

Modern Slavery Statement

for the year ended 31 December 2022

11 April 2023

A Message from our CEO

I am pleased to present Integria Healthcare's Modern Slavery statement for the reporting year ending 2022. This Statement sets out our continuing commitment to address the risks of modern slavery during the ongoing challenges of geopolitical conflicts, post-pandemic disruptions and rising costs globally - all of which risk amplifying modern slavery practices. The complexity of global supply chains and raw material sourcing through third party brokers means that it is almost impossible for any company to claim that it can eradicate modern slavery. We seek to improve our centralised procurement processes to better identify and map high risk areas for evaluation and action to build more effective control points for modern slavery risks year on year.

Our vision is to *inspire people to live better lives, naturally*. Working with our suppliers and distributors to mitigate modern slavery risks and impacts on people and communities as a matter of shared accountability is an important pillar of reflecting our vision and company values in a meaningful way: *Care, Creativity & Innovation, Courage & Commitment*. Since our inaugural report in 2020, Integria has continued to advance our program from prior years to drive a targeted risk-based approach on identifying and addressing the risk of modern slavery in our business and supply chain. This includes maintaining pro-active risk engagement with Tier 1 higher risk suppliers and implementing the compliance framework for supplier pre-vetting and onboarding protocols, the consistent application of contractual standards and regular training of the procurement team on a risk appropriate screening process to identify risks in geographies, sectors and materials.

Put simply, just like the people working in our company, we expect our suppliers to do business in an ethical manner and act with integrity. Our Supplier Code of Conduct and Modern Slavery Standard enshrines our expectations for suppliers to meet the responsibilities set out in the UN Guiding Principles on Business and Human Rights. We are committed to embedding mitigating measures for the risk of modern slavery in our first sustainability report in 2023 as an ongoing material area of business improvement. Our people, our products and our partners are integral to what makes Integria, and our sustainability roadmap will address ethical sourcing principles to improve transparency for all stakeholders.

This Modern Slavery Statement is made by Integria Healthcare (Australia) Pty Ltd ACN 096 496 212 for the calendar year ended 31 December 2022 and is approved by the Board of Integria.

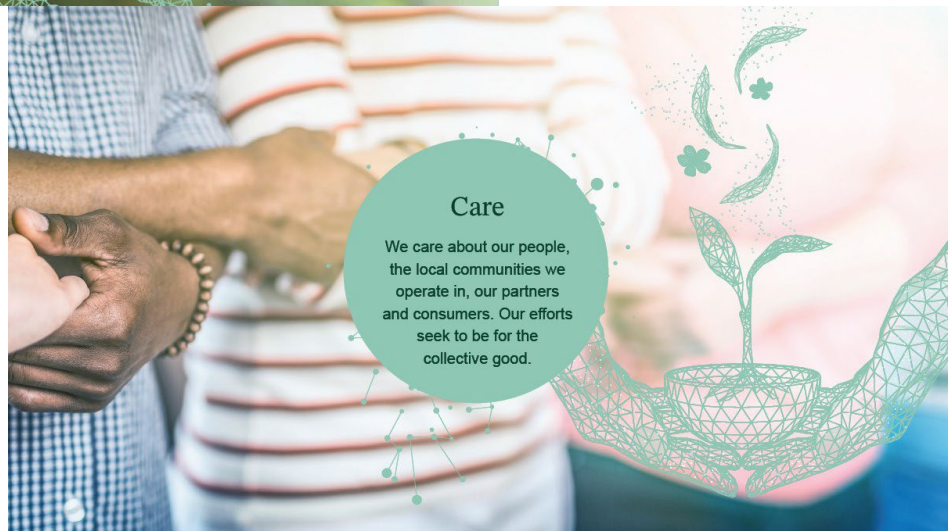


Wayne McIntosh
CEO

Our Vision:

Inspiring people to live better lives, naturally.

Our Values:



Structure, Operations and Supply Chain - Principle 1 & 2

About Integria

At Integria, 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, nervous system support, therapeutic essential oils and 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 brand founders. We invest 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.

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.

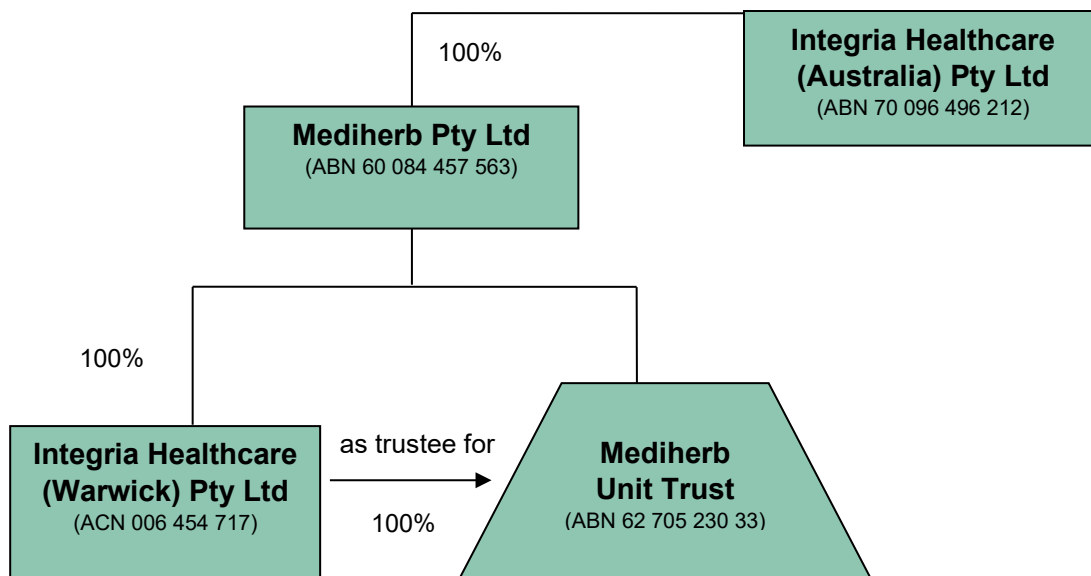
Structure, Operations and Consultation

Integria Healthcare (Australia) Pty Ltd ACN 096 496 212 proudly owns reputable and innovative natural healthcare brands including Thursday Plantation®, Thompson's®, Eagle®, Eagle Clinical®, Eureka® and MediHerb® and partners with leading practitioner-only and retail brands, through its group of companies in Australia and New Zealand. Integria is committed to our people to ensure that they work in an environment that is safe, equitable and fulfilling.

Our governance structure underpins our operations, with policies and procedures including a Supplier Code of Conduct, Whistleblowing Policies, Modern Slavery Standard and employee assistance programs to support a transparent and accountable framework for internal and external stakeholders.

Integria makes this single joint Modern Slavery Statement covers each Australian wholly owned entity of which Integria Healthcare (Australia) Pty Ltd has control (**Integria**). We have taken an integrated approach to addressing modern slavery risks and operate under a common set of governance policies. As our teams operate for the entire group, there has been significant consultation and collaboration between our people to prepare this Statement. We have explained our commitments regarding modern slavery more broadly within our business. All risk assessing and implementation of initiatives apply equally across the group.

Simplified structure of Integria Healthcare Australian entities covered by this Statement



2022 Key Milestones

Integria continues to develop, implement and review its processes and policies on Modern Slavery across direct¹ and indirect² Tier 1³ suppliers. These include:

- ensuring all new contracts and contract renewals include provisions to help address the risk of modern slavery and incorporate our Supplier Code of Conduct (Annexure 1);
- completing a global desktop review of direct Tier 1 suppliers engaged in 2022;
- assessment of 11 completed questionnaires based on guidance criteria and allocation of a mitigated risk rating; and
- continued training of our procurement managers who are responsible for managing relationships with our direct spend supply partners.

The Supply Chain

Integria has a complex and diverse supply chain with local and global supply chain partners in 22 countries covering Europe, North and South America, South Africa and Southeast Asia. With over 800 Tier 1 suppliers, Integria 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 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.

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

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

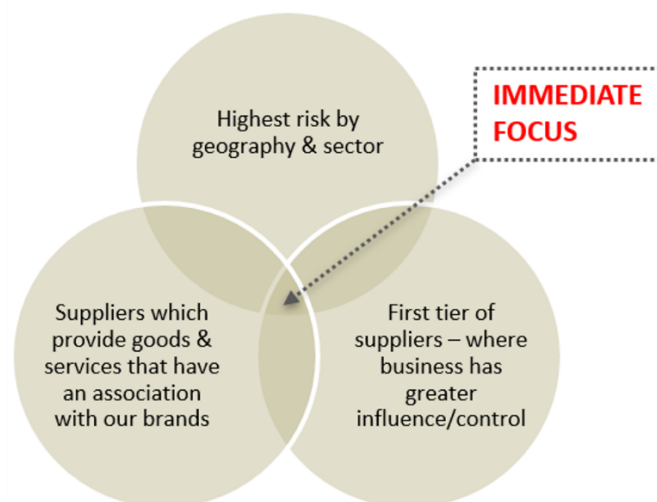


Risks of Modern Slavery - Principle 3

Integria takes a risk-based approach to identifying and addressing modern slavery. In identifying the potential risks, Integria 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

The main risk lies in sourcing ingredients and contract manufacturers where third parties' source on our behalf and we do not currently have full visibility of. This area remains the key focus in our compliance reviews.



How We Assess Risk - Principle 4

In the first two reporting periods, our focus was to review our supply chain, current practices and implement a targeted risk-based approach with due diligence guided by authoritative international criteria to detect the higher risk areas for closer review. Many of these actions continued in our third reporting period.

In 2022, Integria used our risk assessment scorecard tool to review Tier 1 suppliers⁴ (indirect and direct) and to provide a high level review of our supply chain. Our scorecard comprises three priority areas: geography, the nature of the product or service being supplied and our total spend. Each category was 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 2022 assessment is reflected in the map diagram on the following page.

11 suppliers were issued with a Modern Slavery questionnaire designed to identify potential modern slavery risks. All questionnaires were completed and these suppliers were assigned a medium mitigated risk rating. 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.

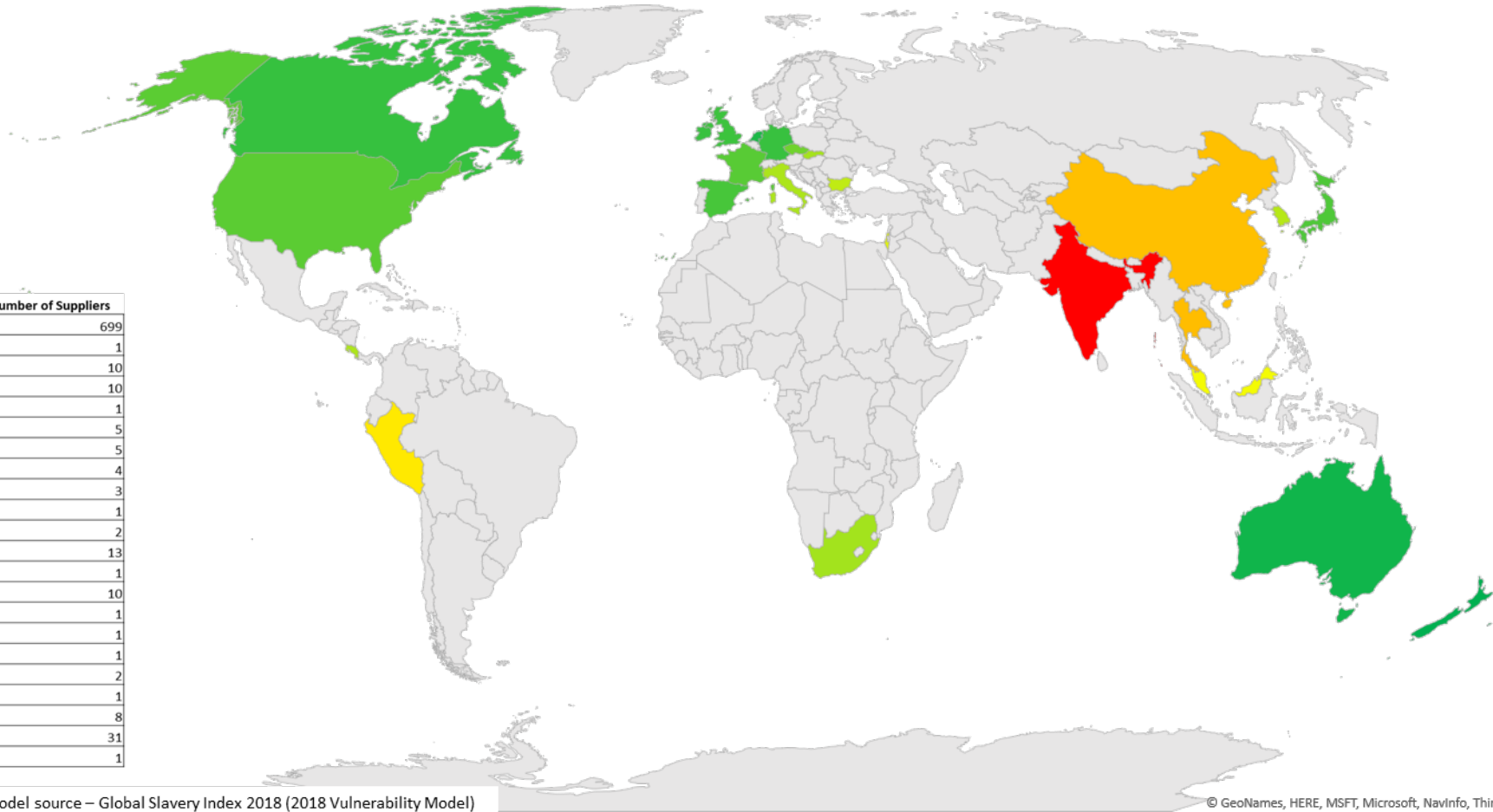
Our risk assessment scorecard identified that:

- from a total of 811 Tier 1 suppliers, 109 were direct Tier 1 suppliers;
- of 109 direct Tier 1 suppliers, 25 had an inherent high-risk rating and 84 had an inherent medium risk rating;
- of the 25 higher risk suppliers, 5 were downgraded to a mitigated low risk rating and 2 were downgraded to a mitigated medium risk rating following supplier review;
- 2 suppliers are subject to ongoing education and training on modern slavery requirements; and
- the balance of suppliers remain under review.

⁴ Review conducted as of December 2022 as depicted on the Vulnerability Map on page 9.

Number of Suppliers vs Vulnerability to Modern Slavery

Vulnerability Score 
1.9 40.95 80



Number of Suppliers	
Australia	699
Bulgaria	1
Canada	10
China	10
France	1
Germany	5
Hong Kong	5
India	4
Italy	3
Japan	1
Malaysia	2
New Zealand	13
Peru	1
Singapore	10
Slovak Republic	1
South Africa	1
Spain	1
Thailand	2
The Netherlands	1
United Kingdom	8
United States	31
Costa Rica	1

*Vulnerability model source – Global Slavery Index 2018 (2018 Vulnerability Model)

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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.

We have continued to implement our risk analysis process by screening new vendors using our risk assessment scorecard tool, issuing questionnaires and allocating a mitigated risk rating based on questionnaire responses as part of the Integria new vendor onboarding process.

Addressing Modern Slavery - Principle 4

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

The 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 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 has a company-wide Modern Slavery Standard (Annexure 2) 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's Chief Executive Officer, and General Counsel and the Procurement Team has the overall responsibility to implement and manage the standard. This standard is supported by Integria's Whistleblowing policies.

Integria requires that all third parties enter into written agreements. Depending on the nature of the arrangement, this may vary from standard terms and conditions to supply agreements and bespoke agreements. Integria requires that all written agreements contain a modern slavery clause. Where agreements are due for renewal or extension Integria requires that the agreements are varied to contain a modern slavery contract clause.

All of Integria's procurement managers are educated on the Modern Slavery Act and its application, as well as being provided with training about Integria's procedures for risk identification and mitigation for direct spend supply partners.

How We Assess Effectiveness - Principle 5

The focus of our supply chain mapping has been to focus on Tier 1 suppliers in higher risk geographies particularly raw material suppliers. The effectiveness of the actions taken to assess and address risk of modern slavery are reviewed through the Modern Slavery working group in an effort of continuous improvement and development of modern slavery risk maturity.



Integria is committed to:

- rolling out Procurement Standards and Guidelines in 2023 as part of Integria's policy management system including modern slavery compliance as part of vendor selection;
- regular review and updating of policies in relation to modern slavery;
- publicly sharing an inaugural Sustainability report at the end of 2023 which includes ethical sourcing principles for procuring raw materials and packaging;
- consistently using the risk assessment scoreboard for onboarding new 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.

Integria will measure effectiveness by:



- conducting desktop and/or physical audits where reasonably required to assess compliance;
 - relevant policies reviewed at least annually and updated where appropriate;
 - reviewing and improving our questionnaire to meet the varied commercial situations of our suppliers. Integria 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
 - inclusion of modern slavery clauses in new contracts;
 - maintain and strengthen our high levels of engagement with suppliers to continually improve our processes and gain deeper insights into our supply chains; and
- monitoring and reporting on our success in investigating, auditing and transitioning or removing suppliers that are high risk and where remediation measures have been exhausted.

Our Holistic Approach to Preventing Modern Slavery - Principle 6

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

Integria has a clear vision to inspire people to live better lives, naturally and values centered in *Care, Courage & Commitment* and *Creativity & Innovation*. Our approach to modern slavery risk management and compliance complements our vision and values - our opportunity to inspire people to live better lives naturally applies not only to our customers, but all those people involved in the creation and distribution of our products.



Complementary Medicines Australia Working Group - Principle 7

Integria participates in the Complementary Medicines Australia Modern Slavery Working Group, and through that collaborative approach with industry members, developing and discussing continuous improvement measures for modern slavery risks in the industry.

The progress of modern slavery initiatives will be constantly reviewed by the Modern Slavery working group comprised of senior Procurement managers and our Legal executive to present to the leadership team on material issues or 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 11 April 2023.

This Statement is prepared annually and published on our [website](#).

Annexure 1

Supplier Code of Conduct

1 Introduction and Purpose

Integria Healthcare (Australia) Pty Ltd, Integria Healthcare (New Zealand) Limited and its related entities (together, being **Integria**) seek to work with suppliers who share a commitment and approach to conducting business with integrity, safely and in an ethically and environmentally responsible manner.

This Supplier Code of Conduct (Code) sets out the expectations that Integria has of its suppliers and is founded on Integria's Vision and Values.

2 Applicability

The Code applies to all Integria suppliers, their suppliers, and any sub-contractors regardless of spend value. These organisations and individuals are expected to comply with this Code. In the unlikely event of any inconsistency, contracts will take precedence over this Code.

3 Compliance with laws

The expectations set out in this Code are not replacements or substitutes for any applicable laws, nor do they amend, supersede, or prevail over any obligations specified in a separate contract between Integria and a supplier.

Suppliers are expected to comply with all laws that apply to their own business operations and make reasonable enquires to ensure that their suppliers do the same. Any known or suspected incidents of non-compliance should be promptly reported to Integria.

Integria reserves the right to seek clarification from suppliers regarding their compliance with this Code.

At Integria's request, and following reasonable notice, the supplier will provide Integria or its nominated representative with the relevant documentation and information.

Where non-compliance with this Code is identified, Integria will (if appropriate) contact the supplier to investigate, rectify and ensure repeated non-compliance is avoided.

4 Human rights and modern slavery

Suppliers are expected to meet the responsibilities of business set out in the UN Guiding Principles on Business and Human Rights including:

- a) Ensuring no use of forced or compulsory labour, human trafficking, child labour, slavery or servitude and that all work is conducted voluntarily, without threat of penalty or sanction and not based on deception.
- b) Identifying, avoiding, minimising and/or mitigating and remedying any human rights impacts on communities.
- c) Making all reasonable efforts to ensure that businesses within their supply chain are not engaged in, or complicit with, human rights abuses such as forced or child labour.
- d) Ensuring all personnel, temporary or outsourced labour (including making reasonable enquiries in relation to those personnel in the Supplier's supply chain) meet the local legal minimum labour age permitted by the law of the country where the labour occurs and are paid a proper and competitive wage which meets their basic needs and provides discretionary income and is no less than the standards required by local laws.

5 Creating a safe work environment that fosters individual and collective success

Integria endeavours to achieve industry leading health and safety performance and is committed to providing a workplace that is safe for its personnel, suppliers, and the public.

Integria wants to procure goods and services from suppliers that conduct business in a way that supports Integria's operating principles including:

- a) No business objective will take priority over health and safety



- b) A requirement that our suppliers and contractors demonstrate the same commitment to achieving excellence in health and safety performance
- c) Compliance with relevant legislation, regulations, codes of practice and industry standards

Suppliers are required to:

- d) ensure their personnel comply with Integria's HSE policies while on Integria property
- e) encourage their workforce to report any accident, injury, illness, or unsafe condition immediately, and stop work that could be unsafe, so that appropriate action can be taken.

Additional specific security, health and/or safety information requirements may also be specified in a written contract between Integria and a supplier.

6 Non-discrimination, grievance processes and freedom of association

We value working with businesses that provide a workplace that:

- a) Is free from any harassment, exploitation, intimidation, inhumane treatment and discrimination including based on race, ethnicity, religion, national origin, disability, age, sexual orientation, gender or marital status.
- b) Has mechanisms to allow personnel to speak up or raise grievances without fear of retaliation.
- c) Respects every person's workplace rights and entitlements and ensures compliance with all relevant workplace laws and regulations.
- d) Provides a means for its personnel, suppliers, and business partners to speak up if they see something that is unsafe, unethical or potentially harmful.

7 Supporting Environmental priorities

Suppliers can demonstrate their commitment to operate in an environmentally sound manner by enhancing environmental sustainability through:

- a) reducing waste and recycling initiatives,
- b) reducing and/or offsetting carbon emissions,
- c) reducing the use of energy, water or other resources,
- d) reducing the use of hazardous and toxic substances, and
- e) ensuring correct disposal of waste and minimisation of packaging.

8 Bribery and corruption, money laundering, conflict of interest and anti- competitive conduct

Suppliers are expected to promote transparency and accountability in the conduct and administration of their business by having in place effective processes and procedures to proactively prevent:

- a) Extortion, embezzlement, bribery and corruption, including expressly prohibiting the direct or indirect giving, paying, promising, or accepting of anything of value to obtain, retain or direct business, to secure an improper advantage or to influence someone including government officials to improperly perform their duties.
- b) Money laundering, including the act of hiding illegal funds (especially those with possible links to terrorism or criminal activity) or giving such funds apparent legitimacy.
- c) Actual or apparent conflicts of interest between personal and business interests, including using Integria information and resources for improper gains.
- d) Anti-competitive conduct, including any form of agreement or understanding with competitors to fix prices, rig bids or restrict supply.
- e) Inappropriate provision of gifts, entertainment or meals to Integria personnel or third parties representing Integria. When legitimately required they should be of modest value, appropriately timed and given in good faith.

9 Protecting proprietary and confidential information

Suppliers are expected to have effective protocols in place for securing and protecting Integria information including:

- a) Respecting the proprietary and intellectual property rights of Integria.
- b) Having information classification protocols and adopting industry best practices on sharing, protecting and securing information.
- c) Observing all data privacy legal requirements on the collection, processing, storing, transfer and disposal of Integria data.
- d) Reporting any suspected or actual information security incidents that impact Integria information or systems to Integria as soon as practically possible.

Suppliers must ensure appropriate controls are in place to protect Integria's brand and intellectual property against unauthorised use and damage.

Suppliers are encouraged to share their ideas with Integria so that together it helps create value for customers and its respective businesses through innovation and continuous improvement.

10 Review cycle

Updates to this Code may be made from time to time and will be available on our website <https://www.integria.com/>

11 References

For further information please refer to the following:

- [UN Guiding Principles on business and human rights](#)
- [International Labour Organization \(ILO\) conventions](#)
- [UN Universal Declaration on the rights of the child](#)

Annexure 2

Modern Slavery Compliance Standard (last reviewed March 2023)

1. Introduction

Integria has introduced this Standard to demonstrate its commitment to operating ethically and in compliance with the Modern Slavery legislation. In this Standard, the terms below are defined as:

Modern Slavery means internationally recognised exploitative practices including human trafficking, slavery, slavery-like practices, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour, deceptive recruiting for labour services.

Modern Slavery Law means: (a) any law rule or other legally binding measure of any jurisdiction that creates a reporting or due diligence obligation in connection with Modern Slavery; and (b) any law that criminalises or imposes a penalty for Modern Slavery.

2. Purpose

The purpose of this Standard is to:

- a) limit the risk of modern slavery occurring within Integria, its supply chain or in any other business relationship;
- b) demonstrate Integria's commitment to only doing business with those who comply with the Modern Slavery Legislation; and
- c) ensure compliance with the Modern Slavery Legislation.

3. Scope

All directors, officers, employees and contractors are responsible for complying with this Standard.

4. Standard

This Standard is designed to govern Integria's compliance with the Modern Slavery Legislation. IHC will meet the requirements under the Modern Slavery Legislation in three ways:

- a) in the procurement of goods and services;
- b) through contract management and monitoring key suppliers; and
- c) preparation and submission of the annual compliance statement.

5. Conducting Procurement of Goods and Services

The procurement framework is the key mechanism whereby suppliers are engaged by Integria. It is therefore important that the procurement framework provides for due diligence on these suppliers and their compliance with the Modern Slavery Legislation. Procuring goods and services should be conducted in a way as to ensure that Integria only sources goods and services from entities that comply with their obligations under the Modern Slavery Legislation.

The extent of the due diligence conducted in a procurement will depend on the types of goods or services being sourced. Examples of the due diligence that may be conducted include requesting:

- a) declaration that the supplier complies with the Modern Slavery Legislation;
- b) a copy of the supplier's most recent modern slavery statement (where available);
- c) details of structure and operations of their supply chain; and/or
- d) details of the actions taken by the supplier to manage and address modern slavery risks in their supply chain.

If a proposed contract is included as part of the procurement, consideration must be given to a provision ensuring compliance with the Modern Slavery Legislation.

6. Contract Management and Monitoring Suppliers

All supplier contracts must contain provisions covering compliance with the Modern Slavery Legislation. The obligations in the clause should include:

- a) compliance with the Modern Slavery Legislation and its reporting requirements;
- b) a requirement to take reasonable steps to ensure that there is no modern slavery in its supply chains or any subcontractor's supply chains; and
- c) a requirement to notify Integria if the supplier becomes aware of any actual or suspected breach of the Modern Slavery Legislation.

Integria will work collaboratively with key suppliers to identify and manage modern slavery risks and develop commercial and actionable solutions. Integria will discontinue arrangements with suppliers where it is apparent that those suppliers have not taken reasonable steps to prevent or specifically prohibit modern slavery in their business operations.

Contract owners, in conjunction with the Procurement, are responsible for conducting audits on key suppliers where there is a reasonable basis to assess and verify compliance with obligations under the Modern Slavery Legislation. The annual statement submitted to the Department of Home Affairs requires reporting on the risks of modern slavery practices in the operations and supply chain of IHC to be identified; and for the reporting of actions taken by Integria to address these risks (including due diligence undertaken). Legal will provide support and guidance to Procurement and contract owners conducting the annual reviews and/or audits.

7. Statement Preparation, Endorsement and Approval

The Modern Slavery Legislation requires that an annual statement be prepared and approved for each financial year. Legal will be responsible for the preparation of the statement. The annual statement will be approved by the Board (on the recommendation of the Chief Executive and General Counsel) and signed by a member of the Board. The statement must be submitted to the Department of Home Affairs prior to 30 June each year commencing 30 June 2021.

8. Key Stakeholder Responsibilities

8.1 Board

The Board is responsible for approving and signing the annual modern slavery statement on the recommendation of the Chief Executive and General Counsel.

8.2 Chief Executive Officer

The CEO is responsible for approving this Standard in accordance with the IHC Policy Management System.

8.3 Leadership Team (LT)

Members of the LT are responsible for the implementation of Standard obligations throughout their respective areas of the business.

8.4 Legal and Procurement Team

The Legal and Procurement Team have overall responsibility for the implementation and management of this Standard and will:

- 8.4.1 provide training to employees (particularly contract owners and those involved in sourcing goods and services) in relation to the obligations under this Standard and the Modern Slavery Legislation;

- 8.4.2 ensure that all applicable contracts have clauses covering modern slavery;
- partner with contract owners to monitor suppliers and their compliance with the Modern Slavery Legislation;
 - oversee sourcing activity, ensuring that an assessment of suppliers is conducted (where appropriate) on their compliance with the Modern Slavery Legislation;
 - provide advice in circumstances of a suspected breach of the Modern Slavery Legislation (or a supplier's suspected breach of the Modern Slavery Legislation) or of this Standard; and
 - prepare the modern slavery statement for approval.

8.5 Contract Owners

Contract owners must monitor key suppliers to ensure they maintain compliance with the Modern Slavery Legislation.

9. Whistleblowing

In extreme circumstances an individual may be concerned that a serious breach of this Standard has occurred but considers that it would be personally damaging to pursue it through normal channels. In such circumstances the individual should refer to IHC's [Whistleblowing Standard, Procedures and Guidelines](#) for information about how to report such a concern and to whom.



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