

## **Joint Modern Slavery Statement for the 2025 Reporting Period**

This is a joint modern slavery statement made by JBX Pty Ltd (ACN 134 120 139) (**JBX**) and Maxigenes Pty Ltd (ACN 150 321 770) (**Maxigenes**) under section 14 of the *Modern Slavery Act 2018* (Cth) (**Act**).

### **Section 16(1)(b) of the Act - JBX and its structure, operations and supply chains**

JBX is an Australian private company that carries on business in Australia and has a consolidated revenue exceeding \$100 million for the reporting period. JBX is wholly owned by Bravo Ventures Pty Ltd (ACN 620 641 661).

JBX produces family nutrition and wellbeing products that are locally made in Australia and New Zealand. The products are sold under the Bio Island brand. Examples of these products include vitamin and nutritional supplements. The products are manufactured using raw materials sourced from Australia or through materials manufactured by suppliers based in Australia and more recently New Zealand. JBX supplies the products to chemists and pharmacies in Australia. JBX also supplies its products to the New Zealand market. The products are also distributed to Southeast Asia and China through a network of supply partners. The raw materials are also sourced from New Zealand, China, Germany, Italy, India, USA, Malaysia, Indonesia, Australia, Spain, France, Norway, Iceland, Peru, South Korea and United Kingdom.

JBX also produces a range of products to support children health and skin care under the By My Side brand. These products are also made in Australia using raw materials sourced from Australia or through materials manufactured by suppliers based in Australia. Examples of these products include lotions, soaps, creams, moisturisers, oils and shampoo. JBX supplies these products to pharmacies and retailers based in Australia. The products are also distributed to Southeast Asia and China.

JBX's personnel manage relationships with various partners in the supply chain in regards to product contract manufacturing, product development and formulation, raw material supplies, label and packaging design and procurement, logistics, regulatory compliance, testing and laboratory services, distribution and warehousing.

### **Section 16(1)(b) of the Act - Maxigenes and its structure, operations and supply chains**

Maxigenes is an Australian private company that carries on business in Australia and has a consolidated revenue exceeding \$100 million for the reporting period. Bravo Ventures Pty Ltd (ACN 620 641 661) also wholly owns Maxigenes.

Maxigenes produces milk powder and chewable milk products. These products are made in Australia using raw materials sourced primarily from New Zealand and also from Australia or through materials manufactured by suppliers based in Australia. The raw materials are also sourced from China, South Korea, Spain, Malaysia, Taiwan and India.

Maxigenes' products are supplied through distributors. JBX distributes these products to chemists and pharmacies in Australia. The products are also supplied to chemists and pharmacies in New Zealand. The products are also distributed to Southeast Asia and China through a network of supply partners.

Maxigenes' personnel manage relationships with various partners in the supply chain in regards to product contract manufacturing, product development and formulation, raw material supplies, label and packaging design and procurement, logistics, regulatory compliance, testing and laboratory services, distribution and warehousing.

## **Section 16(1)(c) of the Act - Risks of modern slavery practices in the operations and supply chains of JBX and Maxigenes**

JBX and Maxigenes consider that there are negligible risks that their operations cause modern slavery practices. All products of JBX and Maxigenes are manufactured in Australia which heavily regulates employment conditions and safety at work. Modern slavery and human trafficking practices are also abhorrent criminal acts which do not align with the business values of JBX or Maxigenes.

Similarly, there are negligible risks that JBX and Maxigenes contribute to modern slavery practices. Both companies negotiate with their suppliers and customers on commercial arm's-length terms. They do not however aggressively negotiate unreasonable prices from their suppliers or demand unreasonable delivery deadlines. JBX and Maxigenes also ensure that orders they place with their suppliers are timely and accurate. For customers JBX and Maxigenes do not price their products such that they would incur a loss or have to resort to unscrupulous labour practices. JBX and Maxigenes are also supportive of their customers.

Both companies acknowledge there may be a heightened risk, that JBX and Maxigenes have direct links to modern slavery practices through their suppliers outside Australia and New Zealand. This is as a result of the geographical locations of some suppliers and the source of raw materials used in products supplied. While both companies put in appropriate safeguards, they acknowledge there is a limit to their knowledge about the labour practices of these customers in certain overseas markets. However, JBX and Maxigenes are unaware of any of these customers using forced labour.

**Section 16(1)(d) of the Act - Actions taken by JBX and Maxigenes during the reporting period to assess and address the risks of modern slavery practices in their supply chains including due diligence and remediation processes**

In the previous reporting period JBX and Maxigenes implemented a specific modern slavery policy for their employees and suppliers. This policy continued through the reporting period. The policy attempts to set clear expectations for employees and suppliers to be alert to the possible and inadvertent risk of modern slavery and requires collaborative work between stakeholders to address the risks. With respect to employees the policy sets a minimum standard that JBX and Maxigenes comply with all laws relating to employment in Australia. JBX and Maxigenes also require under the policy that its suppliers and other contractors meet the same Australian legal requirements and that business is only done with entities who act ethically in relation to labour hire and work.

JBX and Maxigenes also has in place an Employee Handbook (**Handbook**). The Handbook sets out JBX's and Maxigenes' policies, beliefs and benefits for its personnel. Among other things the Handbook imposes obligations on personnel relating to their dealings with suppliers, customers and others. JBX and Maxigenes reviewed and updated the Handbook during the reporting period.

Included in the Handbook is the Business Code of Conduct for JBX and Maxigenes (**Code**) and also their human rights policies, workplace health and safety requirements, and grievance and dispute procedures. Along with the Code these policies, requirements and procedures establish the processes for JBX and Maxigenes in respect to modern slavery and human trafficking concerns (including in supply chains) and the list of actions personnel may take if modern slavery is identified in any part of the supply chain. Those actions include utilising the grievance procedures offered by JBX and Maxigenes which encourage personnel to come forward to management and report suspected modern slavery abuses that require remediation.

A further development in the reporting period is that JBX and Maxigenes began drafting on supplier codes of conduct. These costs will expressly address modern slavery and the intent is that they are finalised within the next reporting period.

During the reporting period JBX and Maxigenes screened all their suppliers and customers for modern slavery risks. This included requesting information from the suppliers about their products and their origin and supplier worksites. It also includes engaging with customers about their markets and operations.

JBX and Maxigenes also negotiated contracts with their suppliers and customers during the reporting period that imposed human rights due diligence and remediation obligations on the contractual parties. The obligations require compliance with all laws (including those regulating workplaces, forced labour and human trafficking). The contracts also facilitate the contracting parties and third parties referring to JBX and Maxigenes complaints about the goods being supplied (and this extends to complaints about suspected modern slavery practices). All such complaints and remediation of modern slavery issues are further enforced by dispute resolution clauses in the contracts.

Following an extensive review in the previous reporting year of their current supply chains, internal practices and procedures to address modern slavery risks, both companies have implemented a separate modern slavery policy which is detailed above. JBX and Maxigenes have also revised their whistleblower and employee conduct policies so that modern slavery concerns may be further identified and addressed. JBX and Maxigenes are also now providing training to its staff about modern slavery risks. This included comprehensive training from an external service provider about the policy underpinning and the requirements under the *Modern Slavery Act 2018* (Cth). The training covered various examples of forced labour globally, key considerations in addressing modern slavery risks in contracts between suppliers and customers, and the required content for modern slavery statements.

JBX and Maxigenes have committed to increased transparency about the risks of modern slavery in their supply chains. In this regard the focus is on the human rights practices involved with sourcing raw materials. In the next reporting period JBX and Maxigenes will

be looking to implement a supplier questionnaire to screen for modern slavery risks and mitigate them. Contractual clauses providing for human rights due diligence and remediation are now also included in JBX's and Maxigenes' supply agreements.

**Section 16(1)(e) of the Act - How JBX and Maxigenes assessed the effectiveness of their actions that assessed and addressed the risks of modern slavery practices in their supply chains**

JBX and Maxigenes are now monitoring the effectiveness of the processes and procedures introduced during the reporting period to address the modern slavery risks that their businesses cause, contribute to, or are directly linked to, in line with the UN Guiding Principles. Both companies will continually assess the effectiveness of their actions in identifying and managing modern slavery risks by tracking their actions and outcomes, partnering with suppliers and other external partners, and undertaking regular internal governance and external processes. Based on the results of these processes, JBX and Maxigenes will adapt and strengthen their actions to continually improve their response to modern slavery.

Notably in the reporting period JBX and Maxigenes have increased the personnel in their supply chain and procurement teams. Part of the intent with this is to develop stronger relationships with suppliers to better assess the effectiveness of the actions by JBX and Maxigenes to address risks of modern slavery practices in the relevant supply chains.

**Section 16(1)(f) of the Act - Process of consultation with entities owned or controlled**

JBX and Maxigenes do not own or control any other entities and therefore this criterion is not applicable.

This statement was approved by the boards of each of JBX and Maxigenes on [04/12/2025].  
The board of Bravo Ventures Pty Ltd (ACN 620 641 661) also approved this statement on [04/12/2025].

**Executed by JBX Pty Ltd (ACN 134 120 139)** in accordance with section 127 of the *Corporations Act 2001* (Cth): )  
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Director  
Amanda Elizabeth Fox



Director/Secretary  
Liqi Luo

**Executed by Maxigenes Pty Ltd (ACN 150 321 770)** in accordance with section 127 of the *Corporations Act 2001* (Cth): )  
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Director  
Amanda Elizabeth Fox



Director/Secretary  
Liqi Luo