



# Modern Slavery Statement



**Vitura Health Limited**

ABN 59 629 071 594

# 1. Introduction

**This modern slavery statement is made under section 14 of the Modern Slavery Act 2018 (Cth) (the Act) in respect of Vitura Health Limited (ABN 59 629 071 594) and its various subsidiaries and relates to the period 1 July 2024 to 30 June 2025.**

This statement has been prepared in consultation with senior executives and subject matter experts from within Vitura's business. For the purposes of this statement, the "Company" or "Vitura" refers to all reporting entities and those further entities which are owned or controlled by Vitura. The Board of Directors of Vitura Health Limited has approved this statement and has authorised it to be signed by Geoff Cockerill, as Vitura CEO.



# 2. About us

**Vitura Health Limited is a market-leading digital health company providing traditional and emerging therapies in Australia.**

Listed on the Australian Securities Exchange (ASX: VIT), Vitura enables patients, doctors, suppliers and pharmacists to connect at each stage of the healthcare journey using the Company's market-leading Canview platform. From appointments to delivery of medicines, Vitura's patients receive trusted, high-quality clinical care where and when they need it.

Founded in late September 2018 (originally as Cronos Australia Limited), Vitura has rapidly evolved to become a comprehensive digital health solutions company.

Vitura's diverse operations include telehealth consultations (for both general health and alternative therapy needs), technology-enabled healthcare management, distribution of more than 600 individual products from 70 brands and industry leading education.

## Vitura's operations

### 2.1 Canview

Canview is Vitura's market-leading online platform that delivers prescribing, dispensing and medication management solutions for alternative therapies. It enables registered health professionals to browse, prescribe and order medicines in one streamlined, compliant and free-to-use platform. See [canview.com.au](https://canview.com.au)

### 2.2 Burleigh Heads Cannabis (BHC)

Established in 2016, BHC is a pioneer in the Australian emerging therapeutics industry. It is now one of Australia's largest and most well-known alternative therapy distributors, partnering with domestic and international suppliers to provide a full-service offering via Canview.

See [burleighheadscannabis.com](https://burleighheadscannabis.com)

### 2.3 Doctors on Demand

Founded in 2015 and acquired by Vitura in October 2023, Doctors on Demand is a leading provider of on-demand virtual healthcare services across Australia. The nationwide platform delivers general healthcare to hundreds of thousands of B2C and B2B patients annually. Services include general medical consultations, urgent care, medical certificates, pathology and specialist referrals, men's health, women's health, medicated weight loss and smoking cessation.

See [doctorsondemand.com.au](https://doctorsondemand.com.au)

## 2.4 Candor Medical

Acquired by Vitura in February 2025, Candor Medical undertakes nationwide telehealth consultations with patients seeking access to medicinal cannabis and other specialty products and services. Doctor-led, Candor is built on the foundation of candid, evidence-based medical advice, ensuring patients receive trustworthy care without compromise. See [candormedical.com](https://candormedical.com)

## 2.5 Releaf

Vitura purchased 50% of Flora Holdings Pty Ltd in November 2024, a joint venture that owns and operates a series of specialty medicinal cannabis clinics and dispensaries operating under the Releaf brand. See [releaf.com.au](https://releaf.com.au)

## 2.6 CDA Clinics

One of the first of its kind in Australia, CDA Clinics provided consultations and prescription services for alternative therapies to eligible Australian patients from January 2020 to March 2025. It provided telehealth and in-person consultations with patients seeking access to medicinal cannabis. Patients that previously used CDA Clinics are now attending Candor or Releaf clinics. See [cdaclinics.com.au](https://cdaclinics.com.au)

## 2.7 Cortexa

Vitura owns 50% of Cortexa Pty Ltd, an incorporated joint venture with Canadian-based PharmAla Biotech (CSE: MDMA). Following changes in relevant scheduling on 1 July 2023, specific psychedelic drugs can be prescribed in Australia by approved authorised psychiatrists for the treatment of certain mental health conditions. Cortexa aims to be the leading supplier of psychedelic drugs, including GMP MDMA and GMP psilocybin, for research and therapeutic use in Australia. See [cortexa.com.au](https://cortexa.com.au)

Known for its experience, quality and trustworthiness, Vitura's purpose-lead portfolio of companies aims to provide a seamless approach to patient treatment pathways, streamlined medication access for pharmacies, and unparalleled prescribing tools and education for clinicians.

# Key components of the Vitura ecosystem

## Components of the ecosystem

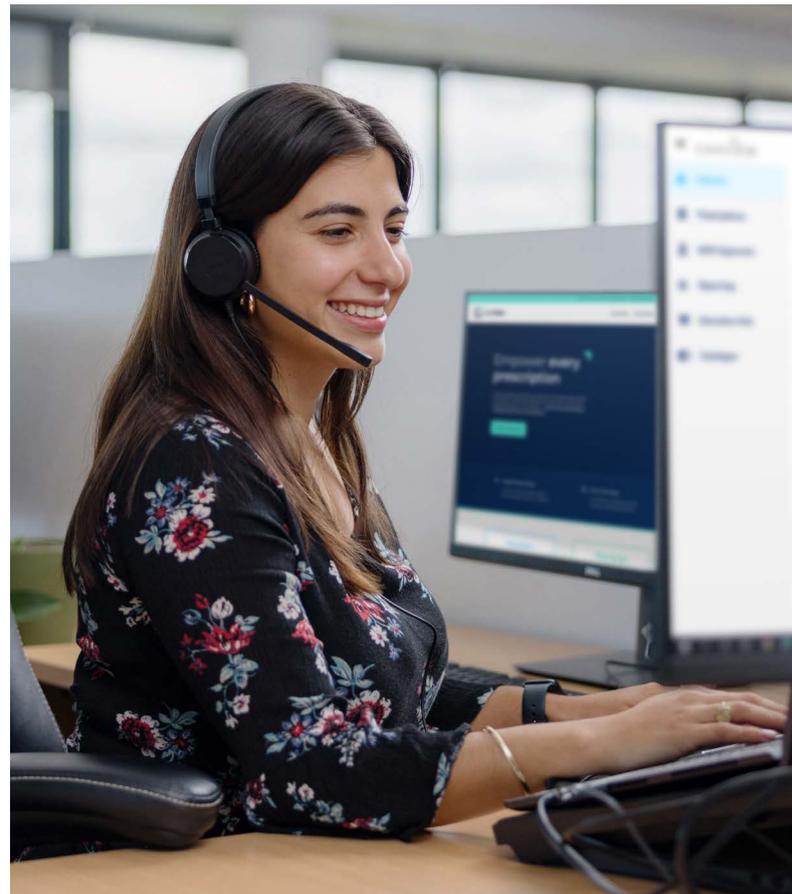
- Telehealth
- Pharmacies
- Product suppliers
- Distribution/logistics providers

## Users of ecosystem

- Patients
- Prescribers
- Pharmacists

The various goods and services supplied by Vitura and its subsidiaries can be classified into two major categories:

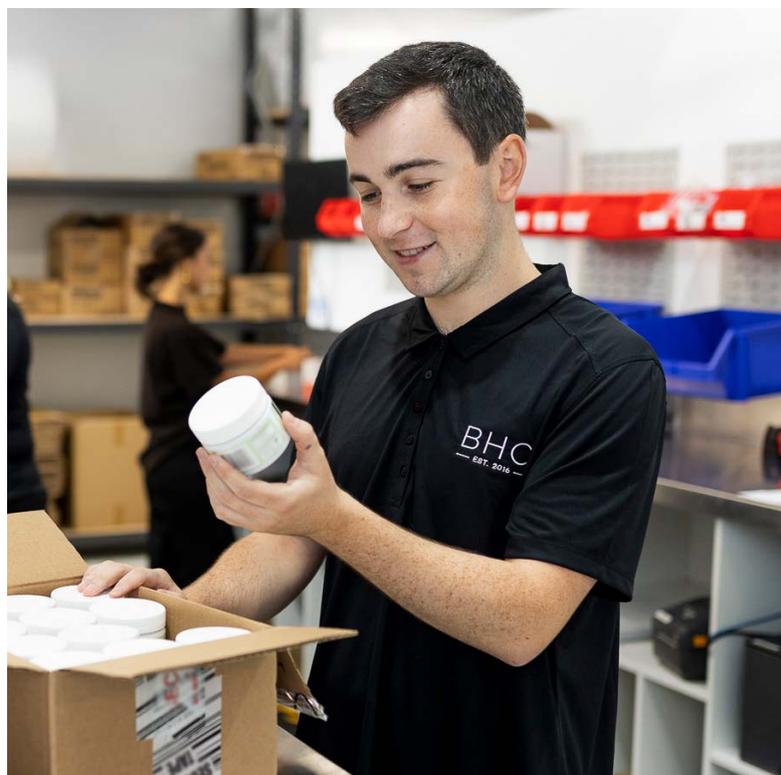
- **Sale and distribution of medicinal cannabis and other products** via its leading online marketplace, Canview. The Canview platform is an integrated, free-to-use pharmacy, doctor and patient online platform, enabling the sale and distribution of more than 600 different medicinal cannabis and smoking cessation products, together with a number of devices, across Australia sourced from approximately 70 of the most well-known international and domestic brands. This platform provides efficient and compliant access to medicinal cannabis and other products for patients and streamlines the process for prescribers, pharmacies and suppliers.
- **Provision of a growing range of medical clinic services** via telehealth through its clinic businesses (including Doctors on Demand, Candor and formerly CDA Clinics) to patients across Australia.



# 3. Description of operations

## 3.1 Pharmacy wholesale and distribution

Vitura's supply chain is complex and has significant scale. BHC-Canview's portfolio of medicines is sourced from over 70 suppliers, many of which are multinational pharmaceutical companies. BHC has two distribution centres and distributes products throughout Australia and distributes over 1 million units which are picked and dispatched in more than 200,000 orders each year. While BHC does not manufacture products directly, it does have a range of 'private label' products manufactured locally and overseas on its behalf. Additionally, BHC's supply chain also includes goods and services that contribute to its ongoing operations including IT, marketing, facilities management, labour hire and transportation.



## 3.2 Telehealth solutions

Vitura, via its various clinic businesses, delivers telehealth, allied health services, alternative therapies, chronic disease management and integrated care coordination. To deliver these services, Vitura contracts a network of Australia-based health practitioners. These services are provided under the Doctors on Demand and Candor brands.

# 4. Risk identification and assessment

Vitura is committed to providing a safe and healthy workplace for every team member by:

- Eliminating hazards;
- Reducing risk;
- Increasing compliance, knowledge and awareness; and
- Promoting and maintaining a culture of continuous improvement

In considering the risks of Modern Slavery in its operations and supply chain, Vitura has considered the Global Slavery Index and the Global Estimates of Modern Slavery (2017) and the Australia Red Cross Addressing Modern Slavery Guide for Australian Businesses.

According to the Global Slavery Index and the Global Estimates of Modern Slavery (2017), an estimated 40.3 million people were victims of modern slavery in 2016. Of these 40.3 million victims, 24.9 million people were in forced labour, and of the 24.9 million victims of forced labour, 16 million were in the private economy.

The Australia Red Cross Addressing Modern Slavery Guide for Australian Businesses states that Africa has the highest prevalence of modern slavery, followed by Asia and the Pacific region.

Vitura considers its direct risk of causing modern slavery to be low, because Vitura is domiciled in, and its operations are limited to, Australia - in a highly regulated healthcare and controlled medicines industries.

Vitura has identified low to moderate risk where it may be directly linked to potential modern slavery related to its supplier partners, particularly those based in countries with documented higher prevalence of modern slavery.

Vitura also identifies low to moderate risk of potential direct link to modern slavery when engaging with third parties, particularly in sectors such as offshore contingent workforce, transport logistics, and third-party suppliers of operational resources such as merchandise, laptops and computers.

The Australia Red Cross Addressing Modern Slavery Guide for Australian Businesses states that Australia is exposed to risks of modern slavery through imported product.

Vitura has identified this as a potential area of direct risk of modern slavery, as Vitura imports medicine products that are manufactured overseas. As the “manufacture” of medicinal cannabis products is largely an agricultural exercise, Vitura deems this risk to be low to moderate because the Global Slavery Index and the Global Estimates of Modern Slavery (2017) states that globally most cases of forced labour occur in a range of areas, which include agriculture. Vitura procures some of its medicinal cannabis products from Colombia, Thailand and South Africa, countries recognised in the Global Slavery Index as having known risks of forced labour in the agricultural sector.

While Vitura is not the manufacturer or “grower” of medicinal cannabis medicines, it recognises that the agricultural sector accounts for 12 per cent of labour exploitation cases, with abuses documented in most countries where these industries operate. Migrant workers are at an especially high risk of coercion in this industry.

Where Vitura’s medicinal products are manufactured outside of the agricultural industry there are two main sub-categories:

- Therapeutic Nicotine Vaping Products (imported from China)
- Psychedelic drugs (developed in Canada and Australia)

Vitura has identified there is a low to moderate potential of direct risk of modern slavery in the importation of therapeutic nicotine vaping products from China. While China does not rank in the top 10 global countries for prevalence of modern slavery according to the Global Slavery Index, there is an increased risk of state-imposed forced labour and ultimately the country is ranked in the bottom half of the 32 countries in the region.

Vitura views the direct risk of modern slavery in its Canadian and local Australian supply chains with pharmaceutical manufacturers and suppliers to be low as the Canadian and Australian pharmaceutical manufacturing industry:

- Is highly regulated;
- Operates in a controlled environment with established, sophisticated policies and processes; and
- Generally employs an educated and skilled workforce

Vitura is cognisant of the potential risk of modern slavery involving indirect relationships of our suppliers and/or manufacturers, specifically those based overseas.



# 5. Actions to address risks

**The Board of Directors and Executive Leadership Team of Vitura are responsible for setting and implementing the strategic direction and corporate governance of Vitura Health Limited, including Vitura's approach to assessing and addressing the risks of modern slavery, proportionate to Vitura's scope and capacity. The Vitura Board, on recommendation from the Audit and Risk Committee (A&RC), has approved this Statement.**

Vitura's approach to assessing and managing the risk of modern slavery forms part of broader efforts to respect human rights and conduct business ethically.

As part of Vitura's Environmental, Social and Governance (ESG) activities this year, the Company has formed a modern slavery working group with representation including General Counsel & Manager of Regulatory Affairs, Quality & Regulatory Affairs Manager, and Knowledge & Safety Manager. This working group's core function is to provide oversight and coordination of modern slavery act related initiatives. The working group has utilised legal guidance, checklists and modern slavery reporting criteria to prepare this statement and has commenced the process of consulting with leaders of each of the related entities.

As part of its focus on compliant corporate governance, Vitura maintains corporate websites, including minimum expectations of suppliers when engaging and conducting business within the Vitura Health Limited group. The Vitura website incorporates governance policies and frameworks including Code of Conduct, Whistleblowing Policy and Modern Slavery Policy. The supplier-facing website and distribution agreements include comprehensive supplier expectations and onboarding procedures that include a modern slavery survey.

The purpose of the Modern Slavery Policy is to ensure that Vitura:

- Complies with all laws and regulations which govern its business operations
- Work with suppliers and external stakeholders to source goods and services ethically and in accordance with its legal ethical and environmental obligations
- Assess, mitigate, and where appropriate, remedy modern slavery found to exist in its operations and supply chains, and the operations and supply chains of its suppliers and external stakeholders

In accordance with the UN Guiding Principles (Principle 31), Vitura will ensure that its published Whistleblower Policy on its corporate website is updated in the next review to ensure it includes the process of reporting certain unacceptable conduct, including modern slavery.

The key principles under Vitura's Code of Conduct are that all employees, suppliers, competitors, clients, customers and other stakeholders are entitled to be treated fairly and with respect; work free from discrimination, bullying and harassment; and have the right to raise issues or make an enquiry or complaint without being victimised.

Where Vitura engages overseas and local contingent labour hire – including transport logistics third-parties – it has commenced the process of ensuring suppliers are compliant with correct rates of pay and conditions in accordance with the Modern Slavery Act 2018 (Cth) and have taken steps to ensure all future new suppliers will be compliant.

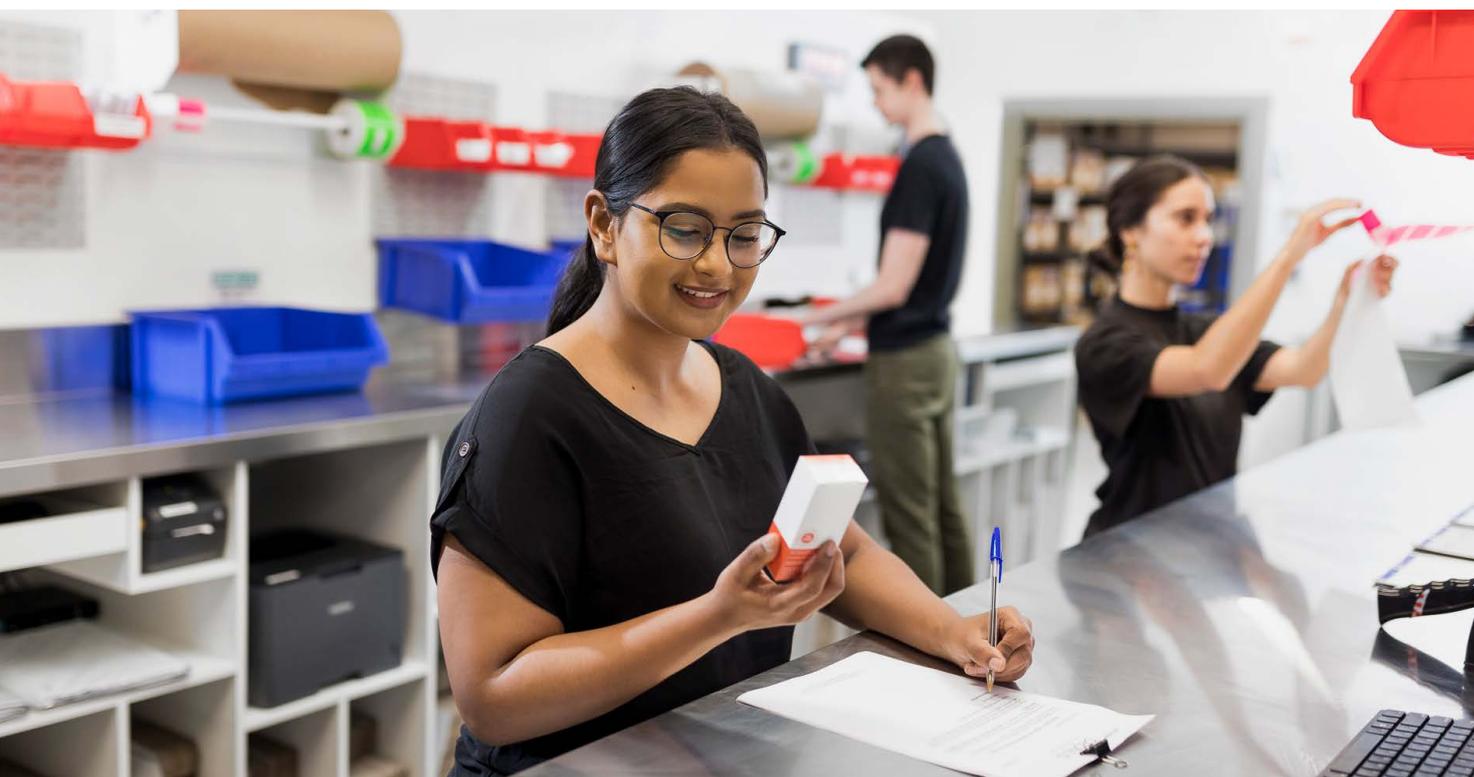
Where Vitura procures operational resources from international suppliers (computers, laptops etc.) additional scoping is required to determine the scale of risk and the most effective approach to controlling or eliminating the risk.

Vitura is currently developing an internal Contract Management System to more effectively manage its contracting, supplier negotiations and compliance requirements. In conjunction with this development, Vitura is currently working to address the need for centralised and comprehensive Contractor Management across its entities. These developments will increase the Company's ability to ensure effective onboarding communications with all types of third-party contractors to educate on its expectations regarding the modern slavery act, its resources to address modern slavery risks, and our tools to analyse and interpret data from our engaged stakeholders.

Vitura will continue to review other agreement templates, including existing and renewed contractual agreements with suppliers to include where possible:

- a) Representations and warranties in respect of compliance with modern slavery laws; and/or
- b) Other contractual controls to be able to identify and address modern slavery risks in the supplier's business and supply chain

As Vitura has identified its contingent labour and operational resources procurement as potentially having moderate Modern Slavery risk, when re-contracting these services, enhanced contract templates described above will be used as part of the risk mitigation and management approach.



# 6. Assessment of effectiveness

As this is Vitura's first Modern Slavery Statement and our introduction of policy and supplier surveys is relatively new (2025) and we are presently undergoing development work to more effectively manage our third-party supplier engagements, our assessment of the effectiveness of these preliminary initiatives will form the basis of our statement in the next period.

## Continuous improvement

Over the next reporting period Vitura proposes to:

- a) Collect data via our supplier survey on Modern Slavery that reflects developments in Modern Slavery regulation both domestically and internationally. This survey has been adopted for new suppliers and existing suppliers will be progressively surveyed.
- b) Roll-out Contract and Contractor Management systems to efficiently engage with third-parties during the contracting and onboarding stages to educate, communicate and influence compliance to the Modern Slavery Act 2018 (Cth).

Through our actions and engagement, Vitura is aligned to the objectives of reducing the risk of modern slavery in operations and supply chains of the controlled medicines wholesale industry.



A handwritten signature in black ink, appearing to read 'G. Cockerill', written in a cursive style.

**Geoff Cockerill**  
Chief Executive Officer  
Vitura Health Limited  
5 December 2025



**VITURA**

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