

Joint Modern Slavery Statement

Under the Modern Slavery Act 2018 (CTH)



REPORTING PERIOD 1 JULY 2020 - 30 JUNE 2021

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

This Joint Modern Slavery Statement has been prepared in consultation with and 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 2021.

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.

This statement is signed by Matt Muscio in his role as the Company Director of LifeHealthcare on

23 December 2021

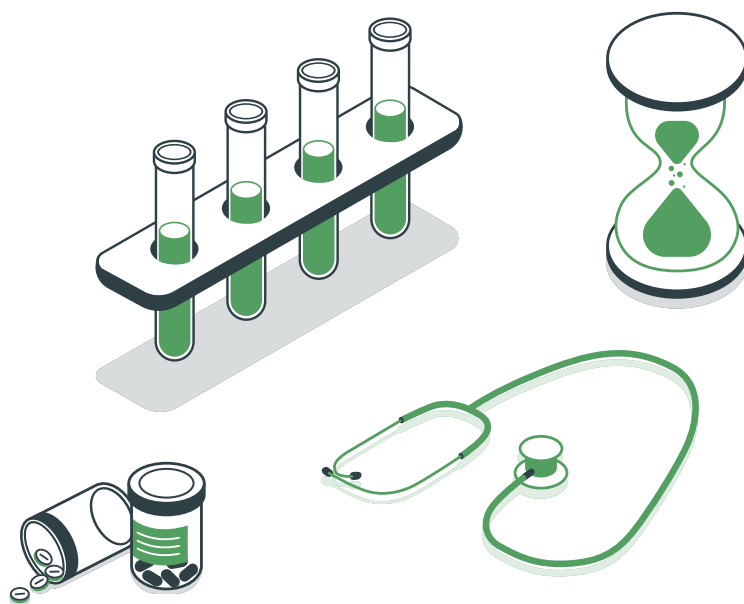
M Muscio

Matt Muscio, Company Director of LifeHealthcare



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Mandatory Reporting Requirements – Preliminary Information

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

This is LifeHealthcare's second statement under the Act. It addresses each of the mandatory reporting requirements and includes details of material changes in our operations and supply chains over the reporting period.

The mandatory reporting entities covered by this joint statement are:

- Pacific Health Supplies TopCo1 Pty Limited (ACN 624 030 897)
- 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:

Operational 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)
- AusBiotechnologies Pty Limited (ACN 091 988 402)
- Tissuelife Pty Limited (ACN 606 484 780)
- Tissue Technologies Pty Limited (ACN 604 860 451)
- ABT Medical Pty Limited (ACN 625 681 889)



Non-Operational Entities:

- 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
- Lifehealthcare Pty Limited- ACN 130 225 599
- 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
- Austspine Pty Limited- ACN 123 698 528

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

During the reporting period, LifeHealthcare also acquired the following new reporting entities, which also form part of the Group, and are covered by this Statement:

- Culpan Medical Pty Ltd ("Culpan") - ABN 85 142 536 641

Australian Biotechnologies Pty Ltd ("AusBio") - ACN 091 988 402, which, in turn, owns and / or controls the following subsidiaries:

- Tissuelife Pty Limited ACN 606 484 780
- Tissue Technologies Pty Limited ACN 604 860 451
- ABT Medical Pty Limited ACN 625 681 88

AusBio is a specialist allograft and biological tissue processor, producing allografts from human bone and soft tissue for a wide range of patient needs and surgical procedures.

LifeHealthcare remains focused on providing access to world-leading medical devices to patients throughout Australian and New Zealand markets. Our priority and passion is health and improving the lives of others. Accordingly, we are aware of our corporate obligation to seek to improve the lives of others, who are outside the scope of direct operations, through assessing and addressing modern slavery in our operations and supply chains.

We continue to partner with world-leading medical device suppliers and manufacturers to support innovation and development throughout the healthcare systems in Australia and New Zealand.

We recognise that our ability to implement effective modern slavery action requires a long term effort in meaningful engagement and collaboration with our key suppliers and other stakeholders.

Our Structure, Operations and Supply Chains

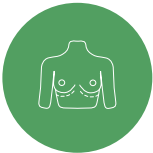
Our core operational entity is Lifehealthcare Distribution Pty Limited, which, in turn, has operational subsidiaries, Spiran Pty Limited (“Spiran”), Culpan and AusBio.

LifeHealthcare Distribution Pty Limited is a leading distributor of medical devices in the therapeutic areas listed on page 7.

Spiran is engaged in the distribution of medical devices in plastics and reconstructive surgery including breast implants and garments used postoperatively.

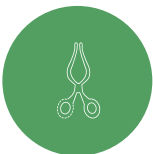
The remaining operational entity, Lifehealthcare Services Pty Limited, manages the employment of the human resources of the remaining entities within the Group, excluding AusBio (which manages its own human resources).

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


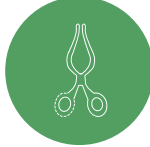





Capital Equipment:

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



Our products are used in the following medical disciplines:

 <p>Orthopaedics & Spine</p>	 <p>General Surgery & Diagnostic Imaging</p>	 <p>Medical Capital & Consumables</p>
 <p>Plastics & Reconstructive Surgery</p>	 <p>Neurovascular Intervention & Neurosurgery</p>	 <p>Robotics & Specialist Capital</p>
 <p>Human Tissue Biologics</p>		

LifeHealthcare distributes specialist medical products within the Australian and New Zealand healthcare sector, throughout both public and private hospitals, with surgeons and medical specialists. Our acquisition of Culpan and AusBio, during the reporting period, has not materially changed these operations. Culpan Medical is also focused upon the provision and distribution of medical devices, with a focus on products within the neurovascular intervention sector, whilst AusBio is focused upon processing, manufacturing and distributing life-enhancing allograft tissue products for the Australian community.

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

LifeHealthcare Group has over 299 staff in locations throughout Australia and New Zealand, including:

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

Part One - Mandatory Reporting Requirements

One of our new acquisitions, AusBio, consolidates its revenue to the mandatory reporting entities. However, functionally, it continues to operate as a separate entity to the LifeHealthcare Group. It is responsible for its own employment branch and the separate functional departments that operate independently of the rest of the Group, including:



Legal



Finance



Business operations



Warehousing



Despite the operational independence of AusBio, it is still subject to the Group's overarching policy and governance frameworks, including all modern slavery related policies.

As outlined above, 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 within Australian communities. 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.

AusBio's 47 employees operate in the following locations:

- Sydney, New South Wales

AusBio is heavily regulated, given that it is operating in the industry of human tissues. We are subject to regulation and licenced by the Therapeutic Goods Administration. We are compliant with the Code of Good Manufacturing Practice for Therapeutic Goods – Human Blood and Blood Components, Human Tissues and Human Cellular Therapy Products.

Part One - Mandatory Reporting Requirements

The supply chain for the LifeHealthcare Group (aside from AusBio) remains unchanged from the previous reporting period. We continue to primarily trade in globally sourced medical and surgical instruments and equipment, however, given that we are not involved in the manufacture of products (excluding AusBio), we also rely on suppliers from the following industries to support our operations:



The first-tier suppliers for LifeHealthcare are based primarily within Australia, and the USA, with the remaining suppliers located in Europe.



Assessing Modern Slavery Risks

We are not aware of any actual or suspected instances of modern slavery in our supply chains or operations being reported or identified during the reporting period.

The primary change to our operations and supply chains compared to that which we described in our First Statement, is the addition of Culpan and AusBio (including its subsidiaries).

Despite this change, the modern slavery risk areas identified and described in our First Statement remains largely unchanged. Our overall modern slavery risk profile continues to be assessed as being relatively low, especially insofar as our direct operations and suppliers are concerned.

LifeHealthcare is highly reliant upon skilled professionals in our direct operations. We recognise that the most elevated areas of potential modern slavery risk for LifeHealthcare are generally located deeper within our supply chains, including in relation to the manufacturing of basic component parts, and the extraction of raw material required as basic inputs for our products.

The general industry categories that continue to be identified as posing the highest potential risk of modern slavery, typically deeper within our operational supply chain:



Wholesale trade in Australia.

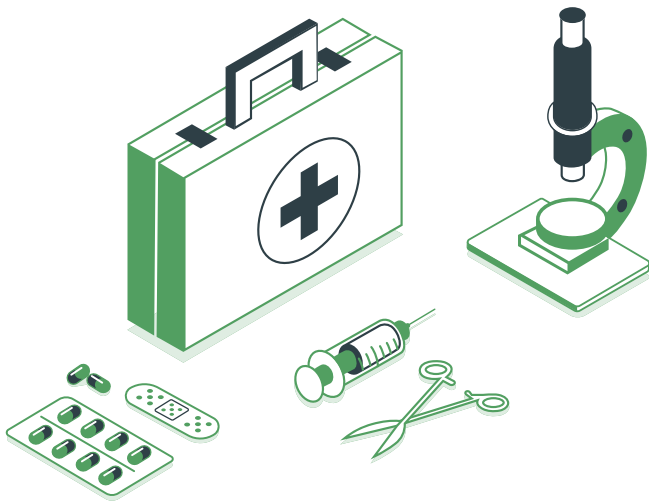


Surgical and medical instrument manufacturing in the USA.



Medical, scientific, optical equipment and watches in Germany.

These general industry categories are not such that the assessed elevated modern slavery risk is necessarily self-evident. Accordingly, we have included the following brief summaries of industry risk.



Wholesale trade in Australia

This category includes a broad range of supplier agents that procure certain medical devices for our distribution. A significant contributing factor to the designation as an elevated risk is our high relative spend in this category. It is widely recognised that the greater the procurement spend, the greater the associated supply chain depth and complexity, and therefore, as a general principle, the greater the modern slavery risk. Globally imported products also have higher risk supply chains, because of the higher likelihood that component parts or raw materials have originated from high-risk geographies.

Surgical and medical instrument manufacturing in the USA

The potentially elevated modern slavery risk in this industry category is primarily attributable to the types of raw materials relied upon to produce medical instruments, such as metal alloys, which can be mined and extracted from modern slavery “hot spots” with a relatively high prevalence of child labour or forced labour. These countries often also feature insufficient worker protection for such hazardous extractive industries. Supply chain features such as extensive transport, freight handling and logistics may also contribute to the elevated overall risk profile.

Medical, scientific, optical equipment and watches in Germany

This general industry category, similar to the Surgical and medical instrument manufacturing in the USA primarily has an elevated risk profile due to the fact that the assembly of medical and scientific equipment relies upon multiple components from vast and complex supply chains (or, more accurately, ‘webs’). These components may have a higher prevalence, especially at the basic parts stages, of being manufactured by vulnerable or migrant workers in countries with a relatively high prevalence of forced labour and debt bondage. The more elevated risk profile does not lie with our direct (first-tier) suppliers, which are characterised by sophisticated and well-protected workforces.



Initial Risk Assessment of AusBio

As we are conscious of the need for ongoing and holistic modern slavery risk assessment, we recognise that the acquisition of Culpan and AusBio during the reporting period, involved a material development in our operations and overall supplier base, particularly with the shift into direct medical manufacturing activities.

To address this, we engaged external subject matter experts to undertake modern slavery risk assessment of these new entities, as part of our overall approach to continuous due diligence.

This risk assessment considered a complex interaction of factors such as:



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



Geographical area of supplier operation



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



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

A detailed summary of the proprietary initial risk assessment methodology is set out in the Appendix to this Statement.

With the acquisition of AusBio, our overall operations profile has changed in the sense that LifeHealthcare entities are now directly involved in the manufacturing of highly specialised medical products, namely, allograft and biological tissue products.

The initial risk assessment of AusBio carried out during the reporting period identified that the following general industry categories as having the highest potential modern slavery risk:



Wholesale trade in Australia.



Surgical and medical instrument manufacturing in the USA.



Non-residential building construction based in Australia.

Non-residential building construction based in Australia

This industry category includes services relating to AusBio’s office and warehouse fit out and renovation during the reporting period. While this was a once-off engagement, and generally not a key ongoing supply significant to AusBio’s business in the supply of human tissues, the Group identified the risk of the industry primarily due to the reliance on low skilled and migrant workers who may be particularly vulnerable to deceptive recruitment practices and forced labour. Overall rates of worker vulnerability can also be exacerbated by the prevalence of subcontracting arrangements, which can drastically reduce the level of labour and supply chain transparency.

These industry categories otherwise correlate with those that have already been identified as potential elevated risk areas, as previously identified in relation to the Group as a whole.

AusBio and its biological tissue-related direct suppliers and its not-for-profit and government donation agency partners are subject to an extensive and stringent governmental regulatory framework. AusBio undertakes vigorous due diligence in its selection process and audit of its trusted suppliers, and AusBio continues to work closely with them to ensure compliance with all governmental regulatory frameworks. AusBio is also subject to yearly review and inspection by the Therapeutic Goods Administration.

Whilst the supply chains associated with the manufacturing activities carried out by AusBio are of the highest quality, we remain alert to the heightened risks, on a global scale, associated with tissue and biological products. AusBio appreciates its long-standing relationships with its well-known suppliers and commits to extensive collaboration and due diligence to ensure there is no linkage, direct or indirect, between AusBio’s operations and supply chains and any possible connections with organ trafficking, which is a widely recognised form of modern slavery (including under the Act). The possibility that our supply chains have any risk whatsoever of being tainted by the illicit procurement of organs, however small that risk may be, informs our modern slavery action, summarised below in Part Four.

The distribution of donated allograft products is dependent upon a rigorous donor screening procedure, wherein each potential donor that we may be sourcing allograft from, is required to undergo extensive medical reviews and each allograft product is subject to strict regulatory requirements.

As part of our due diligence framework, LifeHealthcare will continue to monitor the new risks presented by the acquisition of AusBio, including additional due diligence of specific suppliers in future reporting periods.



Initial Risk Assessment of Culpan

Culpan is a provider of medical devices, which it does not manufacture but rather sources from other suppliers for on-sale. The following identified industry categories that have been assessed as having the most elevated risk of modern slavery occurring within Culpan's operational supply chains:



Surgical and medical instrument manufacturing in the USA.



Forwarding agencies, including logistical and freight services in Australia.



Services to finance and investment in Australia.

Services to Finance and Investment

In addition to the general industry category explanations provided above, Services to Finance and Investment is a further industry category that has been identified by the Group, in the increased engagement of banking services, via the Group's acquisition of Culpan, during the reporting period, as having potential elevated modern slavery risks in its supply chains. This is primarily due to a reliance upon high-risk electronic inputs including computer and technological products that are often imported from hot spot geographies including China and Malaysia. There is a well-documented prevalence of forced labour within the electronics manufacturing industry in these countries, including the increasing global recognition of widespread state-sanctioned forced labour amongst the Uyghur people and other Turkic minorities in (and related to) the Xinjiang region in China (discussed below).

Forwarding Agencies

The Forwarding Agency general industry category has also been identified as having a potentially elevated modern slavery risk. This is primarily due to an industry reliance upon unskilled and migrant workers that are typically more vulnerable to modern slavery, including through deceptive recruitment practices and debt bondage to employment agents.



Consideration of Current Key Issue Areas

Growing international concern in relation to Forced Labour Schemes exploiting the Uyghur people in China

LifeHealthcare acknowledges the increasingly widespread reports of state-imposed labour transfer schemes in various manufacturing industries involving ethnic minorities such as Uyghurs and other Muslim minorities within the Xinjiang region in China.

One aspect of our response to these reports, has been the cross-referencing of our direct supplier list against the companies listed as allegedly having direct or indirect supply chain links from Uyghur forced labour, as published in Australian Strategic Policy Institute's (ASPI) 2020 Report: 'Uyghurs for sale: 'Re-education', forced labour and surveillance beyond Xinjiang' (ASPI Report). It is noted that many of the 83 companies named in this ASPI Report are major global conglomerates, with a worldwide brand presence in a variety of business and household contexts.

We have identified three of our direct suppliers as being included on the list of entities within the ASPI report. These suppliers are all major global companies and household brands. They are all mandatory reporting entities under the Act. Each entity has reported the existence of robust due diligence and remediation frameworks relating to modern slavery risk.

After the release of the ASPI report, one of these suppliers publicly acknowledged historical linkages to a singular Chinese manufacturing factory that is alleged to have engaged forced Uyghur labour. This supplier has also publicly confirmed that it has ceased its relationship with this factory.

The frank public response of this entity is reinforced by their implementation of extensive modern slavery measures, as detailed in their Modern Slavery Statement, including establishing numerous industry collaborations and initiatives, to exert industry influence to combat forced labour and introduce increased supply chain transparency within their operations.

The other two suppliers have publicly denied actual supply chain linkages to the Chinese factories named in the ASPI report as having perpetuated forced labour. The respective Modern Slavery Statements of these suppliers have outlined the existence of considered modern slavery efforts, such as the introduction of independent, third party audits of factories in high-risk locations including China and engaging in direct supplier engagement activities such as providing training on forced labour, which is indicative that these entities are taking considered action to mitigate the risks within their operations and supply chains.

We are continuing to closely monitor the latest developments concerning global supply chain links with the exploitation of Uyghur people in the Xinjiang region and will revise our response regarding these direct suppliers as appropriately required.

Addressing Modern Slavery Risks

LifeHealthcare is committed to continually improving our modern slavery response. A description of our efforts to further assess and address modern slavery in our operations and supply chains is as follows.

Risk Assessment & Analysis

As described in Part Two, during this reporting period we expanded our supply chain mapping with the assistance of specialist external consultants. We have specifically assessed the risk profile of the new entities acquired and this has contributed to our ongoing approach to addressing modern slavery issues.

We are committed to an annual risk review to assess our modern slavery risk profile in our operations and supply chains, including assessing new suppliers and reviewing any material changes that may arise.

Internal governance framework

Our First Statement described the steps we took in developing and updating our internal governance framework, and contractual provisions to specifically address modern slavery issues.

With the acquisition of AusBio in this reporting period, we recognised the need to update our framework to reflect our new operational context.

We have amended our standalone modern slavery policy to reflect this, and have been developing the following policies, which we expect to implement cross-functionally across the Group in the next reporting period:

- Modern Slavery Policy
- Supplier Code of Conduct
- Supplier & Procurement Evaluation Process and Policy
- Human Rights Policy
- Human Rights Grievance Policy
- Code of Conduct
- Whistleblower Policy

We will provide additional mandatory educational modules to all staff through our internal website, with the aim of encouraging a greater understanding of these modern slavery related policies as part of our broader governance framework.

During the reporting period, we also commenced the rollout of contractual provisions that expressly addressed modern slavery issues in select procurement contracts. LifeHealthcare views the contract negotiation phase as an opportunity for ongoing collaboration with our suppliers on addressing modern slavery issues, including ascertaining their awareness and level of response to modern slavery issues.

Moving forward, LifeHealthcare is aiming for all new and updated supplier contracts to contain express provisions addressing modern slavery issues.

Supplier engagement

We maintain close working relationships with our suppliers and routinely discuss modern slavery issues. During the reporting period, LifeHealthcare implemented and issued self-assessment questionnaires to the 50 suppliers with the highest potential modern slavery risk profiles based on the initial assessment process.

The survey process sought information in relation to the following categories:



Supply chain visibility levels



Internal policy and governance frameworks addressing modern slavery



Modern slavery training to employees



The implementation of due diligence and remediation measures

We only received a response from approximately 25% of the surveyed suppliers. We understand such a low response rate to be fairly typical of this process of supplier engagement, reflecting the relative infancy of companies addressing modern slavery issues in Australia. Although the response was low, we continued to assess the impact of each surveyed supplier, which allowed us to effectively engage further enquiries with one of the suppliers through the process.

We recognised that such supplier engagement through self-assessment questionnaires provides us with a tool that identifies the strengths, weaknesses and gaps in our supply chain and indicates to us that there is room for development in improving our supplier engagement in upcoming reporting periods to address any weakness or gaps and to build on or consolidate the strengths.

The process of reviewing the supplier responses included involvement across several key departments, including legal, corporate development and operations. Suppliers were categorised by geographical risk, industry category, and relative spend value of the supplier contract.

This review process resulted in a small number of our suppliers adjusted to a lower modern slavery risk when compared to their initial assessment results, a few unrevised ratings and one supplier being identified as presenting a significantly elevated modern slavery risk, beyond the level which was assigned during the initial risk assessment. We then undertook further targeted due diligence in relation to this supplier, including follow-up questions and supplier engagement to this supplier. The nature and extent of the supplier's responses, sufficiently clarified our areas of concern, including onsite observations that had previously been made by our senior internal personnel.

We intend to issue further supplier surveys in the next reporting period, including to relevant suppliers of Culpan and AusBio. However, to improve the level of engagement from our suppliers, we are developing a more refined questionnaire process, which will be issued in tandem with an invitation for suppliers to take advantage of our online education module on modern slavery issues.

Supplier Due Diligence

As reported in our First Statement, we engaged external subject matter experts to undertake a comprehensive desktop audit of certain suppliers operating in identified higher risk industry categories.

The results of the completed desktop audit provided us with a range of insights into these suppliers, and issues associated to their modern slavery risk profiles:

The vast majority of these suppliers are not mandatory reporting entities, either by virtue of their annual revenue, or the international geography of their operations;

There was a direct correlation between the mandatory reporting suppliers and the entities with the most robust organisational approach to modern slavery;

- Of the non-reporting suppliers, most provided evidence that they were actively developing internal policies and other due diligence measures to assess and mitigate modern slavery risks in their own supply chains;
- All of the reviewed suppliers, bar one, had operations based in multiple countries, indicating that our suppliers are typically operating within more complex global supply chains with a corresponding increase in exposure to high-risk geographies;

➤ A majority of the suppliers were ultimately assessed as having a lower-than-expected risk of modern slavery, based on both their supply chain visibility and efforts to create policy and educational frameworks to address their elevated risk profiles; and

➤ A small minority of suppliers did not appear to be engaged in any level of modern slavery risk mitigation. In the case of one of supplier, the receipt of additional information concerning the geographies of its operational facilities led us to confirm our initial assessment of the supplier as featuring an elevated risk profile.

In light of these findings, we intend to undertake further targeted engagement with certain suppliers in the next reporting period. This engagement will focus on detailed progress updates in relation to modern slavery measures that these suppliers have committed to implementing, for the purpose of determining whether the supplier's efforts have been operationalised.

We are focused on assessing the progress of the suppliers who were deemed to have either not provided adequate evidence to substantiate a lower risk rating, or were deemed high-risk, to determine if further action is required.



Measuring the Effectiveness of our Modern Slavery Response

LifeHealthcare recognises the need to continually improve our modern slavery response, and to ensure that we are implementing effective action.

We have committed the next reporting period to focus upon developing a more in depth and cross-functional matrix to assess our long-term effectiveness and ensure that we are building upon our efforts over consecutive reporting periods.

In our First Statement, we outlined specific key performance indicators as the initial foundation for measuring the effectiveness of our modern slavery response.

A snapshot of our progress over the reporting period, and an outline of our planned action for the next reporting period, is summarised in the table below:

2021 Key Performance Indicator	Progress Indication	Commitment for the future reporting period
Deeper supplier engagement, including provision of online training	In progress, ongoing in future reporting periods.	We have committed to the provision of online training for select suppliers, together with continued progress reviews of suppliers flagged in our desktop audit.
Supplier engagement through issuing self-assessment questionnaires	Completed, ongoing in future reporting periods.	We have committed to issuing additional targeted supplier surveys in the next reporting period.
Desktop auditing of select suppliers	Evaluating the need for further desktop auditing of flagged high-risk suppliers arising from our new entities	Evaluating the need for further desktop auditing of flagged high risk suppliers arising from our new entities.
Continued education for internal stakeholders	In progress, ongoing in future reporting periods.	Planned for next reporting period. We are in the process of finalising online training modules for all new and existing staff.
Developing & implementing grievance mechanism for external stakeholders	In progress, ongoing in future reporting periods.	Finalising and implementing our broader modern slavery policy framework in the next reporting period.
Continued risk management through policy framework and addressing modern slavery risk in relation to LifeHealthcare's business operations at multi-disciplinary level	In progress, ongoing in future reporting periods. We continue to conduct regular reviews and input from key cross-divisional teams, including our internal audit, finance, legal and operations departments, to ensure that our modern slavery action is implemented cohesively, organisation-wide.	Ongoing, multi-disciplinary reviews across key internal departments and in consultation with external consultants.

Consultation with Controlled Entities & Other Relevant Information

Over the reporting period, all reporting entities and owned/controlled entities have been engaged in our modern slavery response. This includes those entities that provide direct operations as well as our non-reporting entities. This consultation has included engagement with our Board.

The comprehensive supply chain assessment for modern slavery risks, along with other due diligence and remediation measures that are discussed throughout this Statement, has been undertaken for the supply chains and operations for the Group as a whole, including our newly acquired entities.

COVID-19 Pandemic

The COVID-19 pandemic has continued to impact our supply chains to the extent that, as a distributor of medical devices and products, we are heavily reliant upon global logistical operations to ensure efficient delivery of our products.

We typically source transportation services from boutique third party logistics providers, since many of our products must be maintained under specific and stringent conditions to maximise product viability. We are aware of the increased pressure placed on logistical and delivery services during the pandemic, in terms of the increased volume of demand for delivery services. We recognise that increased pressures of this kind can contribute towards increased vulnerability of workers. We are not aware of any instances of modern slavery arising in our supply chains as a result of this increased demand, especially given our reliance on boutique service providers that are not as reliant upon migrant and unskilled workers.

Additionally, COVID-19 has limited our ability to undertake in-person audits of our suppliers. We have earmarked this as a potential focus area for future reporting periods.



Initial Risk Assessment Methodology Summary

As discussed in Part Two of this Statement, building upon the comprehensive initial risk assessment that was carried out as part of our inaugural reporting period to identify the elevated areas of modern slavery risk in our supply chains, we engaged our external subject matter experts to carry out the same comprehensive risk assessment in relation to new supplier categories that were not previous subject to assessment. This baseline exercise provides the basis for our subsequent focus for ongoing due diligence and remediation activities across not only the present reporting period but for upcoming years.

This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using the following sources:



The United Nations' (UN) System of National Accounts



UN COMTRADE databases



Eurostat databases



The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO)



Numerous National Agencies including the Australian Bureau of Statistics

The MRIO is then examined against the following international standards:

- The UN Guiding Principles on Business and Human Rights;
- The Global Slavery Index;
- International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
- The United States' Reports on International Child Labour and Forced Labour.

A proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier of LifeHealthcare.

This analysis was performed for the purposes of risk identification under Section 16(1)(c) of the Act. No information confirms the actual existence of non-existence of slavery in LifeHealthcare's supply chains, operations or investments. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.

Initial Risk Assessment Methodology Summary

The multi-faceted approach to modern slavery risk assessment that we have undertaken has included examination and analysis of the following:

- The individual suppliers and industries with the most elevated risk of modern slavery
- Supply chain and investment plots to provide a visual representation of the supply chain supply chains for LifeHealthcare's top 3 first tier industries
- Plotting the relative slavery risk in the supply chain by tier, up to tier 10
- Geographical depiction of the cumulative risk of modern slavery across the supply chain around the world
- An overview of the classification of the first tier of our supply chain by country and industry, including relative modern slavery risk
- Suppliers in our supply chains and operations that posed any calculated risks in relation to modern slavery were identified



Prepared by:  **FairSupply**
Data to Decision. Your ESG partner.



JOINT MODERN SLAVERY STATEMENT

Under the Modern Slavery Act 2018 (CTH)

REPORTING PERIOD 1 JULY 2020 - 30 JUNE 2021

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