

## Myhealth Modern Slavery Statement FY23

### A. Introduction

This is a joint modern slavery statement under section 14 of the *Modern Slavery Act 2018* (Cth) (**the Act**) made in respect of Myhealth Medical Holdings (ACN 611 390 688) (**MMH**) and its wholly owned subsidiaries detailed below:

- Myhealth Management Pty Ltd (ACN 600 425 027) (**MMC**)
- Myhealth Medical Group Pty Ltd (ACN 160 321 693) (**MMG**)
- Myhealth Services Pty Ltd (ACN 620 199 082) (**Services**)

In an effort to demonstrate our ongoing commitment to ethical practices, we have included our subsidiary companies in our Modern Slavery statement. Myhealth believes that addressing the issue collectively across the entire corporate structure is a proactive measure in alignment with our commitment to eradicating modern slavery in all its forms.

This statement is submitted by Myhealth Medical Holdings on behalf of itself and each of its subsidiaries in respect of the reporting period 1 July 2022 to 30 June 2023.

We have consulted with all our wholly owned subsidiaries in the development of this Modern Slavery Statement. This collaborative effort ensures a unified approach across our organisation in identifying and mitigating modern slavery risks, reflecting our commitment to addressing this critical issue effectively.

For the purpose of this statement any references to 'Myhealth' or 'the Company' refer to MMH and all three subsidiaries.

The Board of Directors of Myhealth has approved this statement on behalf of itself and the other reporting entities covered by the statement and has authorised it to be signed by CEO Hadrian Lee.



Hadrian Lee  
CEO

## B. Structure, Operations & Supply Chains

### i) The Company's Structure

Myhealth is an Australian company with its registered office and headquarters located in Sydney and Chatswood, respectively. We strive to provide a healthcare community where everyone can thrive. Our vision at Myhealth is to facilitate access to medical centres in convenient locations that provide the best care, in an inclusive environment.

The first Myhealth Medical Centre opened in 2007, founded by a group of dedicated General Practitioners. We continue to be a doctor-owned, doctor-led, and doctor-run business, focused on providing patients with access to the highest quality care, by supporting doctors to be at their best.

Myhealth is now one of the largest medical centre operators in Australia, with clinics in NSW, QLD & VIC facilitating access to more than 3 million patients yearly.

The Company's structure is illustrated below.

The reporting entities covered by this statement are MMH, MMC, MMG and Services. Myhealth is including its wholly owned subsidiaries as a proactive measure to show our commitment to eradicating modern slavery in all its forms.

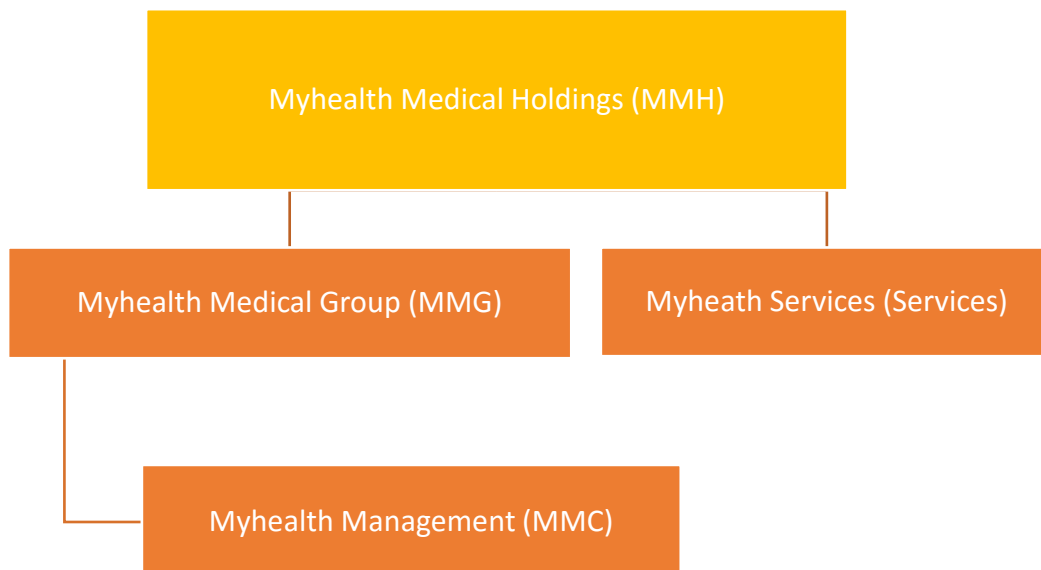


Figure 1.



ii) Operations

Myhealth is Australia's fastest-growing medical centre group, encompassing 112 clinics across the country and employing a workforce of approximately 1,035 employees. We provide facilities and services to more than 843 independent General Practitioners and 269 independent allied health professionals to provide access to comprehensive healthcare services.

The facilities and services we provide to our independent GPs include the provision of premises, facilities management, nurses, reception staff, practice managers, practice management software, administrative and financial services, IT support, and other non-medical services such as the provision of medical consumables.

We also support the operation of pathology collection, and other allied health services within many medical centres by offering facilities via lease or licence agreements to these providers.

<i>Myhealth Medical Holdings (MMH) Operations</i>	
<i>Myhealth Medical Group (MMG)</i>	MMG owns a majority proportion of all the Myhealth Clinics, Myhealth Management and Myhealth Services.
<i>Myhealth Management Pty Ltd (MMC)</i>	Myhealth Management is the supporting management entity for the clinics in the Myhealth Group. IT services, Finance services, Operational services and administrative services are all provided to the clinics from Myhealth Management.
<i>Myhealth Services Pty Ltd (Services)</i>	Services is MMH's employment entity that encompasses our workforce of over 1000 employees. This encompasses our management team at Support Centre as well as our team on the ground. This includes area managers, practice managers, registered nurses and medical receptionists.

## iii) Supply Chain

Our team at Myhealth is committed to ethical and sustainable practices when engaging with the goods and services of suppliers. Our supply chain consists of a range of suppliers, from medical equipment suppliers to office equipment to clothing wholesalers. Due to Myhealth's business model and operations processes, we generally engage with the following services:

- Catering
- Cleaning and Facilities Management
- IT Equipment
- Pharmaceutical companies PPE and Medical Supplies
- Property matters including construction/fit-outs
- Recruitment services
- Security

Figure 2 demonstrates, engagement with each type of vendor, service, and supplier.

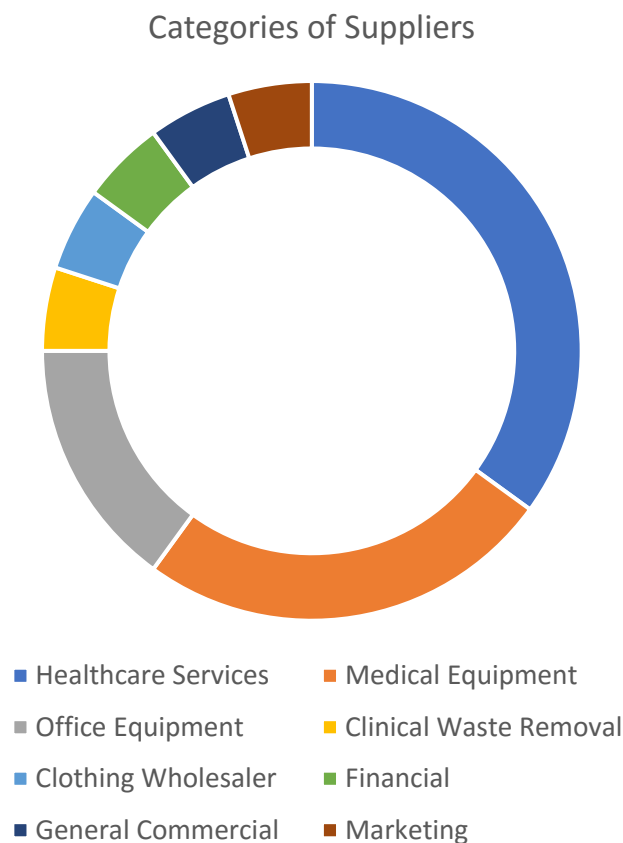


Figure 2

## C. Modern Slavery Risks

Modern Slavery refers to situations of serious exploitation, in which coercion, threats or deception are used to exploit victims and deprive them of their freedoms. This encompasses practices such as servitude, slavery, forced labour, forced marriage, child labour, debt bondage and more. Myhealth believes this as an abhorrent practice and does not tolerate the violation of human rights law.

We recognise that Myhealth has an important role to play in identifying and managing the risk of modern slavery throughout the entirety of our business, workforce, and supply chains. Myhealth supports the use of socially responsible, ethical, transparent, and legislatively compliant practices in carrying out our activities and recognise that ongoing vigilance and effort will be required to eliminate the risks of modern slavery in our operations and supply chains.

Myhealth is committed to combatting modern slavery through a continuous improvement approach. This approach involves proactively assessing and addressing modern slavery risks within our business. Myhealth plans to implement this approach through internal and external risk assessments and following those assessments, develop policies and procedures that align with our approach..

Myhealth plans to use this risk-based approach to identify and prioritise the instances of high risks of modern slavery within our business for a more efficient use of our resources. Once we have identified the key risks within our business, we will implement a continuous improvement approach by focusing further on those highlighted areas of risk to combat modern slavery efficiently.

### i) Operational risks

Myhealth has identified a higher risk in the engagement of third-party contractors and we have endeavoured to introduce measures to assess and mitigate the potential for unfair employment practices such as:

- Third-party contractors are required to acknowledge, review and comply with the Myhealth modern slavery *Code of Conduct*.
- Newly drafted modern slavery contract clauses are available for the business to incorporate into third-party contracts in the absence of any clauses.

Myhealth may consider ways to monitor and assess the effectiveness of these measures and may consider the most efficient way to evaluate the impact of these measures.

### ii) Supply chain risks

There are several categories of suppliers, vendors, and services in Myhealth's supply chain which may be at high risk of modern slavery. These include:

- Clothing suppliers

- Construction sector and major projects
- Facility and property management services
- Food and beverage suppliers
- Medical equipment and accessories suppliers
- Pharmaceutical companies or suppliers that provide medications, drugs, vaccines.
- Cleaning services

Myhealth has identified the top four current risks that are likely to occur according to the type of Supplier.

- **Cleaning and Security Services** pose a greater risk of modern slavery practices as there is a prevalence of labour hire arrangements, formal and in-formal subcontracting and a high number of migrant workers employed in the sector who often have 'precarious' visa rights.<sup>1</sup>
- **Uniform and Clothing Suppliers** identify as a potential high risk of forced labour since many suppliers are susceptible to practice that reflect 'sweatshops'.
- **Construction sector and major projects** have a high risk of modern slavery practices particularly, as there is prevalence migrant labour in construction industry.<sup>2</sup> This risk must be addressed as there is a lack of visibility over the supply chains and our business model has a high reliance on agencies and subcontracted labour.
- **Suppliers based outside Australia** are a specific risk to modern slavery as one of our suppliers are based in the Philippines.

## D. Our Actions

In order to adequately address potential Modern Slavery risks within our organisations, Myhealth has taken a risk-based approach. We have conducted risk assessments that have assisted in the identification and prioritisation of current high risks within our business.

We have conducted both internal and external risk assessments through surveys to form a better understanding of how to address our modern slavery risks. Our internal survey was distributed to our 1,035 employees, who were asked to submit any concerns that they had regarding Myhealth's supply chain in respect of Modern Slavery. Figure 3 illustrates that from those employees that responded to our survey, 1.2% of these employees believed that there may be a risk in cleaning companies.

### i) Internal assessment

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<sup>1</sup> Labour Hire and Contracting Across the ASX100, 2020  
[https://www.accr.org.au/downloads/20200512\\_accr\\_labour\\_hire\\_contracting\\_across\\_the\\_asx100.pdf](https://www.accr.org.au/downloads/20200512_accr_labour_hire_contracting_across_the_asx100.pdf)

<sup>2</sup> Tools down: a review of modern slavery, 2021 <https://www.herbertsmithfreehills.com/latest-thinking/tools-down-a-review-of-modern-slavery-obligations-in-the-construction-sector>

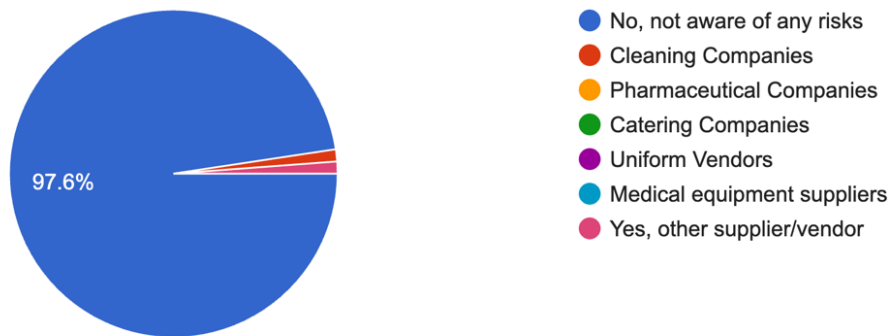


Figure 3: From those that participated in our survey, 1.2% of the employees believed that there may be a risk in cleaning companies.

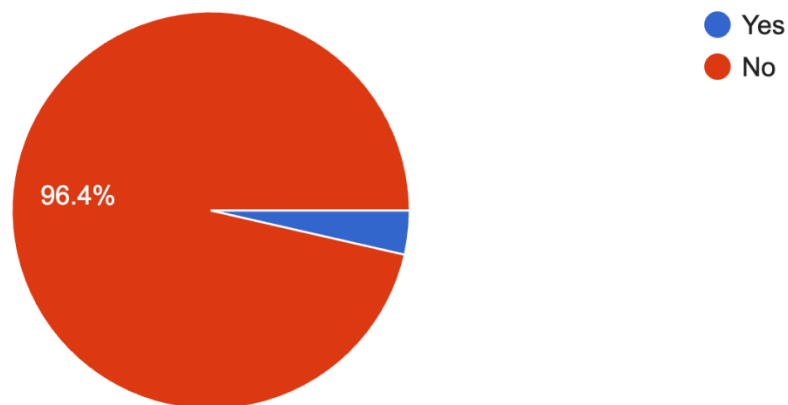


Figure 4: From those that participated in our survey, 3.6% of our employees provided us with suggestions on how Myhealth can address Modern Slavery.

Figure 4 illustrates that from the employees that participated in our survey, 3.6% of our employees provided us with suggestions on how Myhealth can address Modern Slavery. These have been condensed into the following measures:

- Supplier and Subcontractor Due Diligence:** Conduct comprehensive research and evaluation of all suppliers and subcontractors to ensure their adherence to ethical practices and verify their absence of legal disputes or court cases in their history.
- Awareness:** Spread awareness throughout the organization to foster a greater understanding of modern slavery risks and ethical considerations.
- Ethical Labor and Working Conditions:** Partner exclusively with companies that demonstrate a commitment to fair workers' rights, equitable compensation, and safe working environments.
- Supply Chain Transparency:** Thoroughly investigate the origins of our supplies and establish relationships solely with companies and organizations that maintain transparent policies regarding their sourcing and procurement practices.

## ii) External assessment

In light of the input from our internal risk assessment, we adjusted our external survey to ensure we address modern slavery risks adequately. For instance, in order to address concerns regarding supplier due diligence, our external survey questioned all our suppliers on whether they had a Modern Slavery Statement and what measure (if any) they have implemented into their business to address risks of modern slavery.

Figures 5 and 6 respectively demonstrates the percentage of suppliers that have published a Modern Slavery Statement and have a Modern Slavery Policy in place.

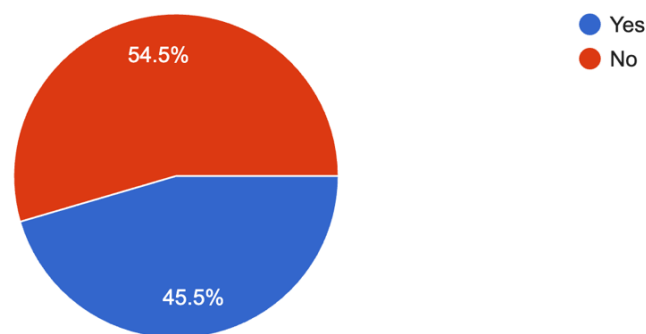


Figure 5: Approximately 45.5% of our suppliers have a Modern Slavery Statement in place.

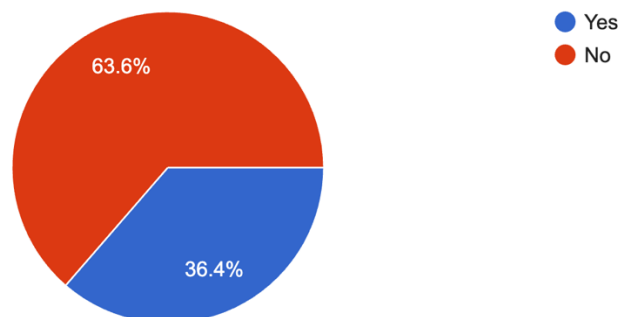


Figure 6: Approximately 36.5% of our suppliers have a Modern Slavery Policy in place.

In order to address how effectively our suppliers address the risks within their businesses, we asked them what measures they have in place that combat these risks. Figure 6 illustrates that a majority of our suppliers have policies in place, conduct due diligence on suppliers, provide training to their employees and/or conduct transparent reporting.



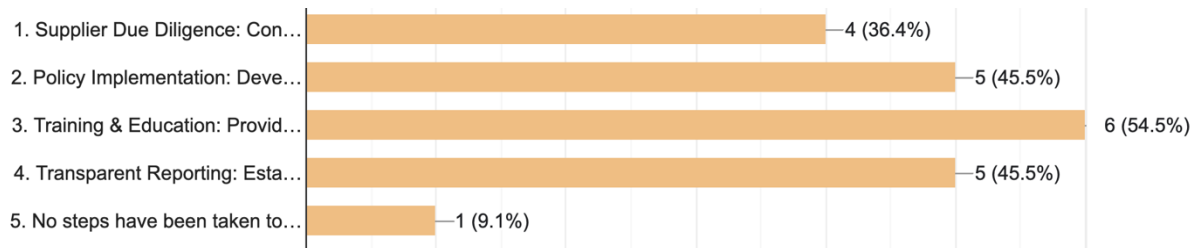


Figure 6: The various measures implemented by our suppliers in order to combat Modern Slavery.

### iii) Myhealth Policy Implementation

- a) Myhealth is currently in the process of developing a modern slavery policy and/or procedure. We are actively assessing which approach aligns best with our business model and available resources. While a specific policy or procedure has yet to be finalised, we are continuing to work towards establishing one in 2024.
- b) We have introduced a *Modern Slavery Code of Conduct* to all our suppliers. This fills the gaps between our level of risk and those suppliers that do not have any measures in place to address Modern Slavery. Among other things, our Code of Conduct requires all suppliers to maintain accurate and up-to-date records regarding their workforce, thus ensuring transparency between Myhealth and our suppliers.
- c) We have incorporated a *Vendor Form for the onboarding of new suppliers into our operations and supply chain*. This requires all new suppliers to acknowledge and review our *Code of Conduct* which addresses future gaps within our supply chain. Additionally, we ask that suppliers implement adequate training for their employees to raise awareness of Modern Slavery risks.
- d) We have drafted standard modern slavery contract clauses for the business to use in third party contracts. The aim of these clauses is to ensure third- party vendors or suppliers affirm their commitment to preventing modern slavery, promote ethical practices and uphold the principles of human rights within their respective operations and supply chains.
- e) Myhealth has grievance mechanisms in place to foster a culture of open communication and transparency and we continue to actively encourage employees to voice concerns about anything that they perceive as 'not right'. We have completed a review and update to our *Whistleblower Policy* to ensure the protection and well-being of our staff who wish to speak up about their concerns.

### **E. Assessing our Actions**

We are committed to the ongoing assessment and monitoring of our performance, to continually improve the effectiveness of our measures against modern slavery. This commitment will strengthen our protection of human rights. To track the impact and effectiveness of our actions, Myhealth may continue to work with both internal and external



stakeholders to address the likely ongoing and changing nature of modern slavery risks to the business.

### F. Consultation

Myhealth places a significant emphasis on the importance of taking all reasonable steps to ensure that entities wholly owned by our organisation are actively engaged in addressing modern slavery risks and implementing appropriate actions. Myhealth has regular meetings with the Board to address any risks within our business. On a day-to-day basis, the Clinical Governance, Operations and Legal teams will take all reasonable steps to ensure appropriate and ongoing management of modern slavery risks. For instance, by instigating regular review of our existing incident reporting framework to identify opportunities for uplift and review. Myhealth has a risk management framework in place which is responsible for assessing, managing, and reporting any risks within the business.

### G. Ongoing Steps

Myhealth does not tolerate Modern Slavery practices including slavery, forced labour or human trafficking in any form and expects its suppliers to adhere to the same standards. As such we will continue publishing annual Modern Slavery Statements under section 14 of the Act.

At Myhealth, we are committed to combatting modern slavery through a continuous improvement approach proactively assessing and addressing risks. This may continue to involve internal and external risk assessments in addition to policy/procedure development and implementation. Our risk-based approach prioritises high risk areas of modern slavery for more efficient use of our resources.

In 2024, Myhealth will focus on key areas that will enable us to continually improve and positively influence the eradication of modern slavery in our supply chain and operations. Our primary areas of concentration and focus are detailed below.

<i>FY24 Focus areas</i>	
<i>Due Diligence</i>	<ul style="list-style-type: none"> <li>• Conduct thorough due diligence on suppliers and business partners.</li> <li>• Regularly assess and update risk profiles associated with various business activities.</li> <li>• Implement risk mitigation strategies to address identified vulnerabilities.</li> <li>• Integrate modern slavery risk assessments into broader risk management frameworks.</li> </ul>
<i>Education and Awareness</i>	<ul style="list-style-type: none"> <li>• Educate our workforce and suppliers about modern slavery risks and indicators. In particular, focus on suppliers who demonstrate low maturity in relation to modern slavery.</li> <li>• Establish training programs to raise awareness and understanding.</li> <li>• Encourage employees to report any concerns related to modern slavery.</li> <li>• Foster a culture of responsibility and ethical conduct within the organization.</li> </ul>
<i>Governance</i>	<ul style="list-style-type: none"> <li>• Consider modern slavery policy and procedure development and implementation</li> </ul>

- Consider the introduction of Modern Slavery contract clauses into future contracts with all suppliers and vendors.