

20 24

# H&H Group Modern Slavery Report

Health and Happiness (H&H) International Holdings Limited





At H&H, we protect human rights as the foundation of health and happiness and work to ensure that individuals touched by our business are granted basic rights and fundamental freedoms to which all humans are entitled. We respect and enhance human life in our workplaces.

We are committed to ensuring that all our business activities are conducted in an ethical and responsible manner.



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Part 1 Introduction





### **About this statement**

This modern slavery statement (the 'Statement') is made pursuant to the Australian Modern Slavery Act 2018 (Cth) and the UK Modern Slavery Act 2015 for the financial year ending 31 December 2024.

It outlines the steps taken by Health and Happiness (H&H) International Holdings Limited and its controlled entities listed in <u>Appendix A</u> (collectively 'H&H Group', 'H&H', the 'Group', 'we', 'us' or 'our') to identify, assess and address modern slavery risks in our operations and supply chains.

Modern slavery encompasses various forms of serious exploitation, including human trafficking, slavery, servitude, forced labour, debt bondage, deceptive recruiting for labour or services, forced marriage, and child labour.





### **About H&H Group**

Dynamic, courageous and ambitious in our mission to make people and their pets healthier and happier, the Group strives to inspire wellness while contributing positively to the needs of society and the planet.

H&H Group is a global premium health and nutrition company headquartered in Hong Kong SAR, with a second head office in London. Listed on the Hong Kong Stock Exchange (HKEx) since 2010 (Stock Code: 1112), we operate through three key business segments – Adult, Baby and Pet Nutrition and Care (ANC, BNC and PNC).

Our premium brands-Biostime, Swisse, Zesty Paws, Solid Gold, Dodie, Good Goût and Aurelia– provide science-backed nutrition and wellness solutions across product categories including:

- nutritional supplements (including vitamin, herbal and mineral supplements ('VHMS') products, paediatric probiotic and nutritional supplements, pet supplements),
- infant formulas:
- pet food:
- baby food, snacks and accessories; and
- skincare products.

## AURELIA **ADULT NUTRITION** Swisse & CARE (ANC) RMB 6,144.9 million Revenue contribution Skincare and Vitamins, Supplements, Functional Food and Skincare Supplements

**BABY NUTRITION** & CARE (BNC)

**RMB 5,907.5 million** Revenue contribution **Biostime** 

Children's Probiotics, Prebiotics, Supplements and Infant Milk Formula

Baby Bottles, Diapers, Accessories and Skincare

Organic Baby and Children's Food

**PET NUTRITION** & CARE (PNC)

RMB 1,874.1 million Revenue contribution

solid gold

Dog and Cat Nutrition and Supplements

Dog and Cat Nutrition







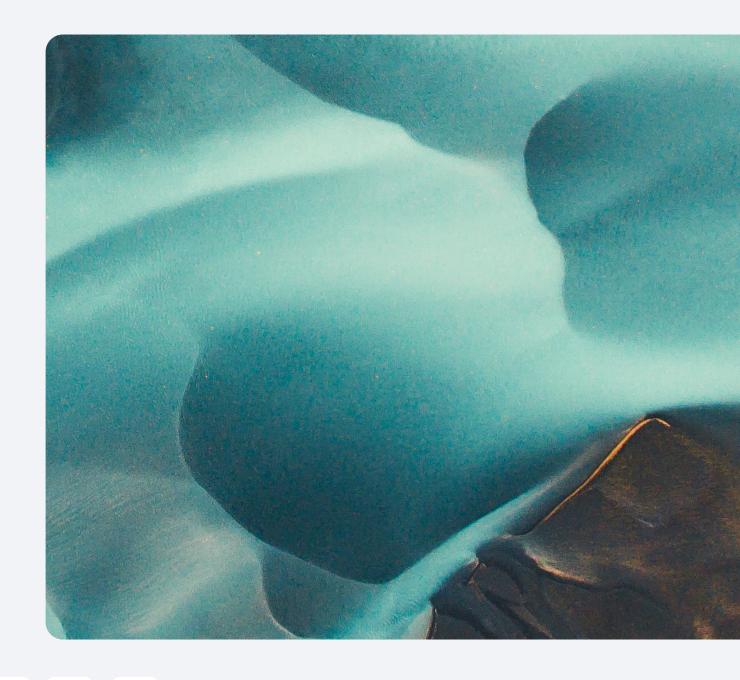
## Our commitment to human rights

At H&H, we protect human rights as the foundation of health and happiness. We recognise our responsibility to respect human rights throughout our operations and supply chain, and we are committed to preventing, identifying and addressing modern slavery risks in our business activities.

This commitment is embedded in our governance framework and demonstrated through:

- our membership in the UN Global Compact since 2018;
- our alignment with the UN Sustainable Development Goals, particularly SDG 8 - 'Decent Work and Economic Growth';
- our role as a signatory to the UN Women's Empowerment Principles since 2022;
- our B Corp certification achieved Group-wide in 2024 (92.5 points), which includes rigorous assessment of labour practices and human rights; and
- our comprehensive policy framework including our Global Human Rights Policy Statement, Code of Conduct, and Supplier Code of Conduct.

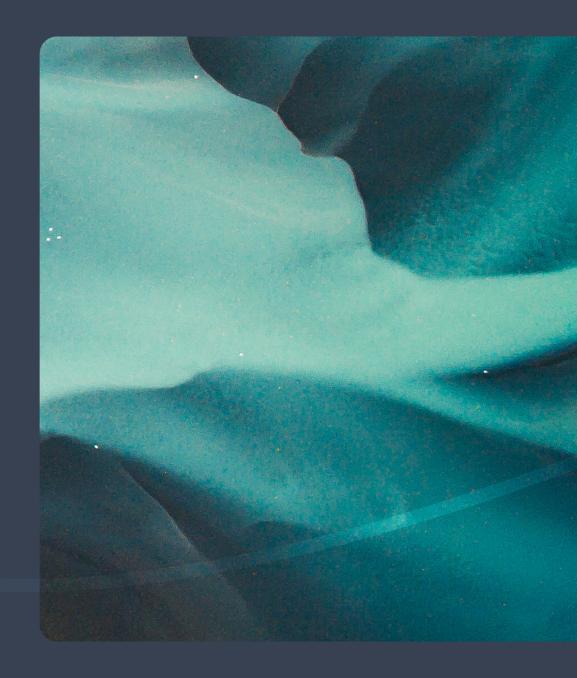
This Statement details how we translate these commitments into action and describes our progress in strengthening our approach to modern slavery risk management during the reporting period.





Introduction

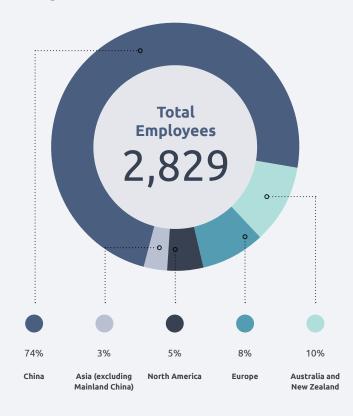
Part 2
Organisational
structure, business
and supply chain

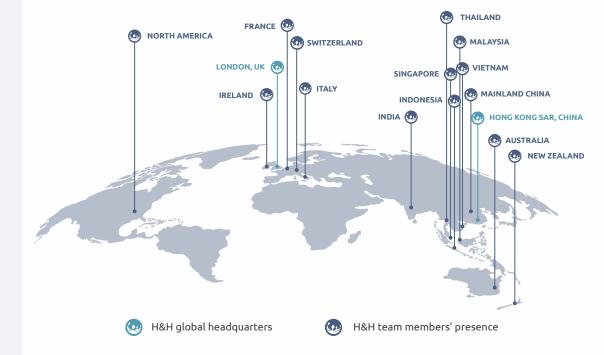


## Our worldwide presence and workforce

#### **Regional distribution**

In 2024, H&H Group directly employed 2,829 team members across 5 regions:





Our manufacturing footprint includes owned facilities in mainland China (Guangzhou and Changsha) and Australia (Sydney; and Melbourne packing facility), complemented by strategic partnerships with contract manufacturers globally.

#### **Employment structure**

To ensure transparency in our employment practices, we monitor the nature of all employment relationships. The vast majority of our workforce (98.6%) is permanently employed<sup>1</sup>, with 98.9% in full-time positions. This employment structure helps minimise workforce vulnerability and supports our commitment to fair labour practices.

Please refer to  $\underline{\mathsf{Appendix}\;\mathsf{B}}$  for detailed workforce information.

<sup>1</sup>China's three-year standard employment contract system is included as permanent for the purposes of reporting given this is the standard system.

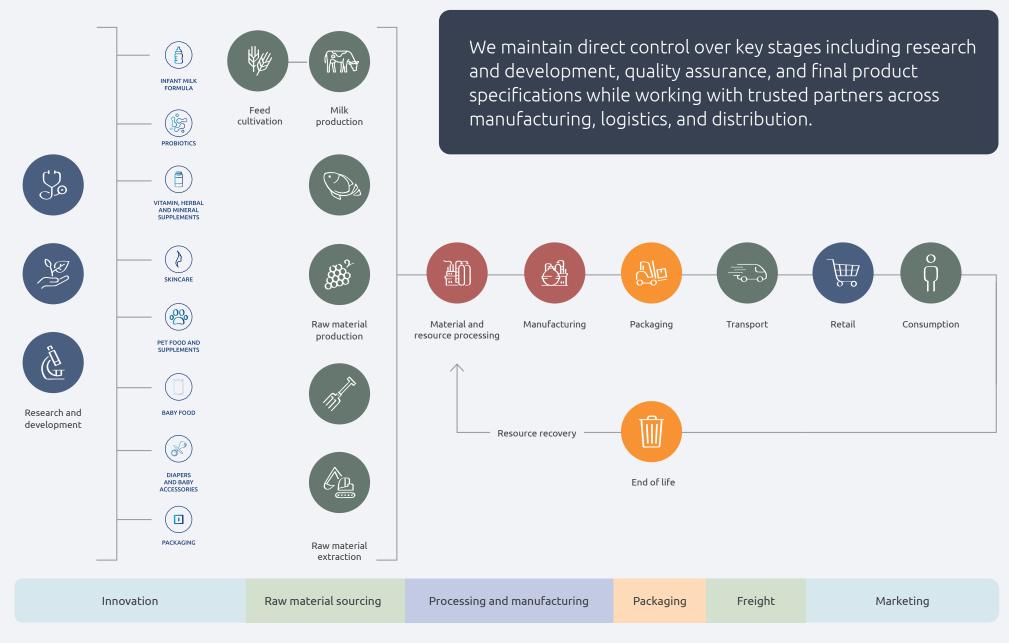




Part 1

Part 7

#### Our value chain







Part 1





Part 4

## Our supply chain

Our supply chain comprises 234 suppliers—with whom we have direct relationship—across four key categories: contract manufacturers; raw material suppliers; packaging suppliers; transport, logistics, and warehouse suppliers.

'Responsible Supply Chain' stands as one of our most material topics and a cornerstone of our business strategy. Our materiality assessment shows that sustainable supply chain practices are essential to our business success, while also significantly impacting communities and the environment where we operate.

We value every participant in our value chain equally from raw material suppliers to distributors—as each plays a vital role in delivering our products responsibly and creating lasting positive impact.

'Responsible Supply Chain' stands as one of our most material topics and a cornerstone of our business strategy.





Part 3
Modern slavery
risks in the Group's
operations and
supply chain





## Our approach to risk assessment

We systematically identify and assess modern slavery risks across our operations and supply chains through a comprehensive, multi-layered approach:

- ESG Committee oversight of sustainability strategy and risk management, providing governance structure for our risk identification processes;
- strategic supplier partnerships through selecting world-class suppliers and building strong long-term relationships with them;
- annual supplier sustainability assessments through our H&H Suppliers Sustainability Assessment via the Sphera SCS platform;
- systematic raw material risk evaluations, systematically assessing the environmental, social and animal welfare risks associated with our sourced raw materials;
- regular materiality assessments confirming 'Responsible Supply Chain' and 'Human Rights and Fair Labour' as material topics, ensuring our risk focus remains aligned with stakeholder expectations and business impact;
- ongoing monitoring through our grievance platform, 'H&H Speak Up'.

We prioritise our risk management efforts based on:

- scale of supplier relationship;
- nature of products and ingredients;
- · complexity of supply chain;
- · level of direct influence;
- effectiveness of existing controls;
- maturity of suppliers.

This prioritisation helps ensure our resources are focused where they can have the greatest impact in preventing modern slavery.

## Risks in our direct operations

We assess the risk of modern slavery in our direct operations as low, supported by our robust employment practices, strong governance frameworks, and comprehensive oversight mechanisms. Our People and Culture teams across the business units are responsible for managing employee working conditions, remuneration and wellbeing as well as compliance with relevant regulations. They are deeply committed to promoting diversity, inclusiveness, fair recruitment, employee retention and development.

### Risks in our supply chain

We acknowledge the existence of human rights abuses in the industries and markets in which we operate. We recognise the possibility of such abuses extending to our supply chain, where we may not have full visibility or control.

#### Raw and packaging materials risks

Our Raw Material Sourcing Policy identifies specific social hotspots across our key ingredient categories that present modern slavery risks:

- animal-derived ingredients (including dairy) where farm workers face risks of serious health problems from exposure to chemicals and dust, physical injury from working with farm animals, and potentially exploitative working conditions in agricultural operations;
- botanicals and other grown ingredients (including palm oil) where workers and local communities may face exploitation, poor working conditions, and human rights violations in agricultural production, particularly in regions with weak labour protections;
- marine-derived ingredients (krill and salmon oils) where fishing industry operations present risks of forced labour, debt bondage, and dangerous working conditions, particularly for workers on fishing vessels;

- chemically-derived ingredients where production operations may expose workers to harmful chemicals resulting in injury and illness, with potential for exploitative working conditions in manufacturing facilities;
- paper and cardboard (packaging materials) where forestry operations can violate labour and community rights, and chlorine bleach processing can impact worker health and safety; and
- glass and metal (packaging materials) where workers in silica mines, glass processing facilities, and metal mining operations face serious health problems and physical injury from occupational hazards.

#### Manufacturing process risks

- Complex multi-tier supply chains that reduce visibility into labour practices at lower tiers.
- Cost pressures that may incentivise suppliers to compromise on labour standards.

#### Geographic distribution and risk assessment

We recognise that modern slavery risks can exist in any jurisdiction and throughout our value chain. Therefore, we apply consistent due diligence processes across all regions, focus our risk assessment on the nature of activities and complexity of supply chains, and prioritise transparency and traceability through comprehensive monitoring programs.

This approach ensures we maintain consistent standards while respecting local contexts and regulations across our global operations.

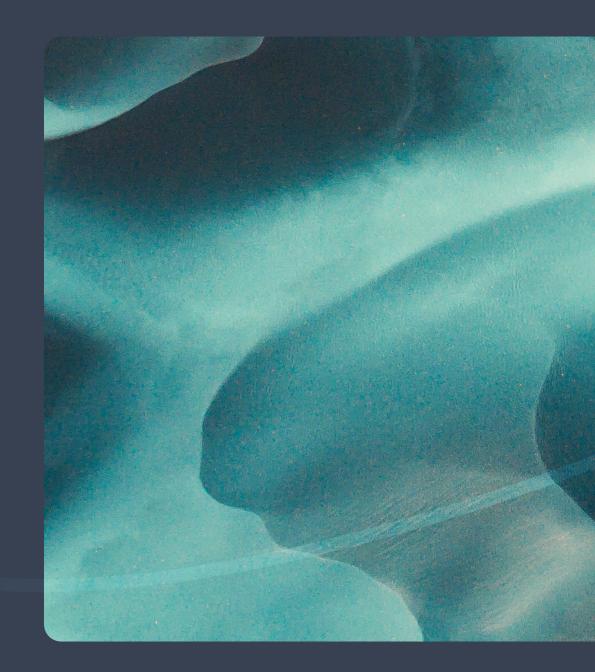
These interconnected risks across our raw materials, manufacturing processes, and global operations require comprehensive due diligence and ongoing monitoring to effectively prevent modern slavery throughout our supply chain. We firmly believe that safeguarding human rights and fostering fairness throughout our supply chain is a shared responsibility. By actively collaborating with our suppliers, conducting due diligence, and implementing monitoring mechanisms, we aim to foster an environment that promotes responsible behaviour and minimises the potential risk of modern slavery.





Part 5

Part 4
Actions we've
taken to reduce the
likelihood of modern
slavery



## Identifying material risks and topics

We conduct a formal comprehensive materiality assessment every two years, with ongoing reviews through regular stakeholder engagement. This assessment identifies priority sustainability topics and ensures alignment of our commitments and strategy. In 2024, we updated our materiality assessment, which identified 14 material topics that guide our sustainability strategy.

Our updated materiality assessment confirmed 'Responsible Supply Chain' as one of our three highest priority topics alongside 'Product Safety and Quality' and 'Nutritional and Health Innovation'. Additionally, 'Human Rights and Fair Labour' is identified as a foundational pillar in our materiality framework.

Our Board maintains ultimate responsibility for the risk management framework and was actively involved in validating the final set of material topics.

## **Embedding modern slavery** prevention in our governance

At H&H Group, we recognise that a robust sustainability governance structure enhances our ability to identify and respond to sustainabilityrelated opportunities and risks.

Part 3

Our ESG Committee, established by the Board of Directors, leads our approach to preventing modern slavery. The Committee comprises:

- Mrs. Laetitia Albertini (Non-executive Director and Committee Chair)
- Mr. Luo Fei (Executive Director and Board Chairman)
- Mrs. Pascale Laborde (Chief Growth and Sustainability Officer)

The Committee defines our sustainability vision, objectives, and strategies, including on human rights. It is supported by an ESG Working Group comprising experienced senior executives from domains that have substantial impact on sustainability strategy.

### Implementing a sound policy framework

We implement three key policies that establish our standards for modern slavery prevention:

#### 1. Global Human Rights Policy Statement

Developed in 2023, this policy:

 aligns with international standards including the Universal Declaration of Human Rights and the ILO (International Labour Organisation) Declaration on Fundamental Principles and Rights at Work;

- focuses specifically on preventing child and forced labour:
- addresses key areas including fair compensation, freedom of association, and non-discrimination; and
- applies to all business operations and partners.

#### 2. H&H Code of Conduct

Our mission to make millions of healthy and happy people around the world starts with how we treat our people. We take our employment obligations seriously. Our H&H Code of Conduct states our commitment to honouring human rights, providing equal opportunities and safe working environments.

#### Our Code:

- establishes clear standards for employment practices;
- requires compliance with laws on compensation, working hours, and benefits;
- promotes equal opportunity and fair treatment; and
- · includes specific guidance on ethical decisionmaking.

Our H&H Code of Conduct is accessible on our website.



Part 1







#### 3. Supplier Code of Conduct

#### This code:

- explicitly prohibits all forms of modern slavery;
- requires fair wages and working conditions to all employees (including equal pay for equal work, adequate rest periods, sufficient leave);
- mandates freedom of association rights;
- applies to all direct suppliers and their supply base;
- is a mandatory requirement in our procurement process; and
- includes specific clauses on human and labour rights and health and safety.

Our Supplier Code of Conduct is accessible on our website.

## Conducting supply chain due diligence

Our supply chain due diligence combines comprehensive assessment programs with systematic risk management.

#### 1. H&H Suppliers Sustainability Assessment

#### Assessment methodology:

Part 2

Our comprehensive annual assessment covers governance, corporate social responsibility

Part 3

commitments, social and labour policies, occupational health and safety, environmental initiatives, and supply chain management. The assessment's focus on human rights and modern slavery topics includes notably child labour, forced labour, freedom of association, rights to collective bargaining and discrimination.

#### Implementation process:

- active engagement with all direct suppliers to encourage participation;
- updated questionnaire design based on supplier feedback for improved clarity;
- · verification of submissions through structured dialogue;
- development of supplier-specific improvement reports;
- creation of tailored regional scorecards with targeted action plans.

#### 2. Raw material risk assessment programme

#### Assessment framework:

We systematically assess environmental, social and animal welfare risks associated with our sourced raw materials through a comprehensive checklist process that includes enquiries about origin, processing, and packaging, along with requests for supporting documentation.

#### Risk categorisation:

Ingredients are categorised into high, medium, or low risk levels with appropriate mitigation plans developed for each category.

#### 3. No Deforestation Policy and sustainable sourcing

In 2024, we launched our comprehensive No Deforestation Policy covering our key deforestation risk commodities: palm oil, paper and cardboard. This policy reflects our commitment to achieving a deforestationfree supply chain by no later than 31 December 2025. Our approach demonstrates how sustainable sourcing practices protect both forests and the communities that depend on them, recognising the interconnection between environmental protection and human rights.

#### Palm oil: comprehensive rights protection through certification

Our No Deforestation Policy establishes strict expectations for all direct suppliers who purchase palm oil, palm kernel oil and their derivatives for H&H Group products:

- source exclusively from suppliers certified under recognised sustainability standards (Roundtable on Sustainable Palm Oil (RSPO) Mass Balance or RSPO Segregated, International Sustainability and Carbon Certification (ISCC), Malaysian Sustainable Palm Oil (MSPO));
- provide regular progress updates upon H&H Group request, including certification status;
- maintain robust grievance mechanisms aligned with United Nations Guiding Principles on Business and Human Rights (UNGP) Principle 31; and
- adhere to our Supplier Code of Conduct and Raw Material Sourcing Policy.







In March 2025, we became an RSPO member, strengthening our commitment to sustainable palm oil sourcing. RSPO certification provides comprehensive protection for workers and communities, including prohibition of discrimination, adequate pay and safe working conditions, rights to collective bargaining and freedom of association, elimination of child labour and forced labour, occupational health and safety protections, and women's empowerment initiatives.

Currently, 100% of palm oil in our infant milk formula is RSPO Mass Balance certified. Some of our PNC products, such as Solid Gold soft treats and Zesty Paws bites, contain palm oil sourced entirely from sustainable RSPO-certified sources.

#### Paper and cardboard: forest and community protection

We require all paper and cardboard to be primarily sourced from suppliers certified under recognised sustainability standards (Forest Stewardship Council (FSC), Program for the Endorsement of Forest Certification (PEFC), or Sustainable Forestry Initiative (SFI)) or equivalent. We prioritise these certifications because they include comprehensive labour rights protections alongside environmental safeguards.

FSC and PEFC certifications explicitly promote responsible forest management in social, environmental, and economic terms, ensuring that forestry operations respect workers' rights and community land tenure. These standards help prevent violations of labour and community rights while protecting forest ecosystems.

#### Additional strategic sourcing practices

- Marine ingredients: 100% of the krill and fish oil contained in our Swisse products are sustainably certified (Marine Stewardship Council (MSC), MarinTrust, or Friend of the Sea).
- Dairy: partnership with B Corp certified Isigny Sainte-Mère cooperative, which obtained silver rating from Ecovadis covering environmental, labour and human rights impacts.
- Organic products: 40% of BNC portfolio (in number of SKUs) are certified organic globally.

We believe these independent certifications provide verification that our sourcing practices support fair labour conditions, community rights, and environmental protection throughout our supply chains, contributing to our commitment to actively manage modern slavery risks and labour standards in our supply chain.

#### 4. Grievance mechanisms

#### 'HH Speak Up' platform

Our whistleblower reporting platform provides multiple channels for reporting misconduct:

- Managed independently by Deloitte to guarantee confidentiality
- Available 24/7 across all regions through website, telephone, and email
- Multiple language support adapted to operating countries



- Protected whistleblower system prohibiting retaliation
- Accessible to all team members, suppliers, and business partners

Since its introduction in 2019, the platform has demonstrated its effectiveness in providing confidential reporting channels, with 23 cases investigated in 2024 (none related to human rights or labour issues). The platform serves as an important avenue for reporting various compliance concerns, including potential modern slavery issues.

#### Supply chain intervention

When human rights alerts arise, whether through our annual assessments, our whistleblowing platform, or other channels, we:

- conduct thorough analysis on the supplier in question;
- review independent social audits (SMETA preferred);
- engage in constructive dialogue;
- · provide improvement support; and
- · implement consequences for non-compliance.

## 2024 strategic developments

In 2024, we continued to progress on our journey to full transparency and governance over our complex supply chain across our portfolio of products.

#### 1. Governance and policy enhancements

We strengthened our governance approach to modern slavery through several key initiatives:

- established comprehensive No Deforestation Policy covering palm oil and cardboard sourcing;
- became RSPO member in early 2025, strengthening ethical sourcing commitments; and
- updated materiality assessment, confirming 'Human Rights and Fair Labour' as foundational pillar.

#### 2. System and process improvements

We enhanced our operational capabilities to better identify and manage supply chain risks:

• launched enhanced supplier assessment questionnaire;

- implemented gap analysis processes with supplier-specific improvement plans; and
- developed regional scorecards for targeted supply chain interventions.

## 3. Partnership and certification achievements

We achieved significant external recognition for our commitment to responsible business practices:

- achieved Group-wide B Corp certification (92.5 points) including rigorous labour practice and supply chain assessment;
- maintained six Great Place to Work® certifications, expanding to China for the first time; and
- extended raw material risk assessment program to 90% of our BNC portfolio.



Part 5
Measuring the
effectiveness of our
actions to reduce the
likelihood of modern
slavery



## **Key performance indicators**

We track our progress through comprehensive metrics across our operations and supply chain to ensure our modern slavery prevention efforts are effective and measurable.

#### 1. Supply chain metrics (2024)

- 98% supplier participation in sustainability assessment achieved through proactive engagement by supply chain managers (145 suppliers representing 98% of supply chain spend)
- 100% supplier compliance with Supplier Code of Conduct or agreed equivalent
- 95% of suppliers confirmed workers' freedom of association rights
- 90% completion of raw material risk assessment for BNC products
- Zero incidents of child or forced labour identified in supply chain assessments

#### 2. Operational metrics (2024)

- 100% completion rate for Global Compliance Training
- Zero incidents of child or forced labour in direct. operations
- 98.6% permanent employment rate supporting workforce stability

- ISO 45001:2018 certification maintained in manufacturing facilities in mainland China
- Grievance mechanism functioning well with 23 cases investigated through 'HH Speak Up' (none related to human rights or labour issues)

## **Technology-enabled monitoring**

The use of the Sphera SCS technology has enhanced our ability to monitor supplier performance through:

- continuous ESG risk assessment and scoring:
- enhanced due diligence capabilities;
- streamlined supplier engagement processes; and
- improved data quality and reporting accuracy.

Looking ahead, the implementation of SupplyScreen technology will further strengthen our effectiveness measurement through:

- instant ESG insights enabling rapid response to emerging risks;
- real-time human rights scoring providing continuous oversight;
- enhanced supplier prioritisation for detailed investigations;
- improved decision-making speed and accuracy; and
- comprehensive risk visualisation across entire supplier network.

#### **External validation**

Independent validation of our practices is achieved through:

- B Corp certification: comprehensive assessment of labour practices and governance (92.5 points achieved, well above the 80-point threshold);
- Great Place to Work® certifications: objective evaluation of workplace culture across six regions, including mainland China for the first time;
- MSCI ESG rating: AA rating maintained reflecting strong ESG performance;
- S&P Global Corporate Sustainability Assessment: H&H ranked in the top quintile of the food products industry (+22 points compared to 2023); and
- Hang Seng/HKQAA rating: A+ rating renewed demonstrating consistent sustainability leadership.

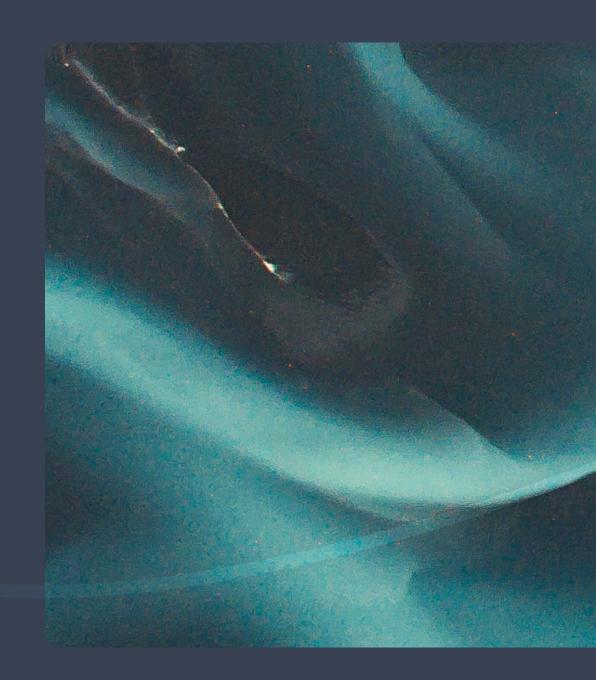
## Stakeholder feedback integration

Our monitoring framework incorporates feedback from multiple stakeholders to ensure comprehensive oversight:

- · regular employee engagement through town halls and performance reviews;
- supplier feedback integration through assessment processes and training sessions;
- external stakeholder input through materiality assessments and ESG Committee reviews; and
- Board oversight through regular reporting.



Part 6
Consultation and approval





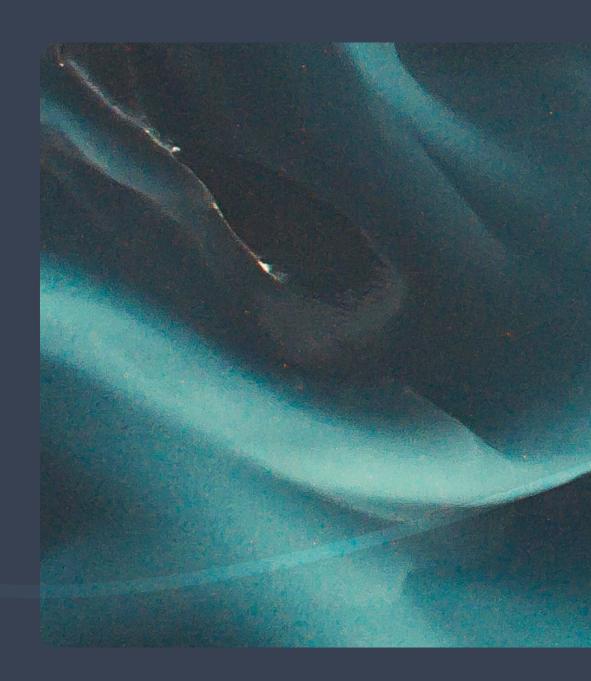
This Statement is jointly submitted by H&H Group and the entities listed in Appendix A, which it controls. We have taken an integrated approach to addressing modern slavery risks and operate under a common set of governance policies and programs. There has been significant consultation and collaboration between our entities and people to prepare this Statement, including within the Sustainability, People and Culture, Procurement, Supply, Legal and Group Communications functions.

The Statement was approved for and on behalf of the Group by the Board of Directors of Health and Happiness (H&H) International Holdings Limited on 20 June 2025.

Jan -

FEI LUO Executive Director, Chairman of the Board

Part 7
Appendices



## Appendix A - List of H&H group entities included in this Statement

Health and Happiness (H&H) China Limited	The People's Republic of China ("PRC")/Mainland China
Biostime (Guangzhou) Health Products Limited	PRC/Mainland China
Dodie Baby Products Inc. (Guangzhou)	PRC/Mainland China
Biostime (Changsha) Nutrition Foods Limited	PRC/Mainland China
Guangzhou Hapai Information Technology Co., Ltd.	PRC/Mainland China
Guangzhou Mama100 E-commerce Co., Limited	PRC/Mainland China
Health and Happiness (H&H) Hainan Nutrition Products Limited	PRC/Mainland China
Swisse Wellness (Guangzhou) Limited	PRC/Mainland China
Farmland Dairy Pty Ltd.	Australia
Swisse Wellness Pty Ltd.	Australia
S W Translink Packaging Pty Ltd.	Australia
Swisse Wellness Group Pty Ltd	Australia
SWG Holdco Pty Ltd	Australia
SW International Pty Ltd	Australia
SW Production Holdings Pty Ltd	Australia
Health and Happiness (H&H) Australia Pty Ltd	Australia
Biostime Healthy Australia Pty Ltd	Australia
Biostime Healthy Australia Holdings Pty Ltd	Australia
Biostime Healthy Australia Investment Pty Ltd	Australia
Swisse Wellness Pty Limited	New Zealand

Health and Happiness (H&H) Hong Kong Limited	Hong Kong
New H2 Limited	Hong Kong
Swisse China Limited	Hong Kong
Health and Happiness (H&H) Singapore PTE. Limited	Singapore
Health and Happiness (H&H) (Thailand) Co., Ltd	Thailand
Health and Happiness (H&H) Trading India Private Limited	India
PT Health and Happiness Indonesia	Indonesia
Health and Happiness (H&H) Taiwan Limited	PRC/Taiwan
Health and Happiness (H&H) Malaysia sdn.bhd.	Malaysia
Health and Happiness (H&H) Vietnam Company Limited	Vietnam
H&H Group DMCC	United Arab Emirates
Health and Happiness France Holding	France
Health and Happiness France	France
Biostime Pharma	France
Health and Happiness (H&H) Italy S.R.L	Italy
Health and Happiness (H&H) UK Limited	United Kingdom
Health and Happiness (H&H) Research Limited	Ireland
Health and Happiness (H&H) LLC	America
Solid Gold Pet, LLC	America
Health and Happiness (H&H) US LLC (formerly known as Zesty Paws, LLC)	America





## Appendix B - Details on our workforce

**Note:** The figures presented in the tables are rounded to the nearest whole number, which may result in slight deviations in totals. This difference is purely technical and does not undermine the reliability of the data presented.

#### Employment by type (2024)

	Number of team members (FTE)	Percentage
Permanent <sup>2</sup>	2,789	98.6%
Temporary	40	1.4%
Full-time	2,798	98.9%
Part-time	32	1.1%

#### Team members by location (FTE, 2024)

Region	Number of team members (FTE)	Percentage
Mainland China	2,084	74%
Australia and New Zealand	295	10%
Europe, including	230	8%
France	120	
Italy	51	
UK	41	
Republic of Ireland	13	
Switzerland	5	
North America	136	5%
Asia excluding mainland China, including	84	3%
Hong Kong SAR	43	
Singapore	18	
India	11	
Thailand	8	
Indonesia	2	
Malaysia	1	
Vietnam	1	

Part 1

Part 2

**Appendices** 

<sup>&</sup>lt;sup>2</sup>China's three-year standard employment contract system is included as permanent for the purposes of reporting given this is the

**Click here** for more information on our 2024 sustainability strategy.

















