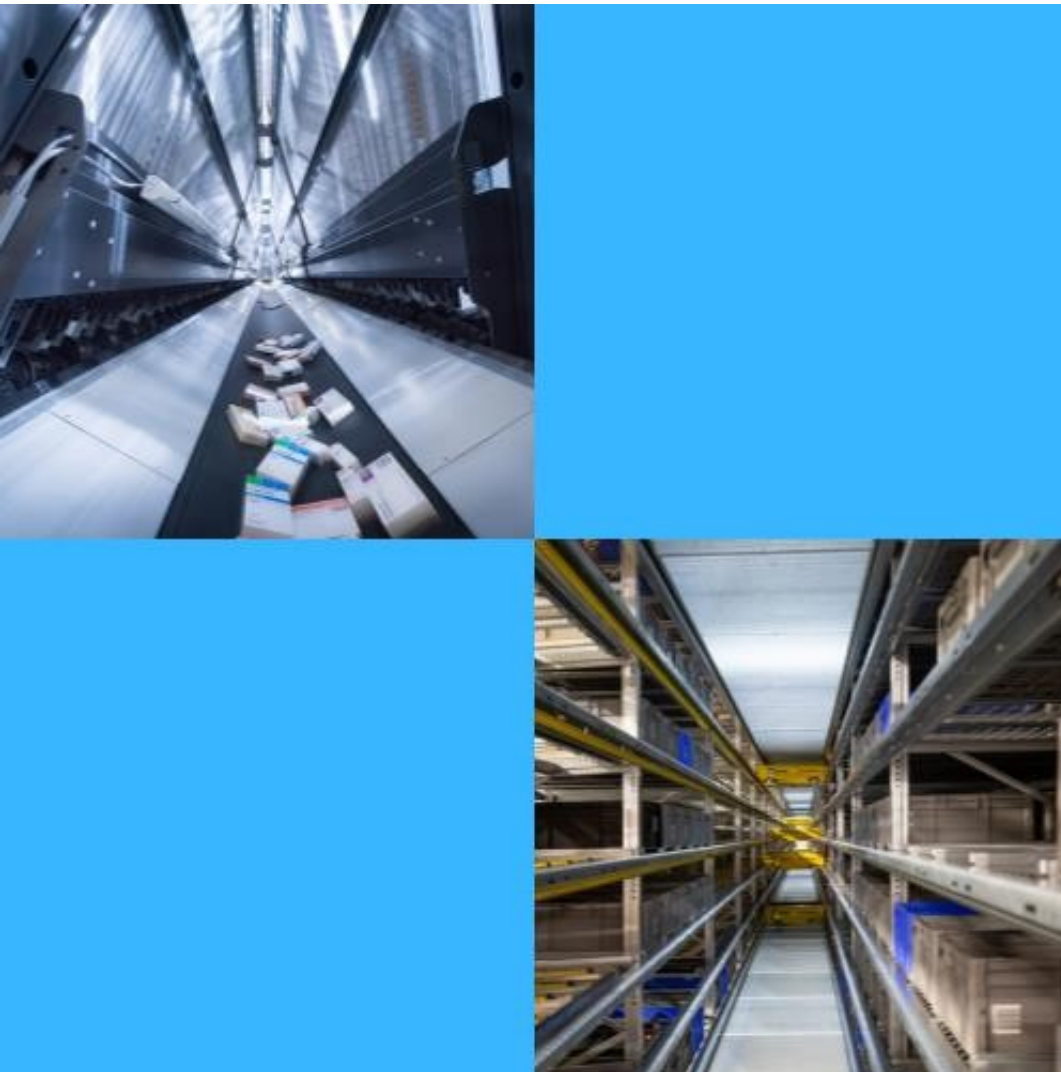


# Modern Slavery Statement 2021

Respecting Ethical Business Practices



EBOS Group acknowledges the Traditional Owners of country throughout Australia and recognises their continuing connection to land, waters and culture. We pay our respects to their cultures and to their Elders past, present and emerging.

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## Introduction

EBOS is the largest and most diversified Australasian marketer, wholesaler and distributor of healthcare, medical and pharmaceutical products. It is also a leading marketer and distributor of recognised consumer products and animal care brands.

Servicing the needs of thousands of customers across Australia and New Zealand, EBOS is committed to building better communities through an unwavering commitment to the provision of high-quality healthcare and animal care products. We are committed to the highest standard of conduct in all of our business activities, and to promoting and supporting a culture of honest and ethical behaviour and corporate compliance, including throughout our supply chain. As a leading healthcare and animal care company in Australia and New Zealand, we recognise our responsibility to lead by example.

This is EBOS's Modern Slavery Statement for the reporting period 1 July 2020 to 30 June 2021. It outlines the steps that we have taken to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chains. We are committed to continuous improvement and will build on the foundations set out in this statement to implement further initiatives to identify, manage and mitigate risks relating to modern slavery.

EBOS Group Limited (NZ Company Number 120844/ ARBN 166 840 973) is listed on the New Zealand and Australian stock exchanges and is the parent company of a number of entities that it controls and on whose behalf this Modern Slavery Statement is made (see section F). A reference to EBOS in this Modern Slavery Statement includes those entities. Some of the entities within the Group are not reporting entities for the purposes of the Australian Modern Slavery Act 2018, however, we have adopted a "whole of business" approach and this Modern Slavery Statement applies to the operations of all entities within the Group.

This Modern Slavery Statement was approved by the Board of EBOS Group Limited.

### A. Our business, operations and supply chains

EBOS's main business is as a marketer, wholesaler and distributor of healthcare, medical and pharmaceutical products to customers in Australia and New Zealand. In addition, it is also a leading marketer and distributor of recognised consumer products and animal care brands. The Group's broad portfolio of businesses also includes businesses that provide support to the healthcare and animal care sectors in which it operates.

EBOS's core operations can broadly be categorised as falling into two segments:

- Healthcare: sale of healthcare products in a range of sectors, own brands, retail healthcare, pharmacy services and wholesale activities;
- Animal Care: sale of animal care products in a range of sectors, own brands, retail and wholesale activities.

The businesses that form part of each segment is set out on the following pages:

# EBOS Group Overview

## Healthcare

### Community Pharmacy



### Institutional Healthcare



Contract Logistics



Animal Care

Animal Care



EBOS's head office is located in Christchurch, New Zealand. EBOS has approximately 3,700 employees and our businesses and functions operate from 63 locations in New Zealand and Australia.<sup>1</sup>

Our employees are engaged either under contract or under awards or collective agreements. Across New Zealand and Australia, we have a number of collective agreements and we engage proactively with unions.

EBOS, by the nature of its business, sources significant quantities of goods from third party suppliers that it then distributes as a wholesaler or distributor as well as for its "own brand" retail businesses.

Our supply chains are extensive and sometimes complex, with a high proportion of our supply chain for our Healthcare segment comprising goods sourced from large global pharmaceutical companies and manufacturers based in regions including Europe, the United States and India and Asia. We also source from businesses located in Australia and New Zealand. Our "own brand" businesses source goods produced locally (being New Zealand) as well as internationally, including geographic locations such as Europe, India and Asia.

There are also a number of third party suppliers that provide services to EBOS to support its business operations, ranging from IT companies, construction, cleaners to freight carriers.

As part of addressing the risk of modern slavery in our operations and supply chains, we are looking to progressively develop a clearer supply chain picture to better demonstrate geographically the location of goods sourced.

## **B. Our actions to assess and address our modern slavery risks (including due diligence and remediation)**

The range of goods and geographic locations associated with the supply of goods may potentially have implications for modern slavery risks in our supply chain. We have adopted a risk based approach in relation to determining the ongoing strategy for identifying and putting systems and controls in place to identify and address modern slavery risks in the supply chain. In keeping with a continuous improvement approach, the systems and controls will be reviewed annually to address emerging risks. In general, risks of modern slavery in our supply chain are relatively low due to the highly regulated nature of the pharmaceutical and medical supplies industry. However, we have assessed that those goods and services that we procure from certain geographical regions may have an elevated risk of exposure.

As a leading healthcare and animal care company in New Zealand and Australia, EBOS recognises its responsibility to lead by example and to manage its business in a manner that reflects the expectations of our stakeholders.

In the 2020- 2021 financial year, EBOS commenced the development of a formal Environmental, Social and Governance (ESG) program and in August 2021 was pleased to release its inaugural Sustainability Report (a copy of which is available on the Company's website).

Many of the initiatives EBOS will undertake as part of its ESG Program build up on work done over many years. The intention of the ESG Program is, therefore, to formalise this activity in a way that is measurable and can be accurately reported on. Importantly, EBOS will also seek to highlight areas where the Group can improve thereby enabling more structured governance, evaluation and disclosure as part of our approach to responsible corporate leadership. The ESG Program has five pillars being:

- Health & Animal Care Partners
- Consumers & Patients
- Community & Environment
- Our People
- Responsible Business

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<sup>1</sup> As at 30 June 2021.

The Responsible Business pillar covers measures related ethical trading of goods and services, including managing risks regarding modern slavery. Accordingly, the risks related to modern slavery will be monitored as part of our broader ESG Program. The ESG Program is guided by the ESG Steering Committee, which comprises senior executives of the Group.

If an instance of modern slavery has been identified in our supply chain, this will be escalated, and we will address the situation in a timely manner and in line with EBOS's values and standards.

### **Corporate Governance Policies**

In addition to the ESG Program, EBOS's current governance framework includes policies which are relevant to addressing modern slavery.

#### **Code of Ethics**

EBOS has a Code of Ethics which is a framework of expected behaviours that reflect the Group's values. It covers expectations in relation to the conduct of EBOS people, particularly in relation to acting honestly, with integrity and in accordance with law. The Code provides that material breaches/matters are to be reported to the Audit and Risk Committee.

EBOS is implementing measures related to the Code such as requiring suppliers to comply with the principles set out in the Code of Ethics.

#### **Whistleblower Protection Policy**

EBOS' Whistleblower Protection Policy states that EBOS is committed to the highest standards of conduct and ethical behaviour in all of our business activities. The policy provides a mechanism for raising and appropriately addressing issues if they arise.

In the next reporting period, EBOS will look to adopt and implement a specific policy related to modern slavery which outlines how it operates and its expectations in relation to labour practices. The intention is for this to be implemented and communicated to our suppliers and service providers during the course of the next reporting period.

### **Employment Policies**

During the 2020-2021 reporting period, EBOS released a number of updated employment related policies which are relevant to addressing labour standards and expectations in its operations.

#### **Workplace Discrimination, Harassment & Bullying Policy**

The intention of this policy is to support a working environment which is free from unlawful discrimination, harassment, sexual harassment, bullying, vilification and victimisation and where all workplace participants are treated with dignity, courtesy, and respect.

#### **Workplace Gender Equality Policy**

EBOS supports the concept of gender equality in employment and in the workplace.

#### **Diversity & Inclusion Policy**

EBOS is committed to developing and creating a more inclusive workplace that embraces and celebrates diversity and inclusion.

Our vision for diversity and Inclusion is to create an environment that promotes diversity and an environment that is safe, inclusive and is reflective of the communities in which we operate.

The Diversity and Inclusion Policy sets out the guiding principles and areas of focus that underpin our approach to developing a diverse workplace.

### Procurement of services

We are progressively implementing updates to our Standard Operating Procedures (SOP) and procurement guidelines across the Group to address modern slavery requirements in on-boarding service providers (for example, service providers at our warehouse operations like cleaners and maintenance service providers). We have for the current reporting period, included in SOP's of a number of businesses that, where appropriate, EBOS's modern slavery due diligence questionnaire be completed. We will continue to look for opportunities to formalise this requirement for service providers with whom we engage.

Modern slavery requirements will continue to be progressively included as an agenda item at review meetings with the Group's main service providers, such as freight carriers.

### Procurement of goods

EBOS has implemented processes to obtain a warranty from third party suppliers that the production and supply of their products do not contravene any modern slavery laws. Such warranties are being included, where relevant and where possible, on EBOS entity procurement portals. These statements also include an acknowledgment that a third party supplier has read, understood and agrees to comply with the EBOS Code of Ethics when doing business with us. Where suppliers have declined to provide such an acknowledgment and warranties, our businesses have engaged with those suppliers to better understand the position. In some instances, this has been because the relevant third party has in place its own robust systems and processes to address modern slavery risks.

We have also put in place a due diligence questionnaire that is being implemented across various business units to be issued to their suppliers and reviewed by each business once completed. Where concerns are raised, these are escalated and further considered.

While we appreciate that we cannot control all actions of our suppliers, we expect our suppliers to treat their employees with dignity and respect. By engaging with our suppliers in relation to modern slavery, this raises awareness and communicates to them our expectations and standards.

### Contractual Requirements

We have updated and rolled out our standard form contracts to incorporate modern slavery clauses as well as seeking to include modern slavery requirements in any third party contracts provided to us for the supply of goods where appropriate.

Our modern slavery clauses typically include the following:

- warranties that no slavery is used anywhere in the supplier's business or in its supply chain;
- warranties that the supplier will apply ethical sourcing practices and take reasonable steps to identify modern slavery risks in its operations;
- an obligation to notify EBOS in the event of a breach, or allegation of a breach of, modern slavery laws; and
- the right to terminate by EBOS for breach of the above obligations and warranties.

### Managing our tendering requirements

We are implementing, as part of the tendering process for EBOS work, a requirement for prospective tenderers to complete a due diligence questionnaire. Initially this will be in respect of major EBOS projects such as construction and IT related projects as well as significant supply arrangements.



## Training of EBOS employees

We have identified an opportunity to incorporate the delivery of modern slavery awareness training as part of the EBOS Legal Compliance Training Framework. This training commenced during the second half of the reporting period and will continue to be implemented as part of the EBOS Legal Compliance Training Framework. Whilst we have included in our training modules training and awareness of our Code of Ethics, Anti-Bribery and Corruption Policy and Whistleblower Protection Policy which are related to some aspects of modern slavery, specific modern slavery awareness training across the Group was developed and implemented during the reporting period.

## Inspections for manufacturing sites

A small number of EBOS entities outsource the manufacturing of “own brand” products. We have identified that there may be a risk of modern slavery in some of these third party operations, particularly where the outsourcing of manufacturing is to overseas third parties based in high risk jurisdictions. For those third party manufacturing sites, EBOS is implementing due diligence measures to assess third party compliance with modern slavery requirements. The disruption caused by COVID-19 has meant that physical site inspections have not been possible for the reporting period. Given the uncertainty and changing circumstances that COVID -19 presents, EBOS is seeking to implement a process whereby an onsite audit will be facilitated locally as part of the regulatory quality audit process. The intention is that once international travel commences, , EBOS personnel will be able to conduct physical site inspections of manufacturing sites as well.

## Investing for growth

A key pillar of EBOS’ strategy is investing for growth, including by acquisitions in Healthcare and Animal care. As part of EBOS’ integration process, the measures outlined in this statement are embedded in newly acquired businesses to the extent relevant.

## C. Measuring our effectiveness

Whilst we have commenced the process of raising awareness within our business as well identifying risks where modern slavery may arise, we understand that this is an ongoing process and we will continue to deepen our understanding of the risks of modern slavery in our operations and supply chains as we continue to engage with our suppliers in relation to the measures that have been taken for this reporting period.

We are monitoring the responses that we are receiving in relation to our due diligence measures and we will continue to build on those measures throughout the next reporting period. Across our various businesses (where relevant) we have been able to engage with the majority of suppliers that supply us with products either via the due diligence questionnaire, supplier portals or contractual requirements.

We are confident that the initial measures that we have implemented have served as a foundation to raise the awareness in our business to the risks of modern slavery.

As we build on the scope of our modern slavery framework, we expect further improvements in our processes and procedures and our ability to measure and report on the effectiveness of the measures adopted.

## D. Consultation and collaboration

EBOS operates a number of diversified businesses. In considering its modern slavery framework, meetings were conducted with the appropriate organisational representatives to communicate expectations, raise awareness and understand how best to implement the measures in a manner that was meaningful and appropriate within the context of the relevant business. For example, for some businesses, it was more appropriate to implement contractual measures with suppliers, rather than a requirement to complete the due diligence questionnaire.

We are also actively listening to and engaging with our suppliers in relation to their feedback and comments where appropriate.

We anticipate that the ESG framework will provide further opportunities for consultation and collaboration, both internally and with external parties.

## E. Our next steps

EBOS will continue to build on the initiatives that it has implemented over the coming year. Specifically, we will look to further embed these initiatives throughout our businesses and look to refine the ability to provide measures of their effectiveness.

In addition, we will consider the implementation of further corporate governance measures, including the preparation of a supplier code of conduct, and a review of the EBOS Code of Ethics to identify potential improvements.

We will also explore mechanisms to measure the effectiveness of initiatives that have been implemented and will continue to work with our suppliers to raise awareness as well as seek opportunities to engage further with industry.

In addition, we will seek to further understand and consider an appropriate framework and mechanism for escalating and addressing an instance relating to modern slavery, if and when it arises. Whilst our existing processes and policies provide for an escalation mechanism, consideration will be given to a more formal process, both for escalation and for addressing an instance that may arise relating to modern slavery.

We are committed to consistently working towards ensuring that there is transparency in our approach to addressing the risk of modern slavery in our operations and supply chains.

**Signed on behalf of EBOS Group Limited and its subsidiaries by**



Elizabeth Coutts

Chair

18 August 2021

## F. Entities within EBOS Group

### New Zealand

Name	New Zealand Company Number
Clinect NZ Pty Limited	5248181
EBOS Medical Devices NZ Limited	7688556
Endeavour Consumer Health Limited	2336947
Masterpet Corporation Limited	8582
PRNZ Limited	1715066
Pharmacy Retailing NZ Limited	49549

### Australia

Name	Australian Company Number
A.C.N. 618 208 969 Pty Ltd	618 208 969
Alchemy Holdings Pty Ltd	604 670 493
Alchemy Sub-Holdings Pty Ltd	604 695 365
Beaphar Pty Ltd	145 508 729
BFCMC Pty Ltd	622 474 855
Blackhawk Premium Pet Care Pty Ltd	150 390 686
Botany Bay Imports Exports Pty Ltd	128 341 980
CC Pharmacy Investments Pty Ltd	128 459 030
CC Pharmacy Management Pty Ltd	128 459 049
CC Pharmacy Promotions Pty Ltd	154 871 753
Chemmart Holdings Pty Ltd	614 007 288
Chem Plus Pty Ltd	008 274 557
Cincotta Holding Company Pty Ltd	169 308 070
Clinect Pty Ltd	150 558 473
Collaboration Medical Clinics Investments Pty Ltd	603 715 000
Collaboration Medical Clinics Pty Ltd	622 474 435
Developing People Pty Ltd	115 878 227
DoseAid Pty Ltd	129 958 934
* EAHPL Pty Ltd	164 521 617
EBOS Aesthetics Pty Ltd	645 058 840
* EBOS Group Australia Pty Ltd	125 401 247
EBOS Health & Science Pty Ltd	003 274 502
* EBOS Medical Devices Australia Pty Ltd	635 893 720
* EBOS PH Pty Ltd	613 974 253
Endeavour CH Pty Ltd	003 631 669
Healthcare Supply Partners Pty Ltd	631 884 609
Hospharm Pty Ltd	136 875 922
HPS Brands Pty Ltd	167 204 962

HPS Corrections Pty Ltd	159 945 936
HPS Finance Pty Ltd	169 377 986
HPS Holdings Group (AUST) Pty Ltd	158 830 641
HPS Hospitals Pty Ltd	158 418 038
HPS IVF Pty Ltd	156 303 561
HPS Services Pty Ltd	160 438 559
Intellipharm Pty Ltd	001 235 374
Lite Living Pty Ltd	166 526 370
LMT Surgical Pty Ltd	092 902 111
* Lyppard Australia Pty Ltd	007 008 906
* Masterpet Australia Pty Limited	000 333 353
Masterpet Logistics Pty Ltd	146 338 418
Mega Save Management Pty Ltd	128 266 437
National Surgical Pty Ltd	078 902 217
Nexus Australasia Pty Limited	115 828 941
PBA Finance No. 1 Pty Ltd	624 432 471
PBA Finance No. 2 Pty Ltd	168 983 597
PBA Wholesale Pty Ltd	157 770 244
* Pet Care Distributors Pty Ltd	125 265 769
* Pet Care Holdings Australia Pty Ltd	000 060 364
Pet Care Wholesalers Pty Ltd	637 762 077
Pets International Pty Ltd	002 960 330
Pharmacy Brands Australia Pty Ltd	109 700 263
Qpharma Pty Ltd (previously Aristopet)	145 418 882
Richard Thomson Pty Limited	115 059 179
* Symbion Pty Ltd	000 875 034
* Terry White Group Pty Ltd	136 808 243
Tony Ferguson Weight Management Pty Ltd	166 526 665
TW&CM Pty Ltd	136 833 620
TWC IP Pty Ltd	136 833 611
Ventura Health Pty Ltd	169 307 975
VIM Health Pty Ltd	166 525 659
VIM Health IP Pty Ltd	166 527 555
Vitapet Corporation Pty Limited	079 725 143
W & W Management Services Pty Ltd	606 748 047
Warner And Webster Pty Limited	004 518 156
You Save Management Pty Ltd	125 763 680
* ZAP Services Pty Ltd	132 014 174
* ZHHA Pty Ltd	131 957 269

## Other

Shanghai EBOS Trading Co Ltd (formerly Shanghai EBOS Business Management Co. Ltd)

\* Reporting entity as at 30 June 2021