

NUTRAVIVA

THE AUSSIE GELATIN COMPANY T/A NUTRAVIVA 2021-2022

MODERN SLAVERY STATEMENT

Reporting Entity – The Aussie Gelatin Company Pt Ltd t/a Nutraviva

Governing Body – Sole Director and Founder, Bruno Rossitt

Date that governing body approved statement – 7th of July 2022

The Aussie Gelatin Company Pty Ltd t/a Nutraviva is an Australian-owned family-run business based in Bathurst, Australia. It is a successful, well-established business with over 800 stockists and thousands of satisfied customers nationwide. The Aussie Gelatin Company Pty Ltd t/a Nutraviva offers a wide range of premium collagen and gelatin products together with a solid commitment to excellence in customer service and satisfaction. We employ 2 full-time staff, 2 part-time employees, and 5 casual employees in Australia.

The Australian Gelatin Company Pty Ltd includes the following brands:

- Nutraviva
- NesProteins
- VivaPets, and
- Simply Beautiful.

AIMS AND OBJECTIVES

The Aussie Gelatin Company Pty Ltd t/a Nutraviva supports the United Nations Sustainable Development Goals and the United Nations Guiding Principles on Business and Human Rights. We place high priority on supporting the goal of decent work and economic growth while working towards the eradication of modern slavery, and we require our consultants, agents, contractors, and suppliers to support the company in the achievement of the aims and objectives of this policy.

We recognise that modern slavery can occur in every industry and sector and has severe consequences for victims. Modern slavery also distorts global markets, undercuts responsible business and can pose significant legal and reputational risks to entities. Entities have a responsibility to respect human rights in their operations and supply chains, as outlined in the United Nations Guiding Principles on Business and Human Rights.

Regardless that our business size does not require mandatory reporting requirements set out in the Modern Slavery Act 2018, we are fully committed to ensuring that robust frameworks and processes are in place to minimise the risk of the many forms of modern slavery, including servitude, human trafficking, forced labour, (including forced marriages), debt bondage, child labour, and deceptive recruiting for labour or services.

RESPONSIBILITIES

The Aussie Gelatin Company Pty Ltd t/a Nutraviva are committed to achieving the highest standards of ethical behavior in the conduct of our business and activities. We support and respect the protection of internationally proclaimed human rights and endeavor to ensure that The Aussie Gelatin Company is not complicit in human rights abuses. To this end, we will not condone slavery or human trafficking or abusive or unfair treatment within our supply chain. We are generally, and through our policies and practices in relation to procurement, human resources, and corporate responsibility, committed to taking steps to ensure that slavery and human trafficking play no part in our supply chains.

Senior management is to provide oversight and work collaboratively with suppliers to ensure that the expectations and standards of the company are understood and that potential exposure to human rights risks is minimised.

Consultants, agents, contractors, and suppliers are expected to support the company in the achievement of the aims and objectives of this policy, and to comply with the company's policies and standards on human rights, ethical business practices, safety, and the environment.

Staff and workers have a responsibility to ensure that goods and services supplied and provided to the company are sourced from suppliers and service providers who hold the same values and principles in relation to promotion of human rights and the eradication of modern slavery, and to raise any issues or suspicions of non-compliance with company management for determination.

POLICIES & PROCEDURES

The Aussie Gelatin Company Pty Ltd t/a Nutraviva recognises the importance of protecting human rights and is committed to protecting the rights of all people (including its employees, the communities in which the company operates, those who may be impacted by its activities, and those within its supply chains) by opposing all forms of slavery and forced labour in its operations and the operations of its suppliers.

We recognise that modern slavery can occur in many forms and are committed to operating responsibly and establishing and adhering to the highest ethical standards by not tolerating any forms of slavery or human trafficking in our business operations and supply chains.

The Aussie Gelatin Company Pty Ltd t/a Nutraviva has no tolerance towards all forms of modern slavery within our business or that of those who supply to us.

- Our Code of Conduct provides clear instructions on what employees can and cannot do in the course of their employment. The ethical principles within incorporate expectations for workplace behaviour and respect for all people in keeping with respective legislation.
- Our Modern Slavery Policy explicitly states that we will not tolerate modern slavery in all its forms. This is also reinforced in our Child Labour and Protection Policy as we acknowledge that children and young people may be more at risk of modern slavery practices. We are fully committed to ensuring that robust frameworks and processes are in place to minimise the risk of modern slavery in our supply chains. We will strive to ensure through consideration of our supply chain mapping and through the questioning of suppliers that all parties in our supply chains are committed to the achievement of the Social Accountability Requirements of SA8000 and ILO Recommendation R146 in relation to child labour.
- Our Anti-discrimination Policy sets out our intention to provide a workplace that is fair and equitable for all employees, and where all individuals and groups will be treated with respect and dignity. We recognise that any distinction, exclusion, or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation constitutes an offence under the Australian Human Rights Commission Act and the Work Health and Safety Act. We strive to ensure that no person is discriminated against on any of the grounds listed in this policy in regard to employment within the company, and ensure that this policy will also extend to persons providing or wishing to provide goods or services to the company.
- We are committed to maintaining a work environment that is free from harassment, retaliation, and discrimination, and where employees feel safe to raise questions and issues at any time without fear of retaliation. The company will strive to protect the rights of any individual who makes such a report to the company in good faith, and strictly prohibits any form of retaliatory action or behaviour against employees who raise issues or exercise workplace rights protected by law.
- We respect and support the protection human rights as set out in the Universal Declaration of Human Rights and the principles of the UN Global Compact in relation to the rights of workers. To achieve the implementation of these principles, we will strive to go beyond legal compliance in respecting and supporting the human rights of all stakeholders and will seek to meet the principles of the Global Compact in all our operations. This commitment is set out in our Labour and Human Rights Policy.
- Our Purchasing & Procurement Policy states our commitment to achieving the principles of health and safety in our workplace, we recognise our moral and legal responsibility to provide a safe and healthy work environment for workers, contractors, customers, and visitors. This commitment also extends to ensuring that our purchasing and procurement

procedures ensure that health and safety and the reduction of modern slavery practices is considered in the purchasing and procurement process.

OUR OPERATIONS AND SUPPLY CHAIN

The sector we operate in is generally assessed as being at low risk of modern slavery being present within it. We operate within Australia which is assessed by the Global Slavery Index as having a lower prevalence of modern slavery and active government responses to dealing with the issues.

Our supply chains consist of the provision of ingredients imported from the following countries:

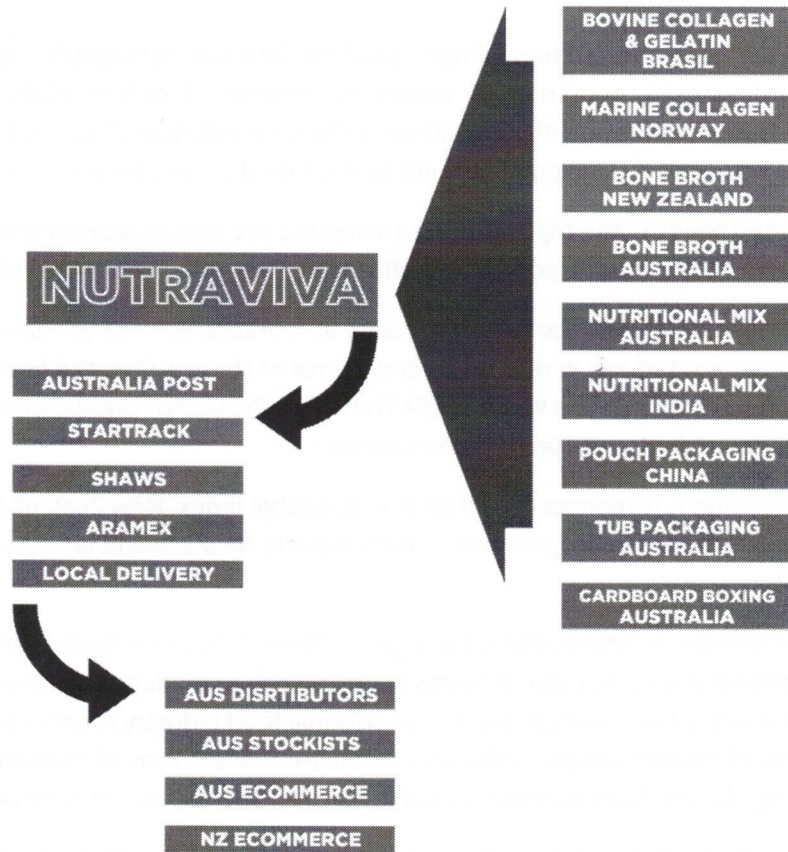
- Bovine Collagen Hydrolysate powder - Brazil
- Marine Hydrolysate Collagen - Norway
- Bone Broth extract powder – New Zealand
- Formulated vitamin blends – India
- Formulated vitamin blends - Australia
- Packaging (stand-up pouches) – China
- Packaging (tubs) - Australia

We purchase bone broth extract powder, some of our vitamin and flavour blends, our tub packaging, and cardboard boxes from known and reputable suppliers within Australia. We have an Approved Supplier Program as part of our internal and HACCP Food Safety requirements that is followed for all suppliers.

Our employees and contractors are sourced within the local labour market. Where applicable, stringent VEVO Visa control and mandatory evidence of a valid passport, together with a valid working rights permit is part of our employment policies.

Our supplier terms include undertakings that suppliers comply with all applicable laws, regulations, and codes for conduct and in an ethically compliant manner including with our standard business practices terms. We have an internal audit process that incorporates all facets of our business.

OVERALL SUPPLY CHAIN



POTENTIAL RISKS WITHIN OUR SUPPLY CHAIN PROCUREMENT

	Sector & Industry Risks	Product & Services Risks	Geographic Risks	Total
Bovine Collagen & Gelatin	5	4	5	14
Marine Collagen	1	1	1	3
Bone Broth Extract – NZ	1	1	1	3
Bone Broth Extract – AU	1	1	1	3
Nutritional Mix – AU	1	1	1	3
Nutritional Mix – IN	1	2	5	8
Pouches	1	2	4	6
Tubs	1	1	1	3
Cardboard	1	1	1	3

Score thresholds:

- Overall score 1-4: Low risk procurement

- Overall score 5-8: Medium risk procurement
- Overall score 9-12: High risk procurement

Brazil: Legislation has been enacted to minimise risk of modern slavery in public supply chains. Policies require businesses to report on their actions to minimise risk of forced labour in their supply chain - National Pact for Eradication of Slave Labour (voluntary initiative); "Slave Labour Dirty List" (List Suja do Trabalho Escravo). Our supplier is not present on the Slave labour Dirty List.

Norway: Only A rated country, the top country in relation to the highest governmental response. One of 122 countries have criminalised human trafficking in line with the UN Trafficking Protocols.

Australia: BBB rated country. Has labour laws covering all workers. Has not yet fully enacted Modern Slavery legislation but is rated low in relation to prevalence of slavery. One of 122 countries have criminalised human trafficking in line with the UN Trafficking Protocols. Legislation includes the incorporation of Independent Anti-Slavery Commissioner.

New Zealand: Government responses are rated as 6/10 Global Index. New Zealand has enacted laws prohibiting slavery, trafficking in persons and forced labour in New Zealand and is a party to several international treaties.

India: Global Slavery Index estimates that on any given day in 2016 there were nearly 8 million people living in modern slavery in India. In terms of prevalence of modern slavery in India, there were 6.1 victims for every thousand people. The nutritional food industry is not considered a product at high risk of modern slavery. India has criminalised most forms of modern slavery, including trafficking, slavery, forced labour, and child sexual exploitation, in its Penal Code.

China: CC rated country. Estimated proportion of population living in modern slavery assessed at 2.77/1000. The Global Slavery Index estimates that on any given day in 2016 there were over 3.8 million people living in conditions of modern slavery in China, a prevalence of 2.8 victims for every thousand people in the country. The nutritional food industry is not considered a product at high risk of modern slavery. Forced labour is a criminal offense in the Chinese criminal code including employers, recruiters, transporters, and people playing any other role in subjecting another to forced labour. Victims of forced labour can obtain compensation for their ordeals. The government has developed a victim assistance system, a compensation fund for victims of forced labour. Article 96 of the Chinese labour law prohibits forced labour.

CONSULTATION APPROACH & PATH FORWARD

Senior management provides oversight and work collaboratively with suppliers to ensure that the expectations and standards of the company are understood and that potential exposure to human rights risks is minimised.

Senior management met during the consultation process to discuss and map the modern slavery risks across the company's operations and supply chains, as well as the actions required to address and assess risks and any additional processes to minimise risks. The Sole Director consulted with supplier to complete questionnaires to assist in minimising risks and guide the path forward.

The Aussie Gelatin Company Pty Ltd t/a Nutraviva recognises that whilst we are not mandated to providing a Modern Slavery Statement, we are part of the solution to the global issue of modern

slavery. Processes have been implemented to raise awareness and ensure modern slavery risks are identified and appropriately addresses. We have endorsed the following:

1. Finalised a modern slavery process outlining key areas relating to management systems, controls, grievance, and mediation processes.
2. Implemented a stand-alone Anti- Modern Slavery Policy, and
3. Provided modern slavery training to our purchasing personnel.

ASSESSMENT: EFFECTIVENESS OF ACTIONS

The Aussie Gelatin Company is committed to continuous monitoring of the effectiveness of our processes and policies to address the risks that our business may potentially cause, contribute to, or is directly linked to in line with the UN Guiding Principles.

Over the reporting period, we have gained insight into understanding how modern slavery risks may present themselves in operations and supply chains. We have evaluated the effectiveness of our actions across the following performance areas:

- Supply Chain assessment and monitoring
- Annual review of our policies and procedures that reflect our commitment
- Ongoing training for employees
- Annual assessment of risks within our supply chain and how these may be further minimised

Our initial assessment process has allowed us to put into place key processes and policies to identify risks and goals to allow us to review and assess the effectiveness of our approach and guide future goal planning.

The Modern Slavery Statement described within this document has been approved by the Reporting Entity, The Aussie Gelatin Company Pt Ltd t/a Nutraviva, by the Principal Governing Body, Sole Director and Founder Bruno Rossitt on the 7th of July 2022.

Signature of Reporting Entity Representative



Bruno Rossitt

Sole Director and Founder