

AESTHETICS AUSTRALIA HOLDINGS PTY LTD

MODERN SLAVERY STATEMENT FOR REPORTING PERIOD ENDING 30 JUNE 2024

Introduction

This statement is made on behalf of Aesthetics Australia Holdings Pty Ltd (ACN 621 040 240), Aesthetics Australia Services Pty Ltd (ACN 621 040 435), Aesthetics Australia Finance Pty Ltd, and Aesthetics Australia Group Pty Ltd (ACN 621 040 640) (collectively “the Reporting Entities”) pursuant to section 16 of the Modern Slavery Act 2018 (“the Act”). It outlines our commitment and actions taken to identify and address modern slavery risks for the financial year ending 30 June 2024 (“Reporting Period”).

This Modern Slavery Statement reflects the status and activities of the Reporting Period and our focus on transparency and ethical business practices by our key suppliers. We continue to explore ways and opportunities to build on our policies, supplier relationships, and risk assessment frameworks to support the Laser Clinics Group to operate in a manner that respects and upholds the human rights of people that work with our business.

1. Reporting Entity

Primary Entity: Aesthetics Australia Holdings Pty Ltd

Ultimate Parent: Aesthetics Australia Holdings Pty Ltd (ACN 621 040 240)

Operating Brands: Laser Clinic Australia, Laser Clinics New Zealand, Laser Clinics UK, Laser Clinics Canada and Skinstitut. **Principal Address:** Level 2, 40 Miller Street, North Sydney, NSW, Australia 2060

This statement has been approved by the Board of Aesthetics Australia Holdings Pty Ltd and is signed by Colette Garnsey, Chairperson of Laser Clinics Group.

2. Structure, Operations, and Supply Chains

The Laser Clinics Group continued to operate a laser, skin care & cosmetic clinic network across Australia that provides laser hair removal, cosmetic injections and advanced skin and body treatments.

During the Reporting Period, Laser Clinics Group operated wholly owned clinics and franchised clinics across Australia, United Kingdom, Canada and New Zealand as outlined below.

Jurisdiction	Wholly Owned	Franchised
Australia	54	75
New Zealand	12	6
United Kingdom	18	26
Canada	6	1

Australia

LCA Franchising Pty Ltd (ACN 150 499 595) is the franchisor entity that enters into all franchise agreements with franchisees in Australia. LCA Franchising Pty Ltd is wholly-owned by LCA Operations Pty Ltd (ABN 89 600 736 212). LCA Operations Pty Ltd is a shareholder of all Australian franchisee entities within the Group and the sole shareholder of the company operated clinics. LCA Operations Pty Ltd is also 100% shareholder in the following subsidiaries that are used to perform

'Head Office' or business operational and administrative functions for the Laser Clinics Group and the franchise network: - CCA Management Pty Ltd (ACN 150 499 415) primarily employs staff within the Laser Clinics Group, - CCA Leasing Pty Ltd (ACN 149 186 103) holds some leases for the corporation in Australia. These subsidiaries also provide managerial oversight and operational, marketing, information technology services, procurement services and business administration for the Laser Clinics Group's businesses.

United Kingdom

In the United Kingdom, LSL Holco Limited (Co. number 10748000) is the franchisor entity that enters into all franchise agreements with franchisees. LSL Holco Limited is wholly-owned by LCUK Operations Ltd (Co. number 12036613).

New Zealand

In New Zealand, LCNZ Franchising Pty Limited (Co. number 689266773) is the franchisor entity that enters into all franchise agreements with franchisees. LCNZ Franchising Pty Limited is wholly-owned by LCNZ Operations Pty Limited (Co. number 6892794). LCNZ Operation Pty Limited is wholly owned by LCA Operations Pty Limited and is a 50% shareholder of all New Zealand franchisee entities within the Group.

Canada

In Canada, LCC Franchising Limited (incorporation number BC1285874) is wholly owned by LCC Operations Limited (incorporation number BC1285868) and has the sole shareholder LCA Operations Pty Ltd. The clinics operating in Canada during the reporting period were all operated by LCC Operations Limited.

The Laser Clinics Group uses its scale and buying power to purchase some goods and services on behalf of the wholly owned and franchisee clinics within the global network.

It is important to note however, that the shareholder Group entities – LCA Operations Pty Ltd, LCUK Operations Ltd, LCNZ Operations Pty Limited and LCS Operations Pte Ltd, despite being shareholders, do not have day-to-day management and control of the operations and procurement of each franchisee entity in the Group.

Therefore, the Group cannot specifically report on all of the modern slavery practices within each franchisee entity within the Group. Within this statement, the Group will:

- Include some information about the supply chain for franchisee clinics where the Group secures the purchasing arrangements for franchisees;
- Report on operational, labour and supply chain practices the Group promotes through its activities as a shareholder and a franchisor to assess and address modern slavery practices within its clinic network

Skinstitut

Skinstitut was founded in 2008 and is the industry leader in affordable, high-performance cosmeceutical skincare. The operating company for the Skinstitut business is Skinstitut (Australia) Pty Ltd (ACN 137 842 883).

This skincare business involves a distinct supply chain for the laser clinics network as well as independent third-party clinics and third-party online retailers and consumers.

2.1 Structure and Operations

a) Clinic Operations

During the Reporting Period, the Laser Clinics Group operated a clinic network across Australia, New Zealand, United Kingdom and Canada. The clinics provide laser hair removal, skincare products, cosmetic injectable treatments, and advanced skin treatments. The clinic network consists of clinics that are wholly owned by the parent entity of the Reporting Entities and clinics that are operated by franchisees.

b) Support Office Operations

To support the clinic operations and manage the Skinstitut, the Laser Clinics Group's head office manages corporate, operational, and administrative functions, including operations, marketing, IT, legal, HR, and finance. These roles are not consumer-facing, and the company does not undertake any product manufacturing itself. Support for Skinstitut is primarily based in the North Sydney head office, with an inventory and distribution centre in Seven Hills, NSW. In addition, there is an inventory and distribution centre in the UK. Further, support offices for team members are also located in New Zealand and Canada.

2.2 Supply Chains

We source goods and services from both local and international suppliers, spanning multiple industries and countries. Key categories in our supply chains can be broadly categorised as:

- Medical supplies, garments, pharmaceuticals, and cosmetic skincare products
- IT services, marketing, property maintenance, and transport services
- Skincare product manufacturing and distribution
- Professional services including banking, legal financial and consulting

The countries where these key suppliers are located are:

1. Australia
2. New Zealand
3. United States of America
4. People's Republic of China,
5. Mexico,
6. Brazil
7. France,
8. Germany,
9. Italy,
10. Japan,
11. Nordic countries,
12. Sweden,
13. United Kingdom.
14. Switzerland
15. Ireland

2.3 Our Workforce

In the Reporting Period, the Laser Clinics Group (including Franchised and corporate owned clinics) operated clinics in every Australian state and territory, the United Kingdom, New Zealand and Canada.

At 30 June 2024, the Laser Clinics Group employed approximately 2,202 employees, a breakdown of which is shown in the table.

Australian State/Territory or Country	Number of Employees
Australian Capital Territory	41
New South Wales	584
Northern Territory	5
Queensland	309
South Australia	57
Tasmania	19
Victoria	400
Western Australia	133
United Kingdom	415
New Zealand	162
Canada	77
Total	2,202

At 30 June 2024, the Laser Clinics Group (including Franchised and corporate owned clinics) employed team members on a full-time, part time and casual basis – a breakdown of which is shown in the table on the right. Note – this is for employees based in Laser Clinics Group clinic locations and does not include support office employees based in each country.

Type of Employment	Number of Employees
Full Time	764 (34.7%)
Part Time	1,013 (46%)
Casual	425 (19.3%)

Our head office

At 30 June 2024, the Laser Clinics Group head office employed approximately 179 employees, a breakdown of which is shown in the table.

The Laser Clinics Group has a head office which performs a number of corporate, operational and administrative functions for the Group, including operations, marketing, information technology, legal,

human resources, and finance. Head office roles are not consumer facing and do not provide services to consumers. We do not manufacture products. Employees who are employed to support the Skinstitut business division are primarily located at the North Sydney head office. The skincare business also has an inventory and distribution centre in Seven Hills, NSW. The Company also has support office roles based in the United Kingdom, New Zealand and Canada. The breakdown of employees fulfilling the above corporate functions is detailed in the table.

Australian State/Territory or Country	Number of Employees
New South Wales	110
Queensland	8
South Australia	2
Victoria	9
Western Australia	1
Australian Capital Territory	0
United Kingdom	33
New Zealand	4
Canada	12
Total	179

The type of employment for these employees at 30 June 2024 is to the right.

Type of Employment	Number of Employees
Full Time	153 (85.5%)
Part Time	10 (5.6%)
Casual	16 (8.9%)

3. Risks of Modern Slavery Practices

3.1 Risk Assessment in Operations

Laser Clinics Group have taken steps to assess the potential for our business to cause, contribute to, or be directly linked to modern slavery via our supply chain.

We recognise that modern slavery risks can arise within our external supply chains and internally within our organisation. However, we do consider that this risk is low, given that Laser Clinics Group actively works to reduce its risk of modern slavery and considers that within its direct operations through our workforce's contractual rights and compliance with local employment standards. Further, our operations are not associated with industries or roles considered at high risk of modern slavery. They are also not based in countries where modern slavery is classified as a high risk (e.g., New Zealand, Australia, the United States and the United Kingdom).

3.2 Supply Chain Risks

Despite low operational risk, certain supply chain categories carry elevated modern slavery risks due to geographical and industry factors.

Set out below are some of the ways in which Laser Clinics Group manages the modern slavery risks arising in its Australian business:

Due Diligence of Suppliers – Process	<p>We have a process in place when engaging with key suppliers to reduce the risk of modern slavery within our network. This process is led by a head of procurement, who monitors the due diligence process involved in assessing suppliers.</p> <p>In the initial phase of assessing a potential vendor, we require that vendor to complete a specific human rights-based questionnaire (Questionnaire).</p> <p>The responses from the Questionnaire allow us to assess the risk involved in engaging with this supplier as well as their supply chain relationships, employment conditions and what complaint/governance processes they have in place.</p>
Due Diligence of Suppliers – existing suppliers	<p>During the Reporting Period, we endeavour to request an updated Modern Slavery Statement from our key vendors.</p> <p>We then review and assess the Questionnaires to determine if there are any new risks and if further information is required with respect to these key vendors.</p> <p>Cosmetic Aesthetics is a key offering at Laser Clinics Group, and we have engaged with our key inject suppliers that are used to support the supply of injectables. During the Reporting Period, through a review of publicly available Modern Slavery and human rights information, as well as engagement through questionnaire documents, we ascertained that:</p> <ul style="list-style-type: none"> • Suppliers have engaged a senior manager with the responsibility for the human rights, ethical trade and corporate social responsibility of the business including an explicit responsibility for preventing modern slavery. • developed well-defined governance and a framework of standard operating procedures and policies which guide how it operates. Including a Code of Ethics and Supplier Code which provide a clear position on prison and forced labor, child labor, working hours, compensation and workplace environment. • created risk forums at both the global and regional level whose role(s) is to manage and oversee risks of modern slavery, as well as driving and providing oversight of both the company's enterprise risk management (ERM) process and global compliance program.
Contract Management and Supplier Code of Conduct	<p>The Laser Clinics Group requires that their suppliers agree to:</p> <ul style="list-style-type: none"> • The Supplier Code of Conduct which states: <ul style="list-style-type: none"> ○ that our suppliers must engage in ethical business conduct. Such conduct includes: <ul style="list-style-type: none"> ▪ Complying with anti-bribery and corruption laws, ▪ Identifying and reporting conflicts of interests, and ▪ Not engaging with goods and services from sanctioned persons, countries or organisations

	<ul style="list-style-type: none"> ▪ Assuring that materials used in manufacturing are not related to groups that engage in abuses of human rights. ○ that suppliers must not engage in force, bonded or indentured labour and provide safe and sanitary working conditions. • Standard modern slavery terms are included in vendor contracts as outlined below: <ol style="list-style-type: none"> 1. The supplier warrants that: <ul style="list-style-type: none"> ▪ neither the Supplier, nor any of its personnel have been convicted of any offence involving slavery or human trafficking; and ▪ to the best of its knowledge and following reasonable enquiries, the Supplier's Supply Chain have not been convicted of any offence involving slavery or human trafficking. 2. In performing its obligations under the contract the supplier must: <ul style="list-style-type: none"> ▪ comply with the Modern Slavery Act 2018 (Cth); ▪ not engage in any activity, practice or conduct which would constitute a Modern Slavery offence being conduct that if such activity, practice or conduct were carried out in Australia would be illegal; ▪ include in its contracts with its subcontractor and suppliers, modern slavery provisions, 3. The supplier must notify us of: <ul style="list-style-type: none"> ▪ any actual or suspected breaches of the modern slavery clauses including by its supply chain; and ▪ any actual or suspect slavery or human trafficking in a supply chain relating to the contract.
Remediation Process	In the event of identified modern slavery practices, Laser Clinics Group is committed to a full investigation and person-centred remediation, aligned with the UN Guiding Principles on Business and Human Rights.

5. Assessing the Effectiveness of Actions

To evaluate the impact of our actions, we have established performance metrics and goals for the next reporting period, including:

- **Supplier Engagement:** Increasing engagement with suppliers on modern slavery compliance.
- **Training Programs:** Expanding modern slavery training for employees involved in supply chain decisions.
- **Monitoring:** Continual monitoring of our grievance mechanisms to detect any potential incidents of modern slavery.

- **Risk Framework:** Developing a risk framework and assessing each vendor and its supply chain for risk associated with modern slavery.
 - **Zero Tolerance:** establishing a zero-tolerance threshold for validated instances of modern slavery within a vendors supply chain.
 - **Head of Procurement:** the hiring of a Head of Procurement that is able to lead and assess the risk involved in the engagement of suppliers.
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6. Consultation on the Development of this Statement

This statement was developed in consultation with all controlled entities where Aesthetics Australia Holdings Pty Ltd holds at least a 51% share. The governance of these entities is overseen by the Board of Directors, and operational and supply chain management by senior executive teams.

7. Approval and Sign-Off

This Modern Slavery Statement has been approved by the Board of Aesthetics Australia Holdings Pty Ltd on behalf of the Reporting Entities on 19 December 2024.



Colette Garnsey

Director

Aesthetics Australia Holdings Pty Ltd

Annexure A: Page References for Mandatory Criteria

Mandatory Criteria	Page Reference
a) Identify the reporting entity	Page 1
b) Describe the reporting entity's structure, operations, and supply chains	Pages 1-5
c) Describe the risks of modern slavery in the entity's operations and supply chains	Pages 5-7
d) Actions taken to assess and address these risks	Pages 5-7
e) Assessment of the effectiveness of these actions	Page 7-8
f) Consultation process for this statement	Page 8