

Modern Slavery Statement for Financial Year 2019 - 2020

1. Pharm-a-Care Laboratories Pty Ltd Modern Slavery Statement

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) by Pharm-a-Care Laboratories Pty Ltd (**Pharmacare**) in respect of Pharmacare and its related bodies corporate.

Pharmacare is committed to acting ethically and with integrity and transparency in all business dealings and has a zero tolerance approach to any form of modern slavery. We are also dedicated to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our supply chain and business dealings.

This document relates to financial year 1 July 2019 to 30 June 2020.

2. About Our Business

Pharmacare is a healthcare company dedicated to enriching people's lives through health and wellness. Pharmacare is 100% Australian and family owned with subsidiary companies around the globe. We market our vitamins, protein powders, deodorant, skincare moisturiser and healthy superfood snacks to customers both in Australia and internationally and strive to make a positive difference to people's lives.

Pharmacare is committed to the community, embracing responsibility for the well-being of our customers, employees, their families, the environment, and groups and individuals in need. We have 10 global offices around the world selling over 25 brands and employ over 600 people across the globe.

Pharmacare takes modern slavery risks seriously and is alive to the possibility of increased risk of modern slavery in countries with higher vulnerability and prevalence of modern slavery.

3. Pharmacare's Modern Slavery Policy

Pharmacare has a Modern Slavery Policy which assists in managing sustainability and human rights. This policy is available to all employees and sets out Pharmacare's commitment to combatting modern slavery and helps employees identify instances of modern slavery and provides contact details for persons within the organisation to whom any concerns should be addressed.

Pharmacare's employees are continuously trained in our policies, including those related to corporate social responsibility, human rights, and our company values. This training includes specific modules relating to modern slavery.

4. Pharmacare's Modern Slavery Prevention and Due Diligence Process

Pharmacare maintains an up-to-date supplier list which outlines where our international suppliers are located. We conduct due diligence on all suppliers before engaging them as our suppliers. Various risk management and due diligence processes are drawn from our Modern Slavery Policy. Our Modern Slavery Policy is also an inflexible part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts that policy.

Examples of Pharmacare's due diligence and monitoring processes include:

- (a) requiring suppliers to complete self-assessment questionnaires to ensure against the possibility that they are engaged in modern slavery and to confirm that their suppliers are not engaged in modern slavery;
- (b) requiring our suppliers to confirm that they hold their own suppliers to account in safeguarding against modern slavery; and
- (c) requiring our suppliers to confirm that they have complied with the *Commonwealth Modern Slavery Act (Cth) 2018* (where applicable) or similar international laws that relate to modern slavery.

5. **Our Training**

A crucial part of our stance against modern slavery is to promote workplace cultural changes through training. We are committed to:

- (a) delivering a training module to employees that outline our obligations under the *Modern Slavery Act 2018 (Cth)* and related laws and our commitment to combatting modern slavery; and
- (b) distributing via our intranet and company newsletter, information outlining our obligations under the *Modern Slavery Act 2018 (Cth)* and related laws and our commitment to combatting modern slavery.

6. **Assessing and Managing Risk and Pharmacare's Risk Management Process**

We are devoted to constantly monitoring our risk profile and incorporating appropriate control measures to mitigate any such risks. We aim to identify our key areas of risk and develop programs which resolve or mitigate such modern slavery risks to the best of our abilities. These records will assist us in our continuing efforts to monitor all our relationships and identify risks factors associated with on-going and future suppliers.

7. **Key Performance Indicators**

Pharmacare has implemented various feedback mechanisms across its operations and works hard to create a culture where employees can share their concerns.

Pharmacare has also introduced a number of Key Performance Indicators which it uses to measure the effectiveness of both its reporting of and response to modern slavery risks and issues, including:

- (a) conducting an annual training session for staff about modern slavery;
- (b) implementing grievance and whistle-blowing procedures for workers and employees if cases of non-adherence to our modern slavery policies are suspected or found; and
- (c) conducting annual reviews to ensure constant visibility and oversight of suppliers in our supply chain.

8. **Collaboration and Engagement with Stakeholders**

Pharmacare actively engages with its employees, and business partners around modern slavery.

9. **Pharmacare's Ongoing Commitment**

Pharmacare recognises that tackling modern slavery requires a continuing year-on-year commitment. In future financial years, we will continue to collaborate with our stakeholders, both internal and external, and our community to address the risk of modern slavery in our supply chain.

10. **COVID-19**

Pharmacare has been more vigilant to the disruptions and restrictions created by COVID-19 and will continue to review how these disruptions may increase the risk of modern slavery practices in Pharmacare's operations and supply chains. Currently, there have been no material impacts on Pharmacare's ability to address modern slavery risks.

This statement was approved by the Board of Pharmacare on 16 March 2021.

Signed: 

Name: Toby Rowley Browne

Date: 16 March 2021