

CRITICAL DENTAL PTY LIMITED
[ABN 60 050 604 763]

MODERN SLAVERY STATEMENT

1. ABOUT CRITICAL DENTAL

Critical Dental is a dental supply company, incorporated in 2000. Since that time we have sold dental consumables and dental equipment to the dental industry throughout Australia. In more recent times we have also provided some marketing services in the same dental industry.

Critical Dental is a private incorporated business whose primary objective is deriving profit for its shareholders. The directors of Critical Dental are also absolutely committed to operating the business in an ethically sound way. Specifically, we are committed to ensuring that our employees, customers and suppliers are always treated with courtesy, dignity, respect and in accordance with all applicable laws and standards (...and this is done within the spirit of applicable laws and standards, not just within the letter thereof). It is our firm belief that the objective to derive profit can be pursued without compromising our ethical standards.

Critical Dental's approach to any business relationship, transaction, improvement, change or development is always to do what we believe is the ethical thing to do. We do this even if it is not always the most financially advantageous. It is our belief that the long term benefits of always taking care of our employees, customers and treating our suppliers with fairness, will always outweigh any short term financial advantage of not doing so.

Critical Dental's commitment to doing whatever we can to help abolish modern slavery is just part of behaving ethically as a corporation. We are committed to achieving a greater understanding the risks of modern slavery and implementing measures to prevent it occurring.

2. ORGANISATIONAL STRUCTURE

Structure

Critical Dental is a private incorporated business [ABN 60050604763], limited by shares. It has 2 directors and 8 employees. Its registered office is Goodwain Chivas, 29-31 Solent Circuit, Baulkham Hills NSW 2153. It is not affiliated with any other entity, corporate or otherwise, nor does it control or own any other entities.

Governance

Critical Dental is committed to integrating best practice governance standards into its day to day operations. Our policy is to operate with values and behaviours that create a culture of transparency and accountability, which will ultimately sustain the success of our business and ensure its performance remains consistent and solid.

Compliance with all relevant laws, regulations and standards is mandatory for all officeholders and employees and underpins our culture of transparency and accountability.

Operations

Critical Dental is a retailer of dental consumables and equipment to the dental industry in Australia. It is also a wholesaler to other dental supply companies. Critical Dental is the registered owner of the trademark 'Surgical Selections'.

In addition, Critical Dental provides some business services in the form of marketing services, and dental equipment dealer network management.

Critical Dental does not sell or provide services outside Australia. It should be noted that the marketing services, and dental equipment dealer network management do involve working with an individual New Zealand dental equipment dealer.

Supply Chains

Critical Dental's supply chain consists of approximately 50 suppliers. Almost all of these are product suppliers, although there are a minimal number of typical business service providers such as accountants, cleaners, couriers and air conditioning technicians.

Of the entire product suppliers, only 2 are overseas based entities, one based in Switzerland, and 1 based in the USA. All other suppliers are based in Australia.

Most of Critical Dental's contracts underpinning its supply chains have been in place for a reasonably long period of time, or if new, often endure for a reasonably long period of time. Most are underpinned by long-term stable business relationships with little change over time. Most of Critical Dental's business contracts are supply contracts, although there are approximately 3 commission agreements at any one time, all of which are locally based.

Critical Dental wholesales and retails a diverse range of dental consumables and equipment, most of which are sourced by the Australian supplier to Critical Dental from overseas. They are manufactured in many countries including the USA, Switzerland, Germany, China, Pakistan and Taiwan.

3. RISK ASSESSMENT OF MODERN SLAVERY

The risks of modern slavery in the supply chains originating in the USA, Switzerland and Germany are extremely low based on the legislative frameworks of those economies and their labour markets.

Local contractors comprising IT consultants, printers, accountants, couriers and air conditioning contractors operate within the NSW and federal Australian labour market laws and regulations (*Fair Work Act* and modern awards) and the risk of modern slavery is extremely low.

The only low-medium risks identified by Critical Dental are in respect of products bought for resale or consumption that originate in China and Pakistan, and possibly with the local cleaners who are contracted to clean the work premises.

This risk assessment is conducted by Rebecca Edwards, a director of Critical Dental by consulting the *Modern Slavery Act* and reviewing *The Global Slavery Index 2018*.

4. ACTION TO ADDRESS RISK

Critical Dental has taken specific action in 2021 regarding tracking the supply chain of the products it purchases from Pakistan in the form of mapping the supply chain directly with the importer of those products. It is more difficult regarding mapping supply chains that originate in China because of China's lack of transparency, although some steps are being taken in 2021 to attempt this process.

With regards to local cleaners, a personal approach will be taken regarding approaching cleaners with regards to payment of employees.

If there is any adverse finding regarding the existence of modern slavery in Critical Dental's supply chain, it will take remedial action by ceasing reliance upon that supply chain. Further, if the modern slavery is reportable in Australia as a criminal offence, Critical Dental will report that offence.

As of 1 July 2021 all contracts entered into by Critical Dental will include modern slavery provisions where appropriate.

5. EFFECTIVENESS

The effectiveness of actions to address risks of modern slavery can only be measured if modern slavery is discovered in our supply chains. The inclusion of modern slavery provisions in Critical Dental's contractual arrangements may reduce the risk or occurrence of modern slavery, however this cannot be measured because it is unseen.

6. CONSULTATION

Critical Dental does not own or control any other entities and its actions with regards to modern slavery are internal corporate actions.

7. OTHER RELEVANT INFORMATION

Critical Dental is committed to reducing any form of modern slavery where it becomes apparent. To date Critical Dental has not dealt with any incidents of modern slavery, nor is it aware of any incidents of modern slavery in any of the business it conducts. Critical Dental understands however that the risk is real and will remain on alert to its occurrence.

Critical Dental is not required to submit a Modern Slavery Statement by the Modern Slavery Act 2018 and this statement is simply a statement of Critical Dental's own ethics and is published to its website as an act of its own volition. It is not a Modern Slavery Statement submitted to the Australian Border Force.