



GenesisCare  
Modern Slavery  
Statement 2019–2020



# 1. Introduction

## Our commitment

GenesisCare is committed to adopting a zero-tolerance approach to modern slavery both internally and in relation to the third party suppliers with whom we engage. We are developing and implementing practices and processes that identify and mitigate the risk of our business and our external supply chains from being impacted or influenced by modern slavery. We expect the same high standards of our business partners, suppliers and contractors, and their own suppliers, wherever they are based.

## This Statement

This Modern Slavery Statement (**Statement**) is made on behalf of Genesis Care Pty Ltd (ACN 137 188 464) (**GenesisCare**) for the reporting period 1 July 2019 to 30 June 2020. This Statement covers GenesisCare and its Australian subsidiaries. Whilst GenesisCare's subsidiaries are not necessarily considered to be reporting entities for the purposes of the *Modern Slavery Act 2018* (Cth), we have adopted a "whole of business" approach to our modern slavery initiatives and voluntarily report on the activities of the GenesisCare subsidiaries on that basis.

This is GenesisCare's first Statement issued and prepared in accordance with the *Modern Slavery Act 2018* (Cth). GenesisCare also prepares an annual modern slavery statement in respect of its UK operations in accordance with the *Modern Slavery Act 2015* (UK). We expect to prepare a consolidated modern slavery statement for the next reporting period covering the requirements of the legislation in each jurisdiction.

## COVID-19 impact

COVID-19 has caused unprecedented challenges to businesses worldwide. GenesisCare acted promptly to ensure the welfare of its patients and staff, and to maintain open lines of communication with suppliers to understand how COVID-19 impacted their operations and supply chains. With significant and ongoing pressure on global businesses, GenesisCare remains vigilant in its approach to identification and assessment of modern slavery risks during this period of heightened risk.

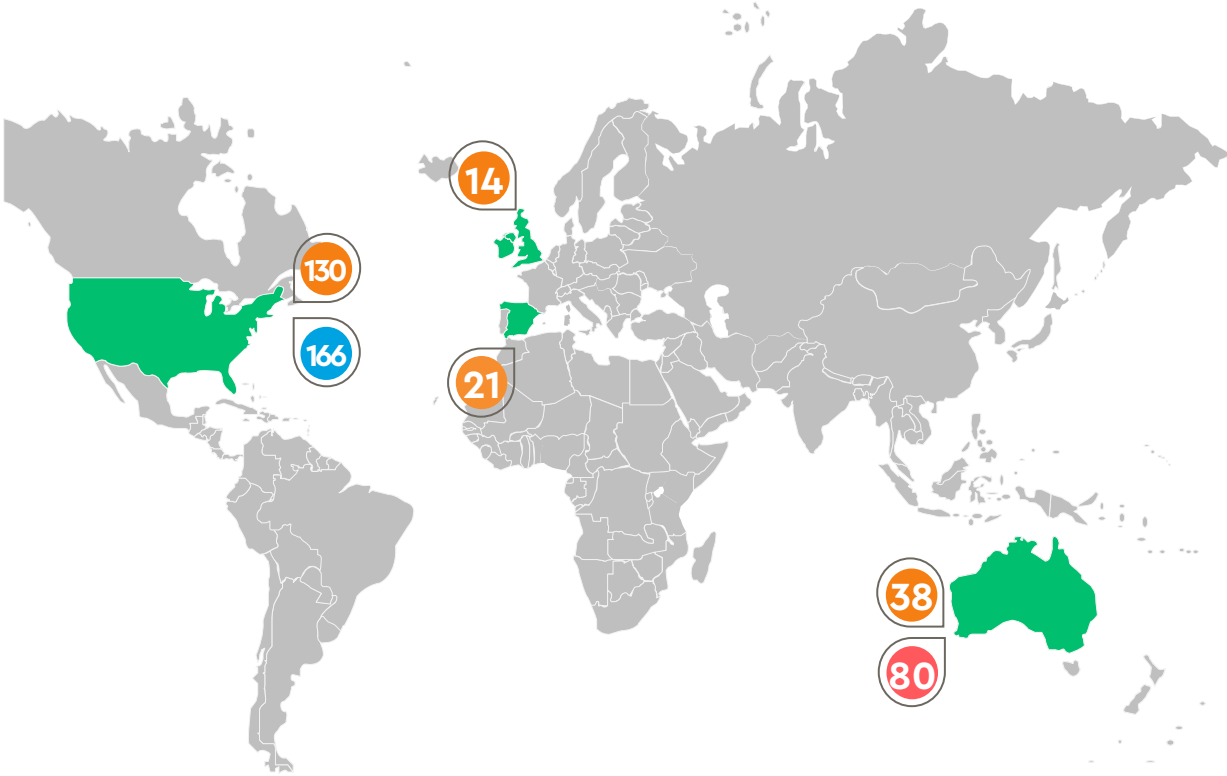
## 2. Structure and operations

GenesisCare delivers treatment to people with cancer and heart disease, the two largest disease burdens globally. We are committed to leading the change in how care is given and are currently leading or participating in more than 150 clinical trials.

The organisation employs or otherwise engages more than 5,500 highly trained physicians, healthcare professionals and support staff across Australia, Europe, and now the U.S. This follows the acquisition of major U.S. integrated oncology provider, 21<sup>st</sup> Century Oncology, in May 2020. Every year GenesisCare’s clinical teams see more than 400,000 patients at more than 440 locations.

For cancer treatment, that includes more than 300 locations in the U.S., 38 locations in Australia, 14 in the UK and 21 in Spain, with more than 30 new centres under development.

GenesisCare also offers cardiology and sleep services at more than 80 locations across Australia. Our purpose is to design care experiences that get the best possible life outcomes. We believe that care should be focused on the individual, not the condition, and are proud of our world-class patient satisfaction ratings.



- Radiation oncology treatment centers (incl. Landmark) – some also include medical oncology
- Additional oncology offices, offering integrated cancer care services
- Cardiology locations

### 3. Governance and values

#### Our governance and leadership structure

The GenesisCare Board is responsible for overseeing the performance and operation of the GenesisCare group. The Board and the Board's sub-committees develop the group's vision, values and governance framework and monitors the group's culture and clinical and corporate risks.

Oversight and reporting regarding anti-slavery initiatives is overseen by the Board's Audit & Risk Committee and People & Culture Committee. Responsibility for the day-to-day implementation of the group's vision and values is delegated to GenesisCare's Executive Leadership Team.

#### Our values

GenesisCare has five key values which underpin all that we do.

Our values embody a commitment to act ethically and with integrity in all our relationships; with our patients, our staff and our suppliers.

 <p><b>Empathy for all</b></p> <p>We understand the needs, emotions and ambitions of our patients and each other.</p> <p>Through listening, understanding and acting with purpose, we make a difference to the experiences and outcomes of patients and each other. We "walk in their shoes", we challenge ourselves not to judge but to support, we care for and improve the experience and outcomes for all.</p>	 <p><b>Partnership inside and out</b></p> <p>We work as one to achieve more, both inside and outside of GenesisCare.</p> <p>We achieve more together than apart. We collaborate, we partner to deliver exceptional outcomes to patients, each other and all stakeholders. Together, we execute with excellence.</p>	 <p><b>Innovation every day</b></p> <p>We all contribute insightful, innovative ideas, both big and small.</p> <p>We believe that great ideas can come from anyone and anywhere. We're all constantly challenging ourselves and each other to find a better way that translates into innovative ideas that improves outcomes and experience. We share ideas across our network and we readily embrace innovation everyday.</p>	 <p><b>Bravery to have a go</b></p> <p>We dare to make ideas happen, to make the impossible a reality.</p> <p>We go above and beyond to make ideas a reality. Bravery to have a go is finding a way to "yes" when others can't. We do this because our patients need and want us to be brave. We are considered and focused on making a profound, positive impact.</p>	 <p><b>Integrity always</b></p> <p>We do the right thing for our patients, our partners and each other.</p> <p>We make evidence-based decisions and take every action and face every challenge in the best interests of our patients and each other. We build trust and lead by example by acting in a safe, honest and transparent way, and call out when things are not right.</p>
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## Our policy framework

GenesisCare's values form the foundation of its policies and procedures, each of which seek to ensure that GenesisCare operates ethically and with integrity.

GenesisCare has a broad suite of policies the implementation of which is overseen by its People & Culture team, including its Employee Code of Conduct, Whistleblower Policy and Grievance Resolution Policy. The GenesisCare Employee Code of Conduct outlines the minimum standards of behaviour that are expected of GenesisCare employees and contractors to ensure GenesisCare achieves its vision and values. The Employee Code of Conduct, supported by the group's policies and training, are an important part of GenesisCare's internal governance framework.

Our UK business has implemented an Anti-slavery and Human Trafficking Policy which is being reviewed and updated so that it has global application to our business.

GenesisCare currently publishes its modern slavery statement in respect of its UK operations on its UK website. GenesisCare intends to also make this Statement accessible on its website.

## 4. Our supply chains

As a global organisation, GenesisCare acquires a wide range of goods and services, including products and services used in the provision of medical treatment to our patients and goods and services to support our corporate business needs. Multiple suppliers fulfil these needs, each of which has its own supply chain, resulting in a complex variety of end-to-end supply chains.

The key categories of goods and services procured by GenesisCare include:

- medical equipment (including associated maintenance services) and medical consumables;
- corporate business products and technology, and professional services; and
- facilities management services, cleaning services and linen supply services.

Our suppliers range in size from those with a global footprint to local suppliers servicing rural and regional areas. In all cases GenesisCare seeks to partner with suppliers that align with our values and commitments to mitigating the risks of modern slavery.

During the reporting period, approximately:

- 85% of our procurement spend was with our top 300 suppliers; and
- 99% of our procurement spend was with suppliers headquartered in Australia, the U.S., Europe, New Zealand or Canada.





## 5. Modern slavery risks and mitigation actions

### Modern slavery risks

We recognise that modern slavery risks can arise both internally within our organisation and within our external supply chains.

There are some suppliers with whom we engage which may operate within an industry which has a high risk of modern slavery. For example, manufacturers such as uniform suppliers or service providers engaged to provide maintenance and cleaning services. In these cases, there may be a higher risk of hazardous working conditions, exploited labour and / or complex multi-tiered supply chains operating in higher-risk jurisdictions.

The majority of our suppliers are based in countries where modern slavery is not classified as high risk based on geography. However, for the few that do operate in a higher risk jurisdiction, there is an inherent increased risk that modern slavery may be present in the extended external supply chain.

We are not currently aware of any material issues relating to modern slavery risks or practices impacting a supplier engaged by GenesisCare. If such an issue were to arise, we would assess alternative suppliers and either (depending on the circumstances and nature of the non-compliance) immediately cease dealings with the supplier, or work with that supplier to obtain appropriate assurances before determining whether it is acceptable to continue working with them.

Internally, GenesisCare has implemented and continues to develop systems and processes to manage the raising of grievances and whistleblowing which allow us to identify and mitigate potential risks of modern slavery. Given the level of control we exercise over our day-to-day operations and the increasing maturity of our internal policies and procedures, we consider that our internal risk of modern slavery is relatively low. The majority of GenesisCare staff are engaged directly by a GenesisCare entity, which also reduces the risk of modern slavery within our workforce. As such, our focus remains on identifying and addressing any material risks of modern slavery which may exist in our external supply chains.

## Managing modern slavery risks

To ensure that supplier organisations adopt appropriate standards and practices regarding the management of modern slavery risks, we have put in place and will continue to develop a number of measures to assess and manage supply chain risk.

<b>Formation of Australian Modern Slavery Working Group</b>	<p>GenesisCare's internal Modern Slavery Working Group was formed to establish and monitor measures to assess and address modern slavery risks.</p> <p>This Group is currently led by the Australian Procurement and Legal teams working closely with senior management and our colleagues in the UK. The group includes representatives from across the business, including, from the company's People &amp; Culture team and Finance team.</p>
<b>Mapping of key suppliers</b>	<p>GenesisCare has undertaken an exercise to map its key suppliers. For the purposes of this first reporting period, we have focused on these suppliers in assessing modern slavery risks in our external supply chain.</p> <p>GenesisCare mapped its key suppliers by procurement spend, focussing on its top 20 key suppliers.</p>
<b>Due diligence of existing suppliers</b>	<p>GenesisCare has developed a modern slavery questionnaire for distribution to its current suppliers. Once completed by a supplier, the questionnaire is assessed by our Procurement team. The assessment is designed to identify the suppliers at risk of modern slavery based on a score / rating system. Depending on the outcome of the assessment, further investigation may be required having regard to the level and nature of identified risk.</p> <p>The questionnaire was distributed to our key suppliers during the first reporting period. The responses informed our understanding of our suppliers':</p> <ul style="list-style-type: none"> <li>• supply chain relationships;</li> <li>• employment conditions; and</li> <li>• compliance and grievance mechanisms.</li> </ul>
<b>Due diligence of new suppliers</b>	<p>We also commenced using the above risk-based due diligence process to assess prospective suppliers.</p> <p>GenesisCare's 'Supplier Tender and Engagement Process' and associated documentation has been updated to reflect these new requirements.</p>
<b>Standard contractual clauses</b>	<p>GenesisCare has updated its standard contractual clauses and supplier terms and conditions to reflect the latest developments and regulation relating to modern slavery. These contractual provisions include:</p> <ul style="list-style-type: none"> <li>• warranties from the third party supplier in respect of its business operations and activities;</li> <li>• requirement that the supplier undertakes investigations into the activities of its own suppliers; and</li> <li>• reporting and notification requirements in relation to modern slavery risks and incidents that become known to the supplier during the course of their engagement with GenesisCare.</li> </ul>
<b>Training our people</b>	<p>We recognise that training and building employee awareness is a key component of addressing risks of modern slavery, both internally, and within our external supply chains.</p> <p>GenesisCare is developing its training program with a focus on staff in key leadership and commercial procurement roles.</p> <p>During the reporting period, commercial teams in the UK received training in modern slavery and human trafficking awareness, or safeguarding (which defines modern slavery and human trafficking as forms of abuse). The UK e-training module is being developed for adoption across the organisation more broadly.</p>



## Future initiatives

<b>Refine due diligence process</b>	<p>GenesisCare will continue to refine its supplier due diligence process to ensure that it remains current and effective. This will include reviewing the content of the modern slavery questionnaire.</p>
<b>Expand &amp; refine due diligence on existing suppliers</b>	<p>We will expand the due diligence undertaken in respect of existing suppliers with a focus on strategically important suppliers and those that are considered to operate within a higher risk category having regard to the sector or geography in which they operate. For the next reporting period, a key aspect of this will be identifying and assessing any new risks arising in relation to our U.S. operations.</p> <p>Where a supplier is unable to satisfy us of their approach to modern slavery, we will review the continued use of that supplier with a view to selecting an alternative supplier which is able to meet appropriate standards.</p>
<b>Training our people &amp; increased employee engagement</b>	<p>In 2021 GenesisCare will seek to introduce updated modern slavery training to key staff engaged in commercial procurement and leadership roles.</p>
<b>Update policies and procedures</b>	<p>GenesisCare will commence a review of key policies and procedures (including its Procurement Policy) to ensure compliance with modern slavery regulation.</p> <p>These policies will be reviewed in light of all applicable modern slavery legislation and other key resources such as the UN Guiding Principles on Business and Human Rights.</p>
<b>Modern Slavery Working Group</b>	<p>GenesisCare intends to expand the membership of its internal Modern Slavery Working Group to formally include representation from other key teams to ensure there is appropriate input received from all key stakeholders across the business.</p> <p>GenesisCare also intends to formalise the Working Group's terms of reference, objectives and reporting commitments to senior management and the board.</p>

## 6. Assessing our approach

We recognise the importance of monitoring and assessing the effectiveness of the measures we are implementing to manage and mitigate the risk of modern slavery in our business operations.

During the next reporting period, we will be reviewing our performance against each of the initiatives outlined in section 5 of this Statement (above). A progress report will be provided to each of the Board's Audit and Risk Committee and People and Culture Committee for their review and oversight. Feedback from their review will be included in our updated road map and set of future initiatives as we continue to further strengthen our approach to managing and mitigating the risks of modern slavery.

## 7. Scope and consultation

The GenesisCare group operates under a common and consistent governance framework. GenesisCare has prepared this Statement following consultation across its business.

GenesisCare's expansion into the U.S. market occurred at the end of this reporting period, in May 2020. For this reason, GenesisCare did not extensively consult with its U.S. based subsidiaries for the purposes of this statement; and this statement is focused on GenesisCare's activities in Australia, the U.K. and Spain. In the next reporting period, the scope of GenesisCare's Statement will be expanded to include its U.S. operations.

## 8. Approval

The risks and potential impacts of modern slavery are matters that are taken seriously by GenesisCare and inform the way in which we engage our people and how we select our suppliers. GenesisCare's approach to identifying and addressing modern slavery risks continues to evolve and mature as our business grows. We will continue to regularly review our approach to assessing and managing these risks, including the effectiveness of the initiatives we are introducing.

This Statement has been approved and is supported by the management and board of GenesisCare and is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth).

A handwritten signature in black ink, consisting of a stylized 'D' and 'C' followed by a horizontal line extending to the right.

**Dan Collins**

GenesisCare

Global CEO, Managing Director and President U.S.

