

Modern Slavery Statement for Financial Year 2020 - 2021

1. Pharm-a-Care Laboratories Pty Ltd Modern Slavery Statement

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) by Pharm-a-Care Laboratories Pty Ltd (**Pharmacare**). Pharmacare's related bodies corporate are included in this statement because they contribute to Pharmacare's consolidated revenue. A list of Pharmacare's related bodies corporate covered by this statement is set out in Annexure A to this document together with the nature of Pharmacare's relationship with each. Pharmacare and its related bodies corporate are referred to in this statement as the Pharmacare Group.

The Pharmacare Group is committed to acting ethically and with integrity and transparency in all business dealings and has a zero tolerance approach to any form of modern slavery. We are also dedicated to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or in that of our supply chains.

This document relates to financial year 1 July 2020 to 30 June 2021.

2. About Our Business

Pharmacare is a healthcare company dedicated to enriching people's lives through health and wellness. Pharmacare is 100% Australian and family owned with subsidiary companies around the globe. We market and sell our vitamins, protein powders, deodorant, skincare moisturiser and healthy superfood snacks to customers both in Australia and internationally and strive to make a positive difference to 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.

We have 14 global offices around the world selling 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 and Promensil and employ over 600 people across the globe. Pharmacare maintains physical offices in Sydney (Australia), Auckland (New Zealand), Guangzhou (China), Shanghai (China), West Sussex (United Kingdom), San Diego (USA), Thailand, Singapore, Korea, Indonesia, Vietnam, Malaysia, Japan and Toronto (Canada).

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.

3. Our operations and supply chains

The Pharmacare Group's health and wellness products are manufactured and distributed in Australia and internationally using a combination of local and foreign raw materials including raw active ingredients such as vitamins, minerals, oils and herbs, excipients used in the manufacture of medicaments and health food products, as well as components including packaging materials such as bottles, labels, satchels and boxes. We acquire raw materials and components for our products from suppliers in Australia and around the world including Europe, North America, South America, and Asia. 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, advertising agencies and distributors. The Pharmacare Group also engages employees and contractors in a number of jurisdictions to manufacture, promote and distribute its products.

We employ persons in Australia, New Zealand, Hong Kong, China, United Kingdom, USA, Thailand, Singapore, Korea, Indonesia, Vietnam, Malaysia, Japan and Canada. We also

engage third parties and contractors in Europe, North America, South America, Asia and Africa.

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

4. **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 low. This is because each of the persons directly involved in the conduct of Pharmacare's operations, or the operation of the entities it controls or owns, is employed by Pharmacare or one of its related bodies corporate in compliance with applicable local industrial relations laws.

Where persons are not directly employed by a member of the Pharmacare Group, for example where a representative or agent is not directly employed by Pharmacare but is otherwise retained, engaged or contracted to assist in the manufacture, sale and supply of its goods, we recognise there is a greater risk of modern slavery occurring for which we have in place the processes described below to mitigate that risk.

We also recognise that there is a risk that we may contribute to modern slavery through our arrangements with third party suppliers or contract manufacturers, such as those that manufacture our products or those that supply raw materials, ingredients and components used in the manufacture of our goods. This is particularly the case where those suppliers or manufacturers are located in industries and countries with a higher risk or incidence of modern slavery where the risks include poor or exploitative labour practices or conditions. While we do not have direct visibility of the way such 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.

5. **Pharmacare's Modern Slavery Policies**

Pharmacare has a Modern Slavery Policy which assists in managing sustainability and human rights. This policy is available to all employees of Pharmacare (including employees of its subsidiaries) and sets out Pharmacare's commitment to combatting modern slavery and helps employees identify instances of modern slavery and provides contact details for persons within the organisation to whom any concerns should be addressed. This policy will continue to be assessed and reviewed to ensure that it continues to remain effective in achieving these aims.

Pharmacare'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.

6. **Pharmacare's Modern Slavery Prevention and Due Diligence Process**

Pharmacare maintains an up-to-date supplier list which outlines where our international suppliers are located. We conduct due diligence on all suppliers before engaging them as our suppliers. Various risk management and due diligence processes are drawn from our Modern Slavery Policy. Our Modern Slavery Policy is also an inflexible part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts that policy.

Examples of Pharmacare's due diligence and monitoring processes include:

- (a) requiring suppliers to complete self-assessment questionnaires to ensure against the possibility that they are engaged in modern slavery and to confirm that their suppliers are not engaged in modern slavery;
- (b) requiring our suppliers to confirm that they hold their own suppliers to account in safeguarding against modern slavery;

- (c) requiring our suppliers to confirm that they have complied with the *Commonwealth Modern Slavery Act (Cth) 2018* (where applicable) or similar international laws that relate to modern slavery; and
- (d) annually auditing our suppliers to ensure their continued compliance with these requirements.

These 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 undertaking further due diligence and monitoring processes to help mitigate the risk of modern slavery in our operations and supply chains.

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 take active steps to require that they remedy the situation to mitigate that risk. If they cannot demonstrate that they have done so then we will take steps to source the requisite materials, components or manufacturing products and/or services from an alternative supplier who can demonstrate compliance with our standards.

7. Our Training

A crucial part of our stance against modern slavery is to promote workplace cultural change through training. We are committed to:

- (a) delivering a training module to employees that outline our obligations under the *Modern Slavery Act 2018 (Cth)* and related laws and our commitment to combatting modern slavery; and
- (b) distributing via our intranet and company newsletter, information outlining our obligations under the *Modern Slavery Act 2018 (Cth)* and related laws and our commitment to combatting modern slavery.

We continue to assess the training we provide and the way in which we inform our employees of their obligations under the *Modern Slavery Act 2018* 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.

8. Assessing and Managing Risk and Pharmicare's Risk Management Process

The Pharmicare Group is devoted to regularly monitoring our risk profile and incorporating appropriate control measures to mitigate any such risks. We aim to identify our key areas of risk and develop programs which resolve or mitigate such modern slavery risks to the best of our abilities. 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.

As noted above, 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, including during the course of the current pandemic.

During this reporting period, Pharmicare actively engaged and consulted with its relevant related bodies corporate in the development of this statement. Together, we discussed details of the reporting requirements under the *Modern Slavery Act 2018*, 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.

9. **Key Performance Indicators**

Pharmacare has implemented various feedback mechanisms across its operations and works hard to create a culture where employees can share their concerns.

Pharmacare has also introduced a number of Key Performance Indicators which it uses to measure the effectiveness of both its reporting of and response to modern slavery risks and issues, including:

- (a) conducting an annual training session for staff about modern slavery;
- (b) implementing grievance and whistle-blowing procedures for workers and employees if cases of non-adherence to our modern slavery policies are suspected or found; and
- (c) conducting annual reviews to ensure constant visibility and oversight of suppliers in our supply chain.

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.

10. **Collaboration and Engagement with Stakeholders**

Pharmacare actively engages with its employees, and business partners around modern slavery.

11. **Pharmacare's Ongoing Commitment**

Pharmacare recognises that tackling modern slavery requires a continuing year-on-year commitment. In future financial years, 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.

12. **COVID-19**

Pharmacare has been more vigilant to the disruptions and restrictions created by COVID-19 and will continue to review how these disruptions may increase the risk of modern slavery practices in Pharmacare's operations and supply chains. Currently, there have been no material impacts on Pharmacare's ability to address modern slavery risks.

This statement was approved by the Board of Pharmacare on 23 December 2021.

Signed:



Name: Toby Rowley Browne

Date: 23 December 2021

Annexure A - Pharmacare related bodies corporate

1. Natural Bio Pty Ltd (ABN 29 101 785 737) is a wholly owned subsidiary of Pharm-a-Care Laboratories Pty Ltd registered in Australia.
2. 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 Ltd is the ultimate holding company.
3. 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 Ltd is the ultimate holding company.
4. 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 Ltd is the ultimate holding company.
5. 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 Ltd is the ultimate holding company.
6. 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 Ltd is the ultimate holding company.
7. 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 Ltd is the ultimate holding company.
8. 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 Ltd is the ultimate holding company.
9. 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 Ltd is the ultimate holding company.
10. 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 Ltd is the ultimate holding company.
11. 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 Ltd is the ultimate holding company.
12. 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 Ltd is the ultimate holding company.
13. 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 Ltd is the ultimate holding company.
14. 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 Ltd is the ultimate holding company.
15. 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 Ltd is the ultimate holding company.

16. PharmaCare (Thailand) Ltd (Co # 0105559111855) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Thailand, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
17. 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 Ltd is the ultimate holding company.
18. 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 Ltd is the ultimate holding company.
19. 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 Ltd is the ultimate holding company.
20. 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 Ltd is the ultimate holding company.