansell Further Preliminary Submission*, p 6.

⁸⁸ Ansell, *Ansell Preliminary Response*, pp 1-2; Ansell, *Ansell Further Preliminary Submission*, p 6.

⁸⁹ Ansell, *Ansell Preliminary Response*, pp 2 and 5; Ansell, *Ansell Further Preliminary Submission*, p 4 and 6.

Conclusion

85. The Independent Examiner acknowledges that the complaint raises valid and serious concerns relating to human rights due diligence and labour rights under the OECD Guidelines.
86. While this Final Statement does not determine whether Ansell's actions are consistent with the OECD Guidelines, the Independent Examiner notes that the enterprise has acknowledged that it may be 'directly linked' to the alleged human rights impacts at the MediCeram facility through its business relationship with the supplier. The Independent Examiner further notes that Ansell has taken specific remediation steps, such as advance payments to help MediCeram facilitate the reimbursement of recruitment fees to affected workers. It has also committed to a review of its Supplier Management Framework, recognising that MediCeram previously did not fall within its scope, together with a broader third party review of its supply chain due diligence approach to better identify and mitigate future risks, while incorporating lessons learned.
87. The Independent Examiner encourages Ansell to continue honouring these commitments, including through the review and improvement of its due diligence and disclosure frameworks, in accordance with the expectations of the OECD Guidelines.
88. To summarise, it is understood that Ansell has either completed or committed to the following actions:⁹⁰
 - 88.1. **third-party expert review:** Ansell has committed to engaging an independent expert third-party to conduct a comprehensive review of its entire supply chain due diligence approach. This review will identify areas for improvement, with reference to the OECD Guidelines and the UNGPs, and specifically concerning stakeholder engagement with rightsholders and the protection of human rights defenders
 - 88.2. **expansion of the Supplier Management Framework and audit threshold reassessment:** Ansell is reviewing the scope of its Supplier Management Framework (along with reassessing its audit thresholds) to include smaller indirect suppliers, such as ceramic former manufacturers who previously fell below audit thresholds, to better identify human rights risks across its entire supply base
 - 88.3. **public disclosure:** Ansell has committed to disclosing summaries of its third party supply chain due diligence review and resulting actions in future public reports, and has also made a number of public statements on the issues and situation at MediCeram, including on its website and in other reporting
 - 88.4. **labour rights reporting:** Ansell will provide updates on its progress regarding these specific supply chain issues in its annual Labour Rights Report, consistent with international modern slavery legislation
 - 88.5. **cash flow support:** to facilitate the expedited repayment of recruitment fees, Ansell committed to and previously implemented advance payments to MediCeram for future supply

⁹⁰ Ansell, *Ansell Preliminary Response*; Ansell, *Ansell Further Preliminary Submission*.

- 88.6. **continued supplier engagement and monitoring, including for reimbursements:** Ansell committed to continued engagement with MediCeram to encourage appropriate action and to monitor the implementation of corrective action plans and remediation. Ansell also monitored and independently verified that workers received remediation for recruitment fees, as previously agreed
- 88.7. **leverage for terminated workers:** Ansell committed to using its leverage to encourage MediCeram to provide financial support for the living costs and medical care of terminated workers that were awaiting repatriation in Malaysia
- 88.8. **collective action with other suppliers and independent organisations:** Ansell advised, and the notifier confirmed, that the Responsible Business Alliance (with support from Ansell, YTY and others) provided humanitarian support, including food costs, to the previously remaining MediCeram workers through Migration Dristi, a non-government organisation. Ansell and the Responsible Business Alliance continued to monitor the situation and remained committed to meeting humanitarian needs until the remaining workers returned to Bangladesh, including potential contributions to their repatriation costs.
89. Correspondence from the parties and media reporting indicates that MediCeram is being wound up. If so, the Independent Examiner notes that some of the commitments identified above may no longer be practically achievable. However, these commitments are indicative of Ansell's intention to address the labour rights concerns raised in this complaint. Taking into account both the commitments made by Ansell and the conduct of the notifier, the Independent Examiner concludes that accepting this complaint for further examination would not contribute to the purposes and effectiveness of the OECD Guidelines.
90. In reaching this decision, the Independent Examiner has carefully balanced the gravity of the alleged human rights impacts, specifically forced labour and debt bondage, against the need to maintain procedural integrity, which is necessary for the AusNCP process to function effectively. While the substantive issues concerning the exploitation of migrant workers are severe and warrant attention under the OECD Guidelines, the utility of an AusNCP-facilitated dispute resolution process relies on mutual trust and confidentiality. This environment has been materially compromised by the notifier's style of engagement, which viewed in its totality, does not meet the standards of 'good faith' engagement under the AusNCP complaint procedures.
91. This determination is based on the finding that the current notifier has not engaged in good faith, as defined by the AusNCP complaint procedures. This includes failing to maintain confidentiality, misrepresenting the issues and the AusNCP process, threatening reprisals, and not genuinely engaging in the proceedings with a view to finding an OECD Guidelines-compatible solution to the issues raised.
92. Consequently, this decision does not prejudice the right of the affected individuals to submit a new application to the AusNCP in the future, either directly or through an alternative intermediary, should circumstances change and provided that any future engagement adheres to the procedural requirements of the AusNCP complaints process.
93. In preparing this Final Statement, the Independent Examiner considered all submissions made by the parties and consulted with the AusNCP Board. A draft version of this statement was also provided to the parties for comment to ensure their positions and submissions were accurately

represented. The Independent Examiner has ensured that any responses from the parties were considered in finalising this statement.

94. The AusNCP complaint procedures specify that acceptance or rejection of a complaint is not an assessment of whether an enterprise's actions are consistent with the OECD Guidelines.
95. This statement is available on the AusNCP website at www.ausncp.gov.au.

Shiv Martin

Independent Examiner
Australian National Contact Point for Responsible Business Conduct
Email: secretariat@ausncp.gov.au

Annexes

Annex A: Schedule of events

Submission	Date
<ul style="list-style-type: none"> Complaint submitted by the notifier to the AusNCP Secretariat 	13 August 2025
<ul style="list-style-type: none"> Further complaint submission by the notifier to the AusNCP Secretariat 	15 August 2025
<ul style="list-style-type: none"> Receipt of complaint acknowledged by the AusNCP Secretariat 	15 August 2025
<ul style="list-style-type: none"> Email from the AusNCP Secretariat to the notifier, seeking further information about the complaint 	25 August 2025
<ul style="list-style-type: none"> Enterprise notified about the complaint by the AusNCP Secretariat and informed that an Independent Examiner (Ms Shiv Martin) had been assigned to the complaint 	29 August 2025
<ul style="list-style-type: none"> AusNCP Board notified about the complaint by the AusNCP Secretariat 	29 August 2025
<ul style="list-style-type: none"> Complaint in de-identified form is listed on the AusNCP website 	29 August 2025
<ul style="list-style-type: none"> Notifier informed that an Independent Examiner (Ms Shiv Martin) had been assigned to the complaint 	29 August 2025
<ul style="list-style-type: none"> Enterprise acknowledged receipt of complaint notification 	1 September 2025
Final Statement	
<ul style="list-style-type: none"> Initial meeting between the Independent Examiner and the notifier 	4 September 2025
<ul style="list-style-type: none"> Email from the AusNCP Secretariat to the enterprise, seeking a preliminary submission to the complaint 	5 September 2025
<ul style="list-style-type: none"> Initial meeting between the Independent Examiner and the enterprise 	9 October 2025
<ul style="list-style-type: none"> Letter from the Independent Examiner to the notifier 	15 October 2025
<ul style="list-style-type: none"> Preliminary Response provided by the enterprise 	19 October 2025
<ul style="list-style-type: none"> AusNCP website updated to publicly name the notifier and the enterprise 	23 October 2025
<ul style="list-style-type: none"> OECD Responsible Business Conduct Centre notified about the complaint by the AusNCP Secretariat (following the publication of the parties' identities on the AusNCP website) 	23 October 2025
<ul style="list-style-type: none"> The enterprise's Preliminary Response is shared with the notifier for comment by mid-November 2025 	27 October 2025
<ul style="list-style-type: none"> The notifier's submission (in response to the enterprise's Preliminary Response dated 19 October 2025) is received by the AusNCP Secretariat 	16 November 2025
<ul style="list-style-type: none"> Meeting between the Independent Examiner and the parties on procedural matters 	19 November 2025
<ul style="list-style-type: none"> Letter from the Independent Examiner to each of the parties, seeking final submissions addressing the six Initial Assessment admissibility criteria, as outlined in the AusNCP complaint procedures 	19 November 2025
<ul style="list-style-type: none"> Email from the notifier to the enterprise, the AusNCP Secretariat and the Independent Examiner 	19 November 2025
<ul style="list-style-type: none"> Email from the notifier to the enterprise, the AusNCP Secretariat and the Independent Examiner 	26 November 2025

<ul style="list-style-type: none"> Email from the notifier to the AusNCP Secretariat and the Independent Examiner, listing the submissions he wishes the Independent Examiner to consider as part of the Initial Assessment of his complaint 	3 December 2025
<ul style="list-style-type: none"> 24-hour extension granted for the enterprise to provide a Final Preliminary Submission 	3 December 2025
<ul style="list-style-type: none"> Further Preliminary Submission provided by the enterprise 	4 December 2025
<ul style="list-style-type: none"> Email from the AusNCP Secretariat to the notifier, sharing a copy of the enterprise's Further Preliminary Submission and confirming understanding of the notifier's submissions for consideration 	8 December 2025
<ul style="list-style-type: none"> Response to the enterprise's Further Preliminary Submission provided by the notifier 	13 December 2025
<ul style="list-style-type: none"> Draft Final Statement provided to Governance and Advisory Board for comment 	25 January 2026
<ul style="list-style-type: none"> Draft Final Statement provided to the parties for comment by 5 March 2026 	19 February 2026
<ul style="list-style-type: none"> Enterprise's submission with feedback on the draft Final Statement received by the AusNCP 	4 March 2026
<ul style="list-style-type: none"> Embargoed copy of the Final Statement is provided to the parties 	10 March 2026
<ul style="list-style-type: none"> Embargoed copy of the Final Statement is provided to the AusNCP Board 	10 March 2026
<ul style="list-style-type: none"> Final Statement published on www.ausncp.gov.au and reported to the OECD 	24 March 2026

Annex B: Schedule of emails

Instances of emails falling short of the standard of 'good faith'

Date	Subject line	Recipients	Parties CC'd	AusNCP Secretariat BCC'd
15 August 2025 (note: from email chain received by the AusNCP on 23 August 2025)	<i>'Re: Complaint: CERAMTEC INNOVATIVE CERAMIC ENGINEERING (M) SDN. BHD.'</i>	Related entity	21 others, including the enterprise	No
23 August 2025	<i>'Re: Complaint: CERAMTEC INNOVATIVE CERAMIC ENGINEERING (M) SDN. BHD.'</i>	Related entity and the AusNCP	24 others, including the enterprise	No
27 August 2025	<i>'IMPORTANT: Remediation appeal from former Ansell supply chain workers of malaysian Ceramtec for the historic abuses they faced'</i>	Related entity, the enterprise and the AusNCP	24 others	
4 September 2025: meeting between the Independent Examiner and the notifier, where the Independent Examiner outlined expectations of 'good faith' behaviour and emphasised the importance of maintaining confidentiality				
9 September 2025	<i>'Re: (German supply chain due diligence act complaint) Re: IMPORTANT: Remediation appeal from former Ansell supply chain workers of malaysian Ceramtec for the historic abuses they faced'</i>	Related entity	25 others, including the AusNCP and the enterprise	No
11 September 2025	<i>'RE: Ansell Ltd - Complaint to AuSNCP - Background, authority and confidentiality [SEC=OFFICIAL]'</i>	AusNCP	Independent Examiner	No
19 September 2025	<i>'Re: Ansell investor query'</i>	Enterprise's investors	Enterprise's investors	Yes
15 October 2025: letter from the Independent Examiner to the notifier, which instructed the notifier to cease BCC'ing the AusNCP Secretariat into emails to third parties				
31 October 2025	<i>'Urgent: Mediceram terminates all employers and proceeds to force repatriation to Bangladesh'</i>	Notifier	53 others, including the enterprise and suppliers	Yes
1 November 2025	<i>'(URGENT FAO Allan Gray investors re: Ansell) Fwd: Urgent: Mediceram terminates all employers and proceeds to force repatriation to Bangladesh'</i>	Enterprise's investors	2 third parties	Yes
3 November 2025	<i>'For Immediate Release 3rd Nov 2025: End Deportation Threats Against Mediceram Forced Labour Victims in Global Gloves Supply Chain of Ansell, YTY and Top Glove'</i>	Notifier	53 others, including the enterprise and suppliers	Yes

3 November 2025	<i>'(Workers claim officials and embassy refuse assistance requests) For Immediate Release 3rd Nov 2025: End Deportation Threats Against Mediceram Forced Labour Victims in Global Gloves Supply Chain of Ansell, YTY and Top Glove'</i>	Notifier, Malaysian government	54 others, including the enterprise and suppliers	Yes
3 November 2025	<i>'Statement for Immediate Release 3rd Nov 2025: Around 190 Bangladeshi Migrant Workers at Mediceram Dismissed for Demanding Fair and Dignified Working Conditions'</i>	Notifier, Malaysian government	54 others, including the enterprise and suppliers	Yes
4 November 2025	<i>'PSM 3rd Nov 2025: 180 Migrant Workers laid off simply for demanding fair employment rights and safe environment'</i>	Notifier, Malaysian government	54 others, including the enterprise and suppliers	Yes
4 November 2025	<i>'*Urgent allegations 1230pm 4th Nov: Mediceram management moves to deport 10 worker leader on flight to Bangladesh today*</i>	Notifier, Malaysian government	54 others, including the enterprise and suppliers	Yes
4 November 2025	<i>'*Urgent allegations 1230pm 4th Nov: Mediceram management moves to deport 10 worker leader on flight to Bangladesh today*</i>	Enterprise's investors	2 third parties	Yes
4 November 2025	<i>'*Urgent allegations 1230pm 4th Nov: Mediceram management moves to deport 10 worker leader on flight to Bangladesh today*</i>	Notifier, Malaysian government	54 others, including the enterprise and suppliers	Yes
4 November 2025 (note: this email was sent three times on this date)	<i>'*4th Nov 2025: Mediceram worker leaders alleging forcible repatriation to Bangladesh speak out before boarding their flight OD0162 at KLIA this evening*</i>	Notifier, Malaysian government	54 others, including the enterprise and suppliers	Yes
5 November 2025: email from the AusNCP Secretariat to the notifier, requesting that the notifier refrain from copying in the AusNCP Secretariat into any further emails, per the Independent Examiner's request				
5 November 2025	<i>'Urgent ILO/IOM reintegration assistance and support request - involuntarily repatriated Malaysia Mediceram Bangladeshi worker leaders and forced labour victims (and complaint to UN HRC mechanism)'</i>	22 recipients, including International Labour Organization and regional organisations	5 others	Yes
5 November 2025	<i>'5th Nov 2025 Channel 24 News: Involuntarily repatriated Bangladeshi worker leaders from Mediceram glove company in Malaysia arrive back to Dhaka airport this morning and speak out to local media'</i>	Notifier, Malaysian government	54 others, including the enterprise and suppliers	Yes
5 November 2025: email from the AusNCP Secretariat to the notifier, asking that the notifier respect the earlier request				
6 November 2025	<i>'Daily Star 6th Nov 2025: Dream turns into despair for 10 deported Bangladeshi migrants from Mediceram in Malaysia (Ansell/YTY gloves supply chain factory)'</i>	Notifier, Malaysian government	54 others, including the enterprise and suppliers	Yes
7 November 2025	<i>'6th Nov MWN: Human chain and protest of students in Bangladesh for Mediceram workers! BD'</i>	Notifier, Malaysian government	54 others, including the enterprise and suppliers	Yes
8 November 2025	<i>'Alleged savagery as #Mediceram glove company forcibly repatriates 6 more alleged Bangladeshi forced labour victims/worker leaders.'</i>	Notifier, Malaysian government	54 others, including the enterprise and suppliers	Yes

8 November 2025 (note: this email was sent two times on this date)	<i>'Workers allegedly coerced during salary collection into signing 'I want to go back home.'</i>	Notifier, Malaysian government	54 others, including the enterprise and suppliers	Yes
8 November 2025	<i>'8th Nov 2025: 152 Mediceram workers sign open letter with updated demands'</i>	Notifier, Malaysian government	54 others, including the enterprise and suppliers	Yes
12 November 2025 (email marked 'Urgent and Strictly Confidential, Not for Sharing Onwards')	<i>'(Urgent and confidential: Ansell alleged PR propaganda against me in bad faith re: Mediceram, malaysia) Fwd: FW: FW: Working in Malaysia'</i>	AusNCP	Independent Examiner and a third party	No
13 November 2025	<i>'For Immediate Release 13th Nov 2025: Response by Andy Hall to allegedly slanderous comments shared by Ansell PR agent Sefiani 'as fact' in Mediceram dispute'</i>	Third party company engaged with the enterprise	Enterprise, investors and the AusNCP	No
16 November 2025	<i>'OECD AusNCP call with Ansell) Re: RE: (Urgent and confidential: Ansell alleged PR propaganda against me in bad faith re: Mediceram, malaysia) Fwd: FW: FW: Working in Malaysia [SEC=OFFICIAL]'</i>	AusNCP	Independent Examiner	No
17 November 2025	<i>'(Ansell/PR agency Sefiani clarify 'respect' for Andy Hall) Fwd: Re: Fwd: Request for article correction'</i>	Notifier	N/A	Yes
17 November 2025	<i>'(Seeking clarification from Sefiani/Ansell) Fwd: Request for article correction'</i>	Enterprise, third party company engaged with the enterprise and the AusNCP (including the Independent Examiner)	Enterprise's investors	No
19 November 2025: joint meeting between the Independent Examiner and the parties, where the Independent Examiner reinforced the need for 'good faith' and confidentiality				
19 November 2025	<i>'Our Position re: involuntary reparations'</i>	Enterprise	AusNCP (including the Independent Examiner)	No
21 November 2025	<i>'(Resend email) Re: RE: Mediceram Documents [SEC=OFFICIAL] 'Re: FW: For Response by 5PM 03/12 - Complaint 38 - Letter from the Independent Examiner [SEC=OFFICIAL]'</i>	AusNCP	N/A	No
5 December 2025	<i>'URGENT ALLEGATIONS: law enforcement official (Negeri Sembilan immigration/police) allegedly coerced former unfairly dismissed Mediceram workers to return to work (@7pm 4/12/25)'</i>	United Nations, Malaysian government and other third parties	30 others, including around eight government agencies	Yes
8 December 2025	<i>'Re: RE: (Final submission): For Response by 5PM 03/12 - Complaint 38 - Letter from the Independent Examiner [SEC=OFFICIAL]'</i>	AusNCP	Independent Examiner	No

11 December 2025	<i>'(Libellous accusations and my clarifications) Re: MediCeram Update'</i>	Mediceram	Over 110 others, including the AusNCP and at least two government agencies	No
11 December 2025	<i>'(YTY claims re: Ansell's misinformation) Re: RE: Our Position re: involuntary reparations'</i>	Enterprise	Enterprise's investors and the AusNCP (including the Independent Examiner)	No
13 December 2025	<i>'Fwd: (YTY claims re: Ansell's misinformation) Re: RE: Our Position re: involuntary reparations'</i>	AusNCP (including the Independent Examiner)	NA	No
13 December 2025	<i>'Re: RE: (FINAL RESPONSE) Re: RE: (Final submission): For Response by 5PM 03/12 - Complaint 38 - Letter from the Independent Examiner [SEC=OFFICIAL]'</i>	AusNCP	Independent Examiner	No
15 December 2025	<i>'(Mediceram case transferred to Industrial Court) Fwd: Re: Permohonan Pindahan Kes ke Mahkamah Perusahaan – Bekas Pekerja MediCeram Sdn Bhd'</i>	Notifier	NA	Yes
16 December 2025	<i>'Seeking urgent court ordered injunctive relief, requesting support from Ansell'</i>	Enterprise	AusNCP (including the Independent Examiner)	No
17 December 2025	<i>'Re: RE: Seeking urgent court ordered injunctive relief, requesting support from Ansell'</i>	Enterprise	AusNCP (including the Independent Examiner)	No
19 December 2025	<i>'Australian Anti-Slavery Commissioner statement on Mediceram case (note Ansell's recent continual rejection of support copied below)'</i>	Notifier	N/A	Yes
19 December 2025	<i>'Aus Anti Slavery Commissioner Statement but Ansell continued rejection of support'</i>	Australian Anti-Slavery Commissioner, the enterprise, the AusNCP, the United Nations and Malaysian authorities and legal advocates	17 others, including three government agencies	No
19 December 2025	<i>'URGENT Submission of SUHAKAM Mediceram re: imminent forcible repatriation complaint SHM.010030 today (workers to be fingerprinted for involuntary repatriation Mon 22nd Dec 2025)'</i>	United Nations, Malaysian government and other third parties	26 others, including one government agency	Yes
20 December 2025	<i>'19th Dec 2025: Forced labour and involuntary repatriation abuse allegations - Mediceram former worker representatives petition SUHAKAM (Malaysian Human Rights Commission)'</i>	Third party	110 others, including around eight government agencies, the enterprise, investors and the AusNCP	No

23 December 2025	<i>'(Union letter and update on court filing/fundraising) Re: Urgent situation regarding modern slavery in Ansell's supply chain (Mediceram)'</i>	Representative of Australia Asia Worker Links	Enterprise, investors and 16 others (the AusNCP, three government bodies and the United Nations)	No
23 December 2025	<i>'DONATE NOW: Emergency Legal & Protection Fund for Migrant Workers Facing Forced Repatriation (Mediceram, Malaysia)'</i>	Unknown third-party organisation	N/A	Yes
24 December 2025	<i>'Update: Malaysian Court refuses to rule on Mediceram case emergency deportation threat injunction request until 5th Jan 2026 (URGENT Submission of SUHAKAM Mediceram re: imminent forcible repatriation complaint SHM.010030 today)'</i>	United Nations	One other recipient	Yes
24 December 2025	<i>'(Court grants emergency hearing on 26/12) Update: Malaysian Court refuses to rule on Mediceram case emergency deportation threat injunction request until 5th Jan 2026 (URGENT Submission of SUHAKAM Mediceram re: imminent forcible repatriation complaint ...)'</i>	United Nations	One other recipient	Yes
24 December 2025 (email marked 'CONFIDENTIAL AND SENSITIVE')	<i>'(Mediceram issues airtickets 26th Dec forced repatriation flights, despite Court granting emergency hearing on 26/12 9am) Update: Malaysian Court refuses to rule on Mediceram case emergency deportation threat injunction request until 5th Jan 2026 (URGE...'</i>	United Nations and government agencies	12 others, including one government agency	Yes
27 December 2025	<i>'26th Dec Mediceram forced repatriation flight goes ahead, facilitated by company management, despite today's Court injunction (URGENT Submission of SUHAKAM Mediceram re: imminent forcible repatriation complaint SHM.010030 today)'</i>	United Nations and government agencies	12 others, including one government agency	Yes
27 December 2025	<i>'Requesting urgent legal aid costs and food support from Ansell'</i>	Enterprise and its investors	10 recipients, including the AusNCP and the Independent Examiner, and at least three government agencies	No
7 January 2026	<i>'IMPORTANT - MediCeram updates: winding up order/immigration response/request for urgent support'</i>	Enterprise, Responsible Business Alliance and other businesses	Five third parties	Yes
19 January 2026	<i>'Re: (Grata Fund support) Re: Re: Ansell PR agency slander against me and my team - legal support'</i>	Legal aid charity	One other recipient, with the AusNCP (including the Independent Examiner) blind copied	Yes

16 February 2026	<i>'Re: Urgent: Mediceram workers detained/extorted during repatriation process AND Next steps fund transfers from Ansell/YTY/RBA to returned former Mediceram workers'</i>	Migrant network and the AusNCP	15 other parties, including the enterprise	No
17 February 2026	<i>'ABC 17th Feb 2026: Australian Anti-slavery commissioner calls for tougher laws amid forced labour concerns for Ansell (MediCeram, Malaysia) and KMart'</i>	Migrant network	17 recipients, including the enterprise, the AusNCP, the Independent Examiner, the Responsible Business Alliance and a migrant worker organisation.	No
17 February 2026	<i>'ABC 17th Feb 2026: Australian Anti-slavery commissioner calls for tougher laws amid forced labour concerns for Ansell (MediCeram, Malaysia) and KMart'</i>	Enterprise, Responsible Business Alliance and glove manufacturers	Migrant worker organisation	Yes
17 February 2026	<i>'ABC 17th Feb 2026: Australian Anti-slavery commissioner calls for tougher laws amid forced labour concerns for Ansell (MediCeram, Malaysia) and KMart'</i>	Enterprise, Responsible Business Alliance and glove manufacturers	Migrant worker organisation	Yes
26 February 2026	<i>'Final 33 MediCeram workers remain in Malaysia still, broken system prevents departure'</i>	Notifier	N/A	Yes
14 March 2026	<i>'IMPORTANT Update 13th Mar: CALL FOR COMPENSATION as all former MediCeram workers/forced labour victims forcibly or voluntarily repatriated at cost to Bangladesh already'</i>	Migrant network	2 individuals recipients	Yes
14 March 2026	<i>'IMPORTANT Update 13th Mar: CALL FOR COMPENSATION as all former MediCeram workers/forced labour victims forcibly or voluntarily repatriated at cost to Bangladesh already'</i>	Migrant network	17 recipients, including the AusNCP, the Independent Examiner, the Responsible Business Alliance, the enterprise and a migrant organisation	No

Annex C: Publications

Ansell Limited, 'Supplier Code of Conduct', Ansell Limited, April 2025, accessed January 2026. <https://www.ansell.com/-/media/projects/ansell/website/pdf/sustainability/supplier-code-of-conduct-2025.ashx?rev=adf41abd06784d86ab74c2e20d775210&hash=B4EEB544A0413DEEF9C1C3A4EF5A09C2>

Ansell Limited, 'Labour Rights Report (and Modern Slavery Statement) 2025', Ansell Limited, August 2025, accessed January 2026 (*Labour Rights Report*). <https://www.ansell.com/-/media/projects/ansell/website/pdf/investors-relations/annual-reports/2025/labour-rights-report-and-modern-slavery-statement-2025.ashx?rev=6a0e34a3ac254ab1bf103bd584208794&hash=5176136B0A4F9C6FAC1F1C4DFA07956E>

Ansell Limited, '2025 Annual Report', Ansell Limited, 25 August 2025, accessed January 2026. <https://www.ansell.com/-/media/projects/ansell/website/pdf/investors-relations/annual-report-2025/ansell-annual-report-2025-pdf.ashx?rev=4f89e618e7104acaaa8b4713d642c8a8>

Ansell Limited, 'Preliminary Response to AusNCP Complaint 38', Ansell Limited, 19 October 2025.

Ansell Limited, 'Human Rights Statement', Ansell Limited, 22 October 2025, accessed January 2026. <https://www.ansell.com/-/media/projects/ansell/website/pdf/sustainability/governance/human-rights-statement-2025.ashx?rev=59b308b81fd24911abb88751df4a82af>

Ansell Limited, 'Ansell suspends supplier relationship with Mediceram', 12 November 2025, accessed January 2026. <https://www.ansell.com/us/en/press-releases/ansell-suspends-supplier-relationship-with-mediceram>

Ansell Limited, 'Further Preliminary Submissions to AusNCP Complaint 38', Ansell Limited, 4 December 2025.

Australian Broadcasting Corporation, 'Anti-slavery commissioner calls for tougher laws amid forced labour concerns for Ansell and Kmart', 17 February 2026, accessed February 2026. <https://www.abc.net.au/news/2026-02-17/anti-slavery-commissioner-tough-laws-dumping-ground-kmart-ansell/106349728>

Australian National Contact Point for Responsible Business Conduct, 'Final Statement: Complaint by Port Hedland Community Progress Association regarding BHP', Department of the Treasury, Australian Government, 1 September 2021, accessed January 2026. https://ausncp.gov.au/sites/default/files/2021-09/AusNCP_Final_Statement_Port_Heland.pdf

Australian National Contact Point for Responsible Business Conduct, 'AusNCP complaint procedures', Department of the Treasury, Australian Government, April 2024, accessed January 2026. <https://ausncp.gov.au/sites/default/files/2024-04/ausncp-complaint-procedures.pdf>

Australian National Contact Point for Responsible Business Conduct, '2024 AusNCP complaint procedures – Comparison of the 2024 and 2022 versions', Department of the Treasury, Australian Government, July 2024, accessed January 2026. <https://ausncp.gov.au/sites/default/files/2024-07/ausncp-complaint-procedures-comparison-2024-2022.pdf>

Australian National Contact Point for Responsible Business Conduct, 'Email correspondence with the notifier of 5 November 2025', 5 November 2025.

Independent Examiner, *Letter from the Independent Examiner to the notifier*, 15 October 2025.

Notifier, *Original complaint submission*, Notifier submission, 13 August 2025.

Notifier, *Email correspondence with the AusNCP Secretariat of 16 October 2025*, 16 October 2025.

Notifier, *Email correspondence with the AusNCP Secretariat of 1 November 2025*, 1 November 2025.

Notifier, *Email correspondence with the AusNCP Secretariat of 4 November 2025*, 4 November 2025.

Notifier, *Email correspondence with the AusNCP Secretariat of 5 November 2025*, 5 November 2025.

Notifier, *Email correspondence with the AusNCP Secretariat of 12 November 2025*, 12 November 2025.

Notifier, *Email correspondence with the AusNCP Secretariat of 19 November 2025*, 19 November 2025

Notifier, 'Response to 19th October 2025 "Ansell's Preliminary Response to OECD Australian National Contact Point (Australian National Contact Point) Complaint 38" Questions Raised by Ansell and Communicated by Australian National Contact Point', 15 November 2025.

Notifier, *Email correspondence with the AusNCP Secretariat of 17 November 2025*, 17 November 2025.

Notifier, *Email correspondence with the enterprise of 16 December 2025*, 16 December 2025.

Notifier, *Emails on Australian Anti-Slavery Commissioner's statement*, 19 December 2025.

Notifier, *Email correspondence with the AusNCP Secretariat of 23 December 2025*, 23 December 2025.

Notifier, *Email chain concerning pro bono assistance*, 19 January 2026.

Notifier, *17 February 2026 emails circulating Australian Broadcasting Commission article*, 17 February 2026.

Organisation for Economic Co-operation and Development, *OECD Due Diligence Guidance for Responsible Business Conduct*, OECD Publishing, 1 February 2018. <http://dx.doi.org/10.1787/15f5f4b3-en>

Organisation for Economic Co-operation and Development, 'Guide for National Contact Points on the Initial Assessment of Specific Instances', OECD Publishing, Paris, 31 January 2019, accessed November 2025. <http://dx.doi.org/10.1787/c8d7f80a-en>

Organisation for Economic Cooperation and Development, *Guide for National Contact Points on Confidentiality and Campaigning when handling Specific Instances*, OECD Publishing, 31 January 2019. <http://dx.doi.org/10.1787/7caff5ea-en>

Organisation for Economic Co-operation and Development, 'OECD Guidelines for Multinational Enterprises on Responsible Business Conduct', OECD Publishing, Paris, 8 June 2023. <http://dx.doi.org/10.1787/81f92357-en>

Annex D: Institutional arrangements

- The Australian Government is committed to promoting the use of the OECD Guidelines and implementing them effectively and consistently. Through business cooperation and support, the OECD Guidelines can positively influence business conduct and ultimately economic, environmental and social progress.
- The OECD Guidelines are recommendations on responsible business conduct addressed by governments, including Australia, to multinational enterprises. They provide voluntary principles and standards for responsible business conduct consistent with applicable laws and internationally recognised standards. Enterprises operating in Australia and Australian enterprises operating overseas are expected to act in accordance with the principles set out in the OECD Guidelines and to perform to the standards they recommend. In countries where domestic laws and regulations conflict with the principles and standards of the OECD Guidelines, enterprises should seek ways to honour such principles and standards to the fullest extent, which does not place them in violation of domestic law.
- The OECD Guidelines represent international standards of behaviour, which in some areas, may impose higher standards than Australian law. Importantly however, while Australia is an adhering country to the OECD Guidelines and the OECD Guidelines have been endorsed within the OECD international forum, they are not a substitute for, nor do they override, Australian or international law.
- The OECD Guidelines can be seen as:
 - A useful aid to business in developing their own code of conduct. They are not aimed at replacing or preventing enterprises from developing their own codes.
 - Complementary to other business, national and international initiatives on corporate responsibility, including domestic and international law in specific areas such as human rights and bribery. For example, the human rights chapter in the OECD Guidelines as well as other key concepts align with the [UNGPs](#).
 - Providing an informal structure for resolving issues that may arise in relation to implementation of the OECD Guidelines in complaints.

Annex E: Governance

- Governments adhering to the OECD Guidelines have flexibility in organising their NCPs, which are expected to meet core effectiveness criteria, by operating in a manner that is visible, accessible, transparent, accountable, impartial and equitable, predictable, and compatible with the OECD Guidelines. NCPs are also expected to seek the active support of social partners, other stakeholders and relevant government agencies.
- Accordingly, the OECD Guidelines stipulate that:
 - NCPs will be composed, organised and sufficiently resourced to provide an effective basis for dealing with the broad range of issues covered by the OECD Guidelines, have access to expertise on all relevant aspects of the NCP mandate, and operate in an impartial manner and maintain an adequate level of accountability to the adhering government.
 - NCPs can use different forms of organisation to meet the effectiveness criteria and maintain stakeholder confidence.
 - Governments are encouraged to include representatives of the business community, worker organisations, civil society and other non-governmental organisations in advisory or oversight bodies to assist the NCP in its tasks and contribute to the effectiveness of the OECD Guidelines.
- The [AusNCP Board](#) includes representatives from Australian Government agencies, business, civil society and unions. The AusNCP Board provides independent expert advice and assistance to the AusNCP and the Independent Examiners on complaints handling. Board members use their networks, events and publications to promote responsible business conduct standards under the OECD Guidelines and the AusNCP services. The AusNCP Board is consulted on all AusNCP statements.
- The AusNCP Board helps to ensure that the AusNCP meets the effectiveness criteria of the OECD Guidelines. AusNCP Board Members may be called on to conduct procedural reviews of AusNCP complaints and may be consulted on various operational and administrative matters as needed.