



Lupin Group Company

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Generic Health Pty Ltd (ABN 93 110 617 859)

## Modern Slavery Statement

**1 April 2022 – 30 March 2023**

Legislation: *Modern Slavery Act 2018* (Cth) (Modern Slavery Act)

Reporting Year: 1

Reporting Period: 1 April 2022 – 30 March 2023 (Financial Year 2023)

**26<sup>th</sup> October 2023**



**LUPIN**

**Principal Governing Body Approval**

This modern slavery statement was approved by the Board of Generic Health Pty Ltd (93 110 617 859) in their capacity as principal governing body of Generic Health (in accordance with section 13 of the Modern Slavery Act 2018 (Cth)) on 26<sup>th</sup> October 2023.

**Signature of Responsible Member**

This modern slavery statement is signed by Ashutosh Damle in his role as CEO of Generic Health Pty Ltd (93 110 617 859) Ltd (in accordance with section 13 of the Modern Slavery Act 2018 (Cth)) on 26<sup>th</sup> October 2023.



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**Director**  
**Ashutosh Damle**

**1. Criterion 1 Identify the reporting entity**

- 1.1 The reporting entity is Generic Health Pty Ltd (ABN 93 110 617 859), Suite 2, Level 2, 19-23 Prospect Street, Box Hill Victoria 3128 (referred to as **we, us, our or Generic Health** in this Statement).
- 1.2 Generic Health reached the reporting threshold in FY23 to become a reporting entity under the Modern Slavery Act. This Statement is submitted and published for our first Reporting Period, being FY23.
- 1.3 Generic Health makes this Statement in accordance with section 13 of the Modern Slavery Act as a single reporting entity.
- 1.4 Our Statement covers all of the 7 mandatory criteria for reporting as set out in section 16 of the Modern Slavery Act. In preparing this Statement, we have used the Commonwealth Guidance for Reporting Entities (**Commonwealth Guidance**) and recently issued Modern Slavery Act Supplementary Guidance to help inform and guide our approach.

**2. Criterion 2 Describe the reporting entity’s structure, operations and supply chains**

**2.1 Our Structure**

- 2.1.1 Generic Health is an Australian private limited company limited by shares and is incorporated in Australia.
- 2.1.2 Generic Health is part of the global Lupin Group, an independent pharmaceutical group and its ultimate parent company Lupin Limited is headquartered in Mumbai, India.
- 2.1.3 Generic Health’s registered office is in Box Hill, Victoria.
- 2.1.4 Generic Health owns and controls a number of other entities one of which is operational but does not employ any staff, the other entities are generally legacy entities and non-operational at the date of publication of this Statement. Generic Health is the only operating entity in Australia that meets the reporting threshold.

**2.2 Our products**

- 2.2.1 We a key player in the Australian generic medicines market. We have a comprehensive product offering which is continuously expanding. Our range of prescription medicines, over-the-counter products and speciality injectable products are available in pharmacies and hospitals nationwide. Our brands and Target markets are summarised below:

Brand	Nature of products
Goanna	Our Goanna range has offered premium oils and creams to alleviate muscular aches and pains, and to provide temporary relief from the symptoms of conditions such as mild arthritis for over 100 years.

<p><b>Pharmacy Action</b></p>	<p>The Pharmacy Action brand is the range of Over-the-Counter products available in pharmacies across Australia. Our Over-the-Counter range sits alongside the market leaders in terms of quality, safety and efficacy.</p>
<p><b>Generic Health - Prescription</b></p>	<p>This product range includes oral products and generic prescription products to be used by healthcare providers made available to patients through local pharmacies.</p>
<p><b>Generic Health - Hospital Injectables</b></p>	<p>All of our injectable products for hospitals must meet the high and strict standards required for a product to wear the Generic Health logo, while offering excellent value.</p> <p>We pride ourselves on working with our hospital partners to ensure product development is relevant and appropriate to meet the needs of our hospital partners and patients.</p>

## 2.3 Our Operations

- 2.3.1 As per the Commonwealth Guidance, 'operations' refers to activities undertaken by the entity to pursue its business objectives and strategy in Australia or overseas. This includes the manufacturing, distribution and procurement of products and services.
- 2.3.2 Generic Health is a key player in the Australian generic medicines market. We aim to provide cost-effective pharmaceutical products to Australian consumers, patients and healthcare providers.
- 2.3.3 Our values including integrity, teamwork, respect and care sit at the heart of everything we do and are key to our success.
- 2.3.4 Generic Health has 51 employees in Australia that are employed directly. We have a small number of contractors at the senior consultant level.
- 2.3.5 Generic Health operates in a highly regulated industry. Accordingly, our operations differ across our core product offering. Across our brands, our core operations involve:
  - **Logistics:** we import products from our direct suppliers and other Lupin Group entities for distribution in Australia. We manage relationships with our suppliers, delivery partners and customers across Australia.
  - **Distribution:** we distribute products to pharmacies and hospitals in Australia. For some of our products, these operations are more complex than shipping other goods due to the strict temperature controls or licenses required where our products are classified as controlled substances.
  - **Sales:** using a team of directly employed Generic Health representatives that work with an extensive list of hospitals and local pharmacies nationwide to build strong relationships and support our pharmacy customers.

- **Marketing:** we market our products primarily to hospitals and pharmacies. Whilst we do not sell our products directly to consumers, we engage in marketing to promote brand awareness of our Over-The-Counter range for consumers who benefit from our offering of a wide range of quality, generic medicines that need to meet the same quality and manufacturing standards applied to the original brands.
- **Compliance:** operating in such a regulated industry, compliance is a big part of what we do to ensure our products meet the strict quality and manufacturing requirements.
- **Licensing:** we procure rights to certain Finished Dosage Formulations for distribution in Australia and also Finished Dosage Formulations that we own the rights for in Australia to third parties for distribution.

## 2.4 Our Supply Chains

- 2.4.1 As is common in the pharmaceuticals industry, our supply chain is complex and long. In some cases, our suppliers are other Lupin Group entities, we also have a wide range of direct suppliers with a mix of Australian and overseas suppliers.
- 2.4.2 Due to the complexity of our products, we typically have a long lead time of at least 6 to 12 months between placing an order on a supplier and actually receiving their products. Where a product involves obtaining licensing rights such as for Finished Dosage Formulations, this lead time can be much longer.
- 2.4.3 The extended supply chains vary significantly across our product line but at a high level generally involves:
  - product development and testing, or intellectual property acquisition;
  - extraction and processing of raw materials;
  - manufacturing of active pharmaceutical ingredients;
  - secondary manufacturing of active pharmaceuticals into consumable products; and
  - distribution and sale.

Across our product range, the point at which Generic Health becomes involved in a product's lifecycle varies. Typically for pharmaceuticals, Generic Health is involved from the sales, marketing and distributions stage. Generic Health is not directly involved in manufacturing consumable pharmaceutical products for any of our brands.

2.4.4 We have mapped out our supply chains at a high level as set out in the following table.

No.	Product / Service Category	Key Themes
<b>Key direct suppliers</b>		
1.	Packaging of Finished Dosage Formulation	<ul style="list-style-type: none"> <li>We do not manufacture any of our products directly in Australia.</li> <li>We engage with our direct suppliers to manufacture and package our products.</li> <li>We use wholesalers and shipping companies to assist with our distribution.</li> <li>Lupin Limited is a key supplier, as we have strong visibility and are aware of their policies and procedures so consider goods and services supplied by Lupin Limited to have lower modern slavery risks.</li> </ul>
2.	Manufacturer and/or Licensor of rights in Finished Dosage Formulation	
3.	Logistics and distribution	
4.	Compliance functions	
<b>Secondary suppliers</b>		
5.	Manufacture of Active Pharmaceutical Ingredients, Excipients and other materials	<ul style="list-style-type: none"> <li>For some of our products, our suppliers engage suppliers for preliminary manufacture or procuring raw materials.</li> </ul>
6.	procurement of raw materials	
<b>Key indirect suppliers</b>		
7.	Office supplies	<ul style="list-style-type: none"> <li>To support our core product offerings, Generic Health engages a range of other suppliers who supply goods or services that are not integrated or used in our products.</li> </ul>
8.	IT equipment / IT suppliers	
9.	Cleaning services	<ul style="list-style-type: none"> <li>These are suppliers from whom we purchase goods and services relating to, for example, cleaning services, office supplies and professional services and more.</li> <li>We acquire a range our shared services from our parent company Lupin Limited.</li> </ul>
10.	Professional services	

**3. Criterion 3 Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.**

- 3.1 In this section we identify the ‘risks of modern slavery practices’, meaning the potential for Generic Health to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.
- 3.2 In this context, ‘risk’ means to people, rather than the risks to Generic Health (such as reputational or financial damage).
- 3.3 We have a range of measures in place to assess and address modern slavery risks in our supply chains as set out in Criterion 4. We have not identified any instances of modern slavery occurring in our operations or supply chains. However, we acknowledge we are required to identify the potential risks of modern slavery in our operations and supply chains in this Statement.
- 3.4 In accordance with the Commonwealth Guidance and known modern slavery indicators, we have done a high level risk mapping exercise of our operations and supply chains which is set out in the table below.
- 3.5 The high level risk mapping was informed by:
  - 3.5.1 the Commonwealth Guidance;
  - 3.5.2 sector guidance in respect of the medical and pharmaceutical industry such:
    - (a) Australasian Centre for Corporate Responsibility (ACCR), ‘Social-risk and decent work in the health care sector part 1: pharmaceutical wholesaling and distribution’;
    - (b) Australian human rights commission health sector guidance; and
    - (c) ILO guidance on employment conditions in the health sector.

**High level risk mapping exercise of our suppliers**

Category of modern slavery risk indicators	Explanation	Suppliers Identified
<b>Sector and industry risks</b>	<p>A sector or industry has higher risks of modern slavery when it has:</p> <ul style="list-style-type: none"> <li>• low visibility over tiered and complex supply chains which interact with other high risk sectors;</li> <li>• undergone a rapid increase in scale and complexity;</li> <li>• a tendency to engage in manufacture of goods in high risk geographies;</li> <li>• a tendency to utilise business structures that reduce visibility of labour conditions of workers; and</li> </ul>	Generic Health’s business involves acquiring manufactured Finished Dosage Formulations, and medical devices .

Category of modern slavery risk indicators	Explanation	Suppliers Identified
	<ul style="list-style-type: none"> <li>vulnerable populations involved in production.</li> </ul> <p>While we have a range of measures in place, we acknowledge the lack of visibility over these supply chains can be a modern slavery risk.</p>	
<b>Product and service risks</b>	<p>Some products and services are considered higher risk because of the way they are produced, provided or used.</p> <p>The development of a product or delivery of a service may have been reported as involving labour exploitation by international organisations or non-governmental organisations.</p> <p>For example, raw materials, cleaning services and manufacturing of Finished Dosage Formulation are recognised as having a higher risk globally.</p>	<p>As above we have identified ingredients in our products as higher product and service risks.</p>
<b>Geographic risks</b>	<p>Victims may be working in a country that has a high prevalence of human rights violations, has inadequate protections for workers or has a high prevalence of people who are vulnerable to exploitation.</p> <p>The Global Slavery Index is a useful tool to identify the prevalence of modern slavery and human trafficking in a particular country, and to assess the adequacy of a government's response to modern slavery and human trafficking risk.</p>	<p>Due to the nature of our products, we have direct suppliers in a number of geographic locations. Whilst some of our direct suppliers are in lower risk countries such as Switzerland, a number of our direct suppliers have operations in higher risk countries such as India, China. 28-30% of the goods and services supplied is by Lupin Limited. As mentioned above, we consider receiving goods from related entities mitigates some of the geographic risks as we have higher visibility and are aware of Lupin Limited's policies and procedures to mitigate modern slavery risks.</p> <p>None of our direct suppliers are located in the top 10 countries with the highest prevalence of modern slavery</p>



Category of modern slavery risk indicators	Explanation	Suppliers Identified
		according to the Global Slavery Index.
<b>Entity risks</b>	Some businesses or other entities may have a higher risk because of poor governance structures, a record of treating workers poorly or a track record of human rights violations.	One of our key suppliers is Lupin and other Lupin entities. Lupin Limited also provides a range of shared services. As noted, the Lupin Group has a range of measures in place to address modern slavery risks in its supply chain. In these circumstances, staff are engaged directly by Lupin and the relevant Lupin entities. We consider the entity risks where we acquire key supplies and services from Lupin to be low, given the governance structures and other measures in place. To date we have not identified any direct supplier risks, however, we are in the process of better understanding the potential entity risks with our supply chain.

**3.6 Operational risk**

- 3.6.1 We did not identify any significant risks in connection with the employment of direct/permanent workers nor any potential for the Generic Health to cause or contribute to modern slavery risks through our employment practices.
- 3.6.2 All of our employees are employed in Australia only which has been identified in the Global Slavery Index 2023 as having among the least vulnerability towards modern slavery in the Asia Pacific region and globally.
- 3.6.3 We regularly assess and ensure that our employment agreements and practices are compliant with all laws in the applicable jurisdictions. Section 4 sets out further information on the steps we take to assess and address operational risks in respect of our staff and employees.
- 3.6.4 We have identified training and education of staff as an area we can wish to focus on to build awareness when it comes to modern slavery risks.

**3.7 Our priorities**

- 3.7.1 Based on this high level risk mapping exercise we intend to take a prioritised risk based approach as recommended by the Commonwealth Guidance.
- 3.7.2 In the next few reporting periods we will be focussing our efforts on the following key areas which we have identified as having higher risks and where we have the most leverage:

- building awareness of modern slavery risk factors within Generic Health so that our staff are aware of and can identify indicators of modern slavery risks; and
- key direct suppliers who provide higher risk products.

**4. Criterion 4 Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes**

**4.1 Actions taken in the reporting period**

Set out below in this section is an overview of the steps we have taken during, and in preparation for our first reporting period to assess and address the risks in our operations and supply chains.

No.	Action	Description
<b>Global Policies and Procedures</b>		
1.	Global Governing Principles	At a global level Lupin Group has instituted P.L.E.D.G.E (Preparing Lupin Employees to Demonstrate Governance and Ethical conduct) to support their robust governing principles.  These principles underpin the way we conduct business and how we interact with our clients, our employees and the community.
2.	Corporate Social Responsibility (CSR) Policy	The CSR Policy sets out Lupin’s objectives in the CSR space, including disaster response, addressing social issues and strategies for implementing CSR goals.
3.	Lupin Whistle-blower Policy	We have a Whistle-blower policy to uphold our commitment to ethics and legal compliance. The Whistle-blower policy is designed to be a safe vehicle to improper and unethical behaviour that is not in line with our company policies. These policies expressly prohibit the use of modern slavery in child labour, forced labour and human trafficking.

No.	Action	Description
4.	Third Party Code of Conduct	<p>This policy sets out the Lupin Group’s expectations for third parties including Suppliers, Vendors, Distributors, Wholesalers, Agents, Technology Partner and manufacturing or research organisations.</p> <p>The Code of Conduct ensures that all third parties that we interact with uphold our commitments to respecting human rights and the prohibition of all forms of child and forced labour, human trafficking, unlawful discrimination and other ethical issues.</p>
5.	Human Rights Policy	<p>This policy is applicable to all Lupin Group employees and subsidiaries and sets out that Lupin Group promotes and upholds fundamental human rights in accordance with global standards. The policy considers regulatory compliance, non-discrimination, diversity and inclusion, forced labour and human trafficking, child labour, fair remuneration, freedom of association and other human rights issues.</p> <p>The Human Rights Policy includes a third party service that routes concerns and enquiries to the global compliance and ethics office, which employees can contact 24/7.</p>
6.	Environmental, Health, Safety and Sustainability ( <b>EHS&amp;S</b> ) Policy	<p>Our EHS&amp;S policy sets out our expectations for employees, contractors and partners to uphold the highest standard of EHS&amp;S. The policy requires compliance with law and regulation, encourages employees to identify and report any unsafe conditions including near miss and implement actions to prevent work related injuries.</p> <p>The policy sets out Lupin Group’s goals in respect of EHS&amp;S and the framework for actioning these items.</p>

No.	Action	Description
7.	Sustainable Procurement Policy	<p>This policy aims to go beyond to compliance and sets out to uphold the highest standards in creating an ethical and sustainable supply chain.</p> <p>This policy applies to all suppliers, contractors, and service providers associated with Lupin Group. It is applicable across all procurement activities and outlining our approach to conducting business ethically. The Policy sets out how Lupin will partner with third parties to implement ESG assessment programs for their suppliers.</p>
<b>Local Policies and Procedures</b>		
8.	Preparing to become a reporting entity	<p>Before we reached the reporting threshold, we reached out to experts to understand our obligations under the Modern Slavery Act, set out our approach going forward and prepare to report.</p>
9.	Internal Stakeholder Communication	<p>In late 2022 we began communicating with internal stakeholders to promote internal awareness of modern slavery issues. This communication covered:</p> <ul style="list-style-type: none"> <li>• the requirements of the Modern Slavery Act;</li> <li>• what this means for Generic Health;</li> <li>• what actions we had already taken; and</li> <li>• what actions are planned going forward.</li> </ul>
10.	Template Modern Slavery Clauses	<p>This contract playbook sets out our positions for including modern slavery clauses in both customer and supplier agreements.</p> <p>As we have a long lead time between signing agreements with our suppliers and actually receiving goods, on this basis we prioritised developing template clauses.</p> <p>We developed these modern slavery clauses to take a risk based approach information by the Government Guidance and the Australian Government's template modern slavery clause options for Commonwealth entities.</p>

No.	Action	Description
11.	Compliance Roadmap	<p>We have prepared a compliance roadmap for the coming reporting periods consistent with the approach being taken by Lupin Group at a global level and Government Guidance.</p> <p>This roadmap informs the actions that we will implement to demonstrate continuous improvement in the coming years.</p> <p>The actions included in our compliance roadmap are discussed in more detail at 4.2.</p>
12.	Australian Packaging Covenant Organisation ( <b>APCO</b> ) membership	<p>APCO is a co-regulatory not-for-profit organisation leading the development of a circular economy for packaging in Australia. The APCO conducts an assessment of our packaging supply chains to assess our progress working towards the 2025 national packaging targets. This requires us to engage with our supply chain on sustainability and other ethical issues.</p>

**4.2 Our future modern slavery roadmap**

- 4.2.1 In order to prepare this Statement, we also conducted a detailed gap analysis of the steps we are currently taking and what measures and controls we can aim to implement to improve our ability to assess and address modern slavery risks in our operations and supply chains.
- 4.2.2 Section 7, sets out our future modern slavery compliance roadmap together with key deliverables we intend to implement. These steps have been informed by the Commonwealth Guidance together with our consideration of emerging market practice in Australia.

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**5. Criterion 5 Describe how the reporting entity assesses the effectiveness of these actions**

- 5.1 Generic Health intends to use key performance indicators (**KPIs**) to measure how effective we have been in identifying and mitigating modern slavery risks in our supply chain.
- 5.2 Based on these KPIs, we will continually assess and improve our modern slavery compliance framework.
- 5.3 Some of these KPIs include the following for the coming reporting periods while future KPIs will be driven by our modern slavery roadmap (see 'looking ahead') in Section 7.1:

No.	Key objective	Key performance indicator
1.	Commence the roll-out of our anti-modern slavery training program with key staff to raise awareness of key concepts of modern slavery and human trafficking.	Record the number of staff who attended training.  Obtain qualitative feedback from some members of the key staff who have participated in the training.
2.	Workshop with key stakeholders on roadmap implementation.	Whether the workshop with key stakeholders occurs during the coming reporting periods.  Obtaining qualitative feedback from key stakeholders that attend the workshop.
3.	Supplier pre-screening questions for modern slavery.	Commence our assessment of our current supplier onboard procedures to review and implement additional questions that enables us to assess modern slavery risks.
4.	Modern Slavery Incident Response Guide	Commence drafting our Modern Slavery Incident Response Guide.

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**6. Criterion 6 Describe the process of consultation with any entities the reporting entity own or controls (a joint statement must also describe consultation with the entity giving the statement)**

- 6.1 As set out in section 2 above, we are the only legal reporting entity in Australia.
- 6.2 Whilst we do own or control some other entities for the purposes of the Modern Slavery Act, these are legacy entities that are not operational. As such, it was not necessary to consult with any other entities to prepare this Statement.

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**7. Criterion 7 Provide any other relevant information**

**7.1 Looking ahead**

- 7.1.1 We are aware that the Modern Slavery Act is currently under review and Australian Government has recently published its statutory review of the Modern Slavery Act. In the coming reporting periods, we intend to monitor and consider these key developments We look forward to reporting on this step in our next statement.
- 7.1.2 Generic Health is in the process of formalising our priorities in relation to modern slavery in consultation with Lupin.
- 7.1.3 We have created a strategic roadmap to address our modern slavery risks and set this out below with indicative timing:

**Short term goals: Coming 1-2 reporting periods**

- 7.1.4 We intend on implementing the following projects.
- (a) **Continuing a high level risk assessment of our operations and supply chains** – continue to identify risks in our operations and supply chains building on the assessment conducted in preparing this statement. a
  - (b) **Modern slavery training for key staff** – this will help key staff better identify and understand modern slavery risks and incidents and build awareness.
  - (c) **Workshop with key stakeholders on roadmap implementation** – this will help to build ownership and awareness of the anti-modern slavery compliance roadmap within key stakeholders.
  - (d) **Supplier pre-screening questions for modern slavery** – this will supplement our current supplier onboarding procedures to ask specific questions aimed at assessing the primary risks in supplier’s own operations and supply chains ask suppliers to provide details of their own internal processes and procedures to assess and address modern slavery risks identified. The addition of the supplier pre-screening questions will bolster our modern slavery due diligence process to better manage modern slavery risks.
  - (e) **Modern Slavery Incident Response Guide** – this set out procedures for how Generic Health would deal with modern slavery incidents including agreed procedures, assigning roles and remediation.

**Medium Term Goals: Reporting year 3 onwards**

- 7.1.5 We intend on implementing the following projects.
- (a) **Building on our anti-modern slavery training and education program** – this will involve considering any feedback received from the training rolled previously and continuing to roll out training and education to appropriate staff.
  - (b) **Detailed supplier surveys** – we will roll out the supplier survey to suppliers identified as higher risk to identify the modern slavery risks in Generic Health’s supply chain at a more granular level.

7.2 We consider that these steps in our modern slavery compliance roadmap will Generic Health in a good position to identify and mitigate modern slavery risks in our business operations and supply chains.

7.3 Lupin has significant oversight into our approach for developing our anti-modern slavery compliance roadmap and preparation of this Statement. The global policies and procedures of the Lupin Group will continue to play a key role in the way we assess and address modern slavery risks in the Generic Health operations and supply chains.

## MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

### Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of Generic Health Pty Ltd (93 110 617 859) as defined by the *Modern Slavery Act 2018* (Cth) (“the Act”) on 26<sup>th</sup> October @023

### Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of Generic Health Pty Ltd (93 110 617 859) as defined by the Act



CEO

26<sup>th</sup> October 2023

### Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	3
b) Describe the reporting entity’s structure, operations and supply chains.	3 – 6
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	7 – 9
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	10 – 13
e) Describe how the reporting entity assesses the effectiveness of these actions.	13 – 14
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	14
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	14 – 15