

## Modern Slavery Statement for Financial Year 2021 - 2022

- **Pharm-a-Care Laboratories Pty. Limited Modern Slavery Statement**

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) by Pharm-a-Care Laboratories Pty. Limited (**Pharmacare**). Pharmacare's related bodies corporate are referred to in this statement because they contribute to Pharmacare's consolidated revenue. A list of Pharmacare's related bodies corporate covered by this statement is set out in Annexure A to this document together with the nature of Pharmacare's relationship with each.

Pharmacare and its related bodies corporate are referred to in this statement as the Pharmacare Group.

The Pharmacare Group is committed to acting ethically and with integrity and transparency in our business dealings and has a zero tolerance approach to any form of modern slavery. We recognise the importance of putting effective systems and controls in place to safeguard against any modern slavery risks that may present within our operations or in that of our supply chains.

This document relates to financial year 1 July 2021 to 30 June 2022.

- **About Our Business**

Pharmacare is a healthcare company dedicated to enriching people's lives through health and wellness. Pharmacare is 100% Australian and family owned with subsidiary companies around the globe as set out in Annexure A to this document. We market and sell our vitamins, protein powders, deodorant, skincare moisturiser and healthy superfood snacks to customers both in Australia and internationally and strive to make a positive difference to people's lives.

The Pharmacare Group is committed to the community, embracing responsibility for the well-being of our customers, employees, their families, the environment, and groups and individuals in need.

We have 15 global offices around the world selling over 25 brands including Nature's Way, Bioglan, Ease-a-Cold, Sambucol, Kids Smart, Redwin, Rosken, Skin Doctors, Go Natural, KP-24, Slim-Right, FatBlaster, Wart-Off, Medi+, BRUT, Norsca, Quality Health, SUP, Naturopathica, Go Natural, and Promensil and employ, or otherwise engage from a third party employer, over 620 people across the globe. Pharmacare maintains physical offices in Sydney (Australia), Auckland (New Zealand), Guangzhou (China), Shanghai (China), West Sussex (United Kingdom), San Diego (USA), Thailand, Singapore, Korea, Indonesia, Vietnam, Malaysia, Philippines, Japan and Toronto (Canada).

The Pharmacare Group takes modern slavery risks seriously and acknowledges the possibility of increased risk of modern slavery in countries with higher vulnerability and prevalence of modern slavery.

- **Our operations and supply chains**

The Pharmacare Group's health and wellness products are manufactured and distributed in Australia and internationally using a combination of local and foreign raw materials including raw active ingredients such as vitamins, minerals, oils and herbs, excipients used in the manufacture of medicaments and health food products, as well as components including packaging materials such as bottles, labels, satchels and boxes. We acquire raw materials and components for our products from Australia and around the world including from China, Vietnam, Turkey, Mexico, Peru, the United States, Taiwan, New Zealand and the Netherlands. We receive manufactured and semi-finished goods from countries including Germany, Greece, the United States, China, India, UK and Italy.



Our supply chain includes extensive local and global supply chains for goods, materials and services that support our business activities including through the use of logistic service providers, local freight forwarders and shipping lines, advertising agencies and distributors. Our supply chain also includes goods and services procured to support our business activities such as electronics, legal and consulting services, and point of sales systems.

The Pharmacare Group also engages employees and contractors in a number of jurisdictions to manufacture, promote and distribute its products. We employ, or engage from a third party employer, approximately 620 persons in Australia, New Zealand, China, United Kingdom, USA, Thailand, Singapore, Korea, Indonesia, Vietnam, Malaysia, Philippines, Japan and Canada. The workforce is predominately made up of permanent employees. Contractors are engaged via a third party employer in sales and marketing roles in Thailand, Singapore, South Korea, Vietnam, Indonesia, Philippines and Japan, as well as in support functions, manufacturing and warehouse roles. We also engage third parties and contractors more broadly in Europe, North America, South America, Asia and Africa.

Our products are marketed and sold in Australia and around the world.

- **The risks of modern slavery in our operations and supply chains**

We consider the risk of modern slavery within the entities comprising the Pharmacare Group to be low. This is because each of the persons directly involved in the conduct of Pharmacare's operations, or the operation of the entities it controls or owns, is employed by Pharmacare or one of its related bodies corporate which each have compliance frameworks tailored to applicable local industrial relations laws.

Where persons are not directly employed by a member of the Pharmacare Group, for example where a representative or agent is not directly employed by Pharmacare but is otherwise retained, engaged or contracted to assist in the manufacture, sale and supply of its goods, we recognise we have lower visibility and control over working conditions and there therefore may be greater risk of modern slavery occurring, for which we have in place the processes described below to mitigate that risk.

We also recognise that there is a risk that we may contribute to modern slavery through our arrangements with third party suppliers or contract manufacturers, such as those that manufacture our products or those that supply raw materials, ingredients and components used in the manufacture of our goods. This is particularly the case where those suppliers or manufacturers are located in industries and countries with a higher risk or incidence of modern slavery where the risks include poor or exploitative labour practices or conditions. For example, we procure food from Turkey and ingredients and/or packaging from China and Thailand, which each have a 'Not Free' Global Freedom Status according to Freedom House. We also use freight forwarders, shipping and airlines to transport our products in countries that may be considered high risk. While we do not have direct visibility of the way such third parties manage their labour arrangements, we are vigilant of the risks and have taken steps to assess and mitigate that risk by way of the processes described below.

- **Actions taken to assess and address modern slavery risks**

*Policies and Procedures*

The Pharmacare Group has a Modern Slavery Policy which assists in managing sustainability and human rights. This policy is available to all employees of the Pharmacare Group and sets out the Pharmacare Group's commitment to combatting modern slavery, helps employees identify instances of modern slavery and provides contact details for persons within the organisation to whom any concerns should be addressed.

Pharmacare also has a Whistleblower Policy which provides an avenue for key stakeholders including current and former employees, contractors and suppliers to raise concern about instances of modern slavery, without fear of victimisation. Many of our



suppliers also have whistleblower policies in place which are included in audit reports shared with us for the purposes of due diligence.

The Pharmacare Group's Anti-Discrimination and Equal Employment Opportunity Policy forms an important part of our actions in ensuring that our operations are not conducted in an environment where modern slavery is facilitated, by making clear that bullying, harassment, discrimination, vilification and victimisation are not tolerated at Pharmacare.

Similarly, our Code of Conduct sets standards of behaviour and conduct expected from workplace participants in their business dealings, many of which are inconsistent with the perpetuation of modern slavery, including:

- (a) compliance with all laws, policies, procedures, rules, regulations and reasonable directions from Pharmacare;
- (b) honesty and fairness in dealing with customers, clients, suppliers, co-workers, management and the general public;
- (c) maintenance of a high standard of integrity and professionalism;
- (d) exercising fairness, equality, courtesy, consideration and sensitivity in dealing with other employees and external contacts;
- (e) promptly reporting any violations of law, ethical principles, policies and the Code;
- (f) observing health and safety policies and obligations, and co-operating with all procedures and initiatives taken by Pharmacare in the interests of work health and safety;
- (g) being truthful in all dealings with persons encountered at the workplace; and
- (h) not abusing the advantages of one's position for private purposes.

The Pharmacare Group's policies will continue to be assessed and reviewed to ensure that they continue to remain effective in achieving their aims.

In all countries other than the United Kingdom, the Pharmacare Group's employees undertake regular training in the business' policies, including those related to corporate social responsibility, human rights, and our company values. This training includes specific modules relating to modern slavery. In the United Kingdom, Pharmacare (Europe) Limited are in the process of preparing a 'Modern Slavery and Human Trafficking Policy' which will support the provision of modern slavery training to staff.

#### *Modern Slavery Prevention and Due Diligence Process*

The Pharmacare Group maintains an up-to-date supplier list which outlines where our international suppliers are located. In a majority of jurisdictions, we conduct due diligence on suppliers involved in the manufacture of our products before engaging them as our suppliers. Various risk management and due diligence processes are drawn from our Modern Slavery Policy.

Examples of Pharmacare's due diligence and monitoring processes undertaken during the reporting period include:

- mapping of suppliers' modern slavery risk rating based on their location and the nature of goods and services provided to the Pharmacare Group;
- requiring our key suppliers to complete self-assessment questionnaires which is used as part of our risk assessment process;
- requiring our suppliers to confirm that they hold their own suppliers to account in safeguarding against modern slavery;
- requiring our suppliers to confirm that they have complied with the *Modern Slavery Act (Cth) 2018* (where applicable) or similar international legislation related to modern slavery; and



- o requiring our suppliers to share the results of audits performed by third party organisations (e.g. Sedex Members Ethical Trade Audits) and/or requiring organisations to confirm membership with a relevant third party organisation.

If as a result of such due diligence and monitoring we become aware that a supplier is at risk of modern slavery or does not have appropriate processes and procedures in place to mitigate such risk, we will evaluate the issue and level of risk before taking active steps to require that they remedy the situation to mitigate that risk. If they cannot demonstrate that they have done so then, should this be warranted by the level of modern slavery risk, we will take steps to report the supplier to the required authorities (where warranted) and end our relationship with the supplier, while sourcing the requisite materials, components or manufacturing products and/or services from an alternative supplier who can demonstrate compliance with our standards.

### *Our Training*

A crucial part of our stance against modern slavery is to promote workplace cultural change through training. We are committed to:

- delivering a training module to employees that outline our obligations under the *Modern Slavery Act 2018* (Cth) and related laws and our commitment to combatting modern slavery; and
- distributing via our company newsletter and other internal communications channels, information outlining our obligations under the *Modern Slavery Act 2018* (Cth) and related laws and our commitment to combatting modern slavery.

In this reporting period, we worked on the preparation of targeted training for employees with key responsibilities for assessing and addressing risks of modern slavery (including members of the procurement and people sourcing teams), covering matters such as risks and key indicators of modern slavery, Pharmacare's obligations under legislation, and steps Pharmacare can take to assess and address modern slavery risk. The training was delivered in the 2022-23 reporting period.

### *Assessing and Managing Risk and Pharmacare's Risk Management Process*

The Pharmacare Group is devoted to regularly monitoring our risk profile and incorporating control measures to mitigate any such risks. We aim to identify our key areas of risk and develop programs which resolve or mitigate such modern slavery risks in line with the Pharmacare Group's risk management framework and practices. These records will assist us in our continuing efforts to monitor all our relationships and identify risks factors associated with on-going and future suppliers.

- **Assessing the effectiveness of our actions**

Our modern slavery risk profile is continuously assessed as our businesses evolve, taking into account developing practices and external factors that poses a modern slavery risk. We ensure that greater focus is given to due diligence processes in respect of suppliers associated with a higher risk of modern slavery

Pharmacare has implemented various feedback mechanisms (e.g. whistleblower and grievance procedures) across its operations and works to create a culture where employees can share their concerns. We use feedback received to assess improvements we can make in our modern slavery strategy. We also consider the type and volume of feedback received to assess whether these feedback mechanisms are effective at bringing incidents of modern slavery to our attention.

We continue to assess the effectiveness of our processes and procedures to ensure that they continue to help us mitigate the risk of modern slavery in our operations and supply chains and that those processes and procedures remain effective as our operations and supply chains adapt and change, including as a result of the COVID-19 pandemic.



We continue to assess the training we provide and the way in which we inform our employees of their obligations under the *Modern Slavery Act 2018* to ensure that these methods are fit for purpose and effective in raising awareness of the risks of modern slavery and what we are doing to combat modern slavery. This includes ensuring that (where necessary) such training is revised to address any changes in risk or additional risk areas that might have arisen since the last time training was provided. It may, (if necessary) in future include addressing remediation actions that we may have taken to combat modern slavery or mitigate the risk of modern slavery in our operations and supply chains.

Our due diligence and monitoring processes are reviewed annually to ensure that they remain fit for purpose and effective in helping combat modern slavery. As our operations adapt and change we continue to consider not only the effectiveness of these existing measures but also additional means of undertaking further due diligence and monitoring processes to help mitigate the risk of modern slavery in our operations and supply chains.

These measures help us to continue to assess the effectiveness of our processes and procedures to ensure that they continue to help us mitigate the risk of modern slavery in our operations and supply chains.

- **Pharmacare's Ongoing Commitment**

Pharmacare recognises that tackling modern slavery requires a continuing year-on-year commitment. In future financial years, we will continue to collaborate with our stakeholders, both internal and external, and our community to address the risk of modern slavery in our supply chain.

- **COVID-19**

Pharmacare has been more vigilant to the disruptions and restrictions created by COVID-19 and will continue to review how these disruptions may increase the risk of modern slavery practices in Pharmacare's operations and supply chains. For example, we have regular meetings with suppliers during which issues that may be exacerbated by COVID-19 and may affect workers in our supply chains may be raised, such as material delays or increased volume load. Currently, while COVID-19 has impacted our ability to meet with suppliers face to face, the ability to communicate with suppliers electronically to progress our modern slavery due diligence (including to obtain information and conduct desktop audits) has meant that there have been no material impacts on Pharmacare's ability to address modern slavery risks.

- **Consultation**

During this reporting period, Pharmacare actively engaged and consulted with its relevant related bodies corporate in the development of this statement. Together, we discussed details of the reporting requirements under the *Modern Slavery Act 2018*, information regarding the actions we have taken and intend to take to address these requirements and shared relevant materials and updates regarding modern slavery risks and issues.

This statement was approved by the Board of Pharmacare in their capacity as principal governing body of Pharmacare on 3 April 2023, and is signed by Toby Rowley Browne as director of Pharmacare. This statement was previously approved by the Board of Pharmacare on 21 December 2022 and signed by Toby Rowley Browne on 22 December 2022, and has been updated on 3 April 2023 to include further information regarding principal governing body approval and signature.

Signed: 

Name: Toby Rowley Browne  
Position: Director  
Date: 3 April 2023



## Annexure A - Pharmacare related bodies corporate

- Natural Bio Pty Ltd (ABN 29 101 785 737) is a wholly owned subsidiary of Pharm-a-Care Laboratories Pty Ltd registered in Australia.
- Pharmacare (Australia) Pty Ltd (ACN 135 292 732) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Australia, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- Natural Bio-Medicals Pty Ltd (ACN 638 816 449) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Australia, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- BioMedica Nutraceuticals Pty Ltd (ABN 35 104 798 165) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Australia, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- Liquefy Health Pty Ltd (ABN 62 614 363 174) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Australia, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- Go Natural Australia Pty Ltd (ACN 007 295 052) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Australia, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- NB Manufacturing Pty Ltd (ACN 607 039 038) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Australia, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- Pharmacare Operations No.1 Pty Ltd (ACN 609 652 780) is a wholly owned subsidiary of NB Manufacturing Pty Ltd (ACN 607 039 038) registered in Australia, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- Pharmacare Operations No. 2 Pty Ltd (ACN 609 589 102) is a wholly owned subsidiary of NB Manufacturing Pty Ltd (ACN 607 039 038) registered in Australia, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- PharmaCare (Hong Kong) Limited (CR#2110063) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Hong Kong, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- PharmaCare Co., Ltd (BR # 310000400751688) is a wholly owned subsidiary of PharmaCare (Hong Kong) Limited (CR#2110063) registered in Hong Kong, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- PharmaCare (Guangzhou) Co., Ltd (BR# S0412017001281) is a wholly owned subsidiary of PharmaCare Co., Ltd (BR# 310000400751688) registered in Hong Kong, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- Pharmacare (New Zealand) Ltd (NZBN 9429041214503) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in New Zealand, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- Pharmacare Japan KK (Co# 011010129403) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Japan, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- PharmaCare (Asia) Sdn Bhd (Co# 854260P) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Malaysia, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- PharmaCare (Thailand) Ltd (Co# 0105559111855) is a wholly owned subsidiary of Pty Ltd (ABN 29 101 785 737) registered in Thailand, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.



- PAC Health (Canada) Inc (BN # 834026189) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in Canada, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- Pharmacare US Inc (Co# 7368129) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in the United States, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- Pharmacare (Europe) Limited (Co# 6408300) is a wholly owned subsidiary of Natural Bio Pty Ltd (ABN 29 101 785 737) registered in the United Kingdom, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.
- PAC Health (Europe) Limited (Co# 683692) is a wholly owned subsidiary of Pharmacare (Europe) Limited (Co# 6408300) registered in the United Kingdom, of which Pharm-a-Care Laboratories Pty Ltd is the ultimate holding company.