



# Modern Slavery Statement 2025

Respecting Ethical Business Practices

 **EBOS**  
GROUP LIMITED







## Acknowledgement of Country and Traditional Owners

At EBOS Group, we represent a collective of companies in Australia, New Zealand and Southeast Asia. We acknowledge the traditional inhabitants and the importance of their connections to the lands and communities in which we work. We offer respect and acknowledgement to lands, waters and communities, and pay our respect to Elders past and present.

Your feedback is important to us. Please forward any comments to [legal@ebosgroup.com](mailto:legal@ebosgroup.com).

Our purpose  
Advance  
opportunities  
to enrich  
lives.

## Our vision

To drive significant impact every day in the lives of our people and those we serve. We're leading with a commitment to excellence and delivering superior performance in new and existing markets.





## Leadership Message

**At EBOS Group, we are committed to striving for the highest standards of conduct and ethical behaviour in all our business activities. This is reflected and supported by our purpose of advancing opportunities to enrich lives, and our vision to drive significant impact in the lives of our people and those we serve – whether that be with respect to members of our own workforce, a commitment to mitigating or preventing modern slavery risks in our supply chains or supporting the communities in which we operate. Our goal is to engage with suppliers and service providers that are aligned with our broader corporate values, including a respect for human rights and commitment towards ethical sourcing.**

The Board oversees the development and implementation of our Environmental, Social and Governance (ESG) Program, as part of its commitment to sound corporate governance. The ESG Program sets out the actions that the Group will take to ensure that we consistently and sustainably deliver on our responsibilities as a provider of essential products and services across our two segments of Healthcare and Animal Care. This includes a commitment to ethical sourcing as reflected in the Group's Ethical Sourcing Strategy.

During FY25, the Group continued to implement and embed our Ethical Sourcing Strategy, first formally initiated in FY23.<sup>1</sup> Our focus for the FY25 reporting period was on extending the strategy across our existing businesses and working towards ensuring that it was more firmly established in supplier on-boarding processes. Whilst we are pleased to report that there has been some progress in each of our segments during FY25, we acknowledge that there are differing levels of advancement of the Ethical Sourcing Strategy across the Group. The complexity of engaging with a large and diverse supplier base continues to present challenges, but we remain committed to driving implementation that is right sized for our various businesses.

With a commitment to continuous improvement, the Group undertook a review of our Ethical Sourcing Strategy during the second half of FY25, with a particular focus on supplier engagement and the tools used to support due diligence. Informed by stakeholder feedback and following the outcome of the review, we will look to implement changes to the online tools that support our due diligence measures in FY26, and refine our practices as we work towards ensuring transparency in our supply chains.

We are keenly aware that addressing and mitigating modern slavery risks in supply chains is inherently complex and requires a long-term focus. It also requires a commitment to the ongoing review and assessment of the effectiveness of the measures put in place and an understanding that our Ethical Sourcing Strategy will need to evolve. We will continue to look for opportunities to improve and adapt to ensure that we are working towards implementing measures that are most appropriate for identifying and addressing the complexities of our supply chains.

This Modern Slavery Statement was approved by the Board of EBOS Group Limited on 29 October 2025.

<sup>1</sup> FY23 means 1 July 2022 to 30 June 2023. FY25 means 1 July 2024 to 30 June 2025. FY26 means 1 July 2025 to 30 June 2026.

# How to read this statement

This is EBOS’ fifth Modern Slavery Statement and has been prepared to address the seven mandatory reporting criteria set out in the *Modern Slavery Act 2018* (Cth).

1. Identify the reporting entity.	Page 5 and Appendix A
2. Describe the reporting entity’s structure, operations and supply chain.	Page 5-11
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.	Page 12
4. Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes.	Page 13
5. Describe how the reporting entity addresses the effectiveness of those actions.	Page 15
6. Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe the consultation with the entity giving the statement).	Page 15
7. Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Page 5-16

# Introduction and Governance

**EBOS Group is the largest and most diversified Australasian marketer, wholesaler and distributor of healthcare, medical and pharmaceutical products. It is also a leading marketer and distributor of recognised animal care brands.**

This is EBOS' Modern Slavery Statement for the reporting period 1 July 2024 to 30 June 2025 (FY25). It outlines the steps that we have taken to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chains.

EBOS Group Limited (NZ Company Number 120844/ ARBN 166 840 973) is publicly listed on the New Zealand and Australian stock exchanges and is the parent company of a number of entities that it controls, and, on whose behalf, this joint Modern Slavery Statement is made (see Appendix A). A reference to EBOS in this Modern Slavery Statement includes those entities. Some of the entities within the Group are not reporting entities for the purposes of the Australian Modern Slavery Act 2018, however, we have chosen to focus on the operations of all Australian and New Zealand entities within the Group.

EBOS operates a number of diverse businesses across the Group under the stewardship of our two main segments: Healthcare and Animal Care. In FY25 our businesses continued to focus on more firmly embedding the Group's formal Ethical Sourcing Strategy into their standard business practices. Whilst there are a number of diverse businesses or business divisions within each segment, the Ethical Sourcing Strategy establishes the common processes in relation to ethical sourcing that each business is expected to embed in their operations. Across the Group, each of our businesses is accountable for managing its modern slavery risks. We fully appreciate that the maturity of modern slavery risk management and reporting will evolve over time as well as across each of our businesses and are committed to working towards ensuring that all our businesses are aligned with the Group's expectations on the management of modern slavery risks.

EBOS reported in its FY24 Modern Slavery Statement that it would engage in a process of assessing and more fully integrating modern slavery measures in its LifeHealthcare, Australian Biotechnologies and Transmedic businesses. Whilst the LifeHealthcare and Australian Biotechnologies businesses were included in the roll-out of the Ethical Sourcing Strategy in previous reporting periods, we are pleased to report that FY25 saw more fulsome implementation across both of these businesses. With the full acquisition of the Transmedic business in January 2025, we will assess and consider how best to implement the Group's strategy in respect of this business during FY26.

Given the diverse nature of the Group's operations, we acknowledge that each business may face unique challenges in implementing modern slavery due diligence practices. However, we remain committed to working towards ensuring that the intent behind these practices is applied across the Group appropriately as part of our broader ESG Program. This includes recognising the need for some flexibility in approach provided this is aligned with the broader ethical sourcing objectives.



# Our ESG Governance structure and approach to ethical sourcing

**The Board and Executive Leadership Team are committed to leading the sustainable development of our businesses in the communities we serve.**

Established governance frameworks guide our business towards impactful execution of EBOS' purpose, vision and sustainability framework.

The Board of Directors is ultimately responsible for sustainability at EBOS and approves, oversees and monitors EBOS' sustainability framework and strategy, including the ESG Program and climate-related risks and opportunities.

Our management approach to ESG topics is outlined under the five pillars of our ESG Program, for which more details can be viewed at [www.ebosgroup.com/sustainability](http://www.ebosgroup.com/sustainability).



The Consumers & Patients pillar includes measures related to ethical trading of goods and services, including managing risks regarding modern slavery. Ethical Sourcing is a sub-strategy of this pillar focused on enhancing our structured framework to assist business units with evaluating suppliers on ESG compliance and performance in addition to commercial assessments developed to deliver on our ESG Program. It is within this framework that our risks relating to modern slavery are monitored as part of our broader ESG Program.

The Chief Executive Officer and his Executive Leadership Team are responsible for the delivery of the ESG Program. The Board has assigned responsibility for monitoring and overseeing our ESG Program to the ESG Steering Committee, comprising senior leaders from key functions across all divisions.

## ESG Governance

Board	Chief Executive Officer	ESG Steering Committee
The Board has responsibility for approving, overseeing, and monitoring the Group's response to and management of the ESG Program.	The Chief Executive Officer (CEO), or a member of the Executive Leadership Team, reports to the Board on the Group's ESG Update at each Board meeting.	Our ESG Steering Committee has responsibility for formulating and implementing the Group's ESG Program. It is composed of senior business representatives across the Group's major business functions. Various ESG initiatives are integrated in our business activities and governance structures including: <ul style="list-style-type: none"> <li>Cyber Security &amp; Privacy Steering Committee</li> <li>Sustainable Packaging Committee</li> <li>Group Safety Committee</li> </ul>

Our Ethical Sourcing Strategy was formally introduced in FY23 with the aim of engaging with suppliers that are aligned to EBOS' corporate values and ESG Program and minimising the risk of modern slavery in our supply chains. Since then, we have consistently looked to implement and embed the practices across the Group, including new acquisitions.

The Ethical Sourcing Strategy sets out the steps for our businesses to implement an effective and appropriate ethical sourcing program having regard to the nature and operation of those businesses. This includes risk assessments of certain suppliers, using online due diligence tools and standard operating procedures, reporting templates and contractual protections. Focus areas of the strategy include managing modern slavery risks and legal and regulatory compliance.

#### Focus areas of our Ethical Sourcing Framework



Underpinning our Ethical Sourcing Strategy, is a suite of policies and procedures which apply to our engagement with suppliers:

- **Supplier Code of Conduct:** this code sets out EBOS' minimum expectations of suppliers in relation to compliance with laws, ethical behaviour, people and safety, environment, quality, privacy and data protection.
- **Ethical Sourcing Policy:** this policy describes specific requirements regarding ethical sourcing – for example, in relation to no use of child labour, employee payments and anti-discrimination and harassment, workplace conditions and environmental standards.

The Supplier Code of Conduct and the Ethical Sourcing Policy are available on our website in the Corporate Governance section – <https://www.ebosgroup.com/who-we-are/corporate-governance/>.

In FY25 our businesses continued to focus on embedding the strategy into their everyday business practices as well as seeking to foster increased supplier engagement and awareness of the EBOS strategy.

More information on the Group's ESG Program, including the 20 material ESG topics identified through stakeholder engagement, and our materiality assessment is available at [www.ebosgroup.com/sustainability](http://www.ebosgroup.com/sustainability). Our 2025 Annual Report includes further information in relation to our approach to sustainability. The policy documents referred to in this Modern Slavery Statement and the 2025 Annual Report are available on the EBOS website – [www.ebosgroup.com](http://www.ebosgroup.com).

As a market leading healthcare and animal care company, we know that our stakeholders and the communities we serve rely on us.



# Our business, operations and supply chains

EBOS primarily provides wholesale and distribution services acting as an intermediary between suppliers and business users including pharmacies, healthcare institutions, veterinarian clinics, medical clinics and other professional care providers. Our supply chain incorporates many local and international suppliers across various areas of our business, including suppliers whose finished products we distribute. In addition, we also source ingredients for products we manufacture and third-party manufacturers for some EBOS-owned brands such as in our Masterpet and Endeavour businesses. Except for our pet food manufacturing plant and QPharma manufacturing plant (in Australia) and our Red Seal toothpaste manufacturing site (in New Zealand), the Group does not own the factories where EBOS-owned brands are manufactured, but engages third parties under contract to manufacture these products.

The Group’s broad portfolio of businesses also includes businesses that provide support to the healthcare and animal care sectors in which it operates.

EBOS’ core operations can broadly be categorised as falling into two segments:

- **Healthcare:** sale of healthcare products (including medicines, over the counter products and medical consumables) in a range of sectors, own brands, retail healthcare, pharmacy services, wholesale activities and businesses that provide support to the healthcare sector such as data businesses and sale and distribution of specialist medical devices and consumables to public and private hospitals, surgeons, medical specialists and clinics; and
- **Animal Care:** sale of animal care products in a range of sectors, own brands, pet food manufacturing, retail and wholesale activities.

The businesses that form part of each segment are set out on the following pages.

## Local and international supply chains

Medicines and healthcare products	Medical devices	Own-brand products
Over-the-counter products and medical consumables, cold chain products, scheduled and unscheduled medicines	Medical equipment and consumables	Ingredients, materials, and finished products



# Our businesses

EBOS' success is built on a diverse range of industry-leading businesses and brands spanning community pharmacy, institutional healthcare, contract logistics, and animal care.

## Healthcare Community Pharmacy



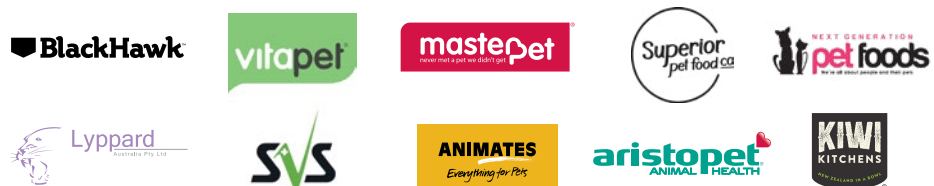
## Healthcare Institutional Healthcare



## Healthcare Contract Logistics



## Animal Care



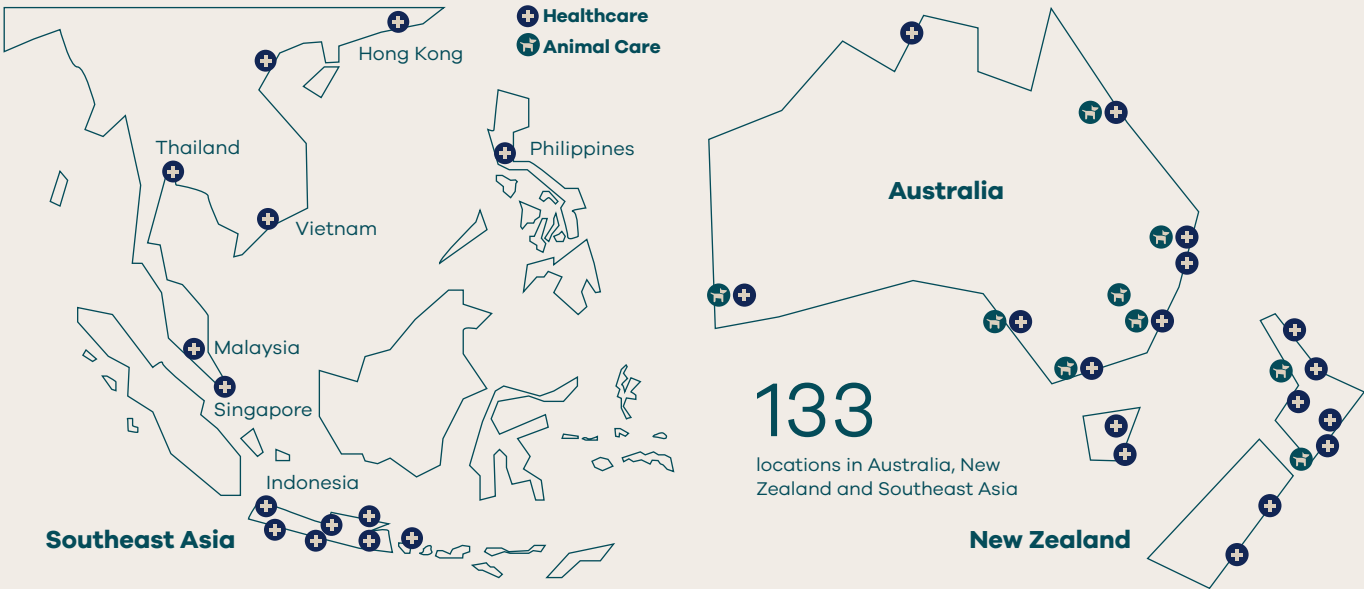
EBOS’ registered office is located in Christchurch, New Zealand. In F25, the Group’s total employee headcount expanded to 5770 employees. Our businesses and functions operate from 133 locations across Australia, New Zealand, and Southeast Asia.<sup>2</sup> Whilst we have included reference to the Groups’ broader operations, our reporting in this Modern Slavery Statement is focused on the strategy in our Australian and New Zealand businesses. We will engage in a process of assessing, with a view to integrating modern slavery measures in our Transmedic business (which operates in Southeast Asia) in FY26.

In FY25, our Animal Care business also completed a number of acquisitions, including SVS Veterinary Supplies Ltd (SVS), a wholesaler of pet medicines and related products in New Zealand, Kiwi Kitchens, a premium pet food brand known for its New Zealand sourced

ingredients and Next Generation Pet Foods, an Australian based manufacturer of pet treats. This Modern Slavery Statement does not include specific information relating to those newly acquired businesses. We will assess how best to integrate those businesses into the Groups’ Ethical Sourcing Strategy in FY26.

Our employees are engaged either under contract or under awards or collective agreements. Across New Zealand and Australia, we have a number of collective agreements, and we engage proactively with unions.

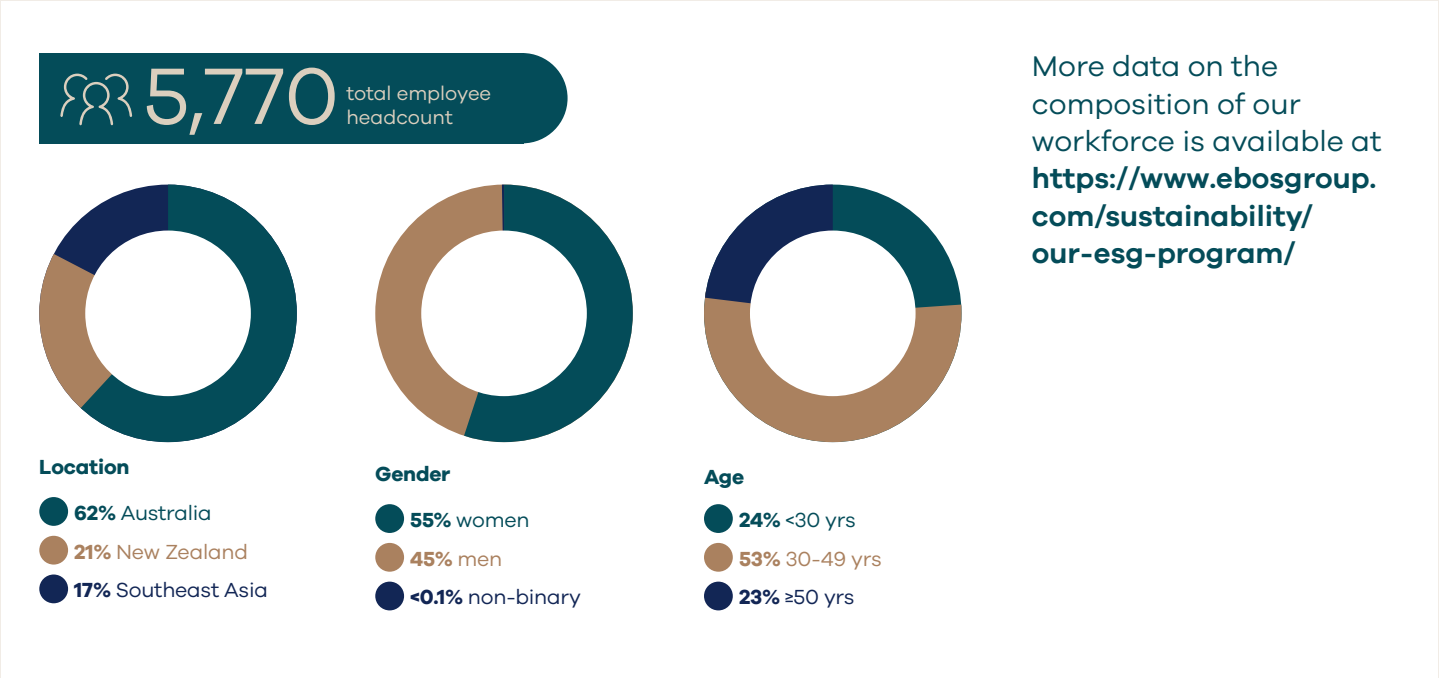
Our locations



<sup>2</sup> As at 30 June 2025, including Transmedic.



Our people



EBOS, by the nature of its business, sources significant quantities of goods from third party suppliers that it then distributes as a wholesaler or distributor. It also sources a wide range of finished products, ingredients and other materials from third party suppliers for its “own brand” manufacturing and retail businesses.

Our supply chains are extensive and sometimes complex, with a high proportion of our supply chain for our Healthcare segment comprising goods sourced from local branches of large global pharmaceutical companies and manufacturers based in regions including Europe, the United States and India and Asia. We also source from businesses located in Australia and New Zealand.

Our “own brand” businesses source goods produced locally (being New Zealand) as well as internationally, including geographic locations such as Europe, India, South Africa and Asia. Our Animal Care segment products are sourced from countries including China, Taiwan and Thailand.

There are also a number of third party suppliers that provide services to EBOS to support its business operations, ranging from IT companies, construction and cleaners to freight carriers.

# Risks of modern slavery in our operations and supply chains

## Our Operations

EBOS Group has assessed the risk of modern slavery in its operations as low. The Group's main operations are based in Australia and New Zealand which are generally understood to be low risk countries.<sup>3</sup> Our employees are engaged either under contract or under awards or collective agreements. Across Australia and New Zealand, 32% of employees participate in collective bargaining agreements.

In order to align on core behaviours, employee's complete integrity training through an online learning platform intended to support our workforce to fully understand our Group policies and to uphold all legal and regulatory requirements relevant to their roles.

All corporate employees participate in training on Whistleblowing, Anti-bullying & Anti-harassment, Worker Health & Safety and Code of Ethics. Selected employees depending on their role, also complete additional training on Modern Slavery. For teams in Operations, Warehousing, Manufacturing and Merchandising short burst courses can be accessed via personal mobile devices covering Whistleblowing, Anti-bullying & Anti-harassment, Worker Health & Safety and Privacy.

Whilst the risk of modern slavery in the Group's operations is considered low, we are acutely aware that there may be modern slavery risks in the operations of the third party suppliers that provide services to EBOS to support its business operations including IT companies, construction, cleaners, security, packaging freight carriers (international and domestic) and labour hire. For example, some of these industries may engage unskilled migrant workers and source personnel through labour hire agents. We have implemented controls where possible, including contractual obligations with respect to modern slavery requirements in our main supplier agreements.

We will continue to consider appropriate mechanisms to monitor these risks in the increasingly complex supply chains of the third parties with whom we deal with and opportunities to include controls where possible.

The Group recognises and continues to monitor potential exposure to modern slavery risk in the context of its own operations.

## Our Supply Chains

The diversity within our Group necessarily means that our supply chains are complex. Our Healthcare segment generally comprises goods sourced from global pharmaceutical companies. Whilst in most instances, our contractual arrangements are with an Australian based entity, we are aware that these goods are often sourced from companies and manufacturers based in regions including Europe, the United States, India and Asia. Some of these are considered to be high risk geographies.

In addition, the production of medical garments, protective personal equipment (PPE), medical and surgical instruments and consumables has been linked to labour and human rights violations.

In our Medical Technology business, as a distributor of specialist medical products, we engage with specialist suppliers from a number of countries to source products including China, Belgium, Canada, Costa Rica, Germany, the United States, the United Kingdom, France, Switzerland, South Korea and Finland. Some of these countries have been identified as presenting a potentially elevated exposure to modern slavery risk. More broadly, we are conscious that a large proportion of key inputs required for end stage assembly of surgical and medical products are manufactured in high-risk countries such as Malaysia, Pakistan and Thailand. Whilst the focus of our Ethical Sourcing Strategy is on Tier 1 suppliers, as the strategy evolves, we will look to understand more fully and mitigate the risks associated with suppliers down the tiers.

In general, the risks of modern slavery in our supply chain are considered relatively low due to the highly regulated nature of the pharmaceutical and medical supplies industry and our engagement with reputable often Australian-based entities. However, we acknowledge that certain goods and services that we procure from certain geographical regions may have an elevated risk of exposure due to unethical labour practices. We are committed to engaging with our suppliers to understand and mitigate these risks. The goal of EBOS' strategy on ethical sourcing is to engage with suppliers that are aligned with our values.

<sup>3</sup> 2023 Global Slavery Index, Walk Free.



# Our actions to assess and address our modern slavery risks (including due diligence and remediation)

In FY25 our businesses have continued to work through implementing and embedding the initiatives set out in the Group’s Ethical Sourcing Strategy into their operations.

The goal of the Ethical Sourcing Strategy is to engage with suppliers and service providers that are aligned with EBOS’ broader corporate values, including a respect for worker’s rights. Whilst the Ethical Sourcing Strategy has drawn on work done in previous years, the intention is to formalise these activities in a way that is measurable and can be accurately reported on. Importantly, EBOS will also continue to seek to highlight areas where the Group can improve thereby enabling more structured governance, evaluation and disclosure as part of our approach to responsible corporate leadership.

The Strategy recognises that EBOS’ businesses are diverse by the nature of their operations and the products and services. However, there are key common processes in relation to ethical sourcing that each business is expected to embed in their operations. Each business is responsible for implementing the strategy tailored to address the modern slavery and ethical sourcing risks that are most appropriate to it.

The Ethical Sourcing Strategy includes the following initiatives that are common expectations across all EBOS businesses:

• **Risk Assessment**

Recognising that risk is influenced by various factors, including for example, inherent industry risk, geographic risk, whether or not the product is own-brand, each business is required to determine its parameters and prioritisation of risk for its suppliers based on the most appropriate category of risk depending on the nature of its business and industry.

During FY25, our businesses have had access to external resources to assist in considering risk such as LSEG Risk Intelligence (LSEG World Check) and SEDEX.

Examples of supply chain risk categories assessed by our businesses
Product/service quality risks
Industry risks
Geographic risks
Entity risks including reputation
Exposure related to supplier size

• **Due Diligence**

Businesses are required to complete due diligence on entities that they engage with. Our businesses have implemented Standard Operating Procedures that reflect the particular business’ approach to due diligence.

During FY25, our businesses have used tools such as LSEG Risk Intelligence, SEDEX and due diligence questionnaires to assess their engagement with existing suppliers (with those suppliers who have been categorised as higher risk taking priority) and in the on-boarding process (where relevant) for new suppliers.

Audits may also be part of the due diligence measures in circumstances primarily where the initial risk assessment or due diligence results indicate an unacceptable level of risk or in relation to businesses with own-brand products, where the business determines appropriate.

During FY25, our businesses continued to embed due diligence processes into their operations and actively engage with suppliers to complete such measures. Whilst some of our suppliers have now completed this process through the SEDEX platform or the manual due diligence questionnaire, due to the complex and often global nature of some of our supply chains, this continues to present some challenges both in respect of existing Tier 1 suppliers and new suppliers being onboarded.

• **Other Controls**

These measures include businesses raising awareness within their supplier cohort of EBOS’ requirements in relation to compliance with EBOS’ Supplier Code of Conduct and Ethical Sourcing Policy and continuing to embed modern slavery requirements into all supplier contracts (where appropriate). In FY25, we took the opportunity to update our standard IT supplier engagement contract to include these requirements. We will continue to look to identify further opportunities to enhance standard contractual terms across the Group to ensure alignment with our ethical sourcing framework.

• **Reporting**

Businesses are required to report bi-annually on factors such as any modern slavery initiatives, any instances of critical non-conformance with suppliers and progress on implementation.

Escalation mechanisms are incorporated into a business’ Standard Operating Procedures where the results of a supplier’s risk assessment or response to due diligence are of concern and immediate action is required.









• **Training**

Modern slavery training is included for all relevant employees as part of EBOS’ formal Integrity Training program. Employees are required to complete this training annually. The online training is designed to raise awareness of modern slavery and how to identify modern slavery risks.

In addition to the ESG Program, EBOS' governance framework includes policies which are relevant to addressing modern slavery in its operations and supply chains:

- **Code of Ethics:** sets out a framework of expected behaviours that reflects the Group's values. It covers expectations in relation to the conduct of EBOS people, particularly in relation to acting honestly, with integrity and in accordance with law. The Code is supplemented by detailed policies and procedures addressing various policy areas of direct relevance to the Group's ESG Program. Any material breaches/matters of the Code are to be reported to the Audit and Risk Committee. The Code is provided to all our employees, officers and business partners upon commencement of their employment or appointment with us.
- **Whistleblower Protection Policy:** willingness to speak up when something is wrong is central to our corporate culture of honesty and integrity. This policy provides a mechanism for raising and appropriately addressing issues if they arise.

#### Key People Policies

 <b>Workplace Discrimination and Bullying Policy</b> <ul style="list-style-type: none"> <li>• Outlines roles and responsibilities and a complaints procedure</li> </ul>	 <b>Grievance and Complaints Procedure</b> <ul style="list-style-type: none"> <li>• Includes procedures for making and investigating a grievance or complaint according to the circumstances</li> </ul>
 <b>Recruitment and Selection Policy</b> <ul style="list-style-type: none"> <li>• Outlines the principles and procedures for the attraction of talent and the recruitment and selection of employees</li> <li>• Designed to ensure that the recruitment process is consistent and offers equal opportunity in all circumstances</li> </ul>	 <b>Flexible Working Policy</b> <ul style="list-style-type: none"> <li>• Covers the requirements under the National Employment Standards in Australia and minimum obligations in New Zealand</li> <li>• Structured approach to requesting, reviewing and approving flexible work arrangements, including safety requirements</li> </ul>
 <b>Workplace Gender Equality Policy</b> <ul style="list-style-type: none"> <li>• Promotes gender equality (including equal remuneration) and removal of barriers to full and equal participation of women in the workforce (including in relation to family and caring responsibilities)</li> <li>• Fosters workplace consultation between employers and employees</li> </ul>	 <b>Diversity and Inclusion Policy</b> <ul style="list-style-type: none"> <li>• Reflects our vision to create an environment that is safe, inclusive and leverages the potential of our people irrespective of difference</li> <li>• Diversity and inclusion in the workplace improves our ability to attract, retain, motivate and develop talent</li> </ul>
 <b>Health and Wellbeing Policy</b> <ul style="list-style-type: none"> <li>• Includes Areas of Focus such as providing our 'Be Well from Anywhere' program, access to annual flu vaccinations and providing mental health awareness training for our leaders</li> <li>• Committed to building a diverse and inclusive culture that is free from bullying and harassment</li> </ul>	 <b>Code of Ethics</b> <ul style="list-style-type: none"> <li>• Outlines standards of conduct and ethical behaviour, corporate compliance and good corporate governance</li> <li>• Includes a framework of standards by which the directors, employees and contractors of EBOS and its related companies are expected to conduct their professional lives</li> </ul>

In line with our commitment to continuous improvement, EBOS completed a review of its Ethical Sourcing Strategy in FY25. Following stakeholder feedback, this review focused particularly on supplier engagement, the challenges of completing meaningful due diligence and the effectiveness of our online tools in addressing those requirements. Based on the outcome of that review, in FY26, we will look to implement changes to the current suite of online tools to facilitate more accessible due diligence measures and support more effective supplier engagement. In addition, we will review and update the supporting suite of documents to ensure that they align with current processes.

We will continue to review and adapt the Ethical Sourcing Strategy where appropriate based on learnings as our businesses continue to embed the strategy, including increasing engagement with suppliers.

If an instance of modern slavery is identified in our supply chain, this will be escalated, and we will address the situation in a timely manner and in line with EBOS' values and standards. Our businesses have included in their respective Standard Operating Procedure, a process for escalation and remediation in the event that an instance of modern slavery is identified or where there is a critical risk identified as a result of the due diligence. Depending on the nature of the non-conformance and severity of harm (or potential harm), our preference is to work with suppliers to remediate the non-conformance with a view to improving working conditions for workers.



## Measuring our effectiveness

The Group's focus for FY25, similar to that in FY24 has been to progress implementation of the Ethical Sourcing Strategy across the Group and to ensure that all our businesses are on-boarded and provided with the necessary awareness and training to undertake meaningful risk assessments and due diligence of its suppliers to identify risks of modern slavery in their supply chains.

During the FY25 reporting period, EBOS extended its Ethical Sourcing Strategy to the remaining Australian and New Zealand businesses - Lyppard, Australian Biotechnologies and Superior Pet Co. These businesses have commenced implementation of the ethical sourcing measures which are expected to be further embedded through FY26. With the exception of the newly acquired businesses in FY25, all Australian and New Zealand businesses within the Group have now been onboarded into the ethical sourcing framework. A number of suppliers have now been screened through the LSEG Risk Intelligence online tool, and our business continues to work towards ensuring that all tier one suppliers undergo appropriate screening.

In addition, businesses are continuing to seek to engage with suppliers for due diligence purposes via online tools or where appropriate, the completion of manual due diligence questionnaires. We appreciate that this is an on-going process with inherent challenges due to the nature of our operations and supply chains. We remain committed to working collaboratively with our suppliers to enhance transparency across our supply chains.

EBOS will continue to monitor the effectiveness of its due diligence measures and supplier engagement activities throughout FY26, particularly in the context of its use of online screening tools.

We will also continue to work with our businesses within each segment to review and assess the self assessment reporting requirements put in place as part of the strategy to ensure that sufficient information is captured, to be able to measure and report on effectiveness of initiatives for a particular business.

## Consultation and collaboration

EBOS operates a number of diverse businesses. We are continuing to engage with the business representatives to communicate expectations, raise awareness and understand how best to embed the measures in a manner that is meaningful and appropriate within the context of the relevant business. For example, for some businesses depending on the number of suppliers, it is more appropriate for all suppliers to complete due diligence measures, while for others, the focus will be on prioritising risk assessments and completing due diligence on those considered to be high risk in the first instance.

As part of the Group's Ethical Sourcing Strategy, all businesses are required to complete a report to support the initiatives set out in the Group's Modern Slavery Statement. The format of the report is standard across all EBOS businesses and includes details of each business' operations, location of Tier 1 suppliers, risk factors considered by the business, due diligence undertaken and any risks of modern slavery identified, together with any remediation steps where relevant.

A monthly cross business Ethical Sourcing Working Group is attended by nominated business representatives responsible for the day-to-day management of the ethical sourcing program in that business. This forum provides a valuable opportunity to share learnings, new initiatives, approaches and resources. In addition, the working group provides a forum to share industry knowledge. Where relevant, business representatives also attend training and information sessions facilitated by industry forums to further build awareness.

Whilst our focus in FY25 was on reviewing and refining existing practices, EBOS recognises that ethical sourcing and modern slavery represent a continually evolving landscape. We acknowledge that consultation and collaboration – both internally and externally – are important in order to deepen our understanding of emerging risks, best practice and continuous improvement.

We are exploring opportunities to participate more broadly in external forums and industry collaborations and will look to more actively do so in FY26.

## Our next steps

As reported in our FY24 statement, the overarching focus in FY25 was to continue to embed the Ethical Sourcing Strategy into each of our businesses to ensure that across our operations and supply chains, processes are in place to identify, prevent, mitigate and manage the risk of modern slavery. This remains our focus and will continue into FY26. In particular, we will continue to focus on:

- **Embedding ethical sourcing measures:** ensure these measures are fully implemented within our newly onboarded businesses and assessing integration into recently acquired businesses.
- **Supplier due diligence and on-boarding:** continuing to expand the use of online screening tools and due diligence platforms and more actively engaging with our suppliers to facilitate participation and completion of due diligence measures. These efforts aim to improve coverage across our suppliers, enhance data quality and support a better understanding of risks in our supply chains.
- **External engagement:** seek opportunities to actively engage in external forums to continue to build awareness and understanding of modern slavery risks and to share learnings on how these risks are being managed and mitigated.
- **Controls:** review our standard contractual clauses to ensure that they continue to reflect EBOS' values and approach to modern slavery.

- **Continuous improvement:** review and refine our approach to due diligence measures to ensure they remain effective in supporting businesses to identify, evaluate and mitigate risks within their supply chains
- **Onsite investigation:** ensure that our businesses are actively seeking to consider and implement due diligence measures, such as audits, where appropriate and work towards looking beyond Tier 1 suppliers.

Signed on behalf of EBOS Group Limited and the subsidiaries listed in Appendix A by:



**Elizabeth Coutts**  
**Chair**  
29 October 2025



# Appendix A

## Entities within EBOS Group

### New Zealand

Name	New Zealand Company Number
Clinect NZ Pty Limited	5248181
EBOS Medical Devices NZ Limited	7688556
Endeavour Consumer Health Limited	2336947
Masterpet Corporation Limited	8582
PRNZ Limited	1715066
Pharmacy Retailing NZ Limited	49549
SVS Veterinary Supplies Limited	366057
Vet2Pet Limited	7969056
SVS 3PL Limited	6844795

### Australia

Name	Australian Company Number
A.C.N. 618 208 969 Pty Ltd	618 208 969
Alchemy Holdings Pty Ltd	604 670 493
Alchemy Sub-Holdings Pty Ltd	604 695 365
Beaphar Pty Ltd	145 508 729
BFCMC Pty Ltd	622 474 855
Blackhawk Premium Pet Care Pty Ltd	150 390 686
Botany Bay Imports Exports Pty Ltd	128 341 980
CAB Medical Pty Ltd	604 292 793
CC Pharmacy Investments Pty Ltd	128 459 030
CC Pharmacy Management Pty Ltd	128 459 049
CC Pharmacy Promotions Pty Ltd	154 871 753
Chemmart Holdings Pty Ltd	614 007 288
Chem Plus Pty Ltd	008 274 557
Cincotta Holding Company Pty Ltd	169 308 070
Clinect Pty Ltd	150 558 473
Collaboration Medical Clinics Investments Pty Ltd	603 715 000
Collaboration Medical Clinics Pty Ltd	622 474 435
Developing People Pty Ltd	115 878 227
DoseAid Pty Ltd	129 958 934

**Australia continued**

<b>Name</b>	<b>Australian Company Number</b>
* EAHPL Pty Ltd	164 521 617
EBOS Aesthetics Pty Ltd	645 058 840
* EBOS Group Australia Pty Ltd	125 401 247
EBOS Health & Science Pty Ltd	003 274 502
* EBOS Medical Devices Australia Pty Ltd	635 893 720
* EBOS PH Pty Ltd	613 974 253
Endeavour CH Pty Ltd	003 631 669
Fibertech Medical Australia Pty Ltd	157 788 362
* Healthcare Supply Partners Pty Ltd	631 884 609
Hospharm Pty Ltd	136 875 922
HPS Brands Pty Ltd	167 204 962
HPS Corrections Pty Ltd	159 945 936
HPS Finance Pty Ltd	169 377 986
HPS Holdings Group (AUST) Pty Ltd	158 830 641
HPS Hospitals Pty Ltd	158 418 038
HPS IVF Pty Ltd	156 303 561
HPS Services Pty Ltd	160 438 559
Intellipharma Pty Ltd	001 235 374
Klinik Solutions Pty Ltd	130 793 261
Lite Living Pty Ltd	166 526 370
LMT Surgical Pty Ltd	092 902 111
* Lyppard Australia Pty Ltd	007 008 906
* Masterpet Australia Pty Limited	000 333 353
Masterpet Logistics Pty Ltd	146 338 418
Mediport Pty Ltd	163 446 893
MD Solutions Australasia Pty Ltd	099 040 874
MD Scopes Pty Ltd	113 630 381
Mega Save Management Pty Ltd	128 266 437
National Surgical Pty Ltd	078 902 217
Next Generation Petfoods Pty Ltd	088 251 585
NGPF Pty Ltd	659 980 159

**Australia continued**

<b>Name</b>	<b>Australian Company Number</b>
Nexus Australasia Pty Limited	115 828 941
PBA Finance No.1 Pty Ltd	624 432 471
PBA Finance No. 2 Pty Ltd	168 983 597
PBA Wholesale Pty Ltd	157 770 244
* Pet Care Distributors Pty Ltd	125 265 769
* Pet Care Holdings Australia Pty Ltd	000 060 364
Pet Care Wholesalers Pty Ltd	637 762 077
Pets International Pty Ltd	002 960 330
Pharmacy Brands Australia Pty Ltd	109 700 263
Qpharma Pty Ltd (previously Aristopet)	145 418 882
Reward Petfoods Pty Ltd	010 422 910
Richard Thomson Pty Limited	115 059 179
Sentry Medical Pty Ltd	003 634 991
* Symbion Pty Ltd	000 875 034
Surgical and Medical Supplies	007 707 128
* Terry White Group Pty Ltd	136 808 243
Tony Ferguson Weight Management Pty Ltd	166 526 665
* TW&CM Pty Ltd	136 833 620
TWC IP Pty Ltd	136 833 611
Ventura Health Pty Ltd	169 307 975
VIM Health Pty Ltd	166 525 659
VIM Health IP Pty Ltd	166 527 555
Vitapet Corporation Pty Limited	079 725 143
W & W Management Services Pty Ltd	606 748 047
Warner And Webster Pty Limited	004 518 156
You Save Management Pty Ltd	125 763 680
* ZAP Services Pty Ltd	132 014 174
* ZHHA Pty Ltd	131 957 269



**Other**

Shanghai EBOS Trading Co Ltd (formerly Shanghai EBOS Business Management Co. Ltd)

**Life Healthcare**

<b>Name</b>	<b>Australian Company Number</b>
* Pacific Health Supplies TopCo1 Pty Limited	624 030 897
* Pacific Health Supplies TopCo Pty Limited	624 032 051
* Pacific Health Supplies Mezzco Pty Limited	624 032 908
* Pacific Health Supplies Holdco Pty Limited	624 033 450
* Pacific Health Supplies Bidco Pty Limited	624 033 889
* LifeHealthcare Group Pty Limited	166 525 186
* LifeHealthcare Finance Pty Limited	166 526 941
* LifeHealthcare Pty Limited	130 225 599
* LifeHealthcare Distribution Pty Ltd	117 449 911
Transmedic Pte Ltd	Reg. no. 198004797R

\*Reporting entities as at 30 June 2025

