



Modern Slavery Statement 2025

This report follows the Modern Slavery Act 2018 (Cth) and covers the financial year from January 1 to December 31, 2025

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Message from Herbs of Gold CEO



Dear Stakeholders,

Herbs of Gold Pty Ltd is pleased to present our Modern Slavery Statement covering the reporting period from 1 January to 31 December 2025.

At Herbs of Gold, our values continue to guide our commitment to ethical business practices and respecting human rights across our operations and supply chain. We recognise modern slavery remains a significant global issue and acknowledge our responsibility to continually strengthen our awareness, governance and due diligence practices.

Throughout 2025, we continued building on the foundations established in previous years and made meaningful progress in improving supplier engagement, governance and internal education.

Key initiatives undertaken during the reporting period included:

- Development and implementation of a Supplier Screening Policy
- Introduction of a Supplier Code of Conduct, distributed to suppliers representing approximately 80% of supplier spend, with all recipients acknowledging and returning the Code
- Continuation of the annual supplier questionnaire and evidence collection program, maintaining coverage of the top 80% of suppliers by spend
- Continued ESG education across the organisation in partnership with The Growth Activists
- Commencement of internal diversity education initiatives
- Updates to our Employee Handbook, including whistleblower processes and governance
- Introduction of an Employee Assistance Program (EAP) to support employee wellbeing and psychological safety
- Progress toward B Corporation certification, formally achieved in 2026

While we recognise there is still more work to do, particularly deeper within our extended supply chain, we remain committed to continuous improvement, transparency and strengthening our approach to identifying and addressing modern slavery risks.

A handwritten signature in dark ink, appearing to be 'SR' or 'SH', written in a stylized, cursive manner.

Shaun Rutherford
CEO, Herbs of Gold Pty Ltd



1. About Herbs of Gold

At Herbs of Gold Pty Ltd (referred to as “we,” “us,” “our,” or “Herbs of Gold”), health is at the heart of everything we do.

We exist to empower people to take control of their health by delivering exceptional herbal and nutritional products, crafted by experienced naturopaths, herbalists and nutritionists. Our high-strength formulas are based on clinical research and traditional evidence, with a thoughtful approach to ethical sourcing, social responsibility and environmental care.

We are committed to upholding ethical business practices that promote health, safety, and human dignity. We condemn all forms of human rights abuses and are actively working to prevent slavery and forced labour across our operations and supply chain. While we acknowledge that we are still on a journey, we are committed to continuous improvement and increasing

our visibility over suppliers, particularly in higher-risk areas. Our aspiration is to build stronger, more transparent partnerships that support ethical sourcing and respect for human rights at every level.

Herbs of Gold voluntarily reports on its commitment to eradicating modern slavery.

Currently, Herbs of Gold is not legally required to submit a Modern Slavery Statement, but we choose to do so voluntarily because everybody is responsible for protecting people from modern slavery.

Since the number of modern slavery cases is increasing, we want to be part of the global effort to end modern slavery. We focus on what we can control: our values, practices, operations, and how we manage our supply chain.

Walk Free Foundation Global Slavery Index 2023 reports⁽¹⁾:

- 50 million people are estimated to be living in modern slavery globally
- 27.6 million people in forced labour
- 12 million children impacted by modern slavery
- 10 million increase in modern slavery since 2016

(1) <https://www.walkfree.org/>

i) Our Business Principles

Herbs of Gold is a *values-led business*

Herbs of Gold proudly follows an E.P.I.C. framework, which is how we ensure our core values, ethics, and moral code reflect in our work methods and decision-making:



Excellence

We pride ourselves on our top-quality product formulas. Our products and our people reflect our high standards. We aim to raise awareness and innovate, encouraging those around us to embrace overall well-being.

Passion for health

Our passion is health. We approach wellness holistically, considering the physical, mental, emotional, social, environmental, and spiritual aspects of health.

Integrity

We always express ourselves openly and honestly. Our high standards apply to every process and interaction, from sourcing quality ingredients to engaging with customers and how we interact with each other.

Care

We are kind, respectful, compassionate, fair, inclusive and supportive to everyone we connect with. We care for people, our planet and ourselves. We are committed to helping the community get the most out of life. We put care at the centre of everything we do.



2.

Our Structure & Operations

Structure

Herbs of Gold is an Australian-owned business that specialises in creating and distributing high-quality, therapeutic herbal and nutritional supplements.

Our products support the health and well-being of everyday Australians, taking a complete approach to wellness.

Herbs of Gold is part of Vita Life Sciences Group (the Group). The Group offers products under several respected brands, including Herbs of Gold, Vita Health and Vita Science with operations in various countries such as Australia, Malaysia, Singapore, Thailand, Vietnam, China, and Indonesia.

Herbs of Gold develops and distributes a wide range of complementary medicines. These products are regulated by either the Therapeutic Goods Administration of Australia (TGA) or Food Standards Australia and New Zealand (FSANZ). We use contract manufacturers to produce our products, with 10 located in Australia, one in New Zealand, one in the USA, and another in China.

This report specifically focuses on Herbs of Gold's operations in Australia.





2. Our Structure & Operations (continued)

Operations

Herbs of Gold has 56 employees, all based in Australia.

This breaks down as follows:

- 40 full-time employees
- 14 part-time employees
- 2 casual employees

Herbs of Gold has a focused business structure centred on developing and distributing therapeutic herbal and nutritional supplements in Australia and China.

Our portfolio of over 140 products covers various health categories within complementary medicine. Our commitment to excellence is evident at every stage of our operations, from carefully selecting raw materials to the final distribution of our products in the Australian market.

Producing our products involves managing this process

carefully with our contract manufacturing partners.

Within our structure we manage all aspects of its operations: regulatory affairs, technical support, training, new product development, customer service, operations, finance, marketing, and sales. There are dedicated but interlinked departments for product development, regulatory compliance, quality assurance, and supply chain management. This integrated structure allows Herbs of Gold to maintain high standards of product quality and customer service, innovation and ethical business practices.

Via our health specialists, we ensure we comply with national regulators, such as the Therapeutic Goods Administration (TGA), for product formulation, registration, labelling, and marketing.

Our supplements are manufactured according to strict Good Manufacturing Practice (GMP) standards to ensure product safety and high quality.

3.

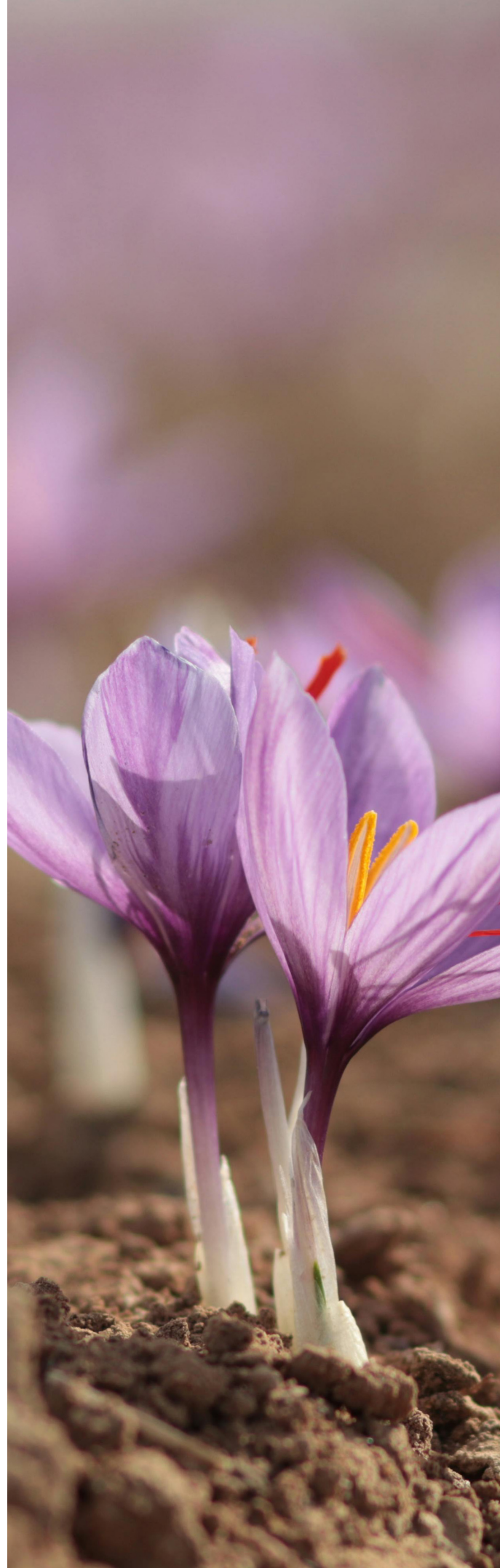
Modern Slavery Risks

We source a wide range of goods and necessary services for our products, including herbal ingredients, nutritional components and packaging materials. Our business model involves our specialist naturopathic team formulating products and partnering with third-party manufacturers who meet our quality and compliance expectations from sourcing through to production.

Over time, Herbs of Gold has developed long-standing relationships with key suppliers and manufacturing partners. However, we recognise that modern slavery risks can exist within global supply chains, particularly where visibility beyond direct suppliers is limited.

Our key area of potential risk remains within our manufacturing and raw material supply chains, particularly in regions and industries associated with elevated risks relating to labour exploitation, temporary workforces and agricultural sourcing.

During 2025, Herbs of Gold continued working with external ESG advisors, The Growth Activists, to strengthen governance practices, improve internal awareness and support the ongoing development of our modern slavery framework.



i) Analysis of operational risks



Herbs of Gold directly employs all staff and maintains oversight of employment conditions and workplace practices within our Australian operations.

Our operational risk management approach focuses on five key areas:

Employees

Including recruitment, employment practices and workplace wellbeing.

Supply chain

Including supplier engagement, screening and onboarding.

Risk management

Including integration of modern slavery considerations into governance processes.

Customers and stakeholders

Through ongoing engagement and communication.

Management systems

Supporting monitoring, governance and continuous improvement activities.

ii) Analysis of supply chain risks

Our suppliers generally fall into four categories of potential modern slavery risk:

- Raw materials and ingredients
- Packaging, freight and warehousing
- Property and business services
- Funding and financial services

Our primary area of focus continues to be suppliers involved in manufacturing and ingredient sourcing. While Herbs of Gold partners with established contract manufacturers and suppliers, we acknowledge that some raw material sourcing may occur in higher-risk regions or sectors where visibility beyond Tier 1 suppliers remains limited.

During 2025, Herbs of Gold strengthened its supplier governance framework through the introduction of a Supplier Screening Policy and Supplier Code of Conduct. These initiatives were designed to improve consistency in supplier engagement, communicate expectations regarding ethical business practices and support stronger due diligence processes moving forward.

During 2025, Herbs of Gold continued to rely on Tier 1 suppliers to monitor and manage risks within their own supply chains (Tier 2 and beyond). While direct visibility into extended supply chains remains limited, Herbs of Gold commenced preliminary engagement with key Tier 1 partners to better understand their sub-supplier management practices and sourcing origins, particularly for raw materials sourced from higher-risk regions. This work is expected to inform a more formalised Tier 2 engagement approach during 2026.

Herbs of Gold also maintained existing audit and inspection processes during the reporting period, with Tier 1 manufacturing partners continuing to provide evidence of their compliance practices, including workplace audits and third-party certifications where available.

Based on our current assessment processes and available information, Herbs of Gold did not identify any known instances of modern slavery within our direct operations or Tier 1 supplier relationships during the reporting period.





4. Actions Taken

Herbs of Gold's ongoing approach to addressing modern slavery risk focuses on governance, education, supplier engagement and continuous improvement.

i) Education and Training

During 2025, Herbs of Gold continued its ESG and modern slavery education program across multiple levels of the business in partnership with external ESG advisors, The Growth Activists.

The workshops focused on increasing awareness of ethical sourcing, supply chain transparency, governance responsibilities and broader human rights considerations. This ongoing program supported both leadership capability and organisation-wide understanding of ESG-related risks and responsibilities.

In addition, diversity initiatives commenced internally during the reporting period, supporting Herbs of Gold's broader commitment to inclusion, respect, ethical workplace practices and fostering a positive workplace culture.

ii) Reporting Mechanisms for Employees and Supply Chain

We continue to maintain a safe and confidential reporting system for whistleblowers. Our whistleblower policy provides a secure and private way to report concerns or misconduct, ensuring that individuals can come forward without fear of retaliation and supporting transparency and ethical accountability.

During 2025, we updated our Employee Handbook, including enhancements to our whistleblower framework and related governance policies.

We also introduced an Employee Assistance Program (EAP), providing employees with access to independent and confidential support services. While separate from the formal whistleblower process, the EAP supports our broader commitment to employee wellbeing, psychological safety and a culture where individuals feel supported to raise concerns and seek guidance where needed.



4. Actions Taken (continued)

iii) Governance, Screening and Disclosures

During the reporting period, Herbs of Gold strengthened its supplier governance and risk management processes through the implementation of a formal Supplier Screening Policy and Supplier Code of Conduct.

The Supplier Screening Policy was developed to support a more consistent and structured approach to supplier onboarding and ongoing risk assessment, including consideration of ethical sourcing and modern slavery risk factors.

The Supplier Code of Conduct was distributed to suppliers, representing approximately 80% of supplier spend. All suppliers receiving the Code acknowledged and returned signed copies during the reporting period.

The Code outlines Herbs of Gold's expectations regarding:

- Ethical business conduct
- Labour practices and workplace standards
- Human rights and anti-slavery commitments
- Legal and regulatory compliance
- Responsible supply chain management

This process strengthened governance controls, reinforced Herbs of Gold's expectations within supplier relationships and served as an important education and awareness initiative for suppliers regarding modern slavery risks and responsible business practices.

In addition to these new governance initiatives, Herbs of Gold continued the supplier questionnaire and evidence collection process introduced in prior reporting periods. Suppliers representing the top 80% of spend were required to complete detailed questionnaires covering modern slavery risk indicators, employment practices, supply chain management and due diligence processes. Responses were reviewed by the operations and project management teams, with supporting evidence assessed to validate supplier disclosures.

Under the supervision of our General Manager Operations and our People & ESG team, Herbs of Gold continue to operate a supplier governance framework focused on identifying and managing modern slavery risks within our supply chain.

During the reporting period, the company also undertook work associated with achieving B Corporation certification, which was formally awarded in 2026. The certification process assessed areas including governance, accountability, employee practices and supply chain management, supporting the company's broader commitment to responsible and ethical business practices.

The B Corporation certification process provided an independent, third-party assessment of Herbs of Gold's governance, worker and community practices, and supply chain management standards. This external validation reinforced the company's internal modern slavery risk management framework and provided additional assurance regarding the maturity of Herbs of Gold's ethical business practices.

iv) Improvement Plans

Herbs of Gold remains committed to continuously strengthening its approach to identifying and addressing modern slavery risks.

Key focus areas moving forward include:

- Continuing education and awareness initiatives internally and across supplier relationships
- Expanding supplier due diligence and engagement processes deeper into the supply chain where possible
- Introducing a more formalised supplier survey and risk assessment process during 2026
- Continuing to strengthen governance and supplier screening practices
- Further embedding ethical sourcing expectations into supplier onboarding and relationship management processes
- Supporting the development of a broader Group-wide approach to modern slavery, governance and reporting
- Increasing supplier coverage from 80% to 90% of total supplier spend for Code of Conduct distribution, questionnaire completion and evidence-based due diligence

Herbs of Gold does not own or control other entities, however it operates within the Vita Life Sciences Group. The Group remains committed to developing a comprehensive Modern Slavery Statement for the broader Vita Life Sciences Group by the end of 2026.



5. Effectiveness of Actions

Continuous improvement and monitoring remain central to Herbs of Gold's approach to managing modern slavery risks.

During 2025, the implementation of the Supplier Screening Policy and Supplier Code of Conduct strengthened supplier governance processes and improved communication of Herbs of Gold's expectations regarding ethical business conduct and human rights practices.

Internal education initiatives, including ESG workshops, diversity training and updates to employee governance frameworks, further supported awareness and accountability across the organisation.

The introduction of the Employee Assistance Program also supported Herbs of Gold's broader commitment to employee wellbeing, psychological safety and maintaining channels through which concerns may be appropriately raised and supported.

Key indicators supporting the effectiveness of actions taken during 2025 include:

- 80% of supplier spend covered by the Supplier Code of Conduct, with 100% acknowledgement and return rate from recipients

- Completion of ESG education sessions across leadership and operational teams
- Introduction of diversity initiatives including team survey, results workshop and training initiatives
- Updated Employee Handbook distributed to all employees
- Introduction of Employee Assistance Program available to all employees
- Supplier questionnaire completion rate maintained at targeted coverage levels

These indicators will continue to be developed and refined as Herbs of Gold matures its modern slavery risk management framework.

While no instances of modern slavery were identified during the reporting period, Herbs of Gold acknowledges that modern slavery risks may continue to exist indirectly within global supply chains, particularly in industries and regions associated with higher inherent risk.

We recognise that managing these risks requires ongoing engagement, continuous improvement and deeper visibility across extended supply chains over time.

6. Consultation

Consultation regarding modern slavery risks and governance continued throughout the reporting period across internal teams, leadership and external advisors.

In 2025, Herbs of Gold focused engagement with suppliers regarding ethical business practices and responsible supply chain management through implementation of the Supplier Code of Conduct and broader supplier governance initiatives.

As the business continues to mature its approach, Herbs of Gold intends to further strengthen supplier engagement and feedback mechanisms during future reporting periods, including a focus on updating our supplier questionnaire and seeking feedback from our suppliers in 2026.

7. Other Relevant Information

Herbs of Gold remains firm in its commitment to help end modern slavery in all its forms, including forced labour, child labour, bonded labour, human trafficking, and exploitative employment conditions.

This statement reflects Herbs of Gold's ongoing commitment to continuous improvement, responsible business practices and strengthening governance frameworks to identify and manage modern slavery risks within our operations and supply chain relationships.



Approval for this Statement

Transparency is a key part of our efforts. We are committed to openly reporting on our actions and progress in combating modern slavery, which includes publishing detailed modern slavery statements as required by law.

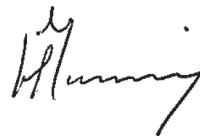
Herbs of Gold has established a way to measure how effective our actions are against modern slavery in our business and supply chains.

We aim to develop these reports to ensure they cover all potential risk areas. As we progress, we plan to regularly review and update our risk assessment processes to identify new risks and adjust our strategies accordingly.

This statement was approved by



Andrew O'Keefe, Managing Director



Henry Townsing, Chairman

on June 30, 2026



herbs of gold™

Herbs of Gold Pty Ltd

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