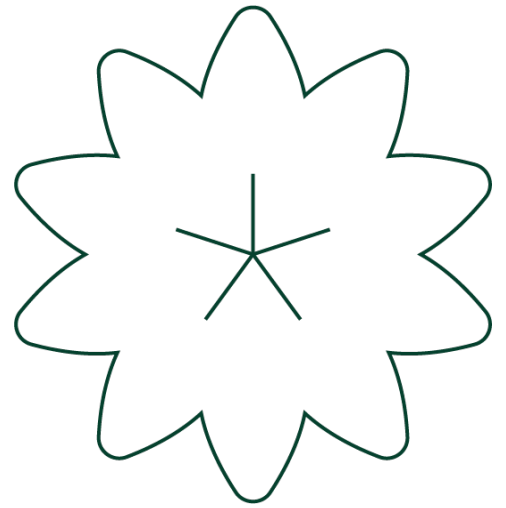




Modern Slavery Statement



18 May 2021

A Message from our CEO

As an organisation with over 60 years experience in the healthcare sector, we believe that people are at the core of what we do. Our vision to inspire better living is not just in philosophy, but in making a material difference to all the lives we touch. This belief is embodied in our rich, values-based culture, which revolves around pulling together and doing the right thing and is embedded in our company policies and procedures, extending to all internal and external stakeholders.

We are committed to acting ethically and with integrity in addressing modern slavery and human trafficking risks in our supply chain. As part of our implementation process, we have looked across the breadth of our business and have undertaken a risk assessment of our supply chain considering risk factors such as the sector, industry, type of products and services, geographic locations and business models, as we know those are important to identifying risks of modern slavery.

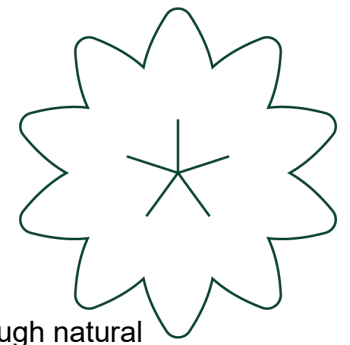
We have taken steps to identify risks in our supply chain and focus our efforts on ensuring we do everything we can to keep our supply chain aligned with our values, including updating our terms of trade with suppliers and introducing a Supplier Code of Conduct. One of the key values of Integria Healthcare is *Doing the Right Thing*. I am proud of the commitment of Integria Healthcare and the work of our dedicated employees to identify and help prevent modern slavery within Integria Healthcare's supply chain.

We recognise that modern slavery still infiltrates many industries, and that we have a shared responsibility to monitor and help prevent the practice from the environments in which we operate. We also recognise, that as a natural healthcare company, we have a real opportunity to make a difference. We have worked, and continue to work, closely with key suppliers, and actively participate in the Complementary Medicines Australia industry working group to support good practice in our industry.

This Statement, approved by the Board of Integria Healthcare, is a reflection of our values at Integria Healthcare, and we will continue this work in the coming year.

Michael Bracka
CEO

Structure, Operations and Supply Chain - Principle 1 & 2



About Integria

At Integria Healthcare, our vision is to inspire people to live better lives through natural healthcare. We bring together the best names in natural medicine to deliver a suite of herbal, nutritional and complementary healthcare products supported by scientific and traditional evidence.



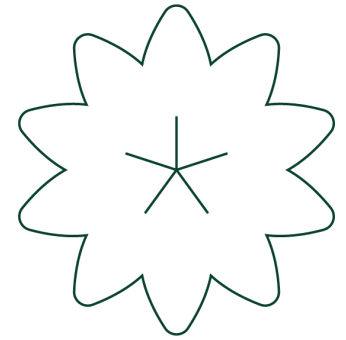
With a history that spans 60 years of science and research into herbal remedies, we are at the forefront of natural medicine research and development. Integria has a deep geographical reach, distributing products in Australia, New Zealand, Southeast Asia, China and parts of Europe, with our own manufacturing facilities in Australia and a network of supply partners across the globe.

Our products are part of everyday life for millions of people around the world who are seeking natural ways to maintain long, healthy lives. Our range of herbal, nutritional and complementary healthcare products support health and wellbeing in many areas including:

- Cardiovascular health
- Respiratory health
- Skin/personal care
- Gastrointestinal support
- Immune support
- Musculoskeletal support
- Blood glucose management
- Dietetics
- Endocrine and nervous system support
- Therapeutic essential oils
- General wellbeing and healthy ageing

We are committed to achieving better patient outcomes through scientific research, product development, education and training, and building on the legacy of our founding fathers, we invest heavily in proprietary research and our manufacturing facility located in Warwick, Queensland. Our Warwick facility operates to the strictest regulatory codes of Good Manufacturing Practice and our national research and development facility in Brisbane complies with the Australian standards of Good Laboratory Practice under the Therapeutic Goods Act. Our Distribution team works tirelessly to ensure all healthcare products are delivered on time, every time, to the highest standards.

At Integria Healthcare, we have a dedicated internal Procurement team with responsibilities to manage relationships with our direct spend supply partners that supply us with goods and services specific to our products, such as raw materials and third party contract manufacturers. Our goal is to select the best fit for purpose suppliers of products and services whose values and operating principles are aligned with that of Integria's and to establish and maintain relationships that will provide sustainable value.



Our Values

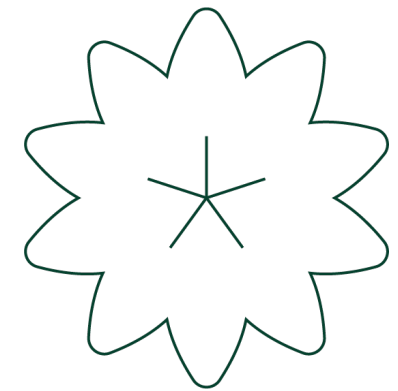
We believe in the power of:

- 1 Loving where we work
- 2 Seeing the world through our customers' eyes
- 3 Passion in everything we do
- 4 Pulling together
- 5 Doing the right thing
- 6 Free thinking
- 7 Natural healthcare being at the heart of what we do

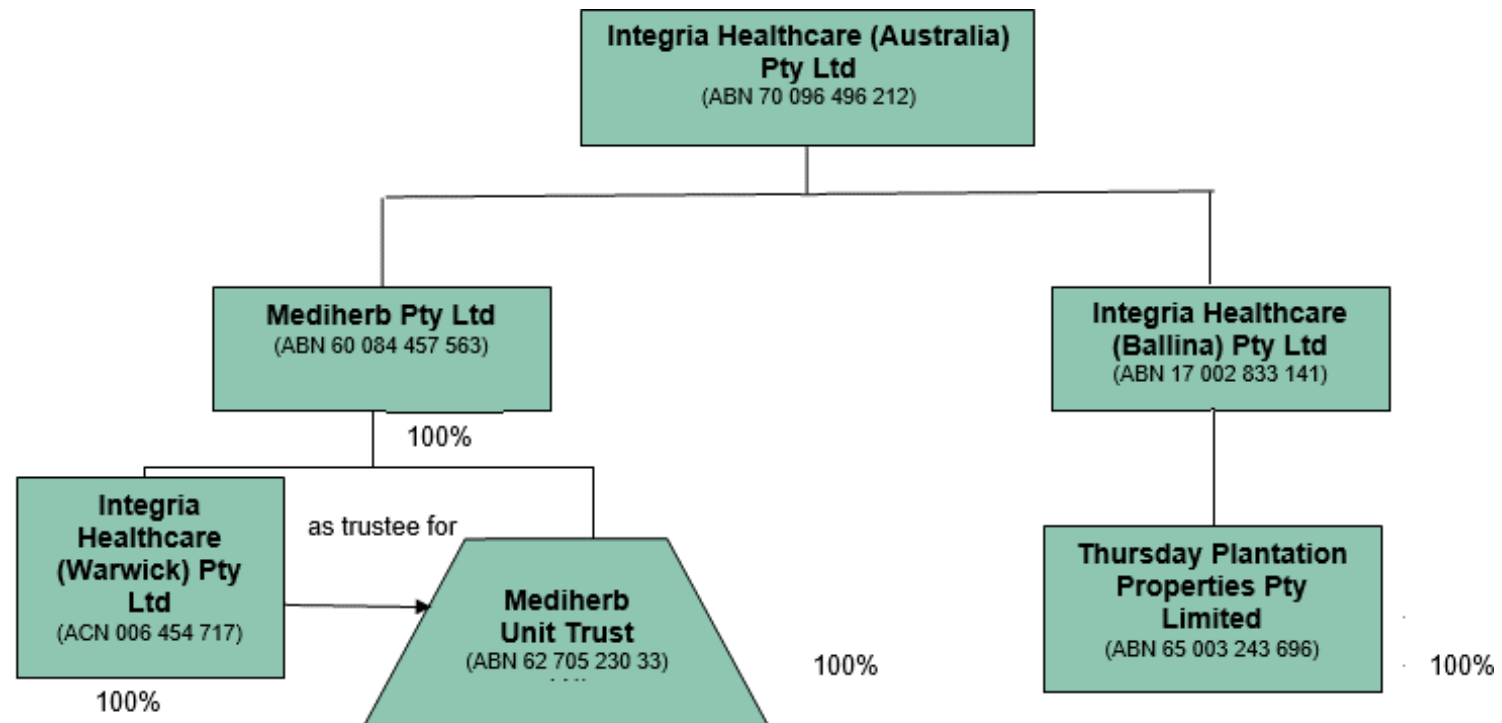
Structure and Operations

Integria Healthcare (Australia) Pty Ltd ACN 096 496 212 proudly owns some of the most reputable and innovative natural healthcare brands including Thursday Plantation®, Thompson's®, Eagle®, Eagle Clinical™, Eureka® and Medi-Herb® and partners with leading practitioner-only and retail brands, through its group of companies in Australia and New Zealand. This Statement covers each Australian wholly owned entity of which Integria Healthcare (Australia) Pty Ltd has control (**Integria Healthcare**). Integria Healthcare makes this single joint Modern Slavery Statement to cover the Integria Healthcare group in Australia.

Integria Healthcare's board is responsible for overseeing the operations of Integria Healthcare and setting the high standards for our products and services.



Simplified structure of Integria Healthcare Australian entities covered by this Statement

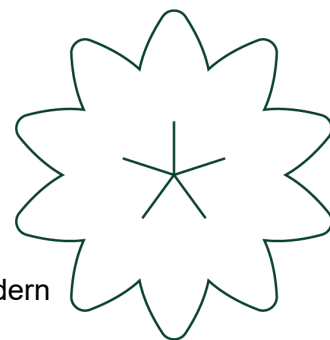


IHC Group of Companies

Key Milestones

Integria Healthcare has taken a number of key steps to develop, implement and review its processes and policies on Modern Slavery. These include:

- a) developing and implementing a risk management framework for modern slavery in our supply chain;
- b) strengthening our supplier contracts with additional provisions to help address the risk of modern slavery and introducing a compulsory Code of Conduct for all suppliers to Integria Healthcare;
- c) completing a global desktop audit of our direct¹ and indirect² Tier 1³ suppliers to review modern slavery risks in accordance with a risk assessment scorecard using accepted external industry indices;
- d) working with those suppliers who score high on our risk assessment scorecard to reduce the risk of modern slavery;
- e) developing a company wide standard on modern slavery; and
- f) providing awareness and necessary training of our procurement managers who are responsible for managing relationships with our direct spend supply partners.



The Supply Chain



Integria Healthcare has a complex and diverse supply chain with local and global supply chain partners in 24 countries covering Europe, North and South America, South Africa and Southeast Asia.

With over 900 Tier 1 suppliers, Integria Healthcare is dedicated to the quality and strength of its raw materials and the integrity and accountability of its supply chain. We procure a broad range of goods and services for the manufacture of our products including herbal materials, essential oils, nutritional ingredients and packaging components. We partner with third party manufacturers that fulfil our commercial requirements and quality standards to expand on our production capabilities and to leverage additional expertise. Establishing long-term arrangements with key strategic suppliers enables us to develop collaborative and trusted working relationships.

Operationally, Integria Healthcare is proudly supported by suppliers in the following areas:

- marketing agency services;
- administrative services;
- medical and manufacturing consumables;
- uniforms;
- IT and telecommunications, and
- building and facility management services.

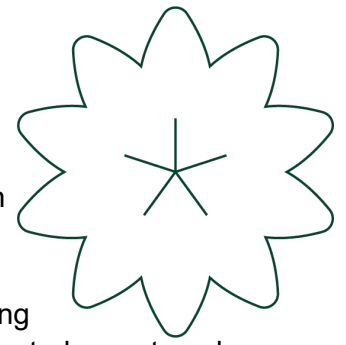
¹Direct suppliers supply Integria with goods and services specific to our products such as raw materials and third-party contract manufacturers.

²Indirect suppliers supply Integria with goods and services related to the day to day operations of the business such as telecommunications and facility management services.

³Tier 1 suppliers are those suppliers that Integria has a direct contractual relationship.

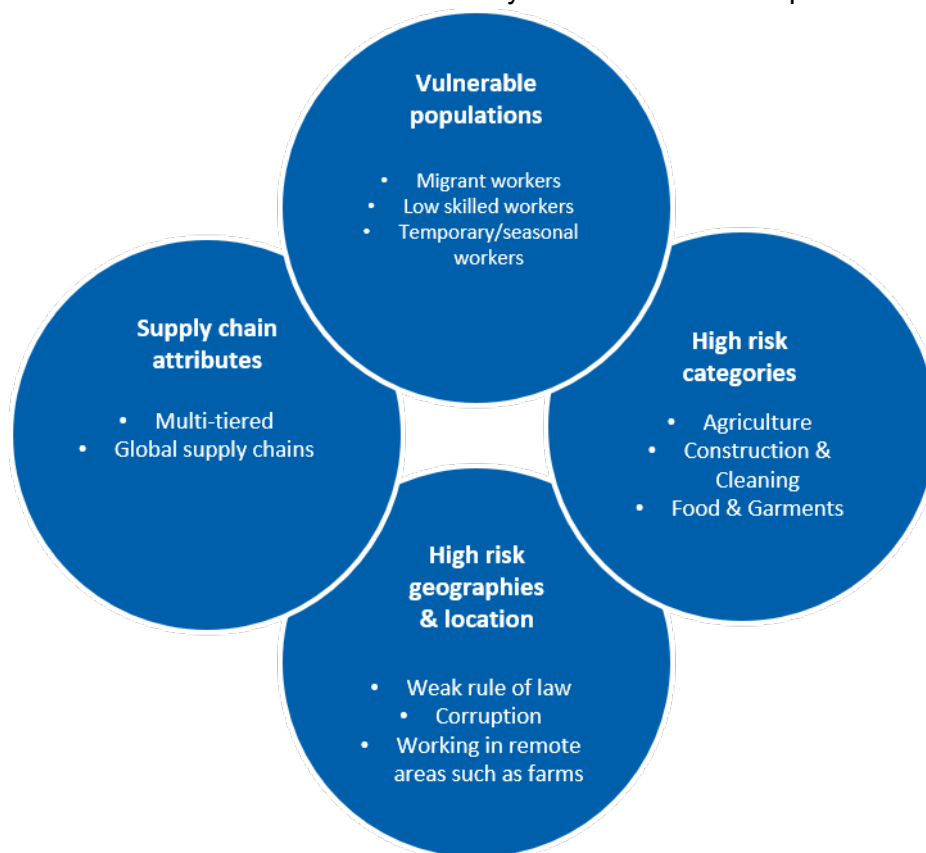
Risks of Modern Slavery - Principle 3

Integria Healthcare recognises that no global business is immune to modern slavery risks.



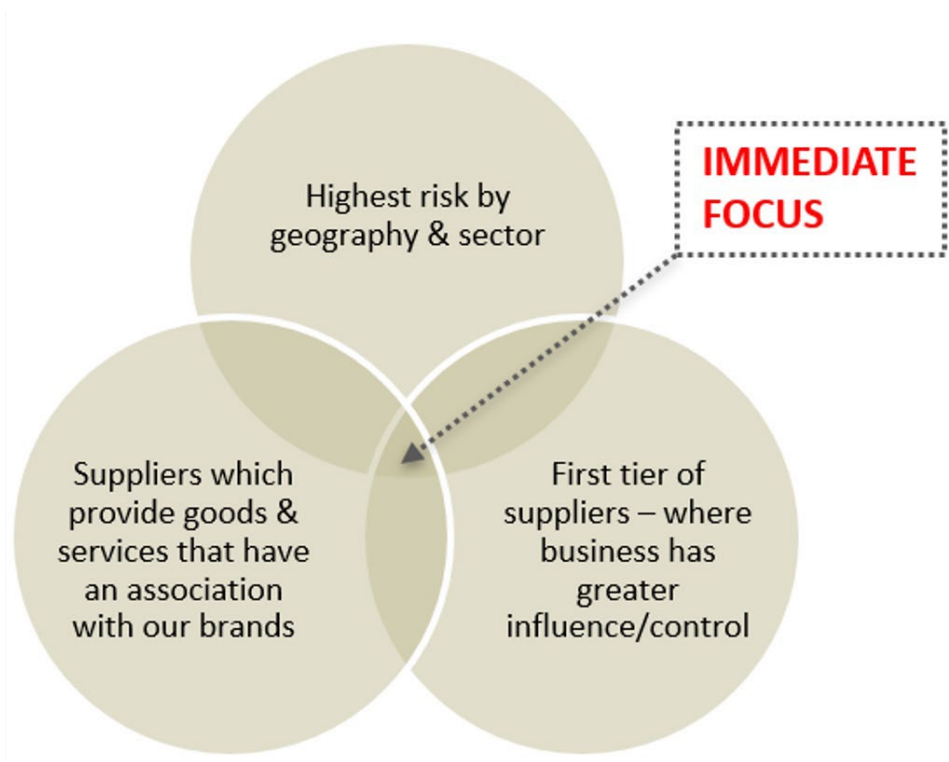
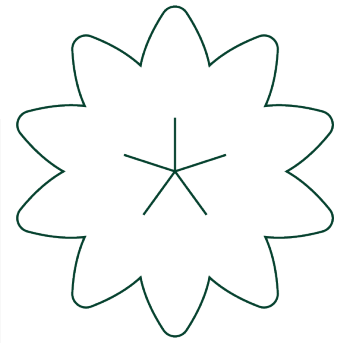
Integria Healthcare takes a risk-based approach to identifying and addressing modern slavery. In identifying the potential risks, Integria Healthcare has adopted an outward facing, people focused approach to its assessment focussing on the risk to people rather than the risk to business.

Having evaluated the features of our business and nature of our supply chains we have identified several modern slavery risk indicators including high risk geographical locations, high risk industries and vulnerable populations. Modern slavery is more prevalent in countries with lower oversight, governance and regulation of employees rights, where there are vulnerable workers and in sectors of the economy which are less transparent and formal.



We have identified that the risk of modern slavery practices increases through the lower tiers of our supply chain due to lesser transparency and therefore we have considered the likelihood that workers may be subject to modern slavery in our extended supply chain and not only our Tier 1 suppliers. As a result, our product supply chain, including raw material suppliers and third party contract manufacturers, has been prioritised for action based on identifying this area as where the highest modern slavery non-compliance risks lie and where we have the greatest level of influence.





Reference: Modern Slavery What Business Needs to Know (Walk Free Foundation
https://cdn.minderoo.org/content/uploads/2019/05/27155016/M1170847-Toolkit-Primer_DIGITAL.pdf

The risks most likely to affect our supply chain are:

- trafficking
- servitude
- forced labour
- debt bondage
- deceptive recruiting for labour or services
- worst forms of child labour



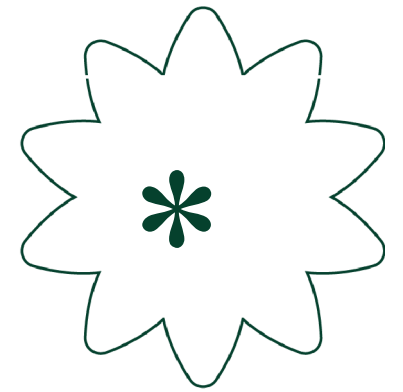
How We Assess Risk - Principle 4

Integria Healthcare has undertaken a review of all 987 of our Tier 1 suppliers.⁴ In undertaking our review, we have developed a risk assessment scorecard tool to provide a high level review of our supply chain. Our risk assessment scorecard comprises three priority areas: geography, the nature of the product or service being supplied and our total spend.

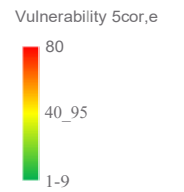
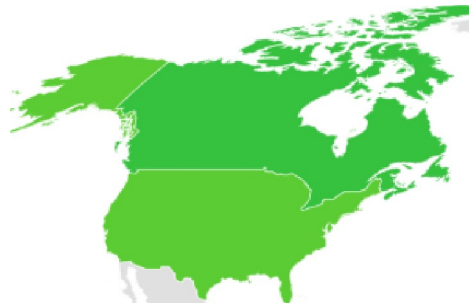
Each category is assigned a rating for risk using external indices, such as the Walk Free's Global Slavery Index and Transparency International's Corruptions Perceptions Index to inform our approach. The results from this assessment is reflected in the map diagram on the following page.

Integria Healthcare has used this process to identify those suppliers for immediate focus. We have issued each of the 28 suppliers identified as higher risk with a Modern Slavery Questionnaire designed to further identify potential modern slavery risks within those organisations. The Questionnaire is designed to establish whether a supplier has policies and processes to identify, investigate and remedy the risk of modern slavery, how they conduct their due diligence, and if they or their suppliers participate in modern slavery.

⁴ Review conducted as at February 2020 as depicted on the Vulnerability Map on page 10.



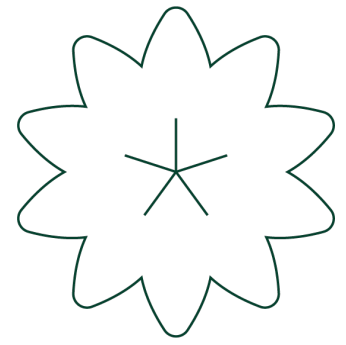
Number of Suppliers vs Vulnerability to Modern Slavery



Number of Suppliers

Australia	867
Brazil	15
Canada	11
China	11
Czech Republic	1
France	1
Germany	1
Hong Kong	3
India	4
Ireland	4
Israel	1
Italy	1
Korea	1
Malaysia	1
New Zealand	1
Peru	1
Poland	3
Slovakia	1
South Africa	4
Spain	1
Thailand	4
United Kingdom	1
United States	3

© GeoNames, HERE, MSFT, Microsoft, NavInfo, Thinkware Extract, Wikipedia



As a result of those 28 questionnaires:

- 8 suppliers were allocated a low mitigated risk rating;
- 3 suppliers were allocated a medium mitigated risk rating;
- 2 suppliers were allocated a high-risk rating; and
- 15 suppliers are under review.

Integria Healthcare is working with the 2 suppliers allocated a high-risk rating and the remaining 15 suppliers still under review to further investigate and assess the ongoing suitability of those suppliers. 209 suppliers were rated as medium risk and 747 suppliers were rated as lower risk.

The remaining Tier 1 suppliers rated as medium and lower risk have not been our immediate focus in this reporting period; however, these suppliers will be reviewed as part of our ongoing compliance assessments and continuous improvement measures noted below.

Addressing Modern Slavery - Principle 4

In order to address and respond to the risks of modern slavery within our supply chain, Integria Healthcare has implemented new purchase order terms, as well as an updated Supplier Code of Conduct, which outlines Integria Healthcare's clear expectations in relation to our suppliers.

The Supplier Code of Conduct makes it clear that suppliers are expected to meet the responsibilities of business set out in the UN Guiding Principles on Business and Human Rights, including to ensure that they do not participate in modern slavery practices, and that they make reasonable efforts to ensure that businesses within their supply chain are not engaged in, or complicit with, human rights abuses.

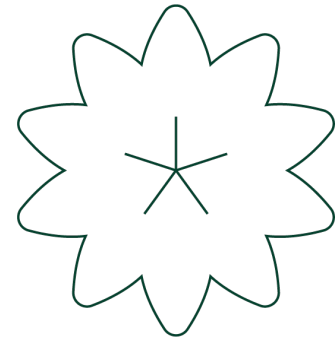
The new purchase order terms include modern slavery compliance provisions, which require our suppliers to take reasonable steps to ensure that there is no modern slavery or human trafficking in the supplier's or its subcontractor's supply chains or in any part of their business. The combination of our updated Supplier Code of Conduct and purchase order terms allow us to audit suppliers and terminate suppliers that fail to comply with our modern slavery requirements. Under the Supplier Code of Conduct, Integria Healthcare will work with suppliers where appropriate to investigate, rectify and ensure non-compliance is avoided. All suppliers are on-boarded through this process.

All new suppliers are assessed against the risk assessment scorecard and are required to complete the questionnaire as part of our procurement and on-boarding process.

Integria Healthcare has introduced a company-wide Modern Slavery Standard which requires our directors, officers, employees and contractors to consider modern slavery in each procurement of goods and services, and requires that all supplier contracts contain provisions covering compliance with modern slavery legislation.

This internal policy was approved by Integria Healthcare's Chief Executive Officer, and the Legal and Procurement Team has the overall responsible to implement and manage the standard. This standard is supported by Integria Healthcare's Whistleblowing policies.

All of Integra Healthcare's procurement managers have been informed about Modern Slavery Act and its application, as well as being provided with training about Integra Healthcare's procedures for risk identification and mitigation for direct spend supply partners.



Integra Healthcare's internal policies and procedures are designed to reflect its commitment to identifying, assessing and mitigating the risks of modern slavery.

How We Assess Effectiveness - Principle 5

Integra Healthcare recognises the need to assess and re-assess the actions we have taken so far, and intend to implement in the future.

Integra Healthcare is committed to:

- continuing to educate and train its employees on the risks of Modern Slavery and integrating Modern Slavery training into our new employee on-boarding program;
- rolling out Procurement Standards and Guidelines as part of Integra's policy management system which will include modern slavery compliance as part of vendor selection;
- rolling out our Questionnaires to the remaining Tier 1 direct suppliers;
- reviewing at a minimum 50% of completed Questionnaires for the remaining Tier 1 direct suppliers and assessing the risk profile of these suppliers; and
- working with our suppliers which may be allocated a high risk rating to reduce the risk of modern slavery posed by that supplier.

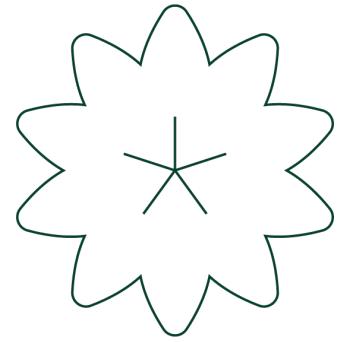
Integra Healthcare will measure effectiveness by:

- conducting desktop and/or physical audits where reasonably required to assess compliance;
- reviewing and improving our questionnaire to meet the varied commercial situations of its suppliers. Integra Healthcare has already identified changes to our questionnaire for smaller, family run farming or gathering operations whose risks differ to larger, more commercial farms or other suppliers; and
- monitoring and reporting on our success in investigating, auditing and transitioning or removing suppliers that are high risk.

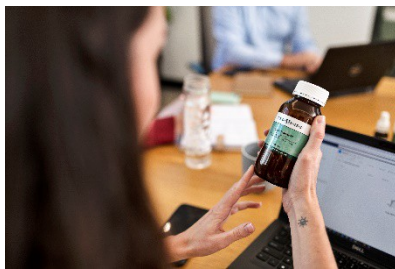
Our Holistic Approach to Preventing Modern Slavery - Principle 6

Integria Healthcare's approach to preventing modern slavery has been rolled out to each entity in the Integria Healthcare group to ensure a consistent and holistic approach to identification and prevention of modern slavery.

Integria Healthcare has a clear vision to inspire people to live better lives through natural healthcare and a distinct values in doing the right thing and having passion in everything we do. Our human rights based approach to modern slavery is a result of that vision and those values, and our opportunity to inspire better lives through our natural healthcare products not only to our customers, but all those people involved in the creation of our products.

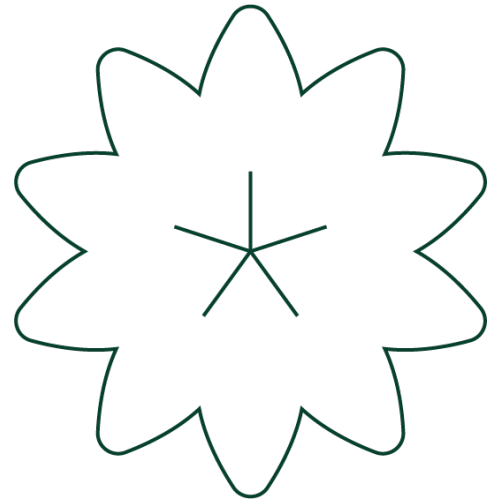


Complementary Medicines Australia Working Group - Principle 7



Integria Healthcare is proud to have participated and contributed to the Complementary Medicines Australia Modern Slavery Working Group, and through that collaborative approach with industry members, developing and discussing methods for assessment and identification of modern slavery risks.

This Statement has been approved by the Board of Integria Healthcare Limited, being the principal governing body of Integria Healthcare group of companies in Australia on 29 April 2021.



Integria[✻]

HEALTHCARE

Integria Healthcare (Australia) Pty Ltd. ACN 096 496 212.
Building 5, Freeway Office Park, 2728 Logan Rd
PO Box 4854 Eight Mile Plains QLD 4113
P: 1300 654 336 • F: 1300 654 844 • www.integria.com



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