



Modern Slavery Statement 2023



David Slade Companies



Contents

Introduction	4
Reporting entity	5
Entities, structure, operations and supply chain	6
Risks of modern slavery practices in operations and supply chain	6
Actions taken to assess and address modern slavery risks	8
Human rights risks	9
Supply chain and operations risks	10
Assessment of the effectiveness of actions taken to address modern slavery	12
Process of consultation	21
Founder approval	21

Introduction

The David Slade Companies understand our responsibility to deliver our services sustainably across environment, social and governance (ESG). This commitment is at the heart of our mission to deliver the best care possible – for our patients, our people and our planet.

We do this through care for:

-  **PATIENTS** – working to expand cancer awareness, clinical competency and access and quality care for at risk communities
-  **PEOPLE** – establishing a diverse, inclusive and attractive working environment; set up to deliver the best possible patient outcomes
-  **PLANET** – actively working towards a lower waste and carbon footprint.

Our commitments are underpinned by good governance – demonstrated through transparent and repeatable reporting and communication to all our stakeholders.

Modern slavery is an umbrella term used to describe human trafficking, slavery, and slavery-like practices. It occurs when coercion, threats or deception are used to exploit individuals and deprive them of their freedom.

Modern slavery is one of the world's largest and most complex human rights issues.

The David Slade Companies are committed to conducting its business in a manner consistent with internationally proclaimed human rights, including all workers' fundamental human right to be treated with dignity and respect, and to live a life of freedom and opportunity. We are committed to conduct business to ensure

modern slavery risks are minimised within our supply chain and operations, any potential cases are investigated, and appropriate actions are taken to address any concerns that are identified.

We are working proactively with our supply chains and operations to reduce the risk of modern slavery and support human rights and we expect all organisations we engage with to do the same.

This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth) sets out the actions taken by the David Slade Companies to address modern slavery risks in our business and supply chain over the financial year ending 30 June 2023. It outlines the current and ongoing activities Icon has committed to identify, assess and remedy risks relating to modern slavery in our business and supply chain and its goals for 2024.



Reporting entity

This report relates to the following entities that have reached the required threshold:

- D Slade Pharmacies as trustee for D Slade Pharmacies Unit Trust – ABN:58 689 652 969
- W.H. McCarthy Pty Ltd – ABN:73 000 004 893
- D Slade (sole trader) – ABN:69 315 076 159 (the David Slade Companies).

Entities, structure, operations and supply chain

The David Slade Companies have been providing outsourced services to the hospital, pharmacy and aged care sectors for over 55 years. We receive services from the Icon Group, Australasia's fastest growing cancer care provider, which provides services to pharmacies owned by the David Slade Companies.

The David Slade Companies are headquartered in Victoria, Australia. The diverse workforce consists of direct employees and locums or contractors.

The David Slade Companies supply chain includes the products and services used to deliver pharmaceutical services and manufacture of patient specific medications. Pharmaceuticals account for over 80% of total expenditure on goods and services. Other goods and services include medical equipment and consumables, ICT Equipment and personal protective equipment for our staff and patients. W.H.McCarthy's supply chain includes the products and services used to deliver pharmacy services to patients.

Risks of modern slavery practices in operations and supply chain

The David Slade Companies acknowledge that as its workforce continues to grow, the potential for modern slavery risks increases. It also acknowledges that risks of modern slavery exist in our operations and supply chains. The David Slade Companies are committed to continually improving their approach to identify, assess and manage modern slavery-related risks in its operations and supply chain.

The greatest area of risk for the David Slade Companies relate to supplier partnerships for the provision of products used in pharmaceutical compounding.



Actions taken to assess and address modern slavery risks



Human rights risks

As the David Slade Companies receives relevant services from the Icon Group, we have chosen to adopt and comply with Icon's Board approved ESG strategy and Modern Slavery Policy that provides focus and oversight on modern slavery risks as well as a number of key sustainability topics. Modern Slavery concerns are addressed through the ESG strategy which reflects on our commitment to the principles of the UN Compact Strategy, and which supports several of the UN Sustainability Goals and Targets.

The David Slade Companies are committed to conducting our business in a manner consistent with internationally proclaimed human rights, including all workers' fundamental human right to be treated with dignity and respect, and live a life of freedom and opportunity. In particular, we are committed to ensuring human rights & modern slavery risks are minimised within our supply chain and operations, any potential cases are investigated, and appropriate actions are taken to address any cases that are identified.

We respect workers' ability to enter employment voluntarily and freely, without the threat of a penalty. We also respect our employees' freedom to terminate employment without penalty, excepting reasonable notice or as per any relevant contract or industrial instrument. The David Slade Companies comply with local laws and regulations regarding minimum worker entitlements, including maximum hours of work and minimum wages and ensure workers are paid a living wage. We do not engage in misleading or fraudulent practices during the recruitment of employees or when offering employment and does not require workers to pay for their jobs.

Additional Icon Group policies which the David Slade Companies have adopted and are relevant to human rights include:

- ✓ Icon Group Code of Conduct
- ✓ Treating People Fairly at Work Policy
- ✓ Ethical Business Conduct Policy
- ✓ Recruitment and Selection Policy
- ✓ Health and Safety Policy
- ✓ Whistleblower and Protection Policy
- ✓ Volunteering at Icon Group Policy
- ✓ Icon's Human Rights Statement
- ✓ Financial Delegations Policy

Team members are encouraged to report any concerns of unethical or illegal conduct, including in relation to modern slavery, either to their leader, the procurement team, the Head of Legal, the People and Capability (Human Resources) team or via the Whistleblower email address. Leaders are educated and informed on the importance of promptly acting on behalf and managing grievances. Methods for reporting grievances, in person and anonymously, are published broadly across the organisation. Where issues are investigated and substantiated we will take appropriate action to remedy.

Supply chain and operations risks

We deal with existing and potential business partners and suppliers fairly and ethically and in accordance with this policy. We endeavour to procure from business partners and suppliers that are aligned with our commitments to human rights, good governance and the environment.

We have implemented procedures to identify, assess and address risks of modern slavery in the operations and supply chains. This include but is not limited to:

Supplier due diligence: we conduct screening of all new suppliers and evaluate current suppliers based on a risk-based matrix to ensure all relevant suppliers are screened to identify potential instances of modern slavery. Any employee seeking to purchase goods or services from a new supplier will require screening by procurement team prior to engaging the supplier.

Supplier communication: we require suppliers to notify the Procurement team as soon as is reasonably practicable after they become aware that modern slavery has occurred or is occurring in their operations or supply chain, or that there is a real and substantial prospect that it has occurred or is occurring.

Alleged Modern Slavery: where any allegations of Modern Slavery have occurred with particular suppliers, we have worked with them to ensure any grievances are clarified and all staff are paid in accordance with relevant awards.

Evaluation of Suppliers of Suppliers: we have engaged with vendors of supply chain risk management solutions and has completed the screening process of Tier 2 suppliers. Subsequent tiers to be screened during the next reporting year.

Supplier compliance with minimum standards: we expect all supplier partners and all parts of our operations to comply with supplier minimum standards. Where a supplier is, or appears, unable to meet any of the supplier minimum standards, we will work with the supplier to understand their limitations and determine how compliance may be achieved.

Training on modern slavery concerns: we are committed to ensuring training is provided so that our workers and other third parties or entities undertaking activity for or on behalf of us understand modern slavery, and what is required to identify, assess and address modern slavery as well as their responsibilities under this policy. Current training modules will be reviewed & refined during the next reporting period.

The publication of this report will provide an opportunity for The David Slade team members, customers and suppliers to ascertain activities undertaken each year to reduce modern slavery. Modern Slavery reporting is provided to the owner of the David Slade Companies.

Any suspected instance of modern slavery in the supply chain operation should be reported to the Procurement team. We will work with the supplier to identify whether modern slavery has occurred, and if so, how the situation will be rectified. We reserve the right to terminate any commercial relationship with suppliers if they breach our Supplier Minimum Standards or are found to have been involved in modern slavery that cannot be addressed.



Assessment of the effectiveness of actions taken to address modern slavery

Given the David Slade Companies association with the Icon Group (including key services it receives from Icon Group), we are aligned with and adopt the Icon Group’s delivery of its key objectives for 2023, with work continuing into 2024 to fully implement the approach. We are investing time and resources to help end modern slavery and are tracking and reporting on the delivery of our initiatives and actions.



Key Objectives	Initiative	FY2023 KPI	FY2023 Actions
Group Risk Assessment and Mitigation	Identifying and addressing modern slavery risks	Procurement will identify impacts in our supply chains and any actions required to address and engage software vendor for next phase of supply chain review.	Software vendors were engaged and monitoring of all significant and high-risk suppliers was undertaken.
		Continued review of modern slavery identification and reporting processes to align with Icon ESG council.	Reviews were performed in FY23.
		Review of reporting platforms and mechanisms for employees and/or individuals to disclose potential modern slavery risk.	P&C reviewed in FY23.
	Annual Risk Assessment Workshop	Group risk assessment across all divisions and operating countries annually. Reported to the board and ESG council.	Completed in FY23.

Key Objectives	Initiative	FY2023 KPI	FY2023 Actions
Group Governance and Systems	Risk assessment of supply chains and procurement operations with focus on Modern Slavery compliance	Review of initial tier 2 supplier report from software vendor.	Completed in FY23.
		Next phase will be to implement supplier survey risk rating tool to review next supply chain tier.	These were deployed during the biennial tender process for all pharmaceuticals in FY23.
		Any modern slavery risk issues identified to be reported to Icon’s ESG Council along with recommended action.	Completed in FY23.
	External publishing of modern slavery action within Sustainability Impact Report	Report on compliance with modern slavery within Icon’s Sustainability Impact Report which will be published annually.	This will be included in our 2023 Sustainability Impact Report submission.
ESG Council	Continued review & alignment of modern slavery working group composition and terms of reference to align with corporate governance and reporting requirements.	The establishment of Icon’s ESG council was achieved in FY23.	

Assessment of the effectiveness of actions taken to address modern slavery

Key Objectives	Initiative	FY2023 KPI	FY2023 Actions
Group Human Rights Responsibilities	Training	Establish Leader training to incorporate supply chain operations and supplier arrangements, with a view to scaling across global operations.	Ethical Business Training was completed and is available as a resource on the intranet.
		Procurement to develop and offer to suppliers training on our approach and policy and on the supplier minimum standards, with a view to scaling across global operations.	Training offered to high-risk suppliers during FY2023.
	Onboarding new acquisitions or new business	A due diligence checklist will be developed to proactively identify any potential threats of human rights violations in any acquired business.	Initial draft has been developed and this will be revised when new businesses are acquired.
		Onboarding processes will include specific training on Icon's commitment to modern slavery.	Modern Slavery training is currently under development for internal stakeholders.
	Policies and Procedures	Procurement to review policies and training materials for suppliers.	Annual review performed.
		Commitment to review policies with modern slavery impacts. Remain compliant and fit for purpose.	Annual review performed.



Assessment of the effectiveness of actions taken to address modern slavery

Key Objectives	Initiative	KPIs to Measure Effectiveness	Current Status	Lead
Group Risk Assessment and Mitigation	Identifying and addressing modern slavery risks	Procurement will identify impacts in our supply chains and any actions required to address and engage software vendor for next phase of supply chain review.	Expansion across all suppliers required.	Procurement
		Continued review of Modern slavery identification and reporting processes to align with Icon's ESG Council.	Annual review mechanism in place.	Procurement
		Review of reporting platforms & mechanisms for employees and/or individuals to disclose potential modern slavery risk.	Expansion across all suppliers required.	Procurement
	Annual Risk Assessment Workshop	Group risk assessment across all divisions and operating countries annually. Reported to Icon's Board and ESG Council.	Annual review mechanism in place based on benchmarking with our industry.	Procurement

Key Objectives	Initiative	KPIs to Measure Effectiveness	Current Status	Lead
Group Governance and Systems	Risk assessment of supply chains and procurement operations with focus on modern slavery compliance	Review of initial tier 2 supplier report from software vendor.	Next phase will be to implement supplier survey risk rating tool to review next supply chain tier.	Procurement
		Any modern slavery risk issues identified to be reported to Icon's ESG Council along with recommended action.	Responsibility matrix to be developed to ensure consistent approach.	Procurement
		External publishing of modern slavery action within sustainability impact report	Report on compliance with modern slavery within the Sustainability Impact Report which will be published annually.	This will be included in our 2024 Sustainability Impact report submission.
	ESG Council	Continued review and alignment of modern slavery working group composition and terms of reference to align with corporate governance and reporting requirements.	Review mechanism in place in consultation with ESG Council.	Executive Management

Assessment of the effectiveness of actions taken to address modern slavery

Key Objectives	Initiative	KPIs to Measure Effectiveness	Current Status	Lead
Group Human Rights Responsibilities	Training	Establish leader training to incorporate supply chain operations and supplier arrangements, with a view to scaling across global operations.	Ethical Business Training to be incorporated into induction of all management positions.	Executive Management
		Procurement to develop and offer to suppliers training on our approach and policy and on the supplier minimum standards, with a view to scaling across global operations.	Biannual training sessions to be offered to all suppliers.	Procurement
	Onboarding new acquisitions or new business	A due diligence checklist will be developed to proactively identify any potential threats of human rights violations in any acquired business.	Checklist to be evaluated with any acquisitions in FY2024.	Executive Management
		Onboarding processes will include specific training on Icons commitment to modern slavery.	Ethical Business Training to be completed as part of any transition of employees.	Executive Management
	Policies and Procedures	Procurement to review policies & training materials for suppliers.	Annual review mechanism in place.	Procurement
		Commitment to review policies with modern slavery impacts. Remain compliant and fit for purpose.	Annual review mechanism in place.	Procurement





Process of Consultation

In association with Icon Group, the ESG Council has been consulted on the development of the Modern Slavery Statement and the progress of its initiatives. Objectives have been discussed and agreed in collaboration and broadly socialised across the organisation and extended leadership teams. Feedback has been sought and integrated from multiple stakeholders. Expert guidance has been sought from internal and external industrial relations and legal specialists. The procurement team have been heavily involved in the development of the policy and the statement. Discussion approval and endorsement from the David Slade Companies has been achieved.

Founder approval

This Modern Slavery Statement meets the requirement for approval and was reviewed and approved by David Slade, as founder and Director of the David Slade Companies, on 30 November 2023. Supporting documentation of this approval is attached to this statement by way of a confirming letter from David Slade.

This statement is made in accordance with the Australian Modern Slavery Act 2018, it represents the Australian Reporting Entities on modern slavery for the financial year ended 30 June 2023.

David Slade
Founder & Director of the
David Slade Companies



Our commitments are underpinned by good governance – demonstrated through transparent and repeatable reporting and communication to all our stakeholders.



DAVID SLADE COMPANIES

11-13 Palmer Court
Mount Waverley VIC 3149
Australia
T +61 3 9565 4490
icongroup.global