

- Provision of information technology services and supply of related equipment from various suppliers.

We also conduct inhouse telemarketing services and employ contact centre personnel according to all applicable Australian employment laws.

Specifically, the Amplifon Code of Ethics mandates that Amplifon will repudiate suppliers who, in violation of the principles of personal freedom and dignity, permit the exploitation of child labor and discrimination based on gender, race, language, personal and social conditions, religious or political creeds.

The enforcement of the code is oversighted by the Amplifon Spa Group Compliance Officer, reporting to the Amplifon Spa Board annually.

RISKS OF MODERN SLAVERY

Amplifon Australia employs people and provides services to customers in accordance with all applicable Australian laws. We believe risks to modern slavery in our business are minimal and limited to potential downstream supply chain activity, such as where and how equipment may be produced or how services may be provided.

Amplifon Australia operates in a heavily regulated allied health environment. Our retail services are regulated and have oversight by commonwealth government agencies within the Department of Health, Department of Veterans Affairs, the Department of Social Services as well as independent statutory authorities including the Australian Communications and Media Authority, the Therapeutic Goods Administration, State and Territory Health Ombudsman and others.

State and Territory Workers insurance agencies also regulate our services. We provide audiology technology from established reputable global suppliers with technologies registered with the Therapeutic Goods Administration. Our audiology professionals are accredited members of Australian Audiology professional bodies. As one of the top 500 Australian companies on tax paid [ATO 2018-19 Report of Entity Tax Information] we have a robust internal and external auditing regime and take all our compliance obligations extremely seriously.

Amplifon Australia has also assessed whether COVID-19 has had an impact on our modern slavery risks, particularly where global supply chains may have been interrupted, and determined there are no such impacts to report.

POLICIES

Amplifon Australia respects human rights in everything we do. We have put in place a modern slavery framework to assist in mitigating human rights risks in our business and supply chains. This framework includes our Modern Slavery Policy which outlines the definition of Modern slavery consistent with the Act, our reporting process, advice on how to respond to a discovery of an instance of modern slavery, timing and content of our reporting and our internal responsibilities.

Related Amplifon Australia policies include our Group Code of Ethics, Group Governance Master Guidelines, Personal Grievance Policy and our Whistleblower Policy.

Through our Whistleblower framework, Amplifon Australia has clear and simple mechanisms in place for employees and ex-employees, their families, suppliers, or members of the public to report any risks of modern slavery. As of the date of this statement, no reports have been received.

MODERN SLAVERY STATEMENT

This is the first Modern Slavery Statement for National Hearing Centres Pty. Ltd. (ABN: 68 200 763 765), trading as Amplifon Australia, for the calendar year 2020. It is made to comply with the *Modern Slavery Act 2018* (Cth), which we entirely support and endorse, and captures our initial actions and proposed actions moving forwards.

Amplifon Australia operates on a European financial year of 1 January to 31 December. Amplifon Australia has prepared this Modern Slavery Statement in accordance with sections 14 and 16 of the Act and this Statement reports on the operations and supply chains of Amplifon Australia.

OUR BUSINESS

Structure: Amplifon Australia commenced operations as National Hearing Care in 1997. In 2010 National Hearing Care was acquired by Amplifon SpA. Amplifon SpA was established in 1950 in Italy. Today Amplifon has more than 10 million customers worldwide each enjoying a personalized and distinctive hearing experience through a unique formula that combines the distribution, application and personalization of hearing solutions. Amplifon group has a network of over 11,000 points of sale and the professionalism and passion of over 17,000 people in 28 countries over 5 continents.

In 2020 National Hearing Care commenced rebranding to Amplifon Australia.

Amplifon Australia has circa 300 Audiology clinics across Australia and is headquartered in Mulgrave, Victoria. The Amplifon Australia Managing Director reports to the Amplifon Asia Pacific Director who in turn reports to the Amplifon global CEO. The Amplifon Australia Board consists of the Australian Managing Director, the Australian Finance Director and a third Director based in Italy. Amplifon Australia employs approximately 1000 people in line with all applicable Australian employment laws and Awards.

For the avoidance of doubt, this Modern Slavery Statement is applicable to Amplifon Australia only and does not report on any other group company of Amplifon SpA globally or in Australia. Amplifon Australia also trades under the name of National Hearing Care, registered to National Hearing Centres Pty Ltd.

Operations within Australia: Amplifon Australia provides Audiology services including audiology screenings, assessments, and prescriptions of technologies to assist with hearing loss, typically being hearing aids.

Supply Chains: We manage suppliers centrally. From 2020 we have commenced annually requesting our suppliers, in writing, to provide attestation that they are aware of the Australian Modern Slavery obligations and our Modern Slavery Policy and that they do not contravene these in anyway.

Amplifon Australia's key suppliers are contracted through our Amplifon global procurement framework. This framework quality assures suppliers against multiple criteria, including alignment to our Group Code of Ethics. Our major supply chain areas include:

- Arrangements for commercial real estate via various retail landlords;
- Supply of hearing aid devices and equipment from various suppliers;
- Supply of hearing aid batteries from various suppliers;
- Provision of logistics services from various suppliers;
- Provision of marketing services from various marketing firms;

ACTIONS TAKEN DURING THE REPORTING PERIOD

During the Reporting Period (Jan 1 2020 – Dec 31 2020), Amplifon Australia responded to its assessment of modern slavery risk in the following ways:

- Amplifon created our Modern Slavery Policy and had the policy reviewed and validated by an external law firm who has specialist legal expertise in Modern Slavery.
- The Modern Slavery Policy was communicated across our business and interviews were held with key management with specific focus on supplier management.
- We reviewed and analysed our operations, supply chain and spend, and we then wrote seeking assurances from our 32 major suppliers that they were aware of the Australian legislative requirements, had read and understood our policy and that they operated consistently with the Australian legislation and our policy.
- Some of our suppliers are themselves global enterprises and have well established public policies relating to Modern Slavery and human rights and publish audit reports on their annual performance against these policies. During the period we also reviewed the published policies and related reporting of major suppliers.

ASSESSING EFFECTIVENESS & PROPOSED ACTIONS FOR 2021

Establishing a Modern Slavery policy, internal communication and supplier statements is a good start for any medium sized enterprise given the relative newness of the Australian legislation (in force from 1 January 2019) but Amplifon Australia will go further and continually review our actions to strengthen our Modern Slavery response. We will use our annual reporting obligation as an opportunity to routinely consult internal management as well as our suppliers on any updates to their modern slavery response or risk profile. By doing this we will be able to better track progress and improvements in the area, as well as the possibility of emerging risks.

In addition to our annual reporting obligation, actions for 2021 will include, but not be limited to:

- An awareness training session for general management scheduled for 2020 was placed on hold due to COVID-19 restrictions and will now occur in early 2021.
- Undertake a review of our supplier onboarding and monitoring process to ensure we have ongoing due diligence of Modern Slavery risk.
- Modern slavery will also be explicitly included in our annual risk assessment program.

STATEMENT

This Modern Slavery Statement was approved by the Amplifon Australia Board on 18 January 2021.

Signed:



Lillian Comitini

Managing Director, Board Director

