



MODERN SLAVERY ACT STATEMENT 2024

7 November 2024

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INTRODUCTION AND OUR APPROACH

This is the fifth Modern Slavery Statement ("Statement") for Ego Pharmaceuticals Pty Ltd ("Ego"), as informed by the Modern Slavery Act 2018 (Cth).

The purpose of this Statement is to outline our approach to ensuring that Ego has appropriate frameworks and processes in place to minimise the risk of Modern Slavery in our business operations and supply chain.

Everyone who is employed by Ego lives our Ego Values. These include "Ethics – we do what is right".

In other words, at Ego our business is conducted in an ethical manner because it is right to do so. Therefore, we ask and expect our business partners to conduct their dealings with us in a fair, honest and ethical manner. And every new employee who joins Ego signs up to the Ego Values as part of the employment commitment. Living the Ego Values is also part of every employee's performance appraisal process.

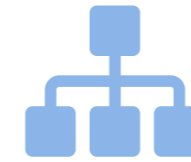
We understand that Modern Slavery can occur in many forms, such as slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour or services.

Ego is fully committed to operating responsibly. This means establishing and adhering to Ego's Values, which provide appropriate ethical standards across our group.

This commitment is supportive of the United Nations Sustainable Development Goals (<https://sdgs.un.org/goals>). Ego became a member of the United Nations Global Compact in 2021.

Ego supports the United Nations' objective of eradicating the many forms of Modern Slavery.

Ego has established a cross-functional group of senior staff together with directors to oversee our efforts to eliminate Modern Slavery within our supply chain.



OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

This statement covers the activities of Ego, which also includes controlled and associated entities as follows:

- Ego Pharmaceuticals Pty Ltd
- Ego Pharmaceuticals UK Limited
- Ego Pharm Malaysia Sdn Bhd
- Ego Pharmaceuticals Taiwan Pty Ltd
- Ego Pharmaceuticals Singapore Pte Ltd
- Ego Pharmaceuticals Hong Kong Limited
- Ego Pharmaceuticals Europe Ltd
- Ego Pharm Marketing Management LLC (in the UAE)

Ego Pharmaceuticals Pty Ltd is a privately owned Australian company with operating entities in the UK, Malaysia, Taiwan, Singapore, Hong Kong, Malta and the United Arab Emirates.

Ego has led the way in the development, manufacture and marketing of innovative skincare products. Our mission is to transform lives through the science of healthy skin. Ego is the specialist in skincare, backed by science. We make our products in Australia for the people of the world. We provide consistently high quality products, underpinned by heritage and integrity.

From its inception as a family business in 1953, Ego has grown to become a world leader, producing a comprehensive skin and health care range for sale in Australia and around the world. Our reputation is built on consistently delivering effective, high-quality products to meet a diverse range of needs, and we are committed to creating the best possible skin therapies for our customers.

Ego develops and manufactures innovative skin care products at our Braeside site in Victoria. These include well-known and trusted brands such as QV®, Aqium®, SUNSENSE®, MOOV®, DermAid®, Egoderm®, Elucen®, Numit®, Pinetarsol®, Resolve®, Sebitar®, SolvEasy®, SOOV® and Zatamil®.

Within Australia, Ego has more than 500 people across engineering, sciences, production, quality, people and performance, logistics, research and development, regulatory affairs, finance, ICT, legal, marketing and sales.

Outside Australia, Ego has approximately 200 people in the areas of marketing, sales, finance and regulatory affairs.

A Board oversees the strategic direction of Ego, and includes its Managing Director, Alan Oppenheim, and Scientific and Operations Director, Dr Jane Oppenheim, as well as independent non-executive directors.



THE REPORTING ENTITY

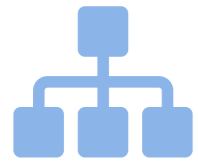
Ego Pharmaceuticals Pty Ltd
21-31 Malcolm Road, Braeside,
VIC 3195, Australia

ABN 86 005 142 361



The upstream supply chain of Ego consists of four main segments:

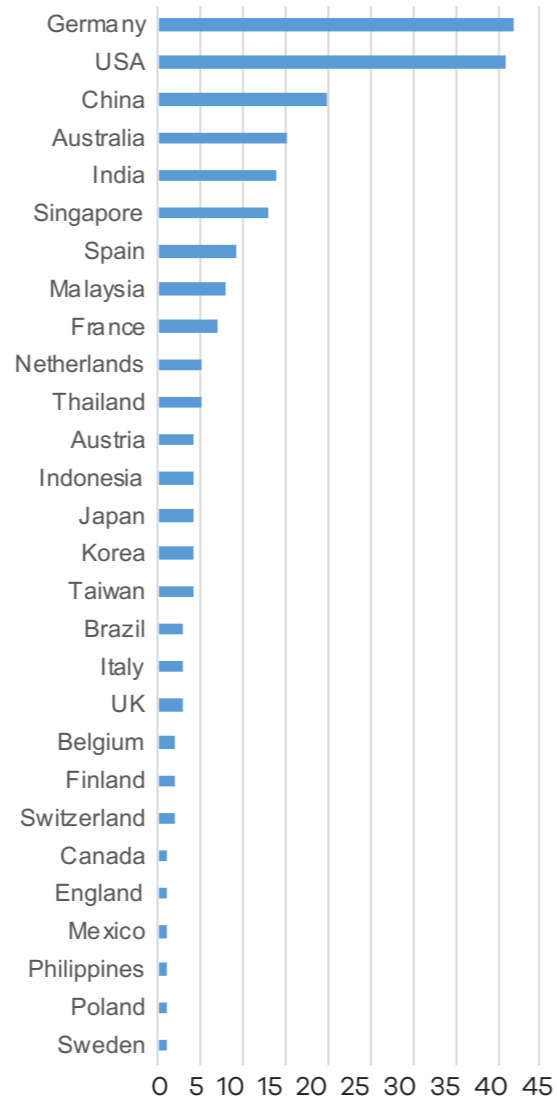




VITAL STATISTICS

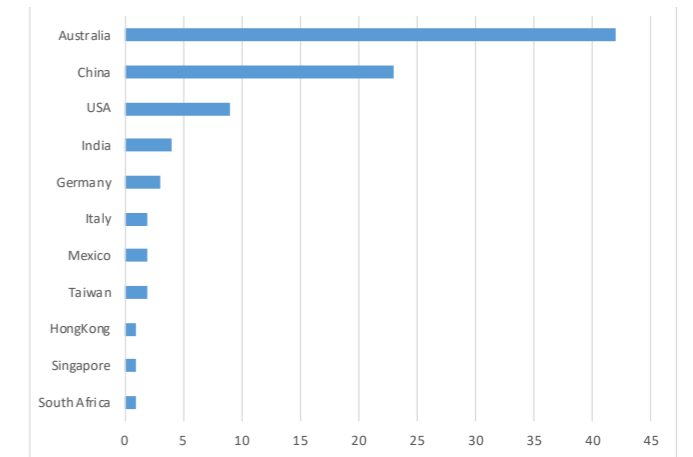
DISTRIBUTION OF RAW MATERIAL MANUFACTURERS

Country	No.	%
Germany	42	19%
USA	41	19%
China	20	9%
Australia	15	7%
India	14	6%
Singapore	13	6%
Spain	9	4%
Malaysia	8	4%
France	7	3%
Netherlands	5	2%
Thailand	5	2%
Austria	4	2%
Indonesia	4	2%
Japan	4	2%
Korea	4	2%
Taiwan	4	2%
Brazil	3	1%
Italy	3	1%
UK	3	1%
Belgium	2	1%
Finland	2	1%
Switzerland	2	1%
Canada	1	0.5%
England	1	0.5%
Mexico	1	0.5%
Philippines	1	0.5%
Poland	1	0.5%
Sweden	1	0.5%
Total		100%



DISTRIBUTION OF PACKAGING MATERIAL MANUFACTURERS

Country	No.	%
Australia	42	47%
China	23	26%
USA	9	10%
India	4	4%
Germany	3	3%
Italy	2	2%
Mexico	2	2%
Taiwan	2	2%
HongKong	1	1%
Singapore	1	1%
South Africa	1	1%
Total	90	100%



EGO STAFF BY COUNTRY



BY THE NUMBERS



Raw Materials

189



Packaging Materials

861



Markets

22



Product Formulations

113



Finished Goods

448



IDENTIFICATION OF THE RISKS OF MODERN SLAVERY

IN OUR OPERATIONS AND SUPPLY CHAINS AND OUR POLICIES AND GOVERNANCE PRACTICES

In accordance with Ego's Values, Ego has zero tolerance for any form of Modern Slavery and slavery-like practices. We established the following governance process to provide the necessary Board oversight of the implementation and subsequent phases, as the identified approach and responses are embedded into Ego's broader compliance requirements.

At the outset of the modern slavery risk identification governance process, Ego revisited its Values to ensure that there was alignment with our activities including our supply chain activities.

Ego's and our Entities' Operations

Consistent with the Ego Values, we have developed a Business Partner Code of Conduct Policy which sets out the standards by which we operate. This policy applies to Ego and its entities. The key points of this policy are:

- Ego supports the UN Global Compact, the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.
- Ego does not employ children under the legal employment age in any country or local jurisdiction.
- Ego does not use any form of forced, bonded or involuntary labour. Workers retain control of their identification documents and do not pay any fee connected to obtaining employment throughout the hiring process and the employment period. Punishment and coercion are prohibited and all disciplinary policies and procedures are fair, clearly defined and openly communicated to workers.
- Ego complies with all applicable laws and

industry standards regarding working hours, overtime, wages and benefits. Ego pays workers in a timely manner. Deductions from wages as a disciplinary measure are not allowed unless legally permitted.

- Ego employees and contract workers are free to leave employment on reasonable notice.

From an Australian company perspective, Ego is subject to some of the strictest employment laws anywhere in the world and follows all applicable laws and awards.

The risk of Modern Slavery within Ego is rated as very low.

Ego Australia's Supply Chain

Ego's supply chain consists of hundreds of suppliers. We have audited our direct input suppliers (raw materials and packaging used in our products), as well as suppliers of indirect goods and services within Australia. The results of these audits have been published in previous Modern Slavery Statements. We will continue these audits on a rolling basis to ensure currency.

Ego's International Operations' and Entities' Supply Chains

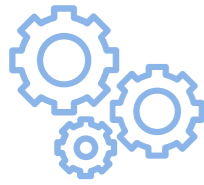
We have also audited the suppliers to our international operations and entities and will continue to do so in the future. These audit results have been published in previous Modern Slavery Statements

Ego's International Entities

To assess the risk of Modern Slavery within our international entities, we conducted desk audits.

Based on a combination of geographical and sector data, we assessed the likelihood of the supply chains of our international entities as low.





ACTIONS ADOPTED

TO ASSESS AND ADDRESS THOSE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

Ego has developed and approved a specific overarching policy to ensure that all our underlying procedures and policies promoted ethical and legally compliant business conduct. This document – *our Business Partner Code of Conduct Policy* – sets out our commitment to prevent violations of human rights such as modern slavery in our business. It describes specific standards to which Ego and

its operating entities adhere. Importantly, Ego also expects our business partners, including our suppliers, to adhere to these standards.

To put this policy into effect with our direct input suppliers, we have incorporated the following clauses in our Ego Purchase Order Terms and Conditions and into our material purchasing and distribution contracts:

MODERN SLAVERY, ETHICAL BEHAVIOUR AND BRIBERY

Unless otherwise required or prohibited by law, the Supplier warrants that:

A it does not employ, engage or otherwise use any child labour in circumstances other than those permitted by law;

B it does not use forced labour in any form (prison, indentured, bonded or otherwise) and its employees are not required to lodge papers or deposits on starting work;

C it provides a safe and healthy workplace, presenting no immediate hazards to its employees, any housing provided by the Supplier to its employees is safe for habitation, and it provides access to clean water, food, and emergency healthcare to its employees in the event of accidents or incidents at the Supplier's workplace;

D it does not discriminate against any employees on any ground (including race, religion, disability or gender);

E it does not engage in or support the use of corporal punishment, mental, physical, sexual or verbal abuse and does not use cruel or abusive disciplinary practices in the workplace;

F it pays each employee at least the minimum wage, or a fair representation of the prevailing industry wage (whichever is the higher), and provides each employee with all legally mandated benefits;

G it complies with the laws on working hours and employment rights in the countries in which it operates; and

H it is respectful of its employees' right to join and form independent trade unions and freedom of association.

The Supplier shall ensure that it has ethical and human rights policies and an appropriate complaints procedure to deal with any breaches of such policies; and the Supplier permits Ego, the right upon reasonable notice (unless inspection is for cause, in which case no notice shall be necessary) to enter upon the Supplier's premises to monitor compliance by the Supplier of the warranties set out in this Clause and the Supplier shall, subject to compliance with law, furnish Ego with any relevant documents requested by Ego in relation thereto.



We have an ongoing process of documenting these same requirements into our formal contract agreements with other suppliers and business partners.

In addition, we periodically review our *Business Partner Code of Conduct Policy* to ensure its currency and appropriateness.

Ego has established several risk mitigation processes, including our Supplier questionnaire for on-boarding requirements.

All of these are subject to regular review to ensure their practicality and assessment of their effectiveness within the operations and supply chain.

Where a potential risk is identified, Ego will work with that supplier to review their practices and to seek to achieve changes that are satisfactory. If this is not likely to be achievable, then Ego would explore what alternatives there may be to achieve a successful resolution.



TRAINING AND CAPACITY BUILDING

We continue to train our people through a range of formal and informal mechanisms:

- A specific proprietary training module on Modern Slavery for key team members who interact with suppliers and need to have a strong understanding of Modern Slavery
- Training in our *Business Partner Code of Conduct Policy*
- Publishing content in our company staff newsletter, the *EgoGram*
- Seminars and strategy meetings, both locally and internationally
- In house training for onboarding new staff, including a module on Modern Slavery
- Attending webinars on Modern Slavery

Apart from the direct interaction with suppliers via our audit program, we have other supporting mechanisms to facilitate the reporting of suspected instances of Modern Slavery, including our *Grievance Procedure* and *Whistleblower Policy*.

In addition to this, Ego is now participating in the UN Global Compact Network Australia, which has a Modern Slavery Community of Practice program.

We have reviewed with interest the outcomes and recommendations of the *Report of the statutory review of the Modern Slavery Act 2018 (Cth) – The first three years* and will await the implementation of any statutory changes out of this report.



ASSESSMENT AND EFFECTIVENESS

Ego has a working party that oversees its management of Modern Slavery risk. The convenor is our Chairman and includes our Managing Director and Scientific and Operations Director. The working party operates closely with key team members as we navigate this landscape.

We are committed to ongoing interaction with our suppliers to gain a more complete and current assessment of Modern Slavery risk within our supply chain. We are also identifying further practical ways of periodically reassessing suppliers who have already engaged with us.



CONSULTATION WITH OUR ENTITIES

Since the start of Ego's Modern Slavery program, we have sought to engage and involve our international entities. An important aspect of this process was a strong engagement with the key Ego personnel within those entities – the people who regularly interact and do business with their suppliers. This proved to be an effective means of not only getting the best level and quality of response from those

suppliers, but of involving our Ego personnel in the process, raising their awareness of Modern Slavery and ensuring their support.

Both the formal Modern Slavery training module and training in the *Business Partner Code of Conduct Policy* has been rolled out to all country and regional managers within our international sales, operations and marketing teams.



RECENT INITIATIVES

We recognise that we are a supplier to many downstream organisations within our supply chain, many of which are bound to carry out their own due diligence on us. We welcome this. To support these activities and provide greater transparency, we have developed a set of Frequently Asked Questions

around Modern Slavery and other aspects of Corporate Social Responsibility, for publication on the Ego website. We believe that this information may also be of interest to a much broader audience who would like to learn more and to be able to make informed, ethical choices.



LOOKING AHEAD

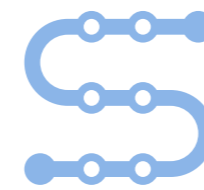
For the next 12 months, we intend to further develop our program of due diligence with our raw material and packaging suppliers so that it becomes more self-sustaining and embedded.

We will also continue our training and awareness programs and monitor the compliance landscape for any statutory changes that may arise.



This statement was approved by the Board of Ego Pharmaceuticals Pty Ltd on 7 November 2024.

Alan Oppenheim
Managing Director



TIME LINE OF EGO'S MAJOR MILESTONES IN ADDRESSING MODERN SLAVERY



egopharm.com

