

Planet Innovation

Modern Slavery Statement 2022

OVERVIEW OF REPORTING ENTITY

This Modern Slavery Statement (**Statement**) is made in accordance with the *Modern Slavery Act 2018* (Cth) (the **Act**) for Planet Innovation Holdings Limited (ABN 37 152 424 916) (**Planet Innovation**) as the Australian parent company of the Planet Innovation Group and is made pursuant to the Act.

References to ‘Planet Innovation’, ‘PI Group’, ‘we’, ‘us’ and ‘our’ refer to Planet Innovation Holdings Limited and its wholly owned controlled entities for the reporting period from 1 July 2021 to 30 June 2022 (**Reporting Year**).

Planet Innovation Holdings Limited owns and controls:

Table 1: PI Group

Entity	Details
▪ Planet Innovation Pty Ltd	ABN: 35 137 428 141
▪ Planet Innovation Products Pty Ltd	ABN: 50 153 338 660
▪ Planet Innovation Digital Pty Ltd	ABN: 73 613 310 580
▪ Planet Intellectual Property Enterprises Pty Ltd	ABN: 28 152 698 747
▪ Planet Innovation Inc.	a controlled entity incorporated in the United States (US)
▪ Planet Innovation Products Inc.	a controlled entity incorporated in the US and established in the Reporting Year

This Statement has been prepared as a Joint Modern Slavery Statement in consultation with executives and senior leaders across the PI Group and details the efforts taken to address modern slavery risk in our second year of reporting. Its drafting has been overseen by the Modern Slavery Working Group established to progress Planet Innovation’s modern slavery response. Planet Innovation Products (PIP) Inc. was newly incorporated in the Reporting Year and is reported by exception.

OUR STRUCTURE AND OPERATIONS

Planet Innovation is a health technology innovation and commercialisation company established in 2009. We exist to create breakthrough products and commercially successful businesses that transform health care and have a positive impact on the world through high-value relationships with global health-tech companies.

Our business provides the full spectrum of product design, engineering and manufacturing services needed to develop and commercialise products for the diagnostics, life sciences and healthcare industries. Services include:

- Product Development
- Digital Services
- Commercial Services
- Regulated product and consumables manufacturing
- Strategic investments which include business partners that utilise the shared services structures and supply chain of the PI Group.

Planet Innovation is headquartered in Box Hill, Victoria, Australia, and has a presence in the US through its US-based entities, with offices in Carlsbad, California and a manufacturing facility in Irvine, California which services the US market. In the Reporting Year, we acquired the US operations of regulated medical device manufacturer, BIT Analytical Instruments GmbH. The acquisition led to the establishment of our manufacturing operations at Irvine, California, in November 2021 and 80 team members joining PI under Planet Innovation Products Inc. PI also secured new leasehold premises and progressed the fit-out of a new manufacturing facility in Blackburn North, Victoria, Australia, during the Reporting Year, which is planned to become fully operational in the 2023 reporting year.

With the expansion to our structure and operations, our global workforce in the Reporting Year grew to approximately 550 team members with 95% of our total workforce being directly employed by Planet Innovation, of which 75% are based in Victoria, Australia. We also engage temporary team members through labour hire agencies for our manufacturing division in Australia and a small number of contractors across both our US and Australia locations.

Table 2: PI Workforce Profile

Team Members	AU	US	
Employees	411	107	518
Temporary workers	19	-	19
Contractors	7	3	10
Total:	437	110	547

OUR SUPPLY CHAINS

Planet Innovation has a diverse supply chain to support our operations and business divisions. We source goods and services for product design and development, consultancy services, and device manufacturing in the health technology sector. Our day-to-day operations rely on domestic labour, commercial leasing and associated property fit-out and maintenance services, information technology infrastructure and utilities services.

For this Reporting Year, our supply chain profile has evolved on the previous reporting year on account of our expansion of locations and new business acquisition, and the implementation of a new enterprise resource planning system (ERP), deployed halfway through the Reporting Year.

For the Reporting Year, Planet Innovation had:

- approximately 695 active suppliers
- in 21 countries
- and a total spend of approximately AUD\$54m.¹

With the introduction of a new ERP we have taken steps to define our sourcing profile based on our spend for the Reporting Year to assist with developing our modern slavery risk analysis and identify any changes to our modern slavery risk profile.

Table 3: PI Sourcing profile

Sourcing Category	Examples of goods or services procured	Key sourcing countries (up to Top 5)
BUILDING	Commercial leasing, special trade services for building fit-out, construction products for fit-out	Australia, US
DESIGN & DEVELOPMENT	Prototype goods (including parts and assembly) and services (including testing), design tools and equipment	Australia, US, China, Singapore, Taiwan
INFORMATION TECHNOLOGY	Telecommunications, IT support and services, software, hardware including laptops and consumer electronics	Australia, Germany, US, China, Malaysia
LABORATORY	Chemicals, laboratory apparatus and consumables, PPE, testing services	Australia, United Kingdom, US

1. Excludes Planet Innovation Products (PIP) Inc. active suppliers and spend for the Reporting Year. Approximately, AUD\$12.8m total spend for a further 265 suppliers from 10 countries were added to PI's supplier profile during the Reporting Year following our US-acquisition in November 2021, now operating under PIP Inc.

Sourcing Category	Examples of goods or services procured	Key sourcing countries (up to Top 5)
TRANSPORT AND LOGISTICS	Couriers or messenger services, freight forwarding, freight transportation arrangement, packing products, storage, vehicles	Australia, US
MANUFACTURING	Plant and machinery, equipment and cleanroom maintenance, technical services (e.g. measuring or calibration services), manufacturing floor storage equipment	Australia, US, Spain, Netherlands, United Kingdom
OFFICE AND EVENTS	Office furniture, stationary, advertising, merchandise, venues, catering, cleaning, property maintenance and waste management	Australia, US
PEOPLE	Labour hire and recruitment agencies, training and development	Australia, US
PRODUCTION INVENTORY	Cable, moulded products, machined products, sheet metal, assembly products, OEM products, plastics, die cut products, PCBA, fasteners, labels, lighting products	Australia, US, China, Thailand, Netherlands
PROFESSIONAL SERVICES	Corporate, financial, engineering consultancy, commercial real estate agents	Australia, US

Our quality management system (QMS) is integral to our core business. Planet Innovation is accredited under ISO:9001 – Quality Management System (Australia) and ISO:13485 – Medical Devices Management (Australia and US). Our supplier management processes are derived under and implemented through our QMS and include supplier screening, review, and relationship management. Our critical activities require supplier evaluation where we aim to work with suppliers who hold the same or similar accreditations aligned to international quality standards, particularly for our manufacturing suppliers. Currently, our US operations hold separate accreditations for medical device management. This provides confidence in the approach to supplier approval and risk mitigation from a quality perspective, however limited analysis has been undertaken in the Reporting Year on modern slavery risk.

The PI Group’s sourcing and supply chain are predominately directed and managed through controlled entities Planet Innovation Pty Ltd (“PIPL”) and Planet Innovation Products Pty Ltd (“PIPP”) (also referred to collectively as “PI Australia”). US-based PIP Inc. also maintains a local supply chain relevant and specific to our US operations. For the Reporting Year, we have grouped our spend by sourcing category for each PI entity to classify our procurement activities and inform our modern slavery risk assessment.

PLANET INNOVATION PTY LTD (PIPL)

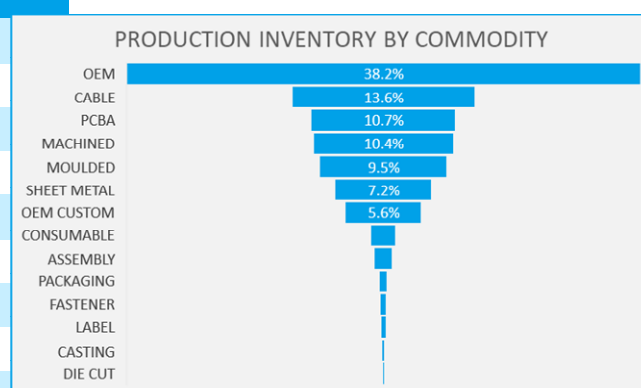
Sourcing Category	% of Spend
BUILDING	16%
DESIGN AND DEVELOPMENT	23%
INFORMATION TECHNOLOGY	26%
OFFICE AND EVENTS	4%
PEOPLE	9%
PROFESSIONAL SERVICES	20%
TRANSPORT AND LOGISTICS	2%

Table 4: PIPL Sourcing

Over 40% of our global supply chain supports our production inventory (with common suppliers also used for our design and development sourcing). Commodities in this category include original equipment manufacturer (OEM) products, followed by cable, print circuit board assembly (PCBA), machined products, plastics and sheet metal (see figure 1 for proportion of spend).

PLANET INNOVATION PRODUCTS PTY LTD (PIPP)

Sourcing Category	% of spend
BUILDING	5%
INFORMATION TECHNOLOGY	1%
LABORATORY	<1%
MANUFACTURING	1%
OFFICE AND EVENTS	<1%
PEOPLE	1%
PRODUCTION INVENTORY	86%
PROFESSIONAL SERVICES	2%
TRANSPORT & LOGISTICS	3%

Table 5: PIPP Sourcing

Figure 1
PLANET INNOVATION PRODUCTS INC. (PIP Inc.)

Sourcing Category	% of Spend
BUILDING	13%
INFORMATION TECHNOLOGY	2%
MANUFACTURING	1%
OFFICE AND EVENTS	1%
PEOPLE	7%
PRODUCTION INVENTORY	69%
PROFESSIONAL SERVICES	4%
TRANSPORT AND LOGISTICS	3%

Table 6: PIP Inc. Sourcing

PI has not undertaken modern slavery risk assessment in relation to its investments for the Reporting Year. PI's incubator and business support program has been involved in the growth and spin-off of independent health technology businesses which PI considers be low risk for inherent modern slavery risk.

RISKS OF MODERN SLAVERY

Our modern slavery risk analysis builds on our 2021 assessment as we continue to refine our understanding and methodology for assessing PI’s modern slavery risk profile. Overall, we consider our core operations to present a low risk of modern slavery given the locations we operate in and the employment and labour protections in place for our employees and contractors in Australia and the US, in compliance with laws.

The following sourcing categories present an inherent risk of modern slavery in their supply chains:

- Production Inventory (see breakdown in figure 1)
- Building (construction and fit-out) – the proportion of PI’s spend in this category is unique to the Reporting Year.
- Information Technology (computers and electronics)
- Office and Events (in relation to office supplies and furniture, cleaning services and direct food procurement)
- Laboratory consumables (including PPE).

In terms of supply chain risk, PI Australia predominately sources from Australian and US companies with principal operations in those countries. For our US manufacturing business, sourcing is primarily from US-based suppliers (approx. 90% of total spend in the Reporting Year) and less than 3% from regions that are at higher risk of modern slavery (which includes China, Mexico). Our spend by country or region (where grouped to guide our analysis) for PI Australia is outlined in figure 2.

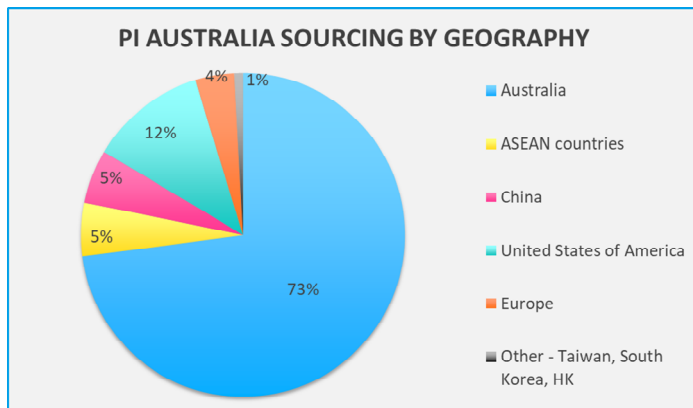


Figure 2

While the majority of our direct (tier 1) suppliers have Australian or US operations, we acknowledge that their complex supply chains (e.g. for OEM, cable, and machined products) involve offshore manufacturing processes or component sourcing from other countries, including in higher risk regions. As we do not yet have visibility of our tier 2 and beyond supply chain, this will be an area to progress our efforts over the next few years. This is part of a broader development piece in PI’s sourcing strategy and overall supplier management framework.

We recognise that the inherent risk in raw material extraction, manufacture and disposal of electronics and sheet metal commodities, and the exposure to indirect modern slavery contributes to our modern slavery risk profile.

For the Reporting Year, approximately 10% (or around \$AUD6m) of our total sourcing spend for PI Australia was from 60 suppliers in countries with medium to high prevalence or vulnerability to modern slavery.²

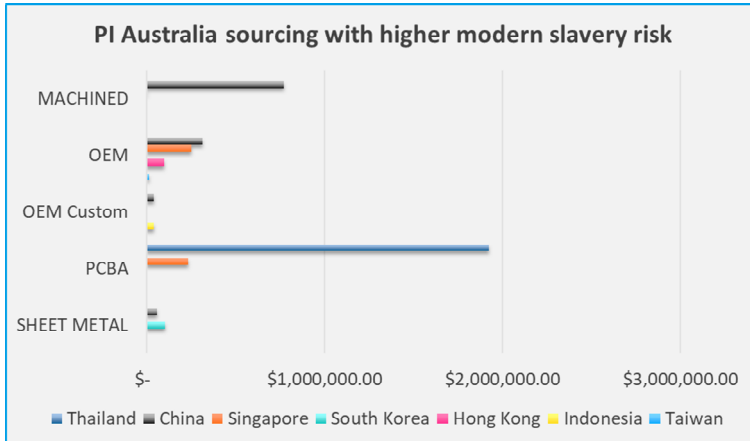


Figure 3

When considering geographic, industry³ and product type risk⁴, and with reference to supplier criticality, approximately 7% of our total spend is sourced from suppliers that have a greater risk of modern slavery in their supply chains (see figure 3). We identify 20 suppliers providing sheet metal, machined parts, OEM and PCBA products from China, Indonesia, Hong Kong, Singapore and Thailand that we consider to be higher risk.

In the Reporting Year, these suppliers have committed to our Supplier Code of Conduct via one of the following avenues: direct engagement based on our 2021 risk assessment; supplier evaluation onboarding processes; or through our revised purchasing terms.

OUR ACTIONS TO ASSESS AND ADDRESS RISKS OF MODERN SLAVERY

In our first reporting year, Planet Innovation committed to a two-year plan to progress initiatives to develop its corporate awareness of modern slavery, build foundational capabilities for assessing modern slavery risk within our operations and supply chain. Our focus was to cement governance and organisational structures from which we can build upon.

a) Corporate governance

Our corporate governance actions have provided opportunity to address modern slavery requirements through policy commitments and enterprise wide frameworks with the addition of a new Anti-Bribery and Corruption Policy, Risk Management Policy and Supplier Code of Conduct developed and implemented in the Reporting Year.

2. When referencing the Global Slavery Index 2018.

3. Manufacturing generally is identified as a sector that is widely considered to have known forced labour exploitation - ILO, Walk Free Foundation in partnership with IOM, 2017.

4. Products derived from raw materials or electronic components.

Table 7: PI Policies

OUR POLICIES	
Anti-Bribery and Corruption Policy	Establishes minimum expectations for PI to comply with anti-bribery and corruption obligations, ensure PI operates within its risk management framework and promotes investor confidence in the integrity of the PI Group, and recognises that corruption is also an underlying cause of abuses and exploitation of vulnerable individuals.
Code of Conduct	Provides the guiding principles and standards for how we work together and with others and speaks to our commitment to addressing modern slavery through ethical business practices.
Risk Management Policy	Defines our commitment and approach to managing risk and the responsibilities delegated down from the Board to give effect to the principles and standards expected in the way we do business, in alignment with our Code of Conduct and other corporate policies adopted by the Board.
Supplier Code of Conduct	Establishes minimum expectations and standards of our suppliers with respect to ethical business practices, health and safety, human rights and labour law compliance, and provides instructions for communicating with PI or reporting suspected unlawful conduct to the Whistleblower Protection Coordinator.
Whistleblower Policy	Encourages and outlines the protections for persons who disclose actual or suspected wrongdoing, and details PI's framework for receiving, handling and investigating disclosures.

In the Reporting Year no disclosures were made under our Whistleblower Policy and there were no reported breaches of PI Policies.

b) Operational initiatives

Our resources and efforts in the Reporting Year have been focused on modern slavery risk in PI's direct supply chain, with attention given to our manufacturing business based on our modern slavery risk profile continuing from PI's 2021 reporting year assessment.

- **Business improvements**

The introduction of PI's new ERP across our Australian locations has strengthened our data points and reporting capability, acting as an enabler for more robust discussions about our supply chain and modern slavery risk within our Modern Slavery Working Group. Process and system enhancements will continue to support uplift in ongoing supplier management and engagement activities with our suppliers moving forward.

Planet Innovation's quality management system is central to our supplier evaluation processes. In the Reporting Year, we have commenced review of existing procedures, and have embedded human rights

due diligence directed questions at both supplier onboarding and at re-evaluation. We are starting to build on our supplier data from a quality focused baseline to guide future actions.

- **Training and awareness**

Training initiatives both internal and through externally available resources, such as from the Supply Chain Sustainability School, have been rolled out in Australia and the US targeting key team members in manufacturing, operations, procurement and human resources. This has supported general awareness raising, participation in Modern Slavery Working group discussions, and modern slavery risk assessment activities. The increased participation and outputs of risk assessment efforts by our procurement team in the Reporting Year demonstrates an increased awareness and understanding of modern slavery, and efforts to weave modern slavery considerations into our sourcing management and decision-making functions which will help steer our future direction.

- **Supplier management and engagement efforts**

Our terms of business, including our Purchase Order (PO) Terms and manufacturing supplier agreement templates have undergone external review. Updates include provisions to address modern slavery obligations and embed our Supplier Code of Conduct. Our revised PO Terms became effective in February 2022 in line with our ERP launch date. Our supplier agreement templates will become operational in the next Reporting Year.

We have reviewed and updated our supplier evaluation due diligence questionnaire to address modern slavery risk indicators within our Quality Management System in Australia and commenced roll out in the Reporting Year. While we have covered about 10% of our suppliers for the Reporting Year, this is now embedded in our cycle and serves as a critical input for building our business intelligence and capability to develop our training, engagement and audit program with our suppliers.

Our key milestone has been the release of PI's first Supplier Code and efforts to write to existing suppliers and seek their commitment to our Supplier Code of Conduct. We focused on our 'Top 20' suppliers identified in our 2021 reporting year, and extended communications to our key spend suppliers acquired through PIP Inc. with positive response rates.

EFFECTIVENESS

PI is not aware of instances of modern slavery with respect to our tier 1 suppliers for the Reporting Year, however we recognise our efforts must extend beyond tier 1 given the hidden nature of modern slavery. Our future direction is to understand our tier 2 supply chains as we mature our practices.

Our quality management system is integral to PI organisational response and the means for measuring its effectiveness. As we embed new processes and gather business intelligence, our QMS improvement cycle will assess the effectiveness of those processes and outputs including our review of supplier evaluation metrics, our procedures for managing supplier responses and relationship management activities.

PI will periodically review its approach and practices to address modern slavery risk and identify improvements supported by the Modern Slavery Working Group, which will continue in the next reporting year. PI's Audit, Risk Management and Compliance Committee will oversee the effectiveness of PI's efforts, under its revised Charter, through regular updates and data as we build upon our due diligence activities.

COVID-19 PANDEMIC IMPACT

In our second Reporting Year, COVID-19 continued to impact our business operations and activities, with supply chain disruptions realised resulting in the need to expand and look to alternative sourcing arrangements in our supply chain. This has influenced PI's sourcing approach and the number of suppliers with whom we engage, and we recognise that the flow on impacts of the pandemic continue to affect modern slavery risk across supply chains in the Reporting Year.

OUR COMMITMENTS LOOKING AHEAD

Planet Innovation's visibility of and response to modern slavery risk in our supply chain will continue to develop. The commitments we made to pursue our modern slavery response in our first reporting year remain relevant and our two-year plan will continue into the next reporting year to guide target setting. As we continue to build on our efforts and implement plans, our attention will also turn to using our modern slavery risk analysis to inform PI's broader sourcing strategy and preferred suppliers. We will look to:

1. Continue to improve our modern slavery risk assessment capability drawing on business intelligence through our newly implemented ERP and supplier evaluation data.
2. Build our training resources for team members and develop initiatives to extend awareness for critical suppliers identified in the Reporting Year.
3. Develop a global approach to risk and supplier management activities in line with strategic sourcing changes.
4. Continue our supplier evaluation efforts against set targets and commence development of audit initiatives for modern slavery risk including commencing active supplier checks against our Supplier Code of Conduct.
5. Utilise the improvement cycle of our QMS to build in new supplier management practices and processes for our Australian and US businesses.

APPROVAL BY GOVERNING BODY

This Statement is made in accordance with the Modern Slavery Act 2018 (Cth). This Statement has been approved on 16 December 2022 by the Board of Directors of Planet Innovation Holdings Limited.



Jonathan Ling

Chair

Planet Innovation Holdings Limited