

MODERN SLAVERY STATEMENT

The reporting entities covered by this Modern Slavery Statement are ABM Australia Holding Pty Ltd ACN 632 660 774 (ABMAH) and Access Brand Management Pty Ltd ACN 618 170 639 (ABM). Access Corporate Group means ABMAH and ABM.

This joint Modern Slavery Statement covers the reporting period 1 January 2020 to 31 December 2020, and it has been approved by the principal governing body of ABMAH and ABM. It is the first Modern Slavery Statement submitted by ABMAH and ABM.

Modern slavery is defined in the *Modern Slavery Act 2018* (Cth). Modern slavery is a complex problem that captures situations where coercion, threats, or deception, are used to exploit individuals and undermine or deprive them of their freedom. Access Corporate Group recognises that modern slavery can occur in various forms, all of which have in common the deprivation of a person's liberty by another. Access Corporate Group recognises that modern slavery occurs throughout the world, including in Australia.

ABOUT ACCESS CORPORATE GROUP

Access Corporate Group is a rapidly growing group that was founded in 2017. Access Corporate Group maintains relationships with many different organisations.

ABM is a privately owned company registered in Australia and is a wholly-owned and controlled subsidiary of ABMAH. ABM directly employs around 200 persons, but it did not own or control any entities in 2020. ABMAH is a large privately owned company registered in Australia. ABMAH owns or controls around a dozen other privately owned companies registered in Australia (including ABM), and several of these companies cover premium cosmetics, wellness and lifestyle brands, which brands were all founded in Australia (Related Brands). Equipped with a holistic approach to brand management, brand development, distribution and retail sales, Access Corporate Group also connects consumers to a selection of other third-party premium brands across cosmetics, wellness and lifestyle categories. These third-party brands are sourced locally and globally.

The strategic mechanisms adopted by Access Corporate Group are varied and include comprehensive brand management. Access Corporate Group delivers on its promise of 'Everyday Better Life' through its comprehensive business model.

Veritas Tempus Naturae, is Latin for truth, time and nature. In the latter part of 2020, ABM started developing a VTN retail website (www.vtnstore.com). When fully operational, it is envisaged that this retail site will become a convenient place for consumers to make online purchases from a selection of premium products across cosmetics, health, and wellness categories, as well as carefully selected wines sourced from regions across Australia.

Access Corporate Group has many supply chains that contribute to the operation of its rapidly growing business.

Access Corporate Group is committed to sourcing and developing high quality products from ethical materials through a local and global network of suppliers. The raw materials used in products manufactured for the Related Brands are largely provided by the manufacturers. There are around 45 or more manufacturers of such products. Products manufactured for some Related Brands are mainly manufactured in Australia. Other Related Brands engage manufacturers from a global range of suppliers covering various regions, including People's Republic of China, Europe, Japan and Taiwan. Good Manufacturing Practices are expected from all manufacturers. Compliance, safety and quality control of Related Brand products are of primary concern to Access Corporate Group. Accordingly, Access Corporate Group adopts stringent quality control measures and procedures across the Related Brand products. Where additional services are required, professional agencies sourced from around the globe, may also be engaged by ABM, and any owned or controlled entities of ABMAH.

Access Corporate Group also engages a number of third-party suppliers to provide the variety of services required for its business operations in and around Sydney. Logistics services are provided by several large well-known multi-national organisations with offices in Sydney, Australia, as well as Australian organisations with strong global connections. More than 30 service providers are engaged by Access Corporate Group to cover public relation events, media, advertising, and other associated activities. The large proportion of these agencies are based in and around Sydney, Australia, and there are also a few providers that are based in People's Republic of China. More than 20 service providers are required for the direct operations of the ABM office in North Sydney, including areas relating to cleaning, food delivery, office supplies, telecommunications, and storage, and such services are predominately covered by organisations with established offices in Sydney, Australia. Where additional resources are required in relation to employment, the agencies engaged have established offices in Sydney, Australia. Other professional advisors and services utilised by Access Corporate Group are also sourced from professional organisations based in Sydney, Australia.

THE RISKS OF MODERN SLAVERY

Employees across multiple entities in Access Corporate Group are covered by National Employment Standards as prescribed under the *Fair Work Act 2009* (Cth). Access Corporate Group has limited exposure to risks of any form of modern slavery through its direct operations in Sydney, but acknowledges that modern slavery occurs throughout the world, including in Australia.

Access Corporate Group is exposed to the risks of modern slavery practices in its operations and supply chains. Such exposure may arise due to various means, including but not limited to:

- its Related Brands' reliance on third-party manufacturers for the supply of raw materials, especially if these materials come from regions where there is a higher prevalence of modern slavery and /or otherwise engage workers on a seasonal basis;
- its Related Brands' reliance on third-party manufacturers and packaging suppliers to produce any finished goods;
- its, or any of its owned or controlled entities, reliance on third-party suppliers for the provision of services;
- its owned or controlled entities, purchase of finished goods from third-party cosmetics, lifestyle and wellness brands, where the traceability of the supply chain of these finished products could prove difficult.

Access Corporate Group recognises that the above risks are minimised when warranties and other representations in relation to compliance with all laws and regulations, are given by any third-party in relation to the provision of their supply of goods or services.

ADDRESSING THE RISKS OF MODERN SLAVERY

Actions taken by ABMAH and ABM during 2020

During 2020, ABM and other relevant entities owned or controlled by ABMAH, including Relevant Brands, started updating certain contracts with third-parties to include specific provisions relating to modern slavery. Initial efforts were focused on manufacturing agreements. The new provisions sought to complement standard clauses that were already present in such contracts, which mandated the third-

party comply with all applicable laws and regulations, including but not limited to employment laws. In addition, Access Corporate Group has always strived to only engage with other organisations that hold similar ethical values to itself and abide by its motto of *'Everyday Better Life'*.

Actions taken by entities owned or controlled by ABMAH during 2020

During 2020, professional auditors were engaged to inspect and report on overseas manufacturing sites involved in the manufacturing of certain products of a Related Brand. The reports included the working conditions of persons at the sites. A physical inspection of these sites was able to be carried out very early in 2020. In relation to the local manufacturing of products, some Related Brands were able to physically inspect some of these sites, but COVID-19 restrictions prevented the inspection of at least one manufacturing site located in Australia.

Looking to the future

Access Corporate Group is a rapidly evolving business. Where possible, and at all times abiding by any public health orders around COVID-19 and other local COVID-19 restrictions, it is hoped that ABMAH will gain a more comprehensive understanding of the supply chains and operations of its owned or controlled entities, as well as any third-party organisations engaged by such entities. It is also expected that ABM will gain a more comprehensive knowledge of its supply chains and operations as it continues to grow and evolve.

ABMAH and ABM have started collecting information from relevant parties in order to comply with reporting obligations for the period covering 1 January 2021 to 31 December 2021. Access Corporate Group intends to prioritise its focus on higher risk supply chains and to increase the awareness of modern slavery practices in all persons belonging to the group. The effectiveness of any procedures, policies, education programs and other associated activities rolled-out by Access Corporate Group in 2021, will be assessed using a variety of quantitative and qualitative measures.

Access Corporate Group will endeavour to prevent any forms of modern slavery in its supply chains and operations in 2021 and beyond.

In preparing this Modern Slavery Statement, ABMAH consulted with a director of each of its owned or controlled entities (including ABM) and other personnel involved in key areas of supply and operations. ABM did not own or control any entities in 2020, and it is a wholly-owned and controlled subsidiary of ABMAH.

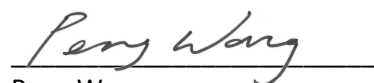
This statement was approved by the principal governing body of ABMAH and ABM on 30 June 2021.

Signed for and on behalf of ABM Australia Holding Pty Ltd (ACN 632 660 774)



Peng Wang
Director

Signed for and on behalf of Access Brand Management Pty Ltd (ACN 618 170 639)



Peng Wang
Director