



## Modern Slavery Statement

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Financial Year: 1 July 2024 – 30 June 2025

## The Reporting Entity

This statement is made by Aspen Asia Pacific Pty Ltd on behalf of its 100% owned subsidiaries, Aspen Pharmacare Australia Pty Ltd and Aspen Pharma Pty Ltd (**Aspen Australia**).

## Structure, operations and supply chains

Aspen Pharmacare Australia Pty Ltd and Aspen Pharma Pty Ltd are the Australian trading entities of the Aspen Group. Headquartered in South Africa, Aspen is a multinational pharmaceutical company with an extensive range of pharmaceutical products that provide treatment for a broad spectrum of acute and chronic conditions experienced through all stages of life, with established offices in over 46 countries and territories, supplying specialty and branded pharmaceuticals in more than 115 countries.

Globally, Aspen Group now employs approximately 9,500 people, comprising of approximately 48% women and 52% men.



**Aspen Pharma Pty Ltd** ACN 096 239 958 manufactures and packages oral solid dose and semi-solid dose pharmaceutical products in its TGA-approved manufacturing site at Dandenong, Victoria. To do so, Aspen Pharma obtains direct inputs: raw materials such as active pharmaceutical ingredients (APIs) and excipients; packaging materials such as cartons, labels, bottles, blister trays and foils; production support including machinery, parts and other equipment and services such as regulatory approval, maintenance, contract laboratory services, freight, logistics, utilities, telecommunications and IT systems, and cleaning and waste management.

**Aspen Pharmacare Australia Pty Ltd** ACN 004 118 594 supplies pharmaceutical products in Australia and New Zealand and exports pharmaceutical products to other countries. These pharmaceutical products

come from a variety of sources: the Dandenong manufacturing site, Aspen Group (some produced at Aspen manufacturing sites and others in-licensed from other pharmaceutical companies), or in-licensed from or contract manufactured by local and overseas pharmaceutical companies. Aspen Australia obtains goods and services from regulatory agencies, consultants, freight-forwarders, warehousing and other transport and logistics suppliers, power, telecommunications and IT service providers, marketing and sales support suppliers including point of sale materials, marketing and advertising agencies, travel agencies, conference organisers, and general support including car fleet, couriers, cleaning and other office services and consumables.

The registered office of both reporting entities is 34-36 Chandos Street, St Leonards, New South Wales 2065, Australia. Together, the entities now employ approximately 584 permanent employees, and engages approximately 7 seasonal, contract, casual or otherwise non-permanent workers.

Aspen Australia’s direct suppliers of goods and services are located in 34 countries<sup>1</sup>.

Top 10 supplier locations based on total spend*	
1	Australia
2	Switzerland
3	Mauritius
4	New Zealand
5	South Africa
6	India
7	Germany
8	Italy
9	Philippines
10	Israel

\*Payments into Mauritius and South Africa are made to Aspen Group entities who obtain supply of goods and services for Australia (and other Aspen Group entities) from various other countries.

**Risks of modern slavery practices in our operations and supply chains**

Having regard to the highly regulated nature of the pharmaceutical industry, human rights risks within Aspen Group’s employed workforce and the workforces of non-Aspen suppliers of pharmaceutical products are still assessed to be low as they are largely made up of skilled workers who undertake work in controlled and regulated environments that operate under established policies and procedures and are often subject to government and contract partner audits.

Aspen Australia’s modern slavery risk exposure could exist in the engagement of suppliers and service providers in higher risk sectors and jurisdictions. Suppliers of non-regulated inputs who operate in countries that do not adequately protect human rights could also pose a modern slavery risk.

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<sup>1</sup> Based on the location of the companies where payments for goods and services were made.

Based on the **International Labour Organisation’s Global Estimates of Modern Slavery** (latest version published in 2022) (**ILO 2022**), there are a number of general risk factors which are relevant to Aspen Australia’s supply chain.

### **Proximity**

Asia and the Pacific has the highest prevalence of forced labour in the world, based on the total number of people. Aspen Australia’s location within the region means that materials and other services from within that may be more susceptible to risk may be more likely to be a part of our supply chain, compared to similar risk in another region.

### **Manufacturing**

The manufacturing sector accounts for nearly one-fifth of all forced labour exploitation of adults. This risk impacts almost every part of Aspen’s business, from finished products we purchase, but also as a large component of our business relates to contract manufacturing it is a consideration that applies to our operations.

Looking specifically at the categories of goods Aspen Australia purchases against those identified as having an increased risk of modern slavery based on the **Global Slavery Index Importing Risk (latest version published 2023)** and ILO 2022, risks could arise in relation to:

- electronics if sourced from Malaysia and China;
- uniforms if sourced from Argentina, Bangladesh, Brazil, China, India and Malaysia;
- construction;
- raw materials in the agriculture sector; and
- services including transport and hospitality.

In addition to the categories above, modern slavery risk could arise in relation to Aspen Australia’s procurement of packaging and other components for pharmaceutical products particularly if sourced from China and other parts of Asia.

## **Actions taken to assess and address risks of modern slavery practices in our operations and supply chains**

### **Risk Assessment**

In earlier reporting years, Aspen Australia assessed the risk of modern slavery in our own operations, which are all within Australia and New Zealand, as low to very low, given the highly regulated nature of the pharmaceutical industry. The workforce is largely made up of skilled individuals who undertake work in controlled and highly regulated environments that operate under established policies and procedures. We have reassessed for the period of 1 July 2024 to 30 June 2025 and that remains the case. This also applies to most of our Tier 1 suppliers.

We also seek input from Aspen Group as to any heightened modern slavery risks identified at a Global level.

During the period from 1 July 2024 to 30 June 2025, we did not identify any heightened modern slavery risk.

From October 2024, Aspen Group implemented an Ethics Compliance Risk Assessment process across all Aspen Group affiliates, including Aspen Australia. Under this process, Aspen Australia is required to complete ethics and compliance risk assessments on a quarterly basis. This quarterly assessment includes the assessment of modern slavery related risks such as procurement of high-risk materials in Aspen's supply chain. Instances assessed to be at high risk of modern slavery violation is assessed by Aspen Australia's senior leadership team and reported to Aspen Group for evaluation and guidance.

Aspen Group is taking steps to further enhance responsible supply chain management across the Group by developing a Group-wide supplier sustainability risk assessment and due diligence program. This program aims to enable Aspen to monitor sustainability performance on a routine basis through reliable sustainability assessments and engage with suppliers to achieve continual improvement and advancement of supplier performance on relevant sustainability aspects. This aligns to Aspen Group's goal of striving to review, with an aim to improve, procedures to support the identification and prevent risks of modern slavery across the business.

As part of this, continuing on from the start made in calendar year 2024, Aspen Group has been gradually implementing the assessment of more key selected suppliers via the EcoVardis platform, which will support our efforts to identify sustainability-related risks in our supply chain. EcoVardis is a globally recognised CSR rating platform which provides a scorecard and report of a supplier's performance on key modern slavery and sustainability areas such as labour, human rights, environment and ethics. This assessment evaluates suppliers on their social performance, including labour and human rights, to assist them in improving their sustainability practices. It involves evaluating policies, actions and reporting to help ensure compliance with Corporate Social Responsibility (CSR) standards and internationally recognised frameworks, such as the UN Guiding Principles on Business and Human Rights. The use of EcoVardis assessments is being rolled-out among Aspen Group's affiliates on a staged-basis, with Aspen Australia and Aspen Group Incorporated (AGI - a major supplier to Aspen Australia) anticipating implementation of EcoVardis assessments on its top 50 suppliers as part of its supplier due-diligence process in 2026.

As noted in previous statements, in 2022 a Group Sustainability Management Framework was developed, and an Executive Sustainability Forum (**ESF**) was established to oversee the sustainability strategy development and monitor its implementation. The development of our Group sustainability strategy has progressed according to key milestones under the oversight of the ESF, chaired by the Group Chief Operations Officer.

The ESF had established focused working groups including the Responsible Supply Chain Working Group. Broadly, the function of this working group is to develop a responsible supply chain strategy and roadmap for Aspen Group and to report to and seek guidance from the ESF on its progress. Under its

mandate, the ESF has articulated Aspen Group's commitment to a responsible supply chain via a position paper (finalised June 2023) which has been published on Aspen's website at <https://aspenshare.co.za/v/04K3YKEB7VRpWqgFf1Dd>

Aspen Group is a member of the Pharmaceutical Supply Chain Initiative (**PSCI**). PSCI is a worldwide collaboration of pharmaceutical and healthcare companies who promote responsible supply chain management and better business conditions across the industry, including the promotion of fair labour practices and human rights. Through the participation in the PSCI, Aspen Group and its affiliates (including Aspen Australia) benefit from the industry-wide collaboration and efforts to uncover and combat modern slavery.

As part of Aspen's responsible supply chain strategy, Aspen Group approved and implemented a group-wide Human Rights Policy in October 2024 which applies to all Aspen affiliates including Aspen Australia. This policy outlines Aspen's commitment to conducting our business in a manner aligned with international human rights instruments including the United Nations Guiding Principles on business and human rights, and reiterates our commitment not to engage in modern slavery practices.

### **Addressing risks**

Aspen Australia considered what policies and procedures it has in place that address modern slavery risks and whether they could be improved. The business strategy, Codes of Conduct, Third Party Due Diligence Procedure and the Whistleblowing policy are all relevant Aspen Group (global) policies that apply to all Aspen Group affiliates, including Aspen Australia.

### **Our sustainable business strategy**

We recognise that doing business in a sustainable and responsible manner is integral to ensuring our future viability. Sustainability considerations underpin our strategy and are integrated into the way we do business. One of our 5 strategic objectives is to be a good corporate citizen by conducting our business in a responsible inclusive and sustainable way. Our sustainability commitment to society is to strive to operate an ethical and responsible business underpinned by our shared values and governance structure; we uphold the dignity, fundamental freedoms and human rights of our employees, contractors and the communities in which we live and work, and others affected by our activities.

As a signatory to the United Nations Global Compact, Aspen has committed to support the 10 principles on human rights, labour, environment and anti-corruption, including principles 4 and 5 which call for the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.

As of June 2025, Aspen maintained its inclusion in the top 30 FTSE/JSE Responsible Index Series and in the FTSE4Good Index Series, which recognises companies with strong ESG practices measured against global standards.

## **Aspen Code of Conduct**

All employees are required to confirm on commencement of employment and annually thereafter that they will comply with the Aspen Code of Conduct, which includes Section 9 (Human Rights, Labour and Employment Practices) stipulating that all employees are responsible for ensuring that Aspen upholds the elimination of all forms of forced and compulsory labour and upholds the effective abolition of child labour.

## **Aspen Supplier Conduct, Compliance and Ethical Undertakings**

Aspen requires all suppliers and service providers to agree to contractual obligations with respect to key ethical and compliance matters, including obligations not to engage in slavery, forced labour or human trafficking. This is done via incorporation of mandatory ethics and compliance clauses in supplier contracts or by requiring suppliers to sign a separate compliance and ethical undertakings document. Aspen's supplier contracts and the separate undertakings documents, require each supplier to warrant, to the best of its knowledge, that in relation to the performance of its obligations for Aspen:

- It does not use, engage in or support child labour practices in its own operation, or its supply chain
- It does not engage in or support slavery, human trafficking or any form of forced labour in its own operation, or its supply chain
- It provides a safe and healthy workplace; any housing supplied to employees is safe for habitation; access is provided to proper sanitation and clean water, and emergency healthcare is provided in case of workplace accidents or incidents
- It does not engage in or support the use of corporal punishment, mental, physical, sexual or verbal abuse, and does not use cruel or abusive disciplinary practices in the workplace
- It pays employees at least the minimum wage, or a fair representation of the prevailing industry wage (whichever is the higher) and provides employees with all legally mandated benefits
- It complies with laws on working hours and employment rights in the countries in which it operates and is respectful of employees rights to join and form independent trade unions and freedom of association

Aspen also has in place a Supplier Code of Conduct which requires suppliers to have ethical and human rights policies and an appropriate complaints procedure to deal with any breaches of such policies.

Suppliers are required to permit Aspen to perform audits of their facilities, records and business processes to verify compliance with the Code. Material breaches of the Code may result in termination of any business relationship with Aspen and disqualification as an Aspen supplier. Given the pandemic, our ability to conduct site visits and audits would be very limited.

Suppliers (as well as employees and others) are encouraged to use the **Tip-Off service** to report suspected unethical behaviour on the part of anyone related to Aspen's business - as described in Aspen's **Whistleblowing Policy**.

### **Annual reminder letter to suppliers**

We send a letter to our suppliers every year, reminding them of the contact details for the Tip-Off line that they can use to report (anonymously or not) any suspected unethical behaviour on the part of any Aspen employee or anyone related to Aspen's business. We give anti-competitive behaviour, fraud and bribery as examples of unethical behaviour.

### **Due diligence**

Aspen screens third parties using a global database of intelligence on heightened risk individuals and organisations. The data is sourced from the public domain including global media research in over 60 languages, covering 240 countries.

Until February 2025, the process was high risk suppliers are requested to complete a Due Diligence Questionnaire which includes further questions related to various risk areas, including a section specific to modern slavery risks. The responses are then internally assessed by Aspen and should any concerns be raised, or a supplier refuse to complete the questionnaire, further investigation will follow.

In February 2025, Aspen formally rolled out a more comprehensive due diligence process for new suppliers in Australia. Under this new process, all new suppliers are required to answer questions targeted at ascertaining their modern slavery risk as part of the onboarding process. This includes questions to ascertain:

- the suppliers' implementation of modern slavery policies, modern slavery compliance training, due diligence of their own supply chain to safeguard against modern slavery risks; and
- if the supplier is providing Aspen with goods or services with high modern slavery risk - for example, goods manufactured in countries where modern slavery is more prevalent, or services in categories which are at higher risk of modern slavery.

Under the new process introduced in February 2025, where a supplier's responses to the initial due diligence questions indicate potentially insufficient modern slavery compliance practices, Aspen then requires the supplier to complete a more in-depth due diligence questionnaire including more comprehensive questions on modern slavery risks. Should a supplier's responses to the more in-depth due diligence questions raises concerns, then Aspen will conduct further investigation into the supplier's modern slavery practices.

### **Training**

Mandatory ethics training is conducted with all employees on commencing employment with Aspen and on an annual basis to ensure that the principles of ethical business conduct and

principles of Aspen's Code of Conduct – including the elimination of all forms of forced and compulsory labour and abolition of child labour - are understood and implemented.

Aspen Australia informally trains employees involved in procurement to ensure that the risks of modern slavery in our supply chains are understood and that the processes we are developing to assess and address these risks are implemented.

### **Remediation processes**

None undertaken as no modern slavery was identified during the period covered by this statement. If we identify a risk, our aim will be to work with the supplier to address the risk. We will ultimately move away from the supplier where possible if they are unable or unwilling to give us confidence that they are working towards eliminating the risk.

## **How we assess the effectiveness of the actions taken to assess and address risks**

The Aspen Code of Conduct details Aspen Group's commitment to fundamental human rights and the Social and Ethics Committee monitors the effectiveness of ethics management globally. Aspen's Ethics and Compliance programme requires each business unit to assess risks associated with violating human rights, child labour as well as slave or compulsory behaviour. No business in the Group identified heightened risks and there were no substantiated incidents of discrimination, slave labour or compulsory labour reported.

Aspen can seek to use its contractual audit rights to conduct an audit if we assess there may be a heightened risk with a particular supplier or if we reasonably suspect a supplier is engaging in modern slavery practices, or to assess the effectiveness of a corrective action plan.

We have not identified any instances of modern slavery and have had no reason to suspect any supplier is engaging in modern slavery practices.

## **Process of consultation between reporting entities**

Aspen Pharmacare Australia Pty Ltd and Aspen Pharma Pty Ltd share two directors and the CEO of both entities is the same person. As previously described, Aspen Pharma Pty Ltd is the manufacturing arm.

## **Other relevant information**

Other Aspen Group companies are also required to comply with Modern Slavery laws (eg in UK and Canada). Each country reports into Aspen Group compliance so that information is able to be shared.

Further information regarding how the Aspen Group of companies approach and mitigate Modern Slavery risk is outlined in the Aspen Group Statement on Modern Slavery for 1 July 2024 to 30 June 2025, available at URL <https://aspenshare.co.za/share/wLGtHyYFrASPIYEQ7KPw>

**Approved by** the Board of Aspen Asia Pacific Pty Ltd on 24 December 2025.

Signed by



Electronically signed by: Trevor Ziman  
Reason: This electronic signature  
confirms that, on this date, I have  
reviewed and approved the contents of  
this document.  
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Director of Aspen Asia Pacific Pty Ltd