

# CW Group Holdings Limited

## 2024-2025 Modern Slavery Statement – ending 12 February 2025

### 1. Reporting Entity

CW Group Holdings Ltd (CWG) is a public company registered in Australia and the ultimate holding company of the Chemist Warehouse Group (the Group), which oversees a network of retail, e-commerce, and franchise-based pharmacies and healthcare operations.

Since its inception in 2000, CWG has become a leading provider of pharmaceutical, healthcare, and beauty products and health related information both domestically and internationally. CWG is involved in marketing, retailing, wholesaling, and distribution of these products, as well as providing branding, marketing, technical, administrative, and other support services to its franchisees. Chemist Warehouse is now Australia's largest discount pharmacy chain, with the aim to make the very best in healthcare available to its customers at unbeatable prices.

### Special Note on Entity Status During the Reporting Period

As a result of the merger with Sigma Healthcare Limited (ASX:SIG; a public company registered in Australia and listed on the Australian Stock Exchange) whereby Sigma Healthcare Limited acquired 100% of the issued shares in CWG, CWG ceased as a Reporting Entity under the Modern Slavery Act 2018 on 12 February 2025. In view of this merger, this Modern Slavery Statement covers the period from 1 July 2024 to 11 February 2025. For the remaining period from 12 February 2025 to 30 June 2025, the operations conducted by CWG form part of the operations of Sigma Healthcare Limited in its capacity as ultimate holding company.

A Modern Slavery Statement for Sigma Healthcare Limited, the continuing entity, covering its reporting period from 1 January 2024 to 31 December 2024, has been prepared and submitted in accordance with the Modern Slavery Act 2018 (Cth). Sigma Healthcare Limited will prepare and submit all future Modern Slavery Statements from 12 February 2025.

### 2. Structure, Operations, and Supply Chains

The CWG Group's principal activities encompass the marketing, retailing, wholesaling, and distribution of pharmaceutical, healthcare, household and beauty products and provision of health related services such as vaccination services. Headquartered in Preston (Melbourne), Australia, the Group supports over 600 stores across Australia, with international operations in New Zealand,

China, United Arab Emirates and Republic of Ireland. The business employs over 21,700 team members across full-time (92%), part-time (6%), and casual (2%) roles, supported by shared services including branding, marketing, distribution, property leasing, finance, and e-commerce (including marketplace). Retail stores are operated by franchisees under the following brands:

- 'Chemist Warehouse'
- 'Chemist Warehouse Optometry'; and
- 'Ultra Beauty'.

Other areas of operations include:

- The House of Wellness, which provides news and information on a range of healthcare topics via online, in print media and a television show; and
- Market Reach, which operates a business in Australia offering product trial solutions and sampling programs.

Our supply chains span over 20 countries, with key procurement regions being the USA (31%), UK (20%), China (17%), Singapore (10%), and New Zealand (9%). Additionally, 91% of products are sourced locally in Australia, with the balance from countries including Italy, Hong Kong, Spain, France, and Vietnam. Products are sourced through direct manufacturing, agent-based procurement, and wholesale acquisition, and transported to warehousing and distribution centres across Victoria, NSW, WA, SA, and QLD via air, sea, and land freight using contracted logistics partners.

### 3. Risks of Modern Slavery Practices

CWG acknowledges the complexity of its global supply chain and recognizes modern slavery risks, including human trafficking, slavery, forced labour, child labour, and slavery-like practices, due to:

- The global nature and complexity of our sourcing footprint
- Use of subcontracted labour and agents
- High-risk manufacturing regions
- Some products involving low-skilled or vulnerable labour
- Lack of visibility over Tier 2 and Tier 3 suppliers
- Freedom of association challenges in some countries
- Risks in indirect services such as cleaning, security, and transport

### 4. Actions to Assess and Address Risks

To manage modern slavery risks, CWG has implemented the following measures:

#### *Governance and Contracts*

All suppliers must sign a Supply Chain Agreement which addresses legal wage compliance, subcontractor obligations, and occupational health and safety

(OH&S) requirements. These agreements extend to non-product suppliers, such as those in cleaning and logistics.

#### *Traceability and Risk Assessment*

We conducted an internal traceability project using supplier questionnaires to assess risks across our global supply chain. Suppliers are assigned risk scores using internationally recognized benchmarking tools, and tailored action plans are developed based on their risk category.

#### *Updated Supplier Compliance Guidelines*

Issuing updated Supplier Compliance Guidelines to outline revised operational expectations, including compliance across all tiers of supply.

#### *Supplier Scorecard*

A baseline supplier scorecard consolidates performance and risk indicators, including modern slavery risks, to monitor supplier improvement over time.

#### *Training and Capacity Building*

An internal modern slavery training program was developed and is being rolled out throughout 2025 to targeted employees, covering identification, reporting, and remediation. A revised Supplier Manual (CW Supplier Compliance Guidelines) sets expectations for ethical conduct and sourcing. Training has been extended to external partners to strengthen supply chain governance and compliance.

#### *Remediation Commitment*

A remediation framework is embedded in our Modern Slavery Policy, detailing steps for investigation, supplier engagement, and corrective action should a breach be identified.

## **5. Assessing the Effectiveness of our actions**

We have introduced four key methods to evaluate the effectiveness of our actions to identify risks of modern slavery:

1. **Risk Trends:** Supplier risk ratings are tracked and compared year-on-year to assess the impact of engagement and training efforts.
2. **Audit and Visit Insights:** Learnings from factory visits and third-party audits are logged and reviewed to track supplier improvements or recurring issues.
3. **Training Completion Rates:** Internal training is measured through completion metrics, post-training assessments, and feedback forms to ensure understanding of key issues.
4. **Incident Reporting and Resolution:** No modern slavery cases were identified or reported during FY2025. However, we recognize that a “zero

report” does not confirm the absence of risk. We continue to treat risk as present but hidden, reviewing reporting channels and whistleblowing mechanisms to ensure accessibility and anonymity.

Effectiveness assessments are reviewed annually, with improvement plans revised based on stakeholder input and emerging best practices.

## **6. Consultation with Owned/Controlled Entities**

CWG manages all subsidiaries via a centralized common shared services model and shared management, ensuring alignment through executive-level collaboration, shared policy frameworks, and coordinated compliance processes. Input was sought from key management personnel of CWG from central functions such as finance, operations, human resources and logistics. Franchisees operate under strict written Franchise Agreements, which embed supply chain and compliance expectations, including adherence to Chemist Warehouse’s ethical sourcing policies.

## **7. Other Relevant Information**

CWG maintains active membership in the Australian Retailers Association and collaborates on an ongoing basis with industry peers, legal experts, and suppliers to enhance industry-wide understanding and action on modern slavery risks. We are committed to expanding staff knowledge and implementing initiatives to reduce modern slavery risks across all operations, striving for continuous improvement and positive impact on our team members and supply chain stakeholders.

This Modern Slavery Statement is prepared in accordance with the Modern Slavery Act 2018 (Cth) after consultation with its subsidiaries and has been approved by the Board of Directors of CW Group Holdings Limited on the date specified below.



Signature

Name: Jack Gance

Position: Director

Date: 16 December 2025