

## Modern Slavery Statement for Financial Year 2022 - 2023

### Pharm-a-Care Laboratories Pty. Limited | Modern Slavery Statement

This Modern Slavery Statement is a joint statement made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) by Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) (**Pharmacare**) and Natural Bio Pty Ltd (ABN 29 101 785 737) (**Natural Bio**), a wholly owned subsidiary of Pharmacare for the period of 1 July 2022 to 30 June 2023 (**Statement**). The related bodies corporate of Pharmacare (including Natural Bio) which have contributed to Pharmacare's consolidated revenue and are covered by this statement are listed in Annexure A with their relationship to Pharmacare (each, a **Related Body**, and collectively with Pharmacare, the **Pharmacare Group**).

The Pharmacare Group:

- (a) is committed to acting ethically and with integrity and transparency in our business dealings;
- (b) has a zero-tolerance approach to any form of modern slavery; and
- (c) recognises the importance of putting effective systems and controls in place to safeguard against any modern slavery risks that may present within our operations or in our supply chains.

### About our business

The Pharmacare Group is a healthcare organisation dedicated to enriching people's lives through health and wellness. Pharmacare is wholly Australian and family owned with subsidiary companies around the globe (see Annexure A). We market and sell our vitamins, protein powders, deodorant, skincare moisturiser and healthy superfood snacks to customers in Australia and internationally and strive to make a positive difference in people's lives.

The Pharmacare Group is committed to the community, embracing responsibility for the well-being of our customers, employees, their families, the environment, and groups and individuals in need.

The Pharmacare Group:

- (a) has 15 global offices around the world, specifically in Sydney (Australia), Auckland (New Zealand), Guangzhou (China), Shanghai (China), West Sussex (United Kingdom), San Diego (USA), Thailand, Singapore, Korea, Indonesia, Vietnam, Malaysia, Philippines, Japan and Toronto (Canada);
- (b) sells over 25 brands, including: Nature's Way, Bioglan, Ease-a-Cold, Sambucol, Kids Smart, Redwin, Rosken, Skin Doctors, Go Natural, KP- 24, Slim-Right, FatBlaster, Wart-Off, Medi+, BRUT, Norsca, Quality Health, SUP, Naturopathica, Go Natural, and Promensil; and
- (c) employs, or otherwise engages from a third-party employer, over 650 people across the globe.

The Pharmacare Group takes modern slavery risks seriously and acknowledges the possibility of increased risk of modern slavery in countries with higher vulnerability and prevalence of modern slavery.

As Pharmacare and Natural Bio adopt consistent policies and processes, operate in the same sector and have many shared suppliers, a consolidated description of their operations and supply chains, modern slavery risks and actions taken to address modern slavery risks is set out in this Statement.

## **Our operations and supply chains**

The Pharmacare Group manufactures and distributes health and wellness products in Australia and internationally.

These products use a combination of local and foreign raw materials, including:

- (a) raw active ingredients such as vitamins, minerals, oils and herbs;
- (b) excipients used in the manufacture of medicaments and health food products; and
- (c) component packaging material such as bottles, labels, satchels and boxes.

Raw materials and components for our products are sourced from Australia, China, Vietnam, Turkey, Mexico, Peru, the United States of America, Taiwan, New Zealand and the Netherlands. We obtain manufactured and semi-finished goods internationally, including from Germany, Greece, the United States of America, China, India, UK and Italy.

Our supply chain includes extensive local and global supply chains for goods, materials and services that support our business activities, including through the use of logistic service providers, local freight forwarders and shipping lines, advertising agencies and distributors. Our supply chain also includes goods and services procured to support our business activities such as electronics, legal and consulting services, and point-of-sales systems.

The Pharmacare Group also engages employees and contractors in a number of jurisdictions to manufacture, promote and distribute its products. We employ, or engage from a third-party employer, approximately 650 persons in Australia, New Zealand, China, United Kingdom, USA, Thailand, Singapore, Korea, Indonesia, Vietnam, Malaysia, Philippines, Japan and Canada. The workforce is predominately made up of permanent employees. Contractors are engaged via a third-party employer in sales and marketing roles in Thailand, Singapore, South Korea, Vietnam, Indonesia, Philippines and Japan, as well as in support functions, manufacturing and warehouse roles. We also engage third parties and contractors more broadly in Europe, North America, South America, Asia and Africa.

Our products are marketed and sold in Australia and around the world.

## **The risks of modern slavery in our operations and supply chains**

We consider the risk of modern slavery within the entities comprising the Pharmacare Group to be relatively low. This is because each person directly involved in the conduct of the Pharmacare Group is employed by Pharmacare or a Related Body (including Natural Bio), which each have compliance frameworks tailored to applicable local industrial relations laws.

The Pharmacare Group recognises that it has lower visibility and control over the working conditions of workers who Pharmacare Group does not directly employ. For example, a representative or agent who is not directly employed by the Pharmacare Group, but is otherwise retained, engaged or contracted to assist in the manufacture, sale and supply of its goods. In that situation, there may be a greater risk of modern slavery occurring, for which we have in place the processes described below to mitigate that risk.

We also recognise the risk of the Pharmacare Group contributing to modern slavery through its arrangements with contract manufacturers of our products or third-party suppliers of the raw materials, ingredients and components used to manufacture our products. In particular, where those suppliers or manufacturers are in industries and countries with a higher risk or incidence of modern slavery, including the risk of poor or exploitative labour practices or conditions. For example, we procure food from Turkey and ingredients and/or packaging from China and Thailand. Each of those countries has a 'Not Free' Global Freedom Status according to Freedom House. We also use freight forwarders, shipping and airlines to transport our products in countries considered high-risk. While we do not have direct visibility of the way these third parties manage their labour arrangements, we are vigilant of the risks and have taken steps to assess and mitigate that risk by way of the processes described below.

## **Actions taken to assess and address modern slavery risks**

### *Policies and Procedures*

The Pharmacare Group has a Modern Slavery Policy which assists in managing sustainability and human rights. This policy, available to all employees of the Pharmacare Group, sets out the Pharmacare Group's commitment to combatting modern slavery, helps employees identify instances of modern slavery and provides contact details for persons within the organisation to whom any concerns should be addressed.

Pharmacare also has a Whistleblower Policy which provides an avenue for key stakeholders including current and former employees, contractors and suppliers to raise concerns about instances of modern slavery without fear of victimisation. Many of our suppliers also have whistleblower policies in place which are included in audit reports shared with us for the purposes of due diligence.

The Pharmacare Group's Anti-Discrimination and Equal Employment Opportunity Policy forms an important part of our actions in ensuring that our operations are not conducted in an environment where modern slavery is facilitated, by making clear that bullying, harassment, discrimination, vilification and victimisation are not tolerated in the Pharmacare Group.

Similarly, our Code of Conduct sets standards of behaviour and conduct expected from workplace participants in their business dealings, many of which are inconsistent with the perpetuation of modern slavery, including:

- (a) compliance with all laws, policies, procedures, rules, regulations and reasonable directions from Pharmacare;
- (b) honesty and fairness in dealing with customers, clients, suppliers, co-workers, management and the general public;
- (c) maintenance of a high standard of integrity and professionalism;
- (d) exercising fairness, equality, courtesy, consideration and sensitivity in dealing with other employees and external contacts;
- (e) promptly reporting any violations of law, ethical principles, policies and the Code;
- (f) observing health and safety policies and obligations, and co-operating with all procedures and initiatives taken by Pharmacare in the interests of work health and safety;
- (g) being truthful in all dealings with persons encountered at the workplace; and
- (h) not abusing the advantages of one's position for private purposes.

The Pharmacare Group's policies continue to be assessed and reviewed to ensure that they continue to remain effective in achieving their aims.

In all countries other than the United Kingdom, the Pharmacare Group's employees undertake regular training in the business' policies, including those related to corporate social responsibility, human rights, and our company values. This training includes specific modules relating to modern slavery. In the United Kingdom, Pharmacare (Europe) Limited are in the process of preparing an internal statement in respect of modern slavery which will support the provision of modern slavery training to staff in 2024.

### *Modern Slavery Prevention and Due Diligence Process*

The Pharmacare Group maintains an up-to-date supplier list which outlines where our international suppliers are located. In a majority of jurisdictions, we conduct due diligence on suppliers involved in the manufacture of our products before engaging them as our suppliers. Various risk management and due diligence processes are drawn from our Modern Slavery Policy.

Examples of Pharmacare Group's due diligence and monitoring processes undertaken during this reporting period include:

- (a) mapping of suppliers' modern slavery risk rating based on their location and the nature of goods and services provided to the Pharmacare Group;
- (b) requiring our key suppliers to complete self-assessment questionnaires which is used as part of our risk assessment process;
- (c) requiring our suppliers to confirm that they hold their own suppliers to account in safeguarding against modern slavery;
- (d) requiring our suppliers to confirm that they have complied with the Act (where applicable) or similar international legislation related to modern slavery; and
- (e) requiring our suppliers to share the results of audits performed by third-party organisations (e.g. Sedex Members Ethical Trade Audits) and/or requiring organisations to confirm membership with a relevant third-party organisation.

If as a result of such due diligence and monitoring we become aware that a supplier is at risk of modern slavery or does not have appropriate processes and procedures in place to mitigate such risk, we will evaluate the issue and level of risk before taking active steps to require that they remedy the situation to mitigate that risk.

If suppliers cannot demonstrate robust processes and procedures, should this be warranted by the level of modern slavery risk, we will take steps to report the supplier to the required authorities and consider ending our relationship with the supplier, while sourcing the requisite materials, components or manufacturing products and/or services from an alternative supplier who can demonstrate compliance with our standards.

#### *Development of standard contractual clauses in supplier agreements*

During this reporting period, modern slavery clauses were developed for inclusion in the Pharmacare Group's manufacturing and supplier agreements as baseline obligations suppliers are required to comply with.

In summary, these provisions variously require suppliers to:

- (a) comply with applicable modern slavery laws and Pharmacare's Modern Slavery Policy;
- (b) identify, assess and address modern slavery risks, remove any modern slavery practices present in supply chains and warrant no sub-contractor/third-party is engaging in any modern slavery practices; and
- (c) complete a self-assessment questionnaire if required.

We also retain the right under its manufacturing and supplier agreements to conduct an audit of a supplier and require suppliers to remediate any identified issues or failures.

#### *Supplier Code of Conduct*

In the reporting period, the Pharmacare Group developed its Supplier Code of Conduct which applies to all persons or entities who supply any product or service to the Pharmacare Group. In summary, the Code includes requirements relating to:

- (a) legal compliance and business conduct - requiring the supplier to comply with all applicable laws and environmental-related regulations;

- (b) ethical expectations - including prohibitions against the use of child labour, modern slavery compliance, anti-discrimination and equal opportunity, anti-harassment and abuse;
- (c) workplace, health and safety - requiring suppliers to provide safe and healthy working environments and ensuring their workers are paid in accordance with the law; and
- (d) information and access rights for the Pharmacare Group as appropriate.

#### *Our Training*

A crucial part of the Pharmacare Group's position against modern slavery is to promote workplace cultural change through training. We are committed to:

- (a) delivering a training module to employees that outlines our obligations under the Act and related laws and our commitment to combatting modern slavery; and
- (b) distributing via our company newsletter and other internal communications channels, information outlining our obligations under the Act and related laws and our commitment to combatting modern slavery.

In the Reporting Period, we delivered targeted training for employees with key responsibilities for assessing and addressing risks of modern slavery (including members of the procurement and people sourcing teams), covering matters such as risks and key indicators of modern slavery, the Pharmacare Group's obligations under legislation, and steps it can take to assess and address modern slavery risk.

#### *Assessing and Managing Risk and Pharmacare's Risk Management Process*

The Pharmacare Group is devoted to regularly monitoring our risk profile and incorporating control measures to mitigate any such risks. We aim to identify our key risk areas and develop programs that resolve or mitigate such modern slavery risks in line with the Pharmacare Group's risk management framework and practices. These records will assist us in our continuing efforts to monitor all our relationships and identify risks factors associated with on-going and future suppliers.

#### **Assessing the effectiveness of our actions**

Our modern slavery risk profile is continuously assessed as our businesses evolve, taking into account developing practices and external factors that pose a modern slavery risk. We ensure that greater focus is given to due diligence processes in respect of suppliers associated with a higher risk of modern slavery.

The Pharmacare Group has implemented various feedback mechanisms (e.g., whistleblower and grievance procedures) across its operations and works to create a culture where employees can share their concerns. We use feedback received to assess improvements we can make in our modern slavery strategy. We also consider the type and volume of feedback received to assess whether these feedback mechanisms are effective at bringing incidents of modern slavery to our attention.

We continue to assess the effectiveness of our processes and procedures to ensure that they continue to help us mitigate the risk of modern slavery in our operations and supply chains and that those processes and procedures remain effective as our operations and supply chains adapt and change.

We also continue to assess the training we provide and the way in which we inform our employees of their obligations under the Act to ensure that these methods are fit for purpose and effective in raising awareness of the risks of modern slavery and what we are doing to combat modern slavery. This includes ensuring that (where necessary) such training is revised to address any changes in risk or additional risk areas that might have arisen since the last time training was provided. It may, (if necessary) in future include addressing remediation actions that we may have taken to combat modern slavery or mitigate the risk of modern slavery in our operations and supply chains.

Our due diligence and monitoring processes are reviewed annually to ensure that they remain fit for purpose and effective in helping combat modern slavery. As our operations adapt and change, we continue to consider not only the effectiveness of these existing measures but also additional means of due diligence and monitoring processes to help mitigate the risk of modern slavery in our operations and supply chains.

These measures help us to continue to assess the effectiveness of our processes and procedures to ensure that they continue to help us mitigate the risk of modern slavery in our operations and supply chains.

#### *Remediation Action Plan*

The Pharmacare Group has taken steps during this reporting period to prepare a Remediation Action Plan which is proposed to be finalised and implemented over the next reporting period. The Plan aims to maintain effective systems which identify, assess, address and proactively remediate modern slavery risks in accordance with relevant legislation, international human rights standards, regulatory obligations, and good corporate governance principles.

A remediation framework has been developed which sets out the appropriate steps that may be taken if reports of modern slavery or potential modern slavery come to the Pharmacare Group's attention. These steps may include:

- (a) escalation of incidents for investigation and remediation;
- (b) assessment of any issues and mechanisms to address them;
- (c) considering any appropriate remedy in the circumstances, in consultation with relevant stakeholders and external bodies;
- (d) working with a supplier to address the root cause of the harm and put remediation measures in place; and
- (e) considering termination of the relationship with the supplier where a supplier is unable or unwilling to remediate the issue.

#### **The Pharmacare Group's ongoing commitment**

The Pharmacare Group recognises that tackling modern slavery requires a continuing year-on-year commitment. In future reporting periods, we will continue to collaborate with our stakeholders, both internal and external, and our community to address the risk of modern slavery in our supply chain.

#### **Consultation**

During the reporting period, Pharmacare actively engaged and consulted with Natural Bio and each Related Body in the development of this statement. Together, we discussed details of the reporting requirements under the Act, information regarding the actions we have taken and intend to take to address these requirements and shared relevant materials and updates regarding modern slavery risks and issues.

This statement was approved by the Board of Pharmacare in their capacity as the principal governing body of Pharmacare and each Related Body (including Natural Bio), and separately by the Board of Natural Bio in their capacity as the principal governing body of Natural Bio on 20 December 2023, and is signed by Toby Rowley Browne, a director of Pharmacare and by Anthony John Robertson, a director of Natural Bio.

Signed:



Name: Toby Rowley Browne  
Position: Director of PharmaCare  
Date: 20 December 2023

Signed:



Name: Anthony John Robertson  
Position: Director of Natural Bio  
Date: 20 December 2023

**Annexure A - Pharmacare related bodies corporate**

- (a) Natural Bio Pty Ltd (ABN 29 101 785 737) is a wholly owned subsidiary of Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) registered in Australia.
- (b) Pharmacare (Australia) Pty Ltd (ACN 135 292 732) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Australia, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (c) Natural Bio-Medicals Pty Ltd (ACN 638 816 449) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Australia, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (d) BioMedica Nutraceuticals Pty Ltd (ABN 35 104 798 165) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Australia, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (e) Liquefy Health Pty Ltd (ABN 62 614 363 174) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Australia, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (f) Go Natural Australia Pty Ltd (ACN 007 295 052) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Australia, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (g) NB Manufacturing Pty Ltd (ACN 607 039 038) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Australia, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (h) Pharmacare Operations No.1 Pty Ltd (ACN 609 652 780) is a wholly owned subsidiary of NB Manufacturing Pty Ltd (ACN 607 039 038) registered in Australia, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (i) Pharmacare Operations No. 2 Pty Ltd (ACN 609 589 102) is a wholly owned subsidiary of NB Manufacturing Pty Ltd (ACN 607 039 038) registered in Australia, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (j) PharmaCare (Hong Kong) Limited (CR#2110063) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Hong Kong, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (k) PharmaCare Co., Ltd (BR # 310000400751688) is a wholly owned subsidiary of PharmaCare (Hong Kong) Limited (CR#2110063) registered in Hong Kong, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (l) PharmaCare (Guangzhou) Co., Ltd (BR# S0412017001281) is a wholly owned subsidiary of PharmaCare Co., Ltd (BR# 310000400751688) registered in Hong Kong, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (m) Pharmacare (New Zealand) Ltd (NZBN 9429041214503) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in New Zealand, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (n) Pharmacare Japan KK (Co# 011010129403) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Japan, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.



- (o) PharmaCare (Asia) Sdn Bhd (Co# 854260P) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Malaysia, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (p) PharmaCare (Thailand) Ltd (Co# 0105559111855) is a wholly owned subsidiary of Pty Ltd (ABN 29 101 785 737) registered in Thailand, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (q) PAC Health (Canada) Inc (BN # 834026189) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Canada, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (r) Pharmacare US Inc (Co# 7368129) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in the United States, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (s) Pharmacare (Europe) Limited (Co# 6408300) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in the United Kingdom, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.
- (t) PAC Health (Europe) Limited (Co# 683692) is a wholly owned subsidiary of Pharmacare (Europe) Limited (Co# 6408300) registered in the United Kingdom, of which Pharm-a-Care Laboratories Pty. Limited (ABN 99 003 468 219) is the ultimate holding company.