



Modern Slavery Policy

Paragon Care Limited

ACN 064 551 426

Document History

Version	Summary of Amendments	Approved by	Approval date
1.0	New Modern Slavery Policy	Board of Directors	30 October 2020
2.0	Annual Review of Modern Slavery Policy	Board of Directors	23 May 2023

Other Policy Details

Key Information	Details
Approval Body	Paragon Care Limited Board of Directors
Key Stakeholders	Paragon Care Limited Board of Directors Senior Executive Team
Responsibility for Implementation	Chief Executive Officer
Policy Custodian	Executive General Manager
Next Review Date	23 May 2023
Reference Policies	Whistleblower Policy Code of Conduct Anti- Bribery & Corruption Policy

Legislative and Regulatory Framework

Authority	Law, Resolution or Regulation
Australian Government	Corporations Act 2001 (Cth) (" Corporations Act ")
	Modern Slavery Act 2018 (Cth) (" Act ")
ASX Corporate Governance Council	ASX Corporate Governance Principles and Recommendation (2019) (" ASX Principles ")

1. Introduction

- 1.1. Modern slavery is an umbrella term for serious exploitative work practices that represent violations of fundamental human rights. Modern slavery can take many forms and it is a complex and multi-faceted problem.
- 1.2. Paragon Care Limited and its subsidiaries (collectively referred to as the “**Company**”, “**we**”, “**us**” or “**our**”) have a zero-tolerance approach to any imposition of, or connection to modern slavery. We are committed to putting measures in place to eliminate modern slavery within our business, infiltrating our supply chains or through any other business relationship.
- 1.3. This includes identifying and mitigating modern slavery risks both within our operations and supply chains.
- 1.4. We will publish an annual Modern Slavery Statement as required by the Act.

2. Purpose

- 2.1 The purpose of the Modern Slavery Policy (the “**Policy**”) is to mitigate the risks associated with any act of modern slavery within our business and supply chain.
- 2.2 The Policy demonstrates our commitment to only doing business with those who fully comply with the Act and to ensure compliance with the Act.
- 2.3 We expect all who have, or seek to have, a business relationship with us to familiarise themselves with this Policy and to act in a way that is consistent with our value. We will only do business with organisations who fully comply with this Policy, or those who are taking verifiable steps towards compliance.
- 2.4 This Policy will be used to underpin and inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Act.

3. Application

- 3.1 This Policy applies to all persons working for or behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative/ suppliers.

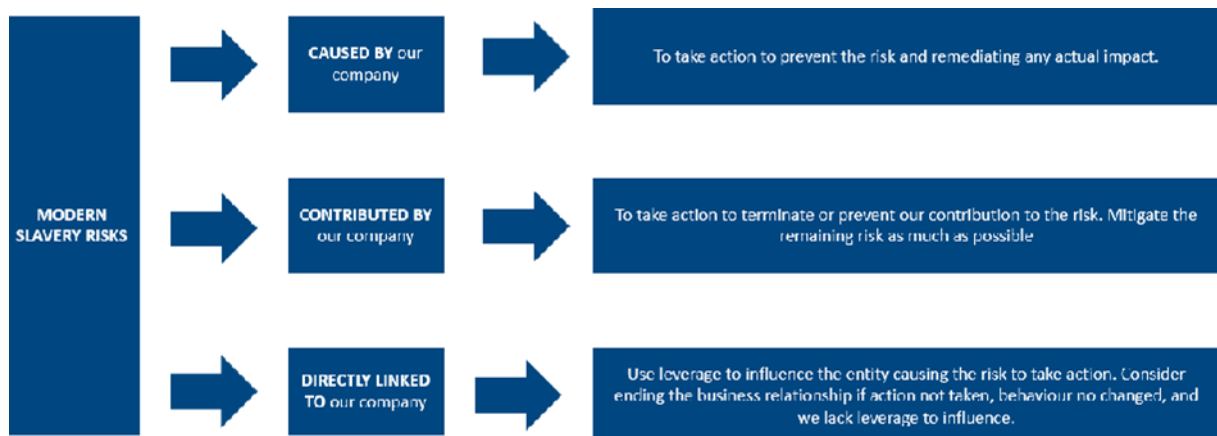
4. Modern Slavery Act

- 4.1 The Act came into force on 1 January 2019 and established a mandatory reporting regime for entities:
 - a) with consolidated revenue of at least A \$100 million in the reporting period; and
 - b) who are either an Australian entity or a foreign entity carrying on business in Australia.
- 4.2 The Act requires reporting through an Annual Modern Slavery Statement (the “**Statement**”).

- 4.3 The Statement will identify and address the risks of modern slavery in our global and domestic operations and supply chains, and actions taken to address those risks.
- 4.4 The Statement must be made publicly available online through the Modern Slavery Statements Register (<https://modernslaveryregister.gov.au/>) and our Company website no later than six months after its financial year end.
- 4.5 There are seven mandatory criteria that we are required to address in the Statement:
- a) Identify the reporting entity;
 - b) Describe the reporting entity’s structure, operations, and supply chains;
 - c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls;
 - d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes;
 - e) Describe how the reporting entity assesses the effectiveness of these actions;
 - f) Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement); and
 - g) Provide any other relevant information.

5. Understanding Modern Slavery risks in our supply chain

- 5.1 We adopt the “Cause, Contribute and Linked Model”¹ to understand and focus on activities we directly control or contribute to as opposed to those activities where the Company has less control.



¹ UN Guiding Principles on Business and Human Rights (UNGPs)

6. Modern Slavery Risks in our Operations and Supply Chain

- 6.1 Modern slavery instances are often complex and hard to detect, especially those we may be connected to through activities of our suppliers and their supply chain.
- 6.2 Identifying these risks is the first step to minimizing them and increasing our ability to detect modern slavery practices through our governance practices.
- 6.3 We treat our employees with dignity and respect and uphold the highest standards of human rights. We take steps to ensure that none of our employees impose or knowingly facilitate forced or compulsory labour for our ultimate benefit. All applicable laws and regulations relating to work, payment of wages and compensation and working hours must be complied with.
- 6.4 We have taken the following measures considering our workforce and employment practices:
- a) Our employment conditions adhere to the legislation relevant to the jurisdiction in which the employees work.
 - b) We provide adequate training including necessary health and safety training.
 - c) Our compensation packages are competitive and consistent with the laws that regulate minimum wage and overtime.
 - d) Our Code of Conduct Policy defines the ethical standards we will follow to ensure we conduct our business with integrity and in compliance with all laws.
 - e) We have an open-door policy and encourage our employees to raise concerns or feedback especially those of a legal and ethical nature. Employees may also raise their concerns through any of the reporting channels outlined in our Whistleblower Policy.
- 6.5 Our procurement framework provides for due diligence on suppliers that are engaged by us and their compliance with the Act. We ensure applicable modern slavery legislation and regulations are factored into our selection and procurement decision-making process.
- 6.6 Procuring goods and services, including raw materials, equipment, packaging or consumable materials and services will, as far as reasonable, be conducted in a way as to ensure that we source goods and services from suppliers that comply with their obligations under the Act. The extent of our due diligence conducted in the procurement process depends on the types of goods or services being sourced.
- 6.7 We seek to include anti-slavery wording in our contractual documentation with our suppliers and where appropriate we require our suppliers to provide us with appropriate comfort that they conduct their business and operations in a manner that is consistent with all applicable laws.
- 6.8 We also have processes in place to continually monitor on-boarded suppliers to ensure expectations are met and compliance with this Policy.
- 6.9 We take violations of this Policy seriously. Where non-compliance is identified and reported, we expect our suppliers to implement corrective action promptly.
- 6.10 We reserve the right to such action as it deems appropriate, including reporting a practice to the relevant authorities, replacement of the supplier and exercising any contractual right of termination.

7. How will we embed the Policy in practice?

- 7.1 Our people are our first line of defence in relation to mitigating the modern slavery risks. Some of the reporting mechanisms that we have introduced for continuous monitoring of our compliance with this Policy and the Act are listed below.
- 7.2 The Board will receive a report at least annually on the assessment undertaken, the statuses of the mitigating controls and strategies taken to mitigate, remediate or eliminate the risk or exposure to the modern slavery practices.
- 7.3 We have mechanics to foster whistleblowing and incident reporting within our business.
- 7.4 Our procurement framework includes identification of suppliers who perpetrate, or are at high risk of perpetrating, modern slavery offences as per our **Supplier Due Diligence Process** and our **Supplier Risk Assessment Methodology**.**

8. Responsibility

- 8.1 The Board has overall responsibility for this Policy and in ensuring we comply with all its legal and ethical obligations.
- 8.2 It is further the responsibility of our CEO to ensure the implementation of this Policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

9. Training

- 9.1 All employees, Senior Management and the Board will receive training on this Policy at least once annually.

10. Compliance with this Policy

- 10.1 Any non-compliance with this Policy by an employee, director or officer of the Company may lead to disciplinary action being taken in accordance with the Company's Code of Conduct. Any violation or conduct that breaches the standards set out in this Policy may be subject to disciplinary measures up to, and termination.
- 10.2 All employees will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this Policy or any related processes or procedures.
- 10.3 If any part of this Policy is unclear, clarification should be sought from the CEO or Company Secretary.

11. Review and Amendments

- 11.1 This Policy will be reviewed by the Board on annual basis to ensure it remains effective and meets the best practice, the statutory requirements and the Company's needs.
- 11.2 The Policy cannot be amended without approval from the Board.

- 11.3 Any changes to this Policy will be communicated by the Company to its employees, its shareholders and the market.
- 11.4 The Policy will be available on the Company's website within a reasonable time after any such updates or amendments have been approved.
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