

Modern Slavery Statement

Pacific Health Supplies TopCo1 Pty limited (ACN 624 030 897)
Pacific Health Supplies HoldCo Pty Limited (ACN 624 033 450)

*JOINT MODERN SLAVERY STATEMENT UNDER
THE MODERN SLAVERY ACT 2018 (CTH)*

Reporting Period: 1 July 2021 - 30 June 2022

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This Modern Slavery Statement has been approved by the Board of Directors of the mandatory reporting entities, Pacific Health Supplies TopCo1 Pty Limited (ACN 624 030 897) and Pacific Health Supplies HoldCo Pty Limited (ACN 624 033 450) in their capacity as the principal governing body of LifeHealthcare on _____ 23 _____ December 2022.

Pursuant to the requirements of the *Modern Slavery Act 2018 (Cth)*, the contents of this Statement have been reviewed and confirmed as accurate by a duly authorised person.



John Cullity
Director

23 December 2022



Information about the Mandatory Reporting Entity

This Joint Modern Slavery Statement is made pursuant to the requirements of the *Modern Slavery Act 2018 (Cth)* (“the Act”).

This is LifeHealthcare’s third Modern Slavery Statement. During the FY22 reporting period, there was a material change to the structure of LifeHealthcare. In December 2021 EBOS Group¹ announced an agreement to acquire LifeHealthcare, including all our Australian, New Zealand, and Southeast Asian subsidiaries. The acquisition completed on 31 May 2022.

The EBOS Group is a mandatory reporting entity under the Act and has separately lodged a modern slavery statement for the FY22 reporting period. Given that the majority of the FY22 reporting period occurred prior to the acquisition by EBOS, this statement has been prepared separately.

During the next reporting period, LifeHealthcare’s modern slavery response will be included in the framework of EBOS Group and will report on our action as a consolidated group.

Aside from the acquisition by EBOS Group, there has not been a material change in relation to our preliminary reporting requirements over the course of the reporting period. Therefore, Part One of this Statement largely mirrors the structure and content of last year’s statement, with any material features of the FY22 reporting period specifically identified.

Preliminary Mandatory Reporting Requirements

This Joint Statement is made pursuant to Section 14 of the Act, on behalf of the following mandatory reporting entities within Australia:

- Pacific Health Supplies TopCo1 Pty Limited (ACN 624 030 897); and
- Pacific Health Supplies HoldCo Pty Limited (ACN 624 033 450).

The Statement is also made on behalf of the following entities that, together, form the consolidated group of entities that are owned or controlled by the mandatory reporting entities:

- Lifehealthcare Distribution Pty Limited (ACN 117 449 911);
- Lifehealthcare Services Pty Limited (ACN 125 822 068);
- Spiran Pty Limited (ACN 603 394 529);
- Culpán Medical Pty Limited (ACN 142 536 641);
- Australian Biotechnologies Pty Limited (ACN 091 988 402);
- Tissuelife Pty Limited (ACN 606 484 780);
- Tissue Technologies Pty Limited (ACN 604 860 451); and
- ABT Medical Pty Limited (ACN 625 681 889).

¹ EBOS Group is the largest and most diversified Australasian marketer, wholesaler and distributor of healthcare, medical and pharmaceutical products. It is also a leading marketer and distributor of recognised animal care brands. EBOS Group is publicly listed on the New Zealand and Australian stock exchanges.

Part One - Information about the Mandatory Reporting Entity

Our non-operational entities include:

- Pacific Health Supplies TopCo1 Pty Limited (ACN 624 030 897);
- Pacific Health Supplies Holdco Pty Limited (ACN 624 033 450);
- Pacific Health Supplies TopCo Pty Limited (ACN 624 032 051);
- Pacific Health Supplies Mezzco Pty Limited (ACN 624 032 908);
- Pacific Health Supplies Bidco Pty Limited (ACN 624 033 889)
- Lifehealthcare Group Pty Limited (ACN 166 525 186);
- Lifehealthcare Finance Pty Limited (ACN 166 526 941); and
- Lifehealthcare Pty Limited (ACN 130 225 599).

The following non-operational entities were included in the FY21 reporting period and have been deregistered during the FY22 reporting period:

- Lifefinance Pty Limited (ACN 123 284 944);
- Electrocore (Aust) Pty Limited (ACN 158 944 597);
- Medical Vision Australia Cardiology & Thoracic Pty Limited (ACN 154 921 829);

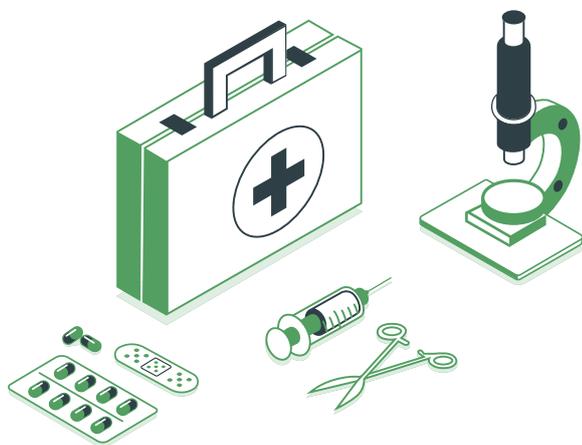
- Oceania Orthopaedics Pty Limited (ACN 141 857 767);
- M4 Healthcare Pty Limited (ACN 154 565 769);
- Central Neurophysiology Supplies Pty Ltd (ACN 080 745 955);
- Coefficient Technologies Pty Limited (ACN 106 645 854);
- Surgical Access Pty Limited (ACN 092 966 142);
- Taylor Bryant Pty Limited (ACN 004 000 373); and
- Austspine Pty Limited (ACN 123 698 528)

(referred to collectively throughout this Statement as "LifeHealthcare", "the Group", and "we").

As part of the acquisition, LifeHealthcare joined the existing Australian medical devices businesses of EBOS Group being (and described further within EBOS Group's FY22 Modern Slavery Statement):

- EBOS Aesthetics Pty Limited;
- LMT Surgical Pty Limited; and
- MD Solutions Australasia Pty Limited.

LifeHealthcare has also acquired a majority interest in the Southeast Asian based medical device distributor, Transmedic Pte Ltd.² Like LifeHealthcare, Transmedic is not operationally involved in the manufacture of the medical devices and equipment it distributes.



² This acquisition was finalised on 30 June 2021, prior to commencement of the subject reporting period.

Our Structure and Operations

LifeHealthcare Distribution Pty Limited is the primary operational entity of the Group and has the following operational subsidiaries:

- Spiran Pty Limited ("Spiran");
- Culpan Medical Pty Ltd ("Cuplan"); and
- Australian Biotechnologies Pty Ltd ("AusBio") (refer to "AusBio" on page 7).

LifeHealthcare Distribution Pty Limited is a leading distributor of medical devices in the therapeutic areas (listed below on page 6), apart from plastics and reconstructive surgery and neurovascular intervention and neurosurgery, which are covered below.

- **Spiran** is engaged in the distribution of medical devices in plastics and reconstructive surgery including breast implants and garments used postoperatively.
- **Culpan** is a distributor of medical devices, with a focus on products within the neurovascular intervention sector.

The remaining operational entity, LifeHealthcare Services Pty Limited, manages the employment of the human resources of the remaining entities within the Group.

LifeHealthcare offers products in the following categories:



Implantable Devices:

Including devices that replace, support or enhance the body's biological structure.



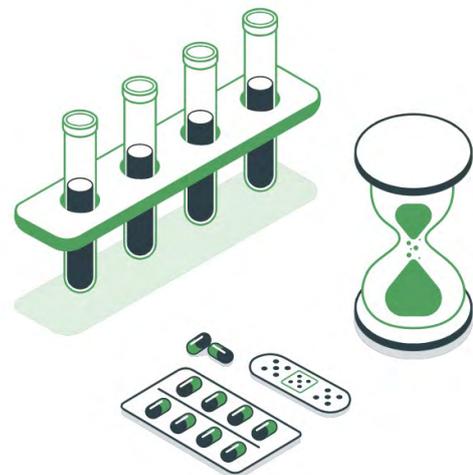
Non-Implantable Devices:

Including instruments used in surgical procedures.



Capital Equipment:

Including equipment used for diagnostic or surgical purposes, such as navigation aids and operating theatre capital equipment.



Part One - Information about the Mandatory Reporting Entity

Our products are used in the following medical disciplines:



Orthopaedics & Spine



General Surgery & Diagnostic Imaging



Medical Capital & Consumables



Plastics & Reconstructive Surgery



Neurovascular Intervention & Neurosurgery



Robotics & Specialist Capital



Human Tissue Biologics

LifeHealthcare distributes specialist medical products within the Australian, New Zealand, and Southeast Asian healthcare sector, throughout both public and private hospitals, with surgeons and medical specialists.

We also provide services relating to regulatory and reimbursement management in the medical device context; and professional education and training for medical professionals.

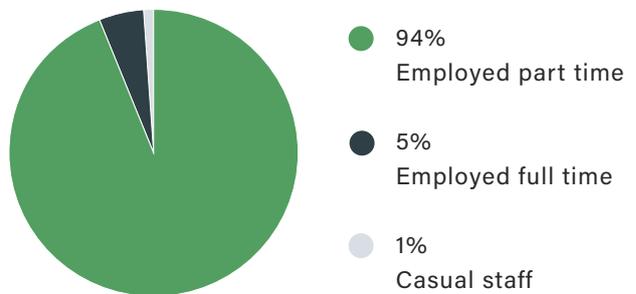
LifeHealthcare operates across the following locations in Australia:

-  Sydney, New South Wales
-  Port Melbourne, Victoria
-  Tranmere, South Australia
-  Wembley, Western Australia
-  Bowen Hills, Queensland

LifeHealthcare (excluding AusBio) employed 237 people in Australia in the reporting period.

The workforce composition is as follows:

41%	38%	21%
of our staff are in sales related roles	of our staff are in operations related roles	of our staff are in share services professional roles



AusBio

As described in our last statement, LifeHealthcare acquired the entity Australian Biotechnologies Pty Ltd during the FY21 reporting period. AusBio also controls and owns the following subsidiaries that form part of the Group:

- Tissuelife Pty Limited (ACN 606 484 780);
- Tissue Technologies Pty Limited (ACN 604 860 451); and
- ABT Medical Pty Limited (ACN 625 681 889).

AusBio is a leading manufacturer and distributor of allograft and biologic tissue products within the orthopaedic, spinal, dental and oral-maxillofacial medial sectors. To date, AusBio have supplied over 140,000 allografts in Australia.

AusBio has partnerships with not-for-profit donation partners, including:

- NSW Health NSW Organ & Tissue Donation Service;
- Australian Tissue Donation Network; and
- Donate Life ACT.

While AusBio and its subsidiaries consolidate their revenue to the mandatory reporting entities, functionally, it continues to operate as a separate entity to the Group. It is responsible for its own employment branch and the separate functional departments that operate independently of the rest of the Group, including:

- Finance;
- Business operations; and
- Warehousing.

AusBio's

52 employees

operate in the headquarters based in Sydney, New South Wales.

Given the industry it operates in, AusBio is subject to significant regulation and is licenced by the Therapeutic Goods Administration and is compliant with the Code of Good Manufacturing Practice for Therapeutic Goods – Human Blood and Blood Components, Human Tissues and Human Cellular Therapy Products.

AusBio remains subject to the Group's governance framework, despite its operational independence.



Our Supply Chain

The supply chains remain mostly unchanged from the first and second reporting periods. Aside from AusBio, the Group is not involved in the manufacture of products and we continue to contribute our largest spend to the following industry categories to support our operations:



Medical Device Providers



Ownership of Dwellings



Wholesale Trade



Forwarding Agencies and Transportation



Computer & Technical Services



Finance & Investment Services



Market Research



Hospitals & Nursing Homes



Business Services

The Group's Tier One suppliers remain predominantly based in Australia, the USA and Germany. However, the Group's remaining suppliers are based overseas, with an increased engagement with suppliers in the Asia-Pacific Region during FY22, including:

- Medical and surgical products and instrument providers based in Turkey, the UK, France, the Netherlands, Costa Rica, New Zealand, Finland, Japan, South Korea and Taiwan.
- Business service providers in Malaysia, Singapore, Netherlands, Philippines, New Zealand and Hong Kong.

AusBio

The supply chains of AusBio and Culpan have not significantly changed since our last statement. Like LifeHealthcare Group, AusBio's suppliers are concentrated in the following industry categories:



Medical and surgical device providers



Business services



Wholesale trade in Australia

AusBio's Tier One suppliers are largely based in Australia, with the remaining suppliers located in the following countries:

- Medical and surgical device providers based in Malaysia, the Netherlands, and the USA; and
- Business services and computer service providers based in the USA and the UK.

Culpan

The supply chains of Culpan have not significantly changed since our last statement. Like LifeHealthcare Group, Culpan's suppliers are concentrated in the following industry categories:



Medical and surgical device providers



Business services



Wholesale trade in Australia

Culpan's direct supplier is also based primarily in Australia. Culpan's international suppliers include medical and surgical device providers based in China, New Zealand, the USA and Japan.

Spiran

Spiran stopped trading effective 30 October 2022.



Assessing Modern Slavery Risks

No actual or suspected instances of modern slavery were identified or reported in our supply chains or operations during the reporting period.

Overall, our risk profile is assessed as remaining relatively low. We acknowledge the new areas of potential risk associated with our recent engagement with specific suppliers located in certain countries, and presence in the Southeast Asian market, as described below.

Assessed areas of potential risk in our supply chain

We have continued to partner with our external consultants to undertake a supply chain risk assessment using proprietary technology to assess the cumulative modern slavery risk through to the tenth tier of our supply chains, through assessing the complex interaction between the following factors:



Total supplier spend amounts i.e. the value of our direct supplier contracts)



Industry category, including industries that, in turn, feed into particular categories further down the supply chain



Geographical area of operation



Depth of tiering within the supply chain(s) e.g., 3rd tier supplier, 5th tier supplier, etc

We have undertaken a risk assessment of the respective supply chains for the following entities within the consolidated Group:

- LifeHealthcare;
- Culpan;
- Spiran; and
- AusBio.

Like the risk assessments described in our previous statements, the proprietary tool has identified that our theoretical exposure to modern slavery risks is most concentrated at the second tier and below of the supply chains across LifeHealthcare, AusBio, Spiran and Culpan.

We have described below the specific industry categories that have been identified by the proprietary risk assessment as higher risk for each operational group. The industry category of *Medical and Scientific Equipment* is identified as a potentially elevated risk category across all entity groups (and consistent with previous statements).



LifeHealthcare Risk Assessment

Medical and Scientific Equipment

LifeHealthcare's business model, as a distributor of specialist medical products, means that an overwhelming proportion of our procurement spend is on suppliers and products in the *Medical and Scientific Equipment* industry category. Given the technical requirements for most of our products, we engage with specialist suppliers around the world.

This risk assessment has identified medical and scientific equipment suppliers in the following countries as presenting a potentially elevated exposure to modern slavery risk:

- Germany;
- the USA;
- Turkey;
- Netherlands;
- The UK; and
- Finland.

Our direct suppliers operating in these countries are exclusively sophisticated organisations that engage skilled and protected employees. However, of this list of higher risk supplier countries, the potential risks associated with our procurement of medical devices from suppliers based in Turkey, which is recognised as an overall higher risk geography in comparison to the European and USA based suppliers.

More broadly, in relation to the supply chains of the medical and scientific equipment and products we procure across these supplier group, we make the following observations about common risk factors below tier one of the supply chain:

- A large proportion of key inputs required for end stage assembly of surgical and medical products are manufactured in high-risk countries such as Malaysia, Pakistan and Thailand. Workers in these countries often have less legal protections, are less likely to be paid a living wage and may be migrant workers from poorer neighbouring countries.
- Manufacturing and assembly workers are often exposed to hazardous working conditions, including exposure to chemicals.
- The raw minerals, metals and alloys used as common supply chain inputs have complex supply chains with low transparency.
- Modern slavery risks are also high in the extraction of common metals and minerals used to manufacture these products. This extraction process is often concentrated in high-risk countries with minimal legal regulation, such as the Democratic Republic of Congo. For instance, there is an increased risk of child and forced labour in the mining of conflict minerals commonly used in medical devices, such as tin, copper, gold, tantalum, and tungsten.

Wholesale Trade in Australia

In addition to our direct procurement of specialist medical products and devices, LifeHealthcare has longstanding supply relationships with several of Australian medical device agencies and related intermediaries that facilitate certain supply agreements.

We continue to have a higher degree of spend on our wholesale agencies and intermediaries, which contributes towards the overall risk rating of this supplier category.

However, the greater the spend we have, the greater degree of commercial leverage we have to influence due diligence and remediation practices.

Additionally, we recognise the similarity of risks associated with the supply chain of the medical products and consumables we are procuring through our agents and intermediaries and the *medical and scientific equipment* purchased directly from suppliers, described on the previous page.

Culpan Risk Assessment

Medical and Scientific Equipment manufactured in the USA and New Zealand

Our proprietary assessment of Culpan has indicated that the greatest potential risks are concentrated within the supply chain for our USA and New Zealand based suppliers of *Medical and Scientific Equipment*. Like LifeHealthcare, Culpan is not a manufacturer of medical devices. Rather, it sources key products from suppliers for distribution.

Our suppliers of medical and scientific related equipment continue, across multiple reporting periods, to be identified by the risk assessment as the area of most elevated potential supply chain risk.

This category is inclusive of several of neurovascular products that only Culpan distributes. Our suppliers in this industry are assessed as higher risk because of our high spend in this category, and because of the same supply chain risks occurring in the manufacturing and extraction of key inputs, as described in our assessment of LifeHealthcare *Medical and Scientific Equipment* on page 11.

Australian Transport Services

The other identified elevated industry category for Culpan is *Australian Transport Services*. This industry category represents all of our logistics, courier and freight related suppliers. The sector is recognised as higher risk because of factors such as reliance on unskilled migrant workers.

Our suppliers in this sector are mostly boutique medical transport providers, that are required to adhere to strict protocols to maximise product viability. On that basis, we consider it less likely that our Tier One suppliers are themselves engaging in modern slavery practices.

Beyond our direct suppliers, the vehicles used by our freight and courier providers are often manufactured offshore in high-risk countries. And, on a global scale, the mining and extractive industry associated with the production of petroleum required to power the vehicles, is recognised as higher risk sector for modern slavery.

AusBio Risk Assessment

Medical and Scientific Equipment manufactured in the USA and Malaysia

As with LifeHealthcare and Culpan, the most notable elevated risk category is *Medical and Scientific Equipment*. The descriptions set out above in relation to general supply chain risks remain relevant in assessing the risks posed by AusBio’s procurement of medical and scientific equipment from suppliers in the USA and Malaysia.

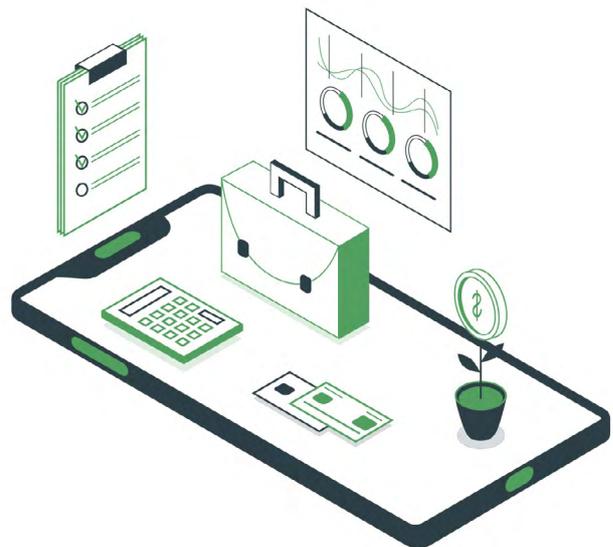
However, we acknowledge the specific risks associated with our relationship with suppliers based in Malaysia, which is a well-recognised high-risk region for the occurrence of modern slavery, particularly in the medical manufacturing sector. While our suppliers are involved in highly technical and skilled types of manufacturing, Malaysia, as a whole, has a high proportion of foreign migrant workers that may source employment through third party agents that charge exorbitant recruitment fees, withhold identity documents, or engage in deceptive recruitment practices that can lead to forced labour.

Our commercial engagement with these suppliers is a new feature of the FY22 reporting period. In recognition of the risks, we undertook a due diligence process assessment of these suppliers as part of our original equipment manufacturers (“OEM”) supplier engagement process, described on page 16.

Business Services Providers from the USA

The other industry category identified by the proprietary risk assessment of AusBio is Business Services Providers from the USA.

This category includes suppliers that are involved in medical related services or research and development. AusBio has a considerable procurement spend on suppliers in this category, contributing to its higher risk profile.



Risk Areas

Key Issues Areas

In our last statement, LifeHealthcare described our efforts to assess our direct supplier list for potential linkages to state-sanctioned Uyghur forced labour. As part of our engagement with this increasingly topical issue, we cross-referenced our direct suppliers against the entities named in the Australian Strategic Policy Institute's 2020 Report: *'Uyghurs for sale: 'Re-education', forced labour and surveillance beyond Xinjiang'*, as allegedly benefiting from Uyghur forced labour. We identified three suppliers through this process, all of which are major global and household brands.

Our external consultants have reviewed the latest modern slavery statements and similar corporate social and responsibility reports disclosed by all of the named suppliers. These statements continue to describe rigorous supplier due diligence measures, including ongoing factory auditing, and engaging with "on the ground" workers, and operational remediation frameworks. Based on these reports, it appears that these suppliers are adequately mitigating the risks associated with the alleged linkages to Uyghur forced labour.

Potential Operational Risk Areas

The Group recognises and continues to monitor potential exposure to modern slavery risk in the context of our operations. The Group is alert to our use of services such as corporate cleaning and office catering providers.

These kinds of services are recognised as higher risk in the domestic setting, because of the commonplace use of practices such as using unskilled migrant workers, sourcing personnel through labour hire agents and "cash in hand" or "off the books" payments. In response to these identified risks,

we have issued our suppliers operating in these categories with self-assessment questionnaires, described on the following page.

In relation to Transmedic, we directly engage professional and skilled staff to support the operations of the business, as with our Australian based offices. We recognise that the same types of operational requirements of this business present possible exposure to modern slavery risk, which may be heightened, given the inherent risks within this region.

AusBio Operational Risks

In addition to the risks identified in the proprietary risk assessment, there are unique risks associated with AusBio's manufacturing operations, which involve human tissue and biological products. This exposes AusBio to a potential (direct or indirect) nexus with the crime of organ harvesting and trafficking, which is a recognised form of modern slavery (as defined by *the Act*).

Because of this unique risk exposure, our manufacturing operations are subject to high degree of regulation, including reviews and inspections performed by the Therapeutic Goods Administration. The distribution of the donated allograft products we rely upon in our manufacturing operations is also regulated by a stringent donor screening procedure. This process requires any potential donor to undergo extensive medical reviews and each individual allograft product is subject to robust regulatory requirements.

As described in our last statement, our biological tissue related direct suppliers and their not-for-profit and government donation agency partners remain subject to an extensive and stringent governmental regulatory framework. We continue to prioritise long-term relationships with our donation partners, to maintain ongoing collaboration and oversight.

Addressing Modern Slavery Risks

LifeHealthcare has continued to undertake action to address our exposure to modern slavery risk in our operations and supply chains, as described in the following pages. We have not been able to complete all the planned actions indicated in our last statement and will review these items as part of the EBOS Group framework.

Supplier Engagement and Due Diligence

Self-Assessment Questionnaires

LifeHealthcare has commenced further assessment of, and engagement with our highest risk suppliers identified by the supply chain risk assessment outlined in Part Two, including suppliers of AusBio and Culpan.

This includes our suppliers operating in the following types of industries:



Medical and Scientific equipment and devices



Corporate catering and restaurant services



Health service providers



Cleaning services

In our last statement, we described a low response rate to our supplier questionnaire. During the reporting period we reviewed and adjusted our approach (covered on the following page).

Part Three - Addressing Modern Slavery Risks

The updated questionnaire now incorporates a range of environmental, social and governance indicators, in addition to the following modern slavery specific content:

- Supplier awareness of modern slavery and existence of supply chain screening initiatives.
- Transparency and visibility of supply chains.
- Internal policy and governance frameworks that cascade obligations down the supply chain.
- Operation of key modern slavery actions, including staff training;
- Employment processes and procedures, such as provision of supplier contracts and use of labour hire companies.
- The extent of supply chain due diligence frameworks, including grievance and remedial processes.
- Identification of specific modern slavery risks and associated red flag.
- Processes for measuring the effectiveness of modern slavery response.

These bespoke self-assessment questionnaires were distributed to 50 of our identified high-risk suppliers.³ Selected suppliers have also been provided with a modern slavery awareness training modules to encourage issue engagement and partnership development.

Supplier Review and Engagement

In our previous Statement we referred to further targeted supplier engagement. Our engagement in FY22 has not taken the form of desktop audits as we had planned in our last statement and instead we rolled out an improved supplier engagement process.

We have focused on engaging with our OEM suppliers, given that this sector has been identified as higher risk supply chain category, across all risks assessments for LifeHealthcare, Culpan and AusBio over consecutive reporting periods. We have improved our supplier engagement process, focusing on the stage of contract negotiation and renewal with OEM suppliers.

We have developed a formal supplier review and gateway process, to integrate regular engagement between our internal commercial stakeholders, legal personnel and quality assurance personnel and the OEM supplier. The purpose of this engagement process is to facilitate initial due diligence assessments of the OEM supplier prior to commercial engagement.

This assessment integrates a wide range of factors, including the supplier's technical and quality assurance, sustainability credentials and their approach to addressing the specific modern slavery risks within their operations and supply chains. If the supplier is rated as higher risk, we undertake a similar review of the supplier's parent company and its potential third-party manufacturers.

We have also focused on introducing collaborative conversations with our suppliers during the process of negotiating modern slavery contract provisions in our distribution agreements. We have used this as an education tool to provide valuable clarification of modern slavery obligations to our suppliers, many of whom are not reporting entities. We have also updated our supplier contracts to support the distribution and completion of self-assessment questionnaires.

We have applied our OEM supplier engagement process during the reporting period with all our new suppliers, and pre-existing suppliers that were subject to a contract renewal or extension during the reporting period. Our process did not identify any suppliers that posed a material modern slavery risk and a vast majority of new or renewed OEM supply contracts have embedded modern slavery related provisions.

³ This occurred after the conclusion of the reporting period and prior to lodgement of this Statement.

Modern Slavery Governance

As part of the acquisition, we are in the process of formalising a corporate governance framework within the EBOS Medical Technology Division. A key element of this has been establishing an 'integration working group' with the other pre-existing entities in this division.

We are represented by our in-house subject matter expert, who has had responsibility for directing our modern slavery response since we first commenced reporting under the Act.

This framework and working group have been a key vehicle for Lifehealthcare to commence integrating our modern slavery response into the broader EBOS Group.

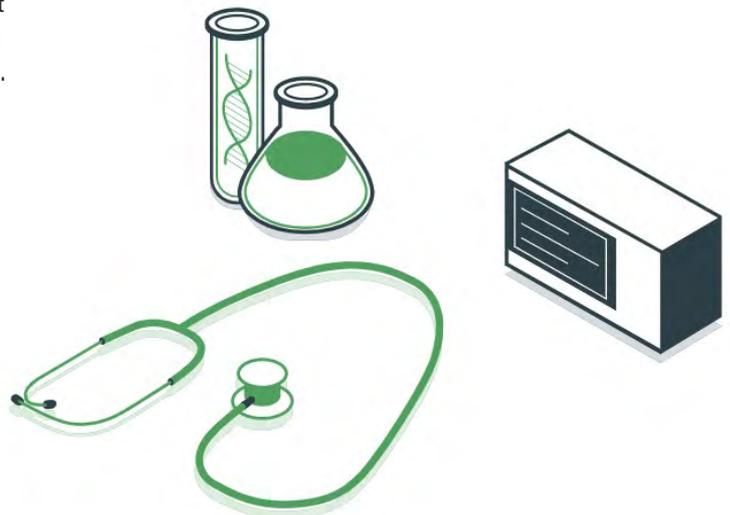
Policy Update

In our previous statement we recognised the need for certain updates to our policy framework. This has been superseded by the acquisition such that the focus is on reviewing the EBOS Group policy framework for implementation within Lifehealthcare. This includes a policy gap analysis and review at a divisional level.

This review is in progress, noting that EBOS Group has recently introduced a Supplier Code of Conduct and Ethical Sourcing Policy and has an established Code of Ethics and Whistleblower Protection Policy.

More broadly, the following updates are noted:

- **Supplier and Procurement Evaluation Process and Policy:** The LifeHealthcare Policy is being reviewed considering the broader EBOS Medical Technology Division.
- **Human Rights Policy:** The LifeHealthcare Policy is being reviewed noting the recently introduced EBOS Group Ethical Sourcing Policy and Supplier Code of Conduct.
- **Human Rights Grievance Policy:** The LifeHealthcare Policy applies and is being reviewed noting the recently introduced EBOS Group Ethical Sourcing Policy and Supplier Code of Conduct.
- **Code of Conduct:** We have implemented the LifeHealthcare version of this policy across the Group.



Supplier Contracts

In addition to embedding modern slavery contract provisions into new and renewed OEM supplier contracts and distribution agreements, as part of our OEM supplier engagement process described above, we have also embedded our modern slavery provisions into all of LifeHealthcare's standard agreements, including:

- Our Master Professional Services Agreement; and
 - Our Healthcare Practitioner Consultancy Agreement.
-

Education and Training

In our last statement, we indicated our intention to provide additional mandatory training to staff, with the intention of encouraging broader understanding of our modern slavery governance framework.

During the reporting period we developed and delivered an educational program to employees, agents and contractors. The training module encompasses acknowledgement of LifeHealthcare's policies and processes and was completed by 95% of our workforce.

We have also introduced a modern slavery component to our employee onboarding program, with all new staff now undertaking training processes facilitated by our legal department to improve awareness of modern slavery issues.

95%
of our workforce completed
LifeHealthcare's new training module.



Measuring the Effectiveness of Our Modern Slavery Response

LifeHealthcare recognises that our efforts to address the risk of modern slavery in our operations and supply chains requires an ongoing and long-term effort to remain effective.

We have previously described key performance indicators (KPIs) to establish the foundation of our long-term modern slavery response.

We have set out below our progress against these KPIs, as a concrete way to measure the effectiveness of our action over the reporting period. We acknowledge that we have not fulfilled all previously planned activities, however, now that the acquisition has been finalised, it is anticipated that our response approach will be evaluated and integrated within the EBOS Group framework.

Key Performance Indicators	Progress Indication
Deeper supplier engagement, including provision of online training.	<p>In progress and ongoing.</p> <ul style="list-style-type: none"> We have provided online training to our high-risk suppliers as part of the SAQ process.
Supplier engagement through issuing self-assessment questionnaires.	<p>Completed.</p> <ul style="list-style-type: none"> We have issued 50 SAQs to our highest risk suppliers. LifeHealthcare group has also continued to engage with our OEM suppliers through our improved supplier engagement process.
Desktop auditing of select suppliers.	<p>Not completed.</p> <ul style="list-style-type: none"> This will be a focus in the next reporting period.
Continued education for internal stakeholders.	<p>Completed.</p> <ul style="list-style-type: none"> Training programs focusing on policy framework completed by 95% of staff.
Developing and implementing grievance mechanisms for existing stakeholders.	<p>In progress.</p> <ul style="list-style-type: none"> We implemented our Whistleblower policy during the reporting period across the LifeHealthcare Group.
Continued risk management through policy framework and addressing modern slavery risk in relation to LifeHealthcare’s business operations at multi-disciplinary level.	<p>In progress.</p> <ul style="list-style-type: none"> As part of the acquisition process, we are integrating our modern slavery response within the EBOS Medical Technology business. We have initially focused on reviewing the existing policy framework of the EBOS Group. We have continued to obtain input from key cross divisional teams, including our internal audit, finance, operations and legal team throughout the reporting period to support our approach to modern slavery across the group.

Consultation with controlled entities and other relevant information

Over the FY22 reporting period, all reporting entities and entities owned/controlled by the Group have been consulted and engaged with as part of our overall modern slavery response. This also includes entities we rely upon to provide direct operations and non-reporting entities.

All entities with the Group have been subject to the proprietary supply chain risk assessment described at Part Two. Additionally, all due diligence measures and operational policies described throughout this statement are applicable to the Group.





Pacific Health Supplies TopCo1 Pty limited (ACN 624 030 897)
Pacific Health Supplies HoldCo Pty Limited (ACN 624 033 450)