



Modern Slavery Statement 2023-2024

International SOS (Australasia) Pty Ltd

Provided: December 2024

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## MODERN SLAVERY STATEMENT 2023-2024

This statement was prepared by the reporting entity: International SOS (Australasia) Pty Ltd ABN 83 052 247 104). The reporting entity's principal place of business and registered office is Level 16, 45 Clarence Street, Sydney NSW 2000.

The reporting entity is a wholly owned affiliate of the International SOS Group, which is the world's leading health and security services group with over 10,000 employees working in 1,000 locations in 85 countries. The ultimate parent holding company is Blue Mountain Pte Ltd, which is incorporated in Singapore and operates under Singaporean Law.

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) (the 'Act'). It outlines the actions taken by International SOS to identify, assess and address modern slavery risks across its operations and supply chains for the year ending 30 June 2024. This statement further addresses how International SOS will continue to develop and strengthen its response to modern slavery over time.

This statement was approved by a resolution of the board of directors of International SOS (Australasia) Pty Ltd on 16 December 2024, as evidenced by my signature below.

A handwritten signature in black ink, appearing to read 'Ian Gilbert', positioned above a horizontal line.

Ian Gilbert

Director of International SOS (Australasia) Pty Ltd

## Our Commitment

Modern slavery is a human rights issue that exploits millions of people globally. International SOS is in the business of saving lives, and are committed to our responsibility to avoid participating, either directly or indirectly, in modern day slavery. Modern day slavery has no place in our company, or in our supply chain.

The International SOS Group is the world's leading health and security services organisation with over 10,000 employees working in 1,000 locations in 85 countries. We were founded on the principle of putting the patient first and this remains true today. Led by more than 5,000 medical professionals and 200 security specialists, our teams work night and day to find solutions to protect our clients' global workforce in whatever situation they may be facing. We assess, advise, and assist from a health, security, and logistical perspective to protect our client's workforce internationally, providing invaluable local knowledge and expertise on a global scale.

The International SOS Group's sustainability commitments set out our ambition and demonstrate how we continue to hold ourselves accountable for our impact and performance. Our philosophy for corporate citizenship initially focused on Healthcare and Education, but has now broadened to cover Environmental, Social and Corporate Governance (ESG). This means all our actions are underpinned by concern for the wellbeing of our employees and the communities where we operate. They also encompass ethical conduct in our dealings with suppliers, clients and other stakeholders. International SOS' ESG Board oversees the development and implementation of our ESG strategy, meeting regularly to advise on and set priorities. Our latest ESG progress report is available on the [International SOS website](#).

International SOS supports the principles of the Act because it not only raises awareness of this issue but provides a crucial step in eradicating the abhorrent practice of modern slavery through corporate accountability. Our statement communicates our efforts to meet (and where possible exceed) the requirements of the Act.

## Our Mission and Values

We fully understand that the health and security of people is imperative to the successful operation and growth of organisations. Especially after COVID-19, health is firmly on the leadership agenda. Even a minor health or security issue, if unchecked, can quickly escalate into a more serious problem. Our purpose is to help keep people healthy and safe, so business can focus on core activities.

We see ourselves as a trusted advisor: there to help companies prepare for all eventualities and build that crucial workforce resilience. Our core **mission** is to pioneer the international medical and travel security risk sector. Protecting people is our priority.

Our **values** are visible in how we act, treat each other, and those who we care for. We are guided by the values of Passion, Expertise, Respect and Care.



## Our Quality Systems

We are committed to providing quality assured services by meeting globally recognised independent certification standards. We regularly review all aspects of our service provision to ensure it reaches the high standards that our clients expect and that we set for ourselves.

International SOS Australasia is proud to have achieved the following certifications:

- **ECOVADIS** Sustainability Rating Certification - After achieving our first EcoVadis certification status in 2020, International SOS has been awarded a Silver EcoVadis Medal.
- Global **ISO 9001:2015** certification across all our business lines and for all registered companies. This certifies that we have superior Quality Management Processes in place, meet regulatory requirements, and continually work to ensure customer satisfaction.
- Compliance with **ISO 45001:2018** Occupational Health and Safety Management System. This covers the provision of medical staffing, medical supply services, primary and occupational care clinics services, and health and security advisories for organisations that require outsourced health services operating in primarily remote areas.
- Compliance with **ISO/IEC 27701:2019** which validates our Privacy Information Management system is compliant with globally accepted privacy standards, appropriately addressing data controller and data processor obligations.
- Compliance with **ISO/IEC 27001:2013** which validates that our Information Security Management system is operating effectively.



## Reporting Criteria 1 & 2: About International SOS

The reporting entity for this statement is **International SOS (Australasia) Pty Ltd**, ABN 83 052 247 104.

This statement also covers the following subsidiaries of the reporting entity:

1. International Health and Medical Services Pty Ltd, ABN 40 073 811 131
2. Medical Direct Solutions Pty Ltd, ABN 67 632 126 491 (deregistered on 21 August 2024)
3. International Health and Medical Services South Pacific Inc
  - a. Incorporated in the Republic of Nauru
4. International SOS (Fiji) Limited
  - a. Incorporated in the Republic of Fiji

The statement also covers the following entity, which is a Joint Venture between the reporting entity and a foreign-owned company:

1. International SOS (Niugini) Limited
  - a. Incorporated in the Independent State of Papua New Guinea

## Our Operations

International SOS, at the end of 2024, operates 18 medical sites across countries including Australia, Nauru, Papua New Guinea, and Tuvalu. We operate all our medical services governance activities and sites within a highly regulated industry overseen by a number of government agencies and independent statutory authorities including Departments of Health, Therapeutic Goods Administration, and State and Territory Health Departments.

International SOS has established a leadership structure enhanced by a robust culture of collaboration, intercompany communication, and the exchange of best practices. A team of executives primarily located at Level 16, 45 Clarence Street, Sydney NSW 2000 oversee the management of relevant issues on a regional scale.

In early December 2024, an International SOS subsidiary transitioned out of a major Federal Government contract resulting in the closure of several medical sites in Australia and a related reduction in staff. At the end of December 2024, International SOS has 238 staff across the following locations:

- Brisbane, Queensland
- Canberra, Australian Capital Territory
- Sydney, New South Wales
- Nauru, Republic of Nauru
- Central Province, Papua New Guinea
- Hela Province, Papua New Guinea
- Gulf Province, Papua New Guinea
- National Capital District, Papua New Guinea
- Manus Province, Papua New Guinea
- Morobe Province, Papua New Guinea
- Enga Province, Papua New Guinea



## Our Employees

| Entity  | Legal Classification                      | Number and Type of Employees             | Entity  |
|---|---|--|---|
| International SOS (Australasia) Pty Ltd (reporting entity)                    | Privately owned proprietary company       | 53 Permanent<br>2 Casual<br>6 Max Term   | Incorporated in Australia<br>Affiliate of AEA International Holdings Pte Ltd*   |
| International Health and Medical Services Pty Ltd                             | Privately owned proprietary company       | 6 Permanent<br>3 Casual<br>22 Max Term   | Incorporated in Australia<br>Subsidiary of the reporting entity   |
| Medical Direct Solutions Pty Ltd  | Privately owned proprietary company       | Nil employees                            | Incorporated in Australia (deregistered in Aug '24)<br>Subsidiary of the reporting entity   |
| International Health and Medical Services South Pacific Inc                   | Privately owned company                   | 0 Permanent<br>2 Casual<br>0 Max Term    | Incorporated in the Republic of Nauru<br>Subsidiary of the reporting entity   |
| International SOS (Fiji) Limited<br>(Dormant throughout the reporting period) | Privately owned limited liability company | Nil employees                            | Incorporated in the Republic of Fiji<br>Subsidiary of the reporting entity  |
| International SOS (Niugini) Limited   | Privately owned limited company           | 45 Permanent<br>13 Casual<br>86 Max Term | Incorporated in the Independent State of Papua New Guinea<br><br>Joint Venture (JV) between the reporting entity and a foreign company, with each partner owning 50% of the shares.<br><br>Reporting entity generally controls the business of the JV, with oversight from the JV Board of Directors. |

\* AEA International Holdings Pte Ltd is a private limited company incorporated in Singapore, and is the operating parent company of International SOS group of companies, including Blue Mountain Pte Ltd, which is the ultimate holding company of International SOS (Australasia) Pty Ltd.

## Our Supply Chain

To resource the many areas of our business, our supply chain consists of a range of large multi-nationals and small, local businesses, which provide our services with medical consumable supplies, pharmaceuticals, and ICT hardware and software. Our procurement policies and procedures provide the governance and guidance for all activities to ensure due diligence checks are performed in line with social and environmental requirements. These are included within our supplier onboarding documentation.

We procure goods and services in the following primary spend categories:

1. **Corporate and operational procurement:** includes, medical equipment, personal protective equipment (PPE) and medical consumables, pharmaceuticals, waste disposal, allied health services, labour hire, uniforms and clothing, information technology and electrical equipment and office supplies.
2. **Professional services:** includes accounting and auditing services, consultants, recruitment, and legal services.

International SOS' expenditure on externally sourced goods and services in FY 2023/24 was more than \$34m AUD. This is managed by the central procurement team and finance teams over our core contracts.

## Reporting criteria 3: Modern slavery risks in operations and supply chain

International SOS has established a framework to identify material risks and is continuously monitoring their effectiveness and appropriate management. Our processes are continuously being developed and applied to a identify risks within geographic, industry, product, and service areas of International SOS' operations and supply chain. The principles that guide our modern slavery risk assessment process are as follows:

1. **Be proactive** – we perform comprehensive risk assessments to identify and comprehend potential modern slavery risks within both our operations and supply chain. Ongoing monitoring and audits of the supply chain are conducted regularly to evaluate adherence to policies aimed at preventing modern slavery.
2. **Engage with stakeholders** – we involve our stakeholders and promote measures against modern slavery.
3. **Communicate** – we provide training to employees and key stakeholders to enhance awareness about the signs of modern slavery and International SOS' commitment to preventing it.
4. **Work together** – we collaborate with our partners, and stakeholders to share best practices and address modern slavery collectively.
5. **Respond** – we consistently assess and revise policies and procedures to align with emerging risks and best practices. We foster a culture of ongoing improvement in our strategy to prevent and address modern slavery.

## Operational risk assessment

International SOS operate in a highly regulated labour market, with a low likelihood of modern slavery cases occurring within operations and our direct workforce. International SOS adheres to and reports against regulatory requirements and enacts internal policies and governance processes to promote a workplace culture of safety



and care, and upholds protections relating to workplace rights, freedom of association and workplace discrimination.

At times, it may be necessary to engage recruitment agencies, or labour hire agencies to fulfil short term temporary needs. Our recruitment and onboarding policy informs the process of appointment of individuals in all positions, this process extends to the engagement of labour hire, temporary or interim personnel through International SOS agreed suppliers.

Our operational framework is informed by a range of measures including the Group Code of Conduct and Ethics, Modern Slavery Policy, Supplier Code of Conduct, Whistleblower Policy, Conflicts of Interest Policy, Diversity and Inclusion Statement and Labour and Individual Rights Policy. These components reinforce our modern slavery response. After consideration, International SOS believes there is a low likelihood of modern slavery harm arising within its own operation and direct workforce.

## Supply chain risk assessment

International SOS is reliant on a significant number of third-party suppliers, delivering goods and services, with areas with the potential for modern slavery harm including:

- Allied health services and consultants
- Cleaning and waste disposal
- Medical and surgical supplies
- Energy, utilities, and communications
- Consulting and professional services

International SOS' internal procurement team negotiates and establishes contractual terms and conditions with preferred suppliers. A requirement for ordering of goods and services is through an online purchasing and payments system, reducing the opportunity for site-based staff to purchase outside these approved channels and suppliers. Centralised contracting of preferred suppliers allows greater control over the vetting and assessment of potential providers and increases the ability to identify, assess and mitigate potential risk of modern slavery harm arising within International SOS' supply chain.

In our future planning, we aim to conduct a comprehensive evaluation of our suppliers to enhance visibility within our supply chain and operations. This entails mapping both Tier 1 and Tier 2 suppliers, assessing inherent modern slavery risks based on factors such as country of origin, industry, product, commodity, and spend level.

We will also strengthen our commitment to mitigating modern slavery risks by introducing a modern slavery clause into goods and services procurement contracts and collaborating with our suppliers to raise awareness of the Supplier code of conduct.

## Reporting criteria 4: Actions taken to assess and address risk

International SOS has a comprehensive set of policies and procedures that enable us to identify and mitigate modern day slavery risks, and we take the following steps to ensure we are effectively mitigating the risk of modern-day slavery occurring:

- Our policy and procedures related to modern day slavery are reviewed annually and may be reviewed more regularly if an incident is reported.

- Reported incidents are analysed to establish if there are any areas of risk that require further mitigations. This includes updating of our risk register/s, as appropriate.
- In 2024, we have progressively implemented a commitment by our Suppliers, particularly those that operate outside Australia borders, to gain continued assurance that they have adequate controls to prevent the risk of modern slavery. Where appropriate, we audit for compliance against this commitment.

## Due Diligence

At International SOS, we do not under any circumstances use forced, bonded or child labour in the provision of our services. In addition, we make every effort to ensure that our suppliers and service providers operate with the highest level of integrity and are free of the use of forced, bonded or child labour.

In Australia, we monitor our suppliers and service providers very closely to ensure that they comply with the highest level of ethical standards. To ensure that our suppliers and service providers deliver the same high levels of professional excellence and safeguarding, we will continue to do risk-based audits. Where appropriate, we include provisions in our contractual agreements that require our counterparties to commit to the prevention of modern slavery.

When International SOS engages with a supplier or service provider, we assess their suitability to provide us with goods and services. Included in this assessment is a risk assessment that considers if they are providing services from countries with a high-risk profile for slavery and whether the services or goods provided are from a low skilled staff group or identified based on the high risk in accordance with the Home Office 'A Typology of Modern Slavery Offences in the UK (2017)' report.

Where a supplier or service provider is considered high risk, we may require further evidence of their due diligence processes to prevent modern slavery. In addition, we monitor our suppliers and service providers closely to ensure that they comply with the highest levels of ethical standards.

## Code of Conduct and Ethics

International SOS attaches great importance to the honest and ethical conduct of our employees, our clients and our suppliers and service providers. This commitment is underpinned by our Code of Conduct and Ethics, which sets out principles enabling our business to operate in a safe, honest and responsible manner. At International SOS, our employees demonstrate core corporate values including passion, expertise, respect and care, and our Code of Conduct and Ethics ensures we put the interest of our clients and members first to make a real difference in people's lives. Training on the Code of Conduct and Ethics is undertaken on an annual basis by all our employees as part of our Global Compliance Course.

## Individual Rights

Our Individual Rights Policy seeks to ensure the protection of individual human rights through our behaviour towards our employees, clients, and service providers. The policy clearly states that we do not employ child, bonded, or forced labour and we expect that our service providers treat their employees with dignity and respect.

## Safeguarding of Children and Vulnerable Adults

At International SOS, we recognise our obligations with regards to providing services to children and vulnerable adults. Our Safeguarding of Children and Vulnerable Adults Policy provides behavioural and procedural guidelines to our employees to ensure that the rights of these individuals are protected and that our employees are aware that they have a responsibility to protect them from harm or abuse when delivering our services.

## Whistleblowing

Our Whistleblowing Policy offers direction to staff who may become aware of modern-day slavery within our business or supply chain and provides information to ensure incidents are appropriately reported.

Furthermore, all staff are required complete an annual Global Compliance Course under our Code of Conduct and Ethics. This course includes training on how to pinpoint modern slavery and how to report it. This course was further updated in 2022 in relation to our Whistleblowing Policy, encouraging our employees to ask questions concerning ethical issues and report ethical violations, including any modern slavery risks/incidents.

Specifically, all staff who undertake procurement activity receive additional training so that they can follow a procurement process which is designed to reduce the risk of International SOS engaging with a supplier or service provider who may engage in modern day slavery. We have also ensured that we keep the health and safety of our employees a priority and have set out guidelines in line with local and national legislation.

## Remediation

International SOS is committed to the UN Guiding Principles on Business and Human Rights. Should undiscovered modern slavery practices be found, International SOS will fully cooperate in remediation efforts to mitigate the impact of these practices.

## Reporting criteria 5: Effectiveness assessment

International SOS recognises the need to continually improve our modern slavery response, and to ensure that we are implementing effective action. We have committed within the next reporting period to focus upon developing a more in-depth assessment of our long-term effectiveness to ensure that we are building upon our efforts over consecutive reporting periods.

### Key performance indicators

The status of our key performance indicators is summarised in the below table:

| Key Performance Indicator   | Progress indication   | Commitment for future reporting period   |
|---|---|--|
| Improved visibility of risk within our supply chain and operations. | Commenced, ongoing in future reporting periods.   | Assessment and mapping of Tier 1 suppliers and Tier 2 suppliers inherent modern slavery risk by country of origin, industry, product, commodity and spend level. |
| Standardising supplier onboarding program across all entities.      | In progress, review of onboarding tools occurring.  | Human rights and modern slavery clauses integrated into key contracts.<br>Supplier onboarding system review.   |
| Verifying compliance of suppliers' obligations.                     | In progress, current supplier engagement is occurring through issuing self-assessment questionnaires. | We have committed to issuing additional targeted supplier surveys in   |

| Key Performance Indicator   | Progress indication   | Commitment for future reporting period   |
|---|---|--|
|   |   | the next reporting period and monitoring responses.  |
| Desktop auditing of select suppliers.   | In progress, ongoing in future reporting periods.   | We are evaluating the need for further desktop auditing.   |
| Continued expansion of employee awareness and capability  | In progress, 98% of staff completed Global Compliance training in 2023-2024 release.  | Continued update of Global Compliance modules for all new and existing staff. Monitoring of staff compliance and development of alternative delivery methods for remote staff. |
| Developing & implementing grievance mechanism for external stakeholders   | Grievance mechanisms for external stakeholders have been developed and implemented.   | Continue to review safeguarding reporting mechanisms across the global business, including within Australia and the Pacific region.  |
| Policy review and update  | Relevant policies were reviewed and updated to better define International SOS' expectations for key stakeholders.  | Continue to update and refine policy documents to align with our goals for the year.   |
| Continued risk management through our policy framework and addressing modern slavery risk in relation International SOS' business operations. | In progress, we continue to conduct regular reviews and input from teams, including our internal audit, finance, legal and operations departments, to ensure that our modern slavery action is implemented cohesively, organisation wide. | Ongoing, multi-disciplinary reviews across internal departments and in consultation with internal and external leaders.  |

## Reporting criteria 6: Consultation with owned or controlled entities

Over the reporting period, all reporting entities and owned/controlled entities have been engaged in our modern slavery response. Our supply chain assessment for modern slavery risks, along with other due diligence and remediation measures that are discussed throughout this statement, has been undertaken for the supply chains and operations for the region.

## Reporting criteria 7: Other relevant information

There is no additional information required in relation to our commitment to the Act.