

1 January 2020

## MODERN SLAVERY ACT STATEMENT

### Vitex Pharmaceuticals Pty Ltd

ABN: 81 089 651 383

#### Introduction

Vitex Pharmaceuticals' core values of **Integrity, Quality** and **Innovation** were established early in the company's history and continue to be hallmarks of our culture. Vitex is built upon adherence to compliance, achieving the highest industry standards, and is committed to industry excellence.

Our commitment to respecting and supporting human rights is aligned to the UN Guiding Principles on Business and Human Rights and we oppose all forms of slavery and forced labour in our operations and in the operations of our suppliers.

Our goal is to be a good corporate citizen and support the eradication of modern slavery.

#### Our Business and Structure

Vitex Pharmaceuticals is a wholly Australian-owned and family operated company established in 1989. Founded and operated by the Chami family, Vitex has become one of Australia's leading high-quality manufacturers of complementary medicine. We deliver solutions from concept to shelf to help companies of all sizes meet their development and manufacturing needs at any stage or scale. We provide a combination of unparalleled best-in-class quality, reliability and compliance – underscored by a long-standing reputation for scientific and technical excellence by regulatory authorities.

Our vision was and will continue to be predicated on a legacy of **Integrity, Quality** and **Innovation**.

The business is led by the founder and Chairman, Mr Elie Chami.

The Board of Directors consists of:

Board member	Chairman	Mr Elie Chami
Board member		Mrs Robine Chami
Board member	Chief Executive Officer	Dr Aniss E Chami
Board member	Chief Operations Officer	Latify Chami
Board member	Chief Procurement Officer	Lucie Chami
Board member	Chief Production Officer	Anthony Chami

The Board of Directors are also members of the Senior Management Team, inclusive of:

Non-Board member	Chief Financial Officer	William Brown
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Non-Board member	Chief Marketing Officer	Christine Nguyen
Non-Board member	Chief Human Resources Officer	Sue Irvine
Non-Board member	Chief Quality Officer	Graham Burgess

The business does not own, or control, other employing entities. Vitex Pharmaceuticals Pty Ltd employs approximately 200 employees at its Eastern Creek site in NSW, Australia.

### **Leadership & Governance**

Strong, ethical leadership and rigorous corporate governance are critical to the long-term sustainability and success of Vitex.

Vitex Senior Leadership recognise the importance of contributing to the eradication of modern slavery and labour exploitation and the potential human rights risks that can exist in employment practices and supply chains.

We maintain robust employment policy and practices and work collaboratively with all suppliers to ensure that our expectations and standards are understood, and the potential exposure to human rights risks is minimised.

### **Code of Conduct**

Vitex's management of modern slavery risks falls within its overall approach to protecting human rights. Our Code of Conduct outlines our approach to establishing the essential standards of personal and corporate conduct and the behaviour expected of everyone who works for Vitex.

The Code of Conduct outlines Vitex's clear position on Human Rights and our commitment to compliance with all legislative requirements.

### **Whistleblower Procedures**

Vitex has established a compliant and robust whistleblower reporting and investigation framework, that allows employees and third parties to report suspected or actual illegal activity or breaches of Company Policy. Employees and third parties can report any improper activity to the Chief Human Resources Officer, CEO or other Senior Leader.

Genuine disclosures are treated with confidentiality, discretion, investigated swiftly and reported to the CEO and Board of Directors ensuring full transparency.

Outcomes of whistle-blower investigations are documented, and appropriate action taken to eradicate any unethical behavior, particularly if in relation to breaches of human rights and modern slavery.

### **Policy frameworks**

Our policy and procedures in relation to:

- + recruitment
- + payroll
- + diversity and inclusion
- + respect in the workplace

- + procurement – tendering processes, contracts, contract management and supplier engagement

outline clear requirements on the identification and management of issues associated with modern slavery and human rights in general.

### **Recruitment**

Vitex have a formal recruitment policy and process detailing the standards expected in recruitment and ensuring practices are free from breach of any Human Rights Legislation. Vitex complies with all Australian Labour law, Fair Work guidelines and National Employment Standards (NES) relevant to the business.

At Vitex, all employees are aware of the existence of modern slavery and the company's policies and procedures established to prevent such cases.

Relevant employees are trained in how to recognise modern slavery and the protocols to conduct if an issue is suspected. Employees engaging with sub-contractors and agencies, in particular, are trained in recognising modern slavery and what to do if they suspect its presence.

Vitex's recruitment policy aims to ensure:

- + all recruitment decisions are consistent with all Vitex values
- + we build a diverse and inclusive workplace ensuring our recruitment procedures are consistent, fair and support diverse candidates
- + act in accordance with our diversity and inclusion policy

Our recruitment management checklist and processes established include verifying candidates' identity (through VEVO) and evidence to confirm their right to work status and generating contracts that comply with these policies and procedures.

### **Payroll**

To further minimise risk, all employees must be paid to a nominated Australian bank account. Under no circumstances are employees paid in a foreign currency or to an overseas account. All employees must provide proof of identity, qualifications and any other credentials on commencement.

### **Procurement, Contractual Arrangements and Risk Assessment**

Modern slavery has the potential to exist in our supply chain through a variety of circumstances.

This is due to Vitex's global supply chain that procures a range of goods and services from many countries around the world, inclusive of, but not limited to China and India. The Vitex Procurement Team source materials that are compliant to Australian regulatory requirements from manufacturers of herbal extracts, vitamins and minerals. Our suppliers must first comply to the quality standards of our industry and governing body, the Therapeutic Goods Administration (TGA). The nature of these arrangements are managed by the Procurement Team who are also responsible for the importation of these materials. The import process is done through Australian Border Force.

We have examined the human rights risks to identify salient risk factors, which are detailed below:

- + Forced or compulsory labour



- + Child labour
- + Wages and benefits
- + Work hours
- + Anti-discrimination
- + Health and Safety

We have further identified the short and long term nature of the relationships and focused on the long term supplier arrangements in the first instance.

Through sound procurement principles we expect consultants, agents, contractors and suppliers to demonstrate their commitment to eradication of Modern Slavery, ethical business practices, safety and environment.

We do this via:

- + requirement for a supplier assessment and analysis of the results of the assessment
- + continued building of capability in the Procurement team
- + understanding all suppliers we deal with and the level of risk they may be exposed to
- + development of further medium-term priorities as we work towards best practice

#### **Future Commitments**

In the medium-term Vitex will focus on:

- + continued modern slavery training to all employees to increase capability and to assist suppliers in building their capabilities.
- + development of our Supplier Code of Conduct
- + ongoing review of findings from supplier audits
- + engagement with suppliers to ensure they understand their requirements – both at meetings and in contractual discussions
- + progressing from long term relationship reviews to the next level of agreement which is short term relationships
- + specific key performance indicators in contracts that assist to manage risk
- + continued research and development of internal policy and procedures to achieve best practice.

Further details on our Modern Slavery compliance program can be found by contacting the Vitex HR Department ([hr@vitexpharma.com.au](mailto:hr@vitexpharma.com.au)).

**Dr A E Chami**

**Chief Executive Officer**

**Vitex Pharmaceuticals Pty Ltd**

***This statement was approved by the members of the board of Vitex Pharmaceuticals on 13 January 2021.***

Board member	Chairman	Mr Elie Chami	
Board member		Mrs Robine Chami	
Board member	Chief Executive Officer	Dr Aniss E Chami	
Board member	Chief Operations Officer	Latify Chami	
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