

MODERN SLAVERY ACT STATEMENT

1. Introduction

This statement is published pursuant to section 14 of the Modern Slavery Act 2018 (Cth) on behalf of Australia By Saint Pty Ltd ACN 624 004 566 and its wholly owned subsidiary Life-Space Group Pty Ltd ACN 621 102 636, which in turn wholly owns Evolution Health Pty Ltd ACN 120 173 159, Ultra Mix (Aust) Pty Ltd ACN 067 526 596 and Divico Pty Ltd ACN 118 062 650 (collectively referred to as LSG, we, us or our). The purpose of this statement is to set out our approach to ensure that LSG has frameworks and processes in place to minimise the risks of modern slavery in our business operations and supply chain.

This statement sets out the steps that LSG has taken during the 12 month period ending 31 December 2022 to prevent slavery in our supply chain or any part of our business.

2. Our structure, operations and business

Life-Space Group Pty Ltd comprises:

- (a) Evolution Health Pty Ltd, which is responsible for domestic and international sales; and
- (b) Ultra Mix (Aust) Pty Ltd which is our manufacturing arm.

In FY 2022, Life-Space HK Limited and Mak Long (HK) Company Ltd, both companies incorporated in Hong Kong, China, became 100% subsidiaries of Evolution Health Pty Ltd. These companies were incorporated to facilitate cross border ecommerce functions with Evolution Health Pty Ltd as the responsible entity for the supply chain and resource management of these companies.

In order to comply with cross order ecommerce platforms' requirements, Evolution Health (Zhuhai Hengqin) Co Ltd was incorporated in the PRC in FY 2022 for insurance purposes. This company is also 100% owned by Evolution Health Pty Ltd but is not involved in any trading.

The Life-Space Group Pty Ltd is wholly owned by Australia By Saint Pty Ltd, an Australian company which in turn is a wholly owned subsidiary of By-Health Co Ltd, a company listed on the Shenzhen Stock Exchange.

Neither Australia By Saint Pty Ltd nor Life-Space Group Pty Ltd is a trading entity in Australia. Neither of them acquires any goods or services nor enter into contractual relationships with external stakeholders with the exception of Australia By Saint Pty Ltd which engages professional taxation and accounting services for its reporting requirements.

We supply a range of complementary medicines and foods for sale in Australia, China and around the world. Our brands include Life-Space, Premedy, Elmore Oil and Coram's.

Our supply chain mainly comprises procurement of raw materials, engagement of contract manufacturers for both turnkey and tolled operations and labour hire arrangements from a manufacturing perspective. Other services acquired include marketing, professional services and office consumables.

3. Policies and Governance Approach

We have a Workplace Discrimination and Harassment Policy and a Grievance and Dispute Policy which apply to all employees, volunteers and stakeholders which enforce LSG's commitment to providing a safe, flexible and respectful environment for our team members and external stakeholders.

All LSG team members are required to treat others with dignity, courtesy and respect. Between the two policies, the rights and responsibilities of all employees, volunteers and stakeholders with clearly set out with procedures in place for the handling complaints and grievances in an efficient, fair and just manner.

In FY 2021, LSG adopted an Employee Handbook which contains principles espoused in the LSG Code of Conduct ("Code") and in FY 2022, this document was finalised to align with our new working environment at the relocated site. Core values of LSG are enshrined within the Code, creating a culture in which employees, customers and suppliers are treated with dignity, fairness, courtesy and respect. LSG fully endorses that all employees are not deprived of their basic human rights. Our Code applies to all employees and provides the framework of principles for conducting business, dealing with other employees, clients and suppliers.

In FY 2022, we finalised our LSG Ethical Sourcing Policy which requires all suppliers to fully comply with all local laws and regulations regarding labour, health, safety and the environment. Our suppliers are also required to fully comply with the legal requirements of the countries in which they operate in addition to all elements set out in the LSG Ethical Sourcing Policy. This policy forms part of our Anti Slavery provision which we insert into our procurement contracts. Internally, we have devised our LSG Human Rights Statement, setting out LSG's commitment to our staff, our vision with respect to our dealings with our vendors and customers regarding the protection, preservation and promotion of human rights.

All contracts with third parties that are governed by Australian law must go through an internal approval process to be vetted by the CEO, legal department before the same are signed off. Contracts governed by PRC law involving LSG are approved through the By Health Co Ltd's approval process (LSG's ultimate holding company).

4. LSG supply chains and risks of modern slavery

Our supply chain mainly comprises procurement of raw materials, engagement of contract manufacturers for both turnkey and tolled operations and labour hire arrangements from a manufacturing perspective. Other services acquired include marketing, professional services and office consumables.

5. Actions taken to assess and address modern slavery risks

Our contract manufacturers are mainly Australian companies which undertake their manufacturing processes in Australia where the risks of modern slavery is considered low. Labour hire, where required, are sourced from labour hire companies which hold a Labour Hire Licence under the Labour Hire Licensing Act 2018 (Vic).

In FY2022, we continued with our practice which commenced in FY2020 where Evolution Health Pty Ltd and Ultra Mix (Aust) Pty Ltd continued to include an Anti Slavery provision into their procurement contracts which includes a requirement that suppliers comply with our Ethical Sourcing Policy, which may be amended from time to time. Where suppliers have their own responsible sourcing policy, are governed by their own professional standards or have aligned their commitment to respecting human rights for their team members with the principles and guidance such as those contained in the United Nations Guiding Principles on Business and Human Rights, we have not insisted on the insertion of an Anti Slavery provision in their contracts. This practice is ongoing and is continued in FY2023.

Our Ethical Sourcing Policy makes specific reference to matters including but not limited to:

- (a) The prohibition of forced/bonded labour/child labour and illegal labour;
- (b) All employees must be treated with respect and dignity;
- (c) All employees must be engaged on a recognised employment relationship;
- (d) All applicable laws with respect to working conditions, health and safety, working hours, employee wages, benefits, freedom of association must be adhered to;
- (e) No discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Prior to FY 2022, for suppliers who were not prepared to abide by our Ethical Sourcing Policy, we devised a Self Assessment Questionnaire which we required our suppliers to complete for our consideration prior to committing to the relevant contracts.

In FY 2022, we requested all our suppliers to complete our Self Assessment Questionnaire, regardless of whether they agreed to abide by our Ethical Sourcing Policy as part of their contractual obligations. We tracked our suppliers' responses,

specifically noting suppliers who fail to provide responses after attempts at following up with them. We will continue to record suppliers' responses in FY 2023 and our attempts at eliciting the required information from them.

We understand the importance of review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain. This will be an ongoing and ever evolving process.

6. Assessing the effectiveness of the actions taken

We will undertake continuous and ongoing assessment of our supply chains by evaluating information that we receive from suppliers and to promptly act on any allegations or findings of involvement in prohibited practices.

FY 2022 was focused on trying to obtain modern slavery risks information from our suppliers and gauging their willingness to provide such information to us. We are unable to adequately assess the effectiveness of such measures in FY 2022. We are, however, looking to continue to monitor our suppliers' responsiveness to our efforts at collecting information about their workforce in FY 2023 in order that we can improve our understanding of the presence, if any, of modern slavery risks in our supply chains. Such efforts will enable us work on development frameworks and processes to ensure that we can review the effectiveness of our actions from FY 2024 onwards.

7. Consultation with controlled entities


As one of the directors of Australia By Saint Pty Ltd and Life-Space Group Pty Ltd is also a director of each of Evolution Health Pty Ltd, Divico Pty Ltd and Ultra Mix (Aust) Pty Ltd, the boards of Australia By Saint Pty Ltd and Life-Space Group are aware of the day to day operations of its subsidiaries with full transparency within the group.

8. Looking forward

Over the next reporting period, we will continue to assess ways to reduce the risks of modern slavery and some steps will include:

- (a) Continuing to monitor the responsiveness of our suppliers' to our Self Assessment Questionnaire;
- (b) Develop frameworks and processes to ensure that we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

This statement is approved by the governing body of Evolution Health Pty Ltd, Life Space Group Pty Ltd, Ultra Mix (Aust) Pty Ltd and Divico Pty Ltd, being the board of directors of Australia By Saint Pty Ltd.

Signed: Fantine Wu 
Position: Director of Australia By Saint Pty Ltd
Date: 1st June 2023