



# Modern Slavery Statement

for the year ended 31 December 2023



## A Message from our CEO

I am pleased to present Integria's Modern Slavery statement for the financial year ending 31 December 2023

As part of our mission to inspire people to live better lives, naturally, we are committed to producing high quality products, whilst sourcing responsibly, reducing the impact of our operations and supporting our stakeholders to thrive. Integria achieved a defining step in our sustainability journey with the publication of its [inaugural Sustainability Report 2023](#). One of the important strategic priorities in 2024 is supply chain resilience of which the risks of modern slavery are significant. Our sustainability strategy seeks to embed modern slavery risk mitigation practices within supply chain practices and ultimately overall company strategy.

As a natural health and wellness company, it is vital that we remain committed and vigilant on the lifecycle of our exceptional products and recognise all risk touchpoints in our global supply chains. Our products seek to enhance the well being of our customers, and the evolution of those products from seed to consumption must be shaped by sustainable supply, operations and stakeholder engagement for mitigating risks of modern slavery.

During the reporting period, we did not identify any instances of modern slavery in our operations or supply chain. However, we recognise that this does not mean modern slavery was not present during this period, so we must not become complacent. We will continue to build on the work we have completed so far and partner with supply chain partners to drive continuous improvements and advance transparency.

This Modern Slavery Statement is made by Integria Healthcare (Australia) Pty Ltd ACN 096 496 212 for the calendar year ended 31 December 2023 and is approved by our Board of Directors.

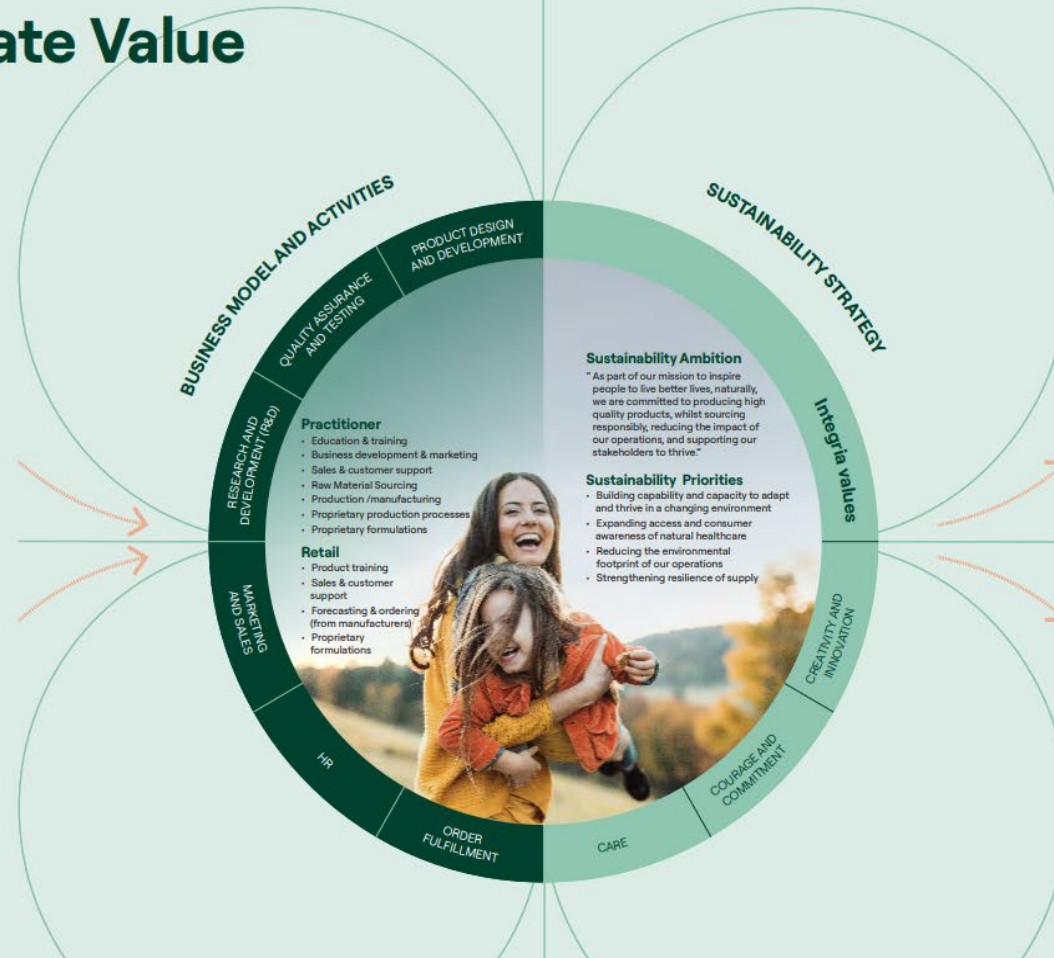


**Wayne McIntosh**  
CEO

# How We Create Value

## INPUTS

-  **People, knowledge and capabilities**
-  **Expertise in sourcing herbal raw materials**
-  **Manufacturing plant in Warwick + Lab in Brisbane HQ**
-  **Brands**
-  **Intellectual property  
Global distribution partnerships**
-  **Long-term trusted supplier partnerships**
-  **Finished goods**
-  **Contract manufacturers**



## STAKEHOLDER GROUPS AND OUTCOMES

-  **Employees**  
Creating an environment where the best people want to work
-  **Customers (CONSUMERS)**  
Producing high quality products that help people to live better lives, naturally
-  **Partners (SUPPLIERS, PRACTITIONERS, DIST. PARTNERS, US)**  
Partnering with ethical and environmentally responsible partners
-  **Investors**  
Generating appropriate returns over the long term
-  **Environment**  
Regenerating natural ecosystems
-  **Communities**  
Promoting and nurturing healthy communities

## Approach

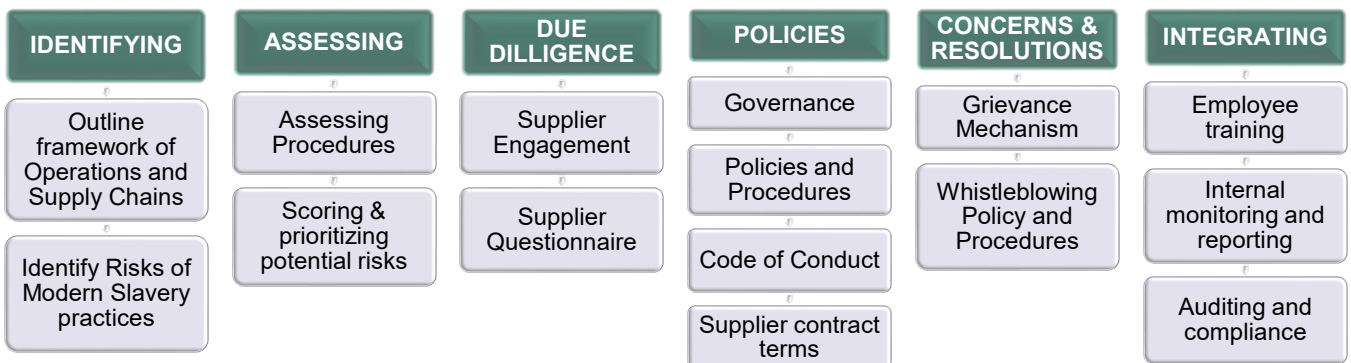
Integria Healthcare recognises that modern slavery represents one of the most significant and intricate human rights challenges globally. The company is dedicated to giving paramount importance to the health, safety, and well-being of its personnel and stakeholders, which includes individuals working both directly and indirectly within its supply chains.

Integria Healthcare is dedicated to conducting its business in alignment with internationally proclaimed human rights, ensuring all workers' fundamental right to be treated with dignity and respect, and to live a life of freedom and opportunity. Integria is committed to conducting business to minimise modern slavery risks within our supply chain and operations. Any potential cases will be thoroughly investigated, and appropriate actions will be taken to address identified instances.

Modern slavery, an umbrella term describing human trafficking, slavery, and slavery-like practices, occurs through coercion, threats, or deception, exploiting individuals and depriving them of their freedom. This term is defined in the Modern Slavery Act 2018 (Cth) and includes eight types of serious exploitation: servitude, slavery, forced labor, forced marriage, the worst forms of child labor, debt bondage, deceptive recruiting for labor or services, and trafficking. These are globally recognised as serious crimes.

Integria continues to proactively collaborate with our supply chains and operations to reduce the risk of modern slavery, promote and support human rights, and expects all engaged organisations to follow suit. This commitment involves a continuous improvement approach as Integria gains a better understanding of the supply chain of our suppliers, working with them to address instances of modern slavery. Integria is determined to invest time and resources to contribute to the fight to end modern slavery.

This statement, in accordance with the Australian Modern Slavery Act 2018 (Cth), outlines the actions undertaken by Integria to address modern slavery risks in our business and supply chain for the financial year ending 31 December 2023. It details the current and ongoing activities Integria has committed to for identifying, assessing, and remedying risks related to modern slavery in our business and supply chain.



Throughout 2023, we have persisted in our ongoing efforts to enhance and refine our approach to minimising risks associated with modern slavery. This progress is encapsulated in the chart above and further elaborated upon in this Modern Slavery Statement. Our operations now better integrate considerations related to modern slavery, emphasising an ongoing commitment to continuous improvement.

## Structure, Operations and Supply Chain – Criteria 1 and 2



### About Integria

Integria Healthcare envisions inspiring individuals to mission to inspire people to live better lives, naturally. Our commitment involves bringing together renowned names in natural medicine to offer a comprehensive range of herbal, nutritional, and complementary healthcare products, underpinned by a combination of scientific and traditional evidence.

With a rich history spanning 60 years of scientific exploration into herbal remedies, we stand at the forefront of research and development in natural medicine. Operating with a broad geographical reach, our distribution extends across Australia, New Zealand, Southeast Asia, China, and parts of Europe. We have our manufacturing facility in regional Queensland Australia and partner with a trusted network of global supply partners.

Our products play an integral role in the daily lives of millions worldwide, offering natural solutions for maintaining long, healthy lives. Catering to various health and well-being aspects, our herbal, nutritional, and complementary healthcare products cover areas such as cardiovascular health, respiratory health, skincare, gastrointestinal support, immune support, musculoskeletal support, blood glucose management, dietetics, endocrine and nervous system support, therapeutic essential oils, and general well-being.

Dedicated to achieving and supporting patient outcomes, we invest significantly in scientific research, product development, education and training. Our commitment is evident in the Warwick manufacturing facility adhering to the highest regulatory standards of Good Manufacturing Practice, while our national research and development facility in

Brisbane complies with Australian standards of Good Laboratory Practice under the Therapeutic Goods Act. Our Distribution team ensures timely and high-standard delivery of healthcare products.

At Integria Healthcare, our internal Procurement team is devoted to managing relationships with direct spend supply partners, responsible for providing goods and services specific to our products, such as raw materials and third-party contract manufacturers. Our goal is to select suppliers aligned with Integria's values and operating principles, fostering sustainable relationships that deliver lasting value.

### Structure and Operations

Integria Healthcare (Australia) Pty Ltd ACN 096 496 212 (**Integria**) takes pride in owning trusted and innovative natural healthcare brands, including Thursday Plantation®, Thompsons®, Eagle®, Eagle Clinical™, Eureka®, and MediHerb®. Additionally, we collaborate with prominent practitioner-only and retail brands through our affiliated companies in Australia and New Zealand. This statement encompasses each wholly owned Australian entity under the control of Integria.

Integria Healthcare presents this consolidated Modern Slavery Statement, covering the Integria Healthcare group in Australia. We take an integrated approach to addressing modern slavery risks and operate under a common set of governance policies. As our teams operate for the entire group, there has been significant consultation and collaboration between our people to prepare this Statement. We have explained our commitments regarding modern slavery more broadly within our business.

### Simplified Structure of Integria Healthcare Australian Entities Covered by this Statement



## Our Values

### Our Guiding Behaviours

At Integria, we embrace a set of core behaviours that define our culture and support our values. These behaviours shape our interactions, decisions, and the way we collaborate with each other.

1. We embrace challenges and opportunities with a growth mindset, nurturing solutions that lead to progress.
2. We actively encourage experimentation, risk-taking and creative thought and action.
3. We help others articulate and frame their ideas and motivate them to persist.

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1. We listen without judgement, collaborate with purpose, and then we commit.
2. We actively engage critical thinking and seek understanding over accepting the status quo.
3. We hold ourselves and others accountable for outcomes.

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1. We are approachable, professional and kind, always.
2. We balance our needs with respect and consideration for the time and needs of others.
3. We recognise and reward effort in ways that are meaningful to the individual.
4. We support our people to bring out their best and strive for collective success.

*Inspiring people to live better lives, naturally.*

## The Supply Chain

Integria Healthcare operates an intricate and varied supply chain, engaging with local and global partners in 20 countries across Europe, North and South America, South Africa, and Southeast Asia. With a network comprising over 283 Tier 1 suppliers, Integria Healthcare places paramount importance on the quality and robustness of raw materials, as well as the integrity and accountability of its supply chain.

The procurement process involves sourcing a diverse array of goods and services essential for manufacturing our products, including herbal materials, essential oils, nutritional ingredients, and packaging components. Collaboration with third-party manufacturers, meeting our commercial requirements and upholding stringent quality standards, enhances our production capabilities and leverages additional expertise. Through the establishment of enduring relationships with key strategic suppliers, we foster collaboration and trust, facilitating long-term arrangements that contribute to the development of cooperative and reliable working partnerships.

Our strategic partnerships with suppliers are strengthened by long-term contractual agreements and mutually established performance benchmarks. The distribution between substantial and enduring collaborations is usually regulated by formal contract terms, while smaller-scale or shorter-duration engagements typically adhere to purchase order conditions. More than 95% of our expenditure with suppliers originates from five key sourcing nations.

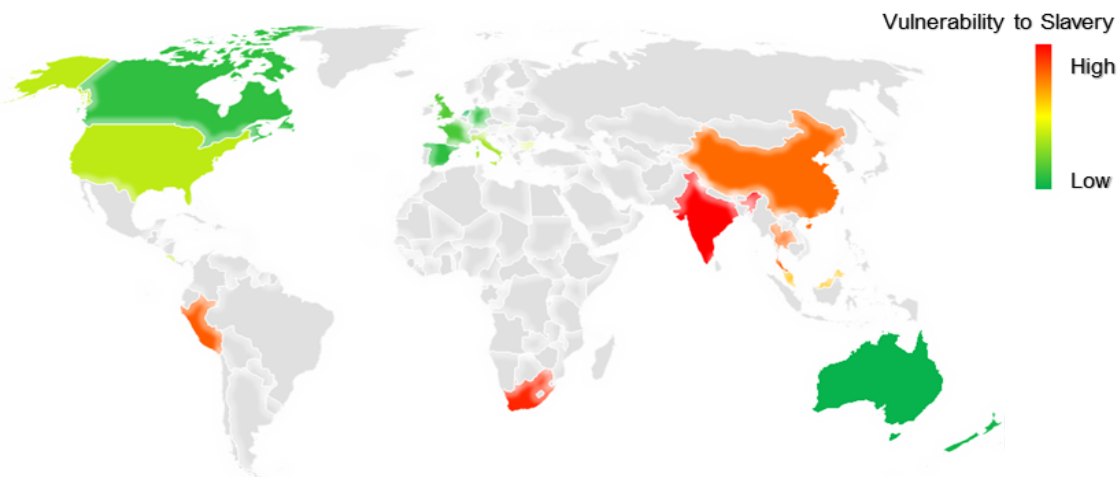
- Spend spread across 20 countries
- 283 Tier 1 suppliers
- Spend spread across 7 industries

Primary Expenditure Categories	% Spend 2023
	47%
Raw Materials	45%
Packaging	5%
Repairs and Maintenance	1%
Operations	1%
Research and Consulting	<1%
Independent Brand Suppliers	<1%

Table 1: Our primary expenditure categories, which represented approximately 90% of our total spending in 2023, encompass Raw Materials and Third-Party Manufacturing.

### Risk of Modern Slavery – Criteria 3

Integria Healthcare recognises the pervasive nature of modern slavery risks within global business operations and has implemented a comprehensive risk-based approach to address these concerns. Through an outward-facing, people-focused assessment, the company identifies various potential risks, including those associated with high-risk geographical locations, industries, and vulnerable populations.



Understanding the heightened prevalence of modern slavery practices throughout lower tiers of the supply chain, Integria Healthcare has prioritised proactive measures within its product supply chain. This includes extending efforts to encompass raw material suppliers and third-party contract manufacturers. Despite inherent limitations in examining risks beyond first-tier suppliers, the company remains dedicated to continuous improvement and actively focuses on high to medium-risk suppliers and partners.

#### The risks most likely to impact Integria Healthcare's supply chain include:

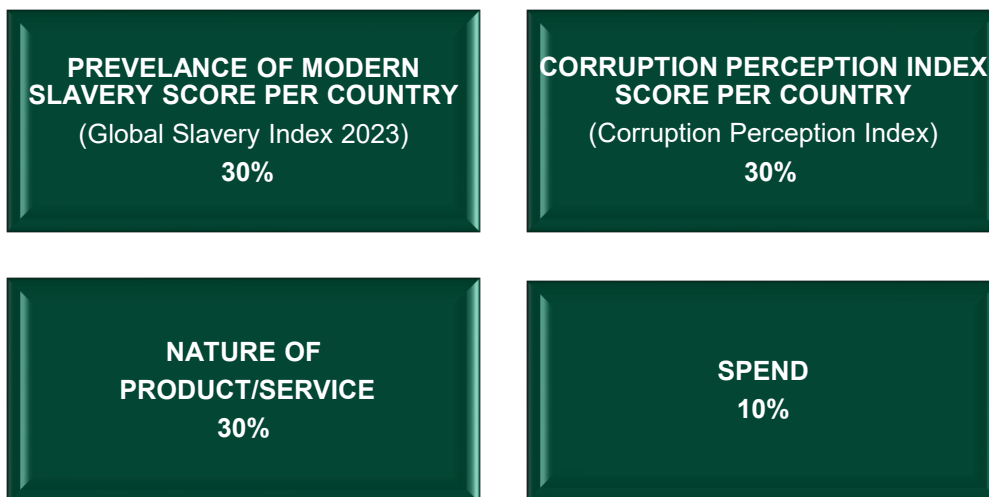




While Integria Healthcare acknowledges that the current risk of modern slavery in its operations is generally low, the company remains vigilant of potential risks associated with extended tiers of the supply chain. These risks are particularly prevalent within geographic, sectoral, and product/service contexts. To address these challenges, Integria Healthcare has implemented robust due diligence processes and continues to assess and mitigate modern slavery risks effectively. By acknowledging these risks and implementing proactive measures, Integria demonstrates its commitment to combating modern slavery throughout its supply chain and ensuring the integrity and effectiveness of its policies, procedures, and controls.

### How We Assess Risk – Criteria 4

Integria Healthcare conducted a thorough review of its 283 Tier 1 suppliers, utilizing a risk assessment scorecard to evaluate key factors including geography, product/service nature, and expenditure. External indices like the Global Slavery Index and Corruption Perceptions Index informed the risk ratings.



In the course of assessing all suppliers, Integria has taken proactive steps to engage with suppliers classified as high-risk and medium risk, identifying 15 suppliers as high risk and 66 suppliers as medium risk, while 202 Tier1 suppliers have been designated as low risk. Our primary emphasis has been on evaluating and addressing the risks associated with high and medium-risk suppliers. Additionally, we distributed Modern Slavery questionnaires, resulting in 66 responses.

After conducting comprehensive supplier reviews, which included assessments of their questionnaires and relevant policies and documentation, it was found that among the 15 high-risk suppliers identified, 11 were reassessed and downgraded to a mitigated medium-risk rating, while 2 were downgraded to a mitigated low-risk rating. Within the medium-risk category, 23 out of the 66 suppliers successfully transitioned to low risk. Integria is currently engaged in ongoing collaboration with high risk and medium risk suppliers who are in the process of meeting all necessary requirements.

This process exemplifies Integria Healthcare's steadfast dedication to consistent standards within its supply chain management practices, with a clear focus on mitigating the risks associated with modern slavery and corruption.

### Supplier Inherent Risk Rating Score per Country:

Country of Location	Group Description	Values	Suppliers	Inherent Risk Rating		
		% Spend		Low	Medium	High
				1-2.4	2.5-3.1	3.2-5
Australia	Independent Brand Supplier	0.13%	2	1.6		
	Other	0.33%	60	1.6		
	Packaging	4.51%	19		2.5	
	Raw Materials	21.89%	54		2.6	
	Repairs & Maintenance	1.04%	71	1.6		
	Third Party Manufacturer	43.07%	13		2.9	
	Utilities	0.26%	13	1.6		
Bulgaria	Raw Materials	0.14%	1			4.1
Canada	Raw Materials	0.97%	6		2.6	
China	Raw Materials	8.96%	4			3.7
Costa Rica	Raw Materials	0.03%	1		3.1	
France	Raw Materials	0.12%	1		2.6	
Germany	Raw Materials	0.03%	2		2.5	
India	Raw Materials	7.33%	4			4.2
Italy	Raw Materials	0.36%	2			3.2
Malaysia	Third Party Manufacturer	0.10%	1			4.1
Netherlands	Third Party Manufacturer	0.18%	1		2.6	
New Zealand	Raw Materials	0.43%	2	2.3		
	Third Party Manufacturer	3.65%	3		2.6	
Peru	Raw Materials	0.04%	1			4.0
Singapore	Utilities	0.08%	1	1.6		
Slovakia	Raw Materials	0.23%	1			4.1
South Africa	Raw Materials	0.09%	1		3.1	
Spain	Raw Materials	1.28%	1		3.1	
Thailand	Third Party Manufacturer	0.36%	1			4.4
United Kingdom	Other	0.01%	2	1.6		
	Consultant	0.39%	1	1.8		
USA	Other	0.18%	3	1.9		
	Raw Materials	3.55%	10		2.9	
	Third Party Manufacturer	0.27%	1			3.2
<b>Grand Total</b>		<b>100.00%</b>	<b>283</b>			

<sup>1</sup> Collated List of all companies for which we paid an invoice in FY 2023 and listed Country of Location & Spend (source: AP).

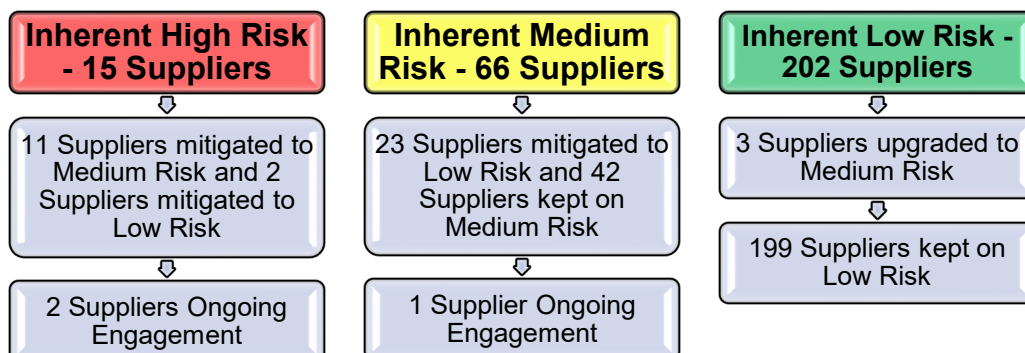
<sup>2</sup> Categorised Suppliers into segments and developed Risk scorecard.

<sup>3</sup> Risk scorecard-based approach - Rated each supplier based on a final weighting namely Geography (Prevalence of modern slavery - 30% & Corruption perception index - 30%), Nature of product/service - 30%, and Spend - 10%.

<sup>4</sup> Identified 283 Tier1 suppliers and listed them according to their Inherent risk rating (High, Medium, Low).

\* Inherent Risk rating weighted to a numerical number out of 5. (Low Risk 1-2, Medium Risk 2.5-3.1, High Risk 3.2-5).

### Mitigated Risk After Review:



## Addressing Modern Slavery – Criteria 4

To address and mitigate the risks associated with modern slavery within our supply chain, Integria has implemented comprehensive measures. These include the incorporation of modern slavery compliance provisions within our purchase order terms and the establishment of a Supplier Code of Conduct, clearly outlining Integria's expectations of our suppliers.

Our purchase order terms mandate that suppliers and their subcontractors take reasonable steps to ensure there is no modern slavery or human trafficking within their supply chains or business operations. This, combined with our Supplier Code of Conduct, empowers us to conduct audits and terminate relationships with suppliers found to be non-compliant. Additionally, under the Supplier Code of Conduct, Integria commits to collaborating with suppliers to address and rectify instances of non-compliance, ensuring adherence to our modern slavery requirements throughout the supply chain. This rigorous process is applied to all suppliers during onboarding.



New suppliers undergo a thorough risk assessment using our scorecard methodology and are required to complete a questionnaire as part of our procurement and onboarding procedures. Furthermore, Integria has established a company-wide Modern Slavery Standard (Annexure 2), mandating that our directors, officers, employees, and contractors consider modern slavery implications in all procurement activities.

This standard, approved by Integria's Chief Executive Officer and General Counsel, is overseen by the Procurement Team, with responsibility for its implementation and management, and is reinforced by our Whistleblowing policies. All third-party agreements, tailored to the specific nature of each relationship, include a modern slavery clause. Upon renewal or extension, these agreements are amended to incorporate modern slavery contract clauses, ensuring ongoing compliance.

Integria's procurement managers receive comprehensive education on the Modern Slavery Act and its implications, as well as training on Integria's procedures for identifying

and mitigating risks associated with our direct spend supply partners. This holistic approach underscores Integria's commitment to combatting modern slavery across our supply chain.

## 2023 Key Milestones: Integria's Progress in Modern Slavery Prevention

Throughout 2023, Integria has remained steadfast in its commitment to developing, implementing, and reviewing robust processes and policies aimed at combating modern slavery across both direct and indirect Tier 1 suppliers. Here are the key milestones achieved:

- **Global Supplier Review:** A comprehensive desktop review of all direct Tier 1 suppliers engaged during 2023 has been completed and updated. This review was based on factors such as spend, geographical location, and the nature of business/services provided.
- **Enhanced Risk Assessment Model:** We have introduced new weightings to our inherent risk model, focusing specifically on the prevalence of modern slavery in supplier countries and the corruption index. This refinement is expected to provide a more accurate assessment of risk outcomes.
- **Questionnaire Assessment:** A total of 66 completed questionnaires were received and assessed against guidance criteria. Each questionnaire was assigned a mitigated risk rating based on thorough evaluation.
- **Procurement Work Group Establishment:** A dedicated procurement Modern Slavery work group, comprising 5 procurement members directly engaging with Tier 1 spend suppliers, has been established. Regular monthly meetings facilitate ongoing training sessions and discussions regarding identified risks, ensuring swift action and communication with relevant stakeholders.
- **Questionnaire Enhancement:** Our questionnaire has undergone significant enhancements to better accommodate the diverse commercial contexts of our suppliers. This includes tailored adaptations for smaller, family-run farming or gathering operations, acknowledging unique risks associated with different supplier types.
- **Contractual Provisions Integration:** As part of our ongoing efforts, all new contracts and contract renewals now include provisions aimed at addressing the risk of modern slavery. Furthermore, our Supplier Code of Conduct (Annexure 1) has been incorporated into these agreements to reinforce our commitment to ethical sourcing practices.

## How We Assess Effectiveness – Criteria 5

At Integria, we prioritise the scrutiny of our supply chain, with particular emphasis on Tier 1 suppliers situated in high-risk regions, especially those providing raw materials. To gauge the efficacy of our efforts in identifying and mitigating modern slavery risks, we conduct regular reviews through our Modern Slavery working group, striving for ongoing enhancement and the advancement of our modern slavery risk management capabilities.

Integria's commitment includes:

- Implementing Procurement Standards and Guidelines in 2024 as part of our policy management system, integrating modern slavery compliance into vendor selection processes.
- Periodically reviewing and updating policies related to modern slavery.
- Releasing a Sustainability report, disclosing sourcing principles for raw materials procurement to improve on supply chain transparency.
- Consistently utilising the risk assessment scoreboard for assessing new suppliers.
- Collaborating with suppliers deemed as high risk to mitigate the risk of modern slavery associated with their operations.

Integria will gauge effectiveness by:

- Conducting desktop and/or physical audits as needed to ensure compliance.
- Regularly reviewing relevant policies and updating them when necessary.
- Incorporating modern slavery clauses into new contracts.
- Sustaining and reinforcing our robust engagement with suppliers to continuously enhance our processes and gain deeper insights into our supply chains.
- Monitoring and reporting on our success in investigating, auditing, and either transitioning or removing high-risk suppliers, exhausting remediation measures as needed.

## **Our Holistic Approach to Preventing Modern Slavery – Criteria 6**

At Integria Healthcare, our commitment to preventing modern slavery is integral to our holistic approach, encompassing all entities within the Integria group. Guided by our core values of Care, Courage & Commitment, and Creativity & Innovation, we strive to inspire people to lead better lives naturally. This commitment extends beyond our customers to include all individuals involved in the creation and distribution of our products. Our approach to modern slavery risk management and compliance is seamlessly aligned with our values and vision.

We have identified key business objectives, prioritizing supply flexibility and ensuring traceability and ethical sourcing of ingredients. We prefer to source materials locally and ethically, reducing reliance on high-risk regions like China. Moreover, we emphasize natural excipients, clean labeling, and organic and sustainable packaging materials.

These objectives are intertwined with our suppliers and customers. By prioritizing ethical and sustainable sourcing practices, we promote transparency and accountability throughout our supply chain. This aligns with our social responsibility commitment and mitigates the risk of modern slavery. Additionally, meeting customer demands for ethically sourced and sustainable products reinforces our dedication to ethical business practices, fostering positive social and environmental outcomes.

## **Complementary Medicines Australia Working Group – Criteria 7**

Integria actively engages in the Complementary Medicines Australia Modern Slavery Working Group, collaborating with industry peers to develop and discuss continuous

improvement measures for addressing modern slavery risks in the sector. The progress of our modern slavery initiatives is regularly assessed by the Modern Slavery working group, comprised of senior Procurement managers and our Legal executives. They present material issues or risks to the leadership team for consideration.

This statement has received approval from the Board of Integria Healthcare (Australia) Pty Ltd, the principal governing body of the Integria Healthcare group of companies in Australia. It is prepared annually and published on our website.

## **Annexure 1**

### **Supplier Code of Conduct**

#### **1 Introduction and Purpose**

Integria Healthcare (Australia) Pty Ltd, Integria Healthcare (New Zealand) Limited and its related entities (together, being **Integria**) seek to work with suppliers who share a commitment and approach to conducting business with integrity, safely and in an ethically and environmentally responsible manner.

This Supplier Code of Conduct (Code) sets out the expectations that Integria has of its suppliers and is founded on Integria's Vision and Values.

#### **2 Applicability**

The Code applies to all Integria suppliers, their suppliers, and any sub-contractors regardless of spend value. These organisations and individuals are expected to comply with this Code. In the unlikely event of any inconsistency, contracts will take precedence over this Code.

#### **3 Compliance with laws**

The expectations set out in this Code are not replacements or substitutes for any applicable laws, nor do they amend, supersede, or prevail over any obligations specified in a separate contract between Integria and a supplier.

Suppliers are expected to comply with all laws that apply to their own business operations and make reasonable enquires to ensure that their suppliers do the same. Any known or suspected incidents of non-compliance should be promptly reported to Integria.

Integria reserves the right to seek clarification from suppliers regarding their compliance with this Code.

At Integria's request, and following reasonable notice, the supplier will provide Integria or its nominated representative with the relevant documentation and information.

Where non-compliance with this Code is identified, Integria will (if appropriate) contact the supplier to investigate, rectify and ensure repeated non-compliance is avoided.

#### **4 Human rights and modern slavery**

Suppliers are expected to meet the responsibilities of business set out in the UN Guiding Principles on Business and Human Rights including:

- a) Ensuring no use of forced or compulsory labour, human trafficking, child labour, slavery or servitude and that all work is conducted voluntarily, without threat of penalty or sanction and not based on deception.
- b) Identifying, avoiding, minimising and/or mitigating and remedying any human rights impacts on communities.
- c) Making all reasonable efforts to ensure that businesses within their supply chain are not engaged in, or complicit with, human rights abuses such as forced or child labour.
- d) Ensuring all personnel, temporary or outsourced labour (including making reasonable enquiries in relation to those personnel in the Supplier's supply chain) meet the local legal minimum labour age permitted by the law of the country where the labour occurs and are paid a proper and competitive wage which meets their basic needs and provides discretionary income and is no less than the standards required by local laws.

#### **5 Creating a safe work environment that fosters individual and collective success**

Integria endeavours to achieve industry leading health and safety performance and is committed to providing a workplace that is safe for its personnel, suppliers, and the public.

Integria wants to procure goods and services from suppliers that conduct business in a way

that supports Integria's operating principles including:

- a) No business objective will take priority over health and safety
- b) A requirement that our suppliers and contractors demonstrate the same commitment to achieving excellence in health and safety performance
- c) Compliance with relevant legislation, regulations, codes of practice and industry standards

Suppliers are required to:

- d) ensure their personnel comply with Integria's HSE policies while on Integria property
- e) encourage their workforce to report any accident, injury, illness, or unsafe condition immediately, and stop work that could be unsafe, so that appropriate action can be taken.

Additional specific security, health and/or safety information requirements may also be specified in a written contract between Integria and a supplier.

## **6 Non-discrimination, grievance processes and freedom of association**

We value working with businesses that provide a workplace that:

- a) Is free from any harassment, exploitation, intimidation, inhumane treatment and discrimination including based on race, ethnicity, religion, national origin, disability, age, sexual orientation, gender or marital status.
- b) Has mechanisms to allow personnel to speak up or raise grievances without fear of retaliation.
- c) Respects every person's workplace rights and entitlements and ensures compliance with all relevant workplace laws and regulations.
- d) Provides a means for its personnel, suppliers, and business partners to speak up if they see something that is unsafe, unethical or potentially harmful.

## **7 Supporting Environmental priorities**

Suppliers can demonstrate their commitment to operate in an environmentally sound manner by enhancing environmental sustainability through:

- a) reducing waste and recycling initiatives
- b) reducing and/or offsetting carbon emissions,
- c) reducing the use of energy, water or other resources,
- d) reducing the use of hazardous and toxic substances, and
- e) ensuring correct disposal of waste and minimisation of packaging.

## **8 Bribery and corruption, money laundering, conflict of interest and anti- competitive conduct**

Suppliers are expected to promote transparency and accountability in the conduct and administration of their business by having in place effective processes and procedures to proactively prevent:

- a) Extortion, embezzlement, bribery and corruption, including expressly prohibiting the direct or indirect giving, paying, promising, or accepting of anything of value to obtain, retain or direct business, to secure an improper advantage or to influence someone including government officials to improperly perform their duties.
- b) Money laundering, including the act of hiding illegal funds (especially those with possible links to terrorism or criminal activity) or giving such funds apparent legitimacy.
- c) Actual or apparent conflicts of interest between personal and business interests, including



using Integria information and resources for improper gains.

- d) Anti-competitive conduct, including any form of agreement or understanding with competitors to fix prices, rig bids or restrict supply.
- e) Inappropriate provision of gifts, entertainment or meals to Integria personnel or third parties representing Integria. When legitimately required they should be of modest value, appropriately timed and given in good faith.

## 9 Protecting proprietary and confidential information

Suppliers are expected to have effective protocols in place for securing and protecting Integria information including:

- a) Respecting the proprietary and intellectual property rights of Integria.
- b) Having information classification protocols and adopting industry best practices on sharing, protecting and securing information.
- c) Observing all data privacy legal requirements on the collection, processing, storing, transfer and disposal of Integria data.
- d) Reporting any suspected or actual information security incidents that impact Integria information or systems to Integria as soon as practically possible.

Suppliers must ensure appropriate controls are in place to protect Integria's brand and intellectual property against unauthorised use and damage.

Suppliers are encouraged to share their ideas with Integria so that together it helps create value for customers and its respective businesses through innovation and continuous improvement.

## 10 Review cycle

Updates to this Code may be made from time to time and will be available on our website

<https://www.integria.com/>

## 11 References

For further information please refer to the following:

- [UN Guiding Principles on business and human rights](#)
- [International Labour Organization \(ILO\) conventions](#)
- [UN Universal Declaration on the rights of the child](#)

## **Annexure 2**

### **Modern Slavery Compliance Standard (last reviewed March 2023)**

#### 1. Introduction

Integria has introduced this Standard to demonstrate its commitment to operating ethically and in compliance with the Modern Slavery legislation. In this Standard, the terms below are defined as:

**Modern Slavery** means internationally recognised exploitative practices including human trafficking, slavery, slavery-like practices, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour, deceptive recruiting for labour services.

**Modern Slavery Law** means: (a) any law rule or other legally binding measure of any jurisdiction that creates a reporting or due diligence obligation in connection with Modern Slavery; and (b) any law that criminalises or imposes a penalty for Modern Slavery.

#### 2. Purpose

The purpose of this Standard is to:

- a) limit the risk of modern slavery occurring within Integria, its supply chain or in any other business relationship;
- b) demonstrate Integria's commitment to only doing business with those who comply with the Modern Slavery Legislation; and
- c) ensure compliance with the Modern Slavery Legislation.

#### 3. Scope

All directors, officers, employees and contractors are responsible for complying with this Standard.

#### 4. Standard

This Standard is designed to govern Integria's compliance with the Modern Slavery Legislation. IHC will meet the requirements under the Modern Slavery Legislation in three ways:

- a) in the procurement of goods and services;
- b) through contract management and monitoring key suppliers; and
- c) preparation and submission of the annual compliance statement.

#### 5. Conducting Procurement of Goods and Services

The procurement framework is the key mechanism whereby suppliers are engaged by Integria. It is therefore important that the procurement framework provides for due diligence on these suppliers and their compliance with the Modern Slavery Legislation. Procuring goods and services should be conducted in a way as to ensure that Integria only sources goods and services from entities that comply with their obligations under the Modern Slavery Legislation.

The extent of the due diligence conducted in a procurement will depend on the types of goods or services being sourced. Examples of the due diligence that may be conducted include requesting:

- a) declaration that the supplier complies with the Modern Slavery Legislation;

- b) a copy of the supplier's most recent modern slavery statement (where available);
- c) details of structure and operations of their supply chain; and/or
- d) details of the actions taken by the supplier to manage and address modern slavery risks in their supply chain.

If a proposed contract is included as part of the procurement, consideration must be given to a provision ensuring compliance with the Modern Slavery Legislation.

## 6. Contract Management and Monitoring Suppliers

All supplier contracts must contain provisions covering compliance with the Modern Slavery Legislation. The obligations in the clause should include:

- a) compliance with the Modern Slavery Legislation and its reporting requirements;
- b) a requirement to take reasonable steps to ensure that there is no modern slavery in its supply chains or any subcontractor's supply chains; and
- c) a requirement to notify Integria if the supplier becomes aware of any actual or suspected breach of the Modern Slavery Legislation.

Integria will work collaboratively with key suppliers to identify and manage modern slavery risks and develop commercial and actionable solutions. Integria will discontinue arrangements with suppliers where it is apparent that those suppliers have not taken reasonable steps to prevent or specifically prohibit modern slavery in their business operations.

Contract owners, in conjunction with the Procurement, are responsible for conducting audits on key suppliers where there is a reasonable basis to assess and verify compliance with obligations under the Modern Slavery Legislation. The annual statement submitted to the Department of Home Affairs requires reporting on the risks of modern slavery practices in the operations and supply chain of IHC to be identified; and for the reporting of actions taken by Integria to address these risks (including due diligence undertaken). Legal will provide support and guidance to Procurement and contract owners conducting the annual reviews and/or audits.

## 7. Statement Preparation, Endorsement and Approval

The Modern Slavery Legislation requires that an annual statement be prepared and approved for each financial year. Legal will be responsible for the preparation of the statement. The annual statement will be approved by the Board (on the recommendation of the Chief Executive and General Counsel) and signed by a member of the Board. The statement must be submitted to the Department of Home Affairs prior to 30 June each year commencing 30 June 2021.

## 8. Key Stakeholder Responsibilities

### 8.1 Board

The Board is responsible for approving and signing the annual modern slavery statement on the recommendation of the Chief Executive and General Counsel.

### 8.2 Chief Executive Officer

The CEO is responsible for approving this Standard in accordance with the IHC Policy Management System.

### **8.3 Leadership Team (LT)**

Members of the LT are responsible for the implementation of Standard obligations throughout their respective areas of the business.

### **8.4 Legal and Procurement Team**

The Legal and Procurement Team have overall responsibility for the implementation and management of this Standard and will:

- 8.4.1 provide training to employees (particularly contract owners and those involved in sourcing goods and services) in relation to the obligations under this Standard and the Modern Slavery Legislation;
- 8.4.2 ensure that all applicable contracts have clauses covering modern slavery;
  - partner with contract owners to monitor suppliers and their compliance with the Modern Slavery Legislation;
  - oversee sourcing activity, ensuring that an assessment of suppliers is conducted (where appropriate) on their compliance with the Modern Slavery Legislation;
  - provide advice in circumstances of a suspected breach of the Modern Slavery Legislation (or a supplier's suspected breach of the Modern Slavery Legislation) or of this Standard; and
  - prepare the modern slavery statement for approval.

### **8.5 Contract Owners**

Contract owners must monitor key suppliers to ensure they maintain compliance with the Modern Slavery Legislation.

## **9. Whistleblowing**

In extreme circumstances an individual may be concerned that a serious breach of this Standard has occurred but considers that it would be personally damaging to pursue it through normal channels. In such circumstances the individual should refer to IHC's [Whistleblowing Standard, Procedures and Guidelines](#) for information about how to report such a concern and to whom.

# Integría

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