

Modern Slavery Statement

2024



1. Introduction

DBG supports the protection of human rights and is committed to implementing practices in its operations and supply chains to combat modern slavery. DBG recognises the complexities of modern slavery and the many forms it presents including human trafficking, slavery, servitude and forced labour and takes a firm stance against any such practices.

In line with the requirements of the Australian Modern Slavery Act 2018 ('Cth') (the **Act**), DBG Global Enterprises Pty Ltd (**DBG**) is required to produce an annual modern slavery statement identifying actions taken by DBG to ensure modern slavery is not taking place in our operations and supply chains for the financial year ending 31 March 2024. This is DBG's first consolidated modern slavery statement covering all its companies.

2. DBG's businesses and supply chains

DBG is a leading diversified health, wellness and beauty group, aimed at enhancing the health and well-being of all patients and consumers by providing affordable access to health, wellness and beauty products. DBG is made up of four main businesses, being Arrotex Pharmaceuticals (**Arrotex**), VidaCorp, AXE Health Service (**AXE Health**) and Independent Pharmacies Australia (**IPA**).

DBG's supply chain includes manufacturing and distribution of pharmaceuticals and cosmetics in Australia and globally, and the purchase of products and services required for the operations of our businesses, including employment and training of staff, external legal advice, IT support and services and the leasing of office space.

DBG aims to streamline operations and consolidate policies and procedures in the areas of supply chain, risk management, and employee training to support responsible and sustainable business practices.

DBG is committed to operating our business within a legal and ethical environment that upholds its reputation as a company committed to working with integrity alongside Australian and global suppliers that are aligned to our values.

DBG expects all of its suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity.

a. Arrotex

Arrotex, a subsidiary of DBG, is Australia's largest generic pharmaceutical and private label over the counter (**OTC**) medicines company. Arrotex is the largest privately-owned Australian pharmaceutical company operating in Australia.

Arrotex supplies high quality medicines in a wide range of therapeutic categories and dosage forms that are available in every Australian pharmacy. Arrotex also manufactures and distributes over 250 of the most prescribed medicines on the Pharmaceutical Benefits Scheme. Arrotex is committed to providing sustainable, high-quality and cost-effective access to its products that pharmacies and the Australian public rely on every day.

b. VidaCorp

VidaCorp, the consumer health and beauty subsidiary of DBG Group, is home to market leading Health, Wellness, and Beauty brands. VidaCorp provides access to high-quality consumer health, wellness and beauty products and services that enhance well-being, promote inclusiveness, and inspire confidence.

VidaCorp delivers quality OTC medicines to retail pharmacies across more than 150 products in 12 health and wellbeing categories. VidaCorp also provides leading private label brands to community pharmacies with over 120 products across 12 everyday health categories, including allergy, cold and flu, digestive health, pain relief, eye and ear care, skincare, and more. VidaCorp is committed to providing access to affordable, luxury beauty products both within Australia and internationally.

c. AXE Health

AXE Health is a comprehensive solutions provider, which delivers end-to-end solutions for pharmaceutical and healthcare industries. AXE Health provides a unified service platform through a streamlined and cohesive multi-channel approach to health service implementation. This includes pharmacy engagement programs, nursing and telehealth services, strategic advisory and consulting services, contract sales teams, medical education and consumer wellness offering innovative health technology.

d. IPA

IPA is the strongest independent pharmacy network in Australia with over 1,000 members. IPA has a diverse suite of brands and offers to support community pharmacy and continues to evolve its member-centric offer and industry leading brand strategies to improve member, customer and supplier partner outcomes.

3. Actions Taken to Address Modern Slavery Risks

a. Policies

DBG is committed to ensuring the highest standards of conduct and ethical behaviour in all of our business activities and promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance. We recognise our responsibility to be aware of the risks of modern slavery in our organisation and have various internal policies to help mitigate against the risks of modern slavery and set out our expectations of all employees and how they should apply our values (Pioneering, Accountability, Collaboration and Tenacity) in their daily work. DBG has implemented several internal policies to ensure that we are conducting business in an ethical and transparent manner. These policies include:

- Code of Conduct
- Discrimination, Harassment, Bullying and Victimisation Policy
- Whistleblower Policy
- Workplace Health and Safety
- Modern Slavery Policy

The Modern Slavery Policy requires all employees to act in a professional and ethical manner to preserve the human rights of others. DBG is committed to ensuring our manufacturers and suppliers also adopt the same standards of expectations and behaviours outlined in our policies.

b. Onboarding Suppliers

As part of our supplier onboarding process for all direct suppliers, DBG has introduced a modern slavery assessment. DBG uses the information gathered from potential suppliers to assess their practices and ensure their operations align with the values and expectations of DBG.

4. Assessment of modern slavery risk

DBG has identified two areas where the potential for modern slavery risks arises in our business operations. These areas are through (1) our direct and indirect workforce and (2) supply chain. To combat modern slavery risks DBG has implemented and enforces systems and practices to ensure the risk of our exposure to threats of modern slavery remain low.

a. Indirect and direct workforce

In 2020, we harmonised the policies of Arrow and Apotex and again in 2024, we harmonised the policies of Arrotex and VidaCorp. An assessment has been undertaken to ensure our policies reflect our commitment to operate in line with international human rights standards and expectations. We are committed to reviewing and updating these policies as DBG continues to grow. We believe that the risk of exposure to modern slavery in our direct workforce is low. This is due to:

- the highly regulated nature of our industry;
- our employees being largely educated or skilled;
- our employees operating in workplace environments where established policies and processes are in place; and
- our employees regularly undertaking training.

DBG recognises that we need to be observant and attentive to potential exposure to modern slavery. We currently raise awareness of modern slavery through communications to our workforce, so all our employees understand potential risks and are able to identify and raise concerns relating to modern slavery. We are also looking to implement further training to ensure employees possess a high level of understanding of potential modern slavery risks in our organisation and supply chains.

We are aware that our risk of exposure to threats of modern slavery is greater in environments where third parties provide us with limited visibility of their operations. These higher-risk engagements most relevant to DBG include manufacturing, facilities services, construction, hospitality, logistics and warehousing.

b. Supply Chain

We believe that our exposure to the threats of modern slavery predominately rests in our

product supply chain. Our supply chain is made up of three components:

- suppliers of direct materials, including pharmaceutical ingredients, manufacturing and packaging;
- suppliers of indirect services, such as professional services, facilities; and
- sales and distributors of our products.

DBG engages with suppliers and manufactures domestically and globally. Our exposure to the risk of labour exploitation is particularly heightened in countries where we do not have clear visibility to the operations of suppliers and manufacturers, and where human rights are afforded lower protection. We acknowledge our responsibility to be aware of modern slavery and human trafficking risks within these supply chains and endeavor to uphold human rights in all our business activities. In order to reduce our exposure to threats of modern slavery in our product supply chain, we continue to implement the following:

- practices to ensure new and existing suppliers and manufacturers are subject to due diligence checks to confirm they compliant with modern slavery requirements and operating in an ethical manner. If a new or existing supplier and/or manufacturer is not compliant with the Act and engages in practices which are unlawful and unethical, we may decide to not work with them; and
- modern slavery clause in our manufacturing and supply agreements. The modern slavery clause establishes our expectation for how we require our suppliers and manufactures to assess and manage modern slavery risks.

On a domestic level, DBG ensures all its manufacturing sites which produce pharmaceutical products supplied to the Australian market are compliant with the Therapeutic Goods Administration (**TGA**) Good Manufacturing Practice (**GMP**) procedures. All therapeutic goods supplied to the Australian market by DBG are registered on the Australian Register of Therapeutic Goods (**ARTG**).

5. Due diligence and risk management

DBG is committed to implementing approaches to minimise the potential for modern slavery activities to form part of our business and supply chain. In managing these approaches, the observance of human rights forms an important part of our organisation.

DBG has implemented modern slavery platforms into its business to assist in assessing and allocating the risk of its direct suppliers. DBG will look to consolidate these platforms across its companies and ensure that each new supplier completes the required questionnaire and a risk rating is allocated upon completion, considering the supplier's current economic, social and political factors of their operating environments and their respective answers.

a. Governance

DBG's human rights compliance, including modern slavery compliance, is overseen by our People and Culture department, with the Legal department involved when necessary. Our People and Culture department has implemented DBG Values, which embody DBG's commitment to operate ethically, with integrity in all our business dealings and

relationships, and our obligation to improve our practices to combat slavery. All employees are required to understand and comply with these values.

The DBG Board, which includes senior representatives from across the business (including the Legal department), provides oversight of our governance and risk management framework and has approved this statement.

b. Reporting and investigating concerns

All DBG employees are encouraged to report on any concerns they may have in regards to possible breaches of our policies, or suspected breaches of laws or regulations. DBG, through its Whistleblower Policy, encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving DBG's businesses and provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.

6. Training and Consultation

DBG requires all employees to undertake training modules in relation to Anti-Competitive Conduct, Consumer Protection, Contract Law, Privacy and Modern Slavery. DBG also ensures it is compliant with GMP training requirements requiring all staff that are involved in the pharmaceutical division of our business to complete annual DBG Pharmacovigilance Refresher Training.

DBG is overseen by centralised Operations, Legal and Human Resources departments. DBG's policies are consistent in their application as they apply group-wide, prescribing how employees are to respond to and report concerns of modern slavery. In addition, teams within DBG have regular meetings – whether these be department-wide or within smaller operating teams – at which members are provided opportunity to raise any concerns they may have. If any concerns are raised at these meetings or otherwise in accordance with the policy, Legal and the People Culture departments will work in conjunction to assess and respond to the concern.

7. Effectiveness of Actions

Modern slavery is a complex issue that requires a multilateral response with ongoing input and collaboration with stakeholders and suppliers. DBG is focused on continuing to raise awareness and developing strategies for its employees to understand the risks of modern slavery and how to deal with these. DBG's Modern Slavery Policy educates employees on the potential threat of modern slavery and the different forms it presents itself. It also provides ways for our employees to deal with the threat if it materialises in our business and/or operations. The training modules DBG employees are required to complete further assists in developing awareness as to recognising and addressing threats and/or instances of modern slavery. The use of modern slavery clauses in DBG's supplier agreements as a contractual requirements ensures that our suppliers are aware of DBG's expectation with regards to modern slavery practices and that DBG will not accept any form of modern slavery, discriminatory or exploitative behaviour.

A handwritten signature in black ink, appearing to read 'Dennis Bastas', with a long horizontal stroke extending to the right.

Dennis Bastas
Chairman & Group CEO
DBG Global Enterprises Pty Ltd