

aspenmedical



wherever
we're
needed

Modern
Slavery
Statement
2020



3M 1870 NIOSH V95 TC-84A-3844

Code: 1000

Contents

Our approach and progress	5
Our governance	7
Risk management and mitigation	9
Due diligence and supply chain assurance	10
Stakeholder engagement	11
Training and capacity building	11
Measuring effectiveness	11
Looking ahead	12

Our Approach and Progress

This Statement, pursuant to s54(1) of the Australian Modern Slavery Act 2018 (Cth), sets out the actions taken by Aspen Medical to detect the risks of modern slavery and human trafficking across our business and supply chain for the financial year ending 30 June 2021 and ensure we have in place the most appropriate responses to those risks.

With this Statement, we express our intent to implement those principles. We are committed to making the Modern Slavery Act and its principles part of the strategy, culture and day-to-day operations of the company and to engage in collaborative actions, to ensure we meet those requirements we have set out. Aspen Medical will make this Statement of this commitment to our teams, our stakeholders and the public. We recognise our commitment to report annually on our progress in implementing the seven mandatory statements outlined in this Statement.

In addition to the work we are doing in our procurement, recruitment and operations, we support the Ten Principles of the UN Global Compact and are an active member. We commit to providing an annual Communication on Progress that describes our company's efforts to implement the Ten Principles.

Key actions in 2020/21

1. Developing our methodology and systems to enable our objectives to be achieved.
2. Development of an IT resource to support our risk management and supply chain due diligence.
3. Developing support processes for any of our Suppliers who require remediation.
4. Development of a training program for our key stakeholders to detect and prevent modern slavery risks and provide awareness training for all Aspen Medical team members.
5. Promote our Modern Slavery Statement internally and externally.

Our structure, operations and supply chains

Aspen Medical is an Australian and veteran-owned global provider of innovative healthcare solutions across a diverse range of clients in the Government, Non-Government Organisation (NGO) and Private sectors.

Aspen Medical headquarters are in Canberra with a key operations hub and logistics centre in Brisbane. Aspen Medical operates across Australia, the Pacific, the US, Canada, Europe, Africa, and the Gulf Region. The company employs experienced, and highly-trained professionals dedicated to providing healthcare wherever it is needed.

Visit our website for further information:

[aspenmedical.com](https://www.aspenmedical.com)



MAPA
PROFESSIONAL
ULTRANITRIL 480
CE 0334



wherever
we're
needed

Our Governance

Aspen Medical has a robust corporate governance framework in place, with the Board overseeing our broader human rights program through the Quality Management Review Committee.

The purpose of the Quality Management Review Committee is to review the organisation's management systems across all sites at planned intervals, to ensure its continuing suitability, adequacy and effectiveness, and alignment with the strategic direction. This review shall include assessing opportunities for improvements and need for changes to the management systems, including the policies, objectives and targets.

Aspen Medical's Quality Management System is an accredited Integrated Management System audited by a third-party accreditation body comprising ISO 9001:2015 Quality Management System, ISO 14001:2015 Environmental Management System and ISO 45001: 2018 Occupational Health and Safety Management System. Aspen Medical conducts international humanitarian work and has established a specific World Health Organization (WHO) Emergency Management Team (EMT) management system called Rhino, which has undergone third-party auditing by auditors from the WHO and accredited Aspen Medical as a WHO EMT.

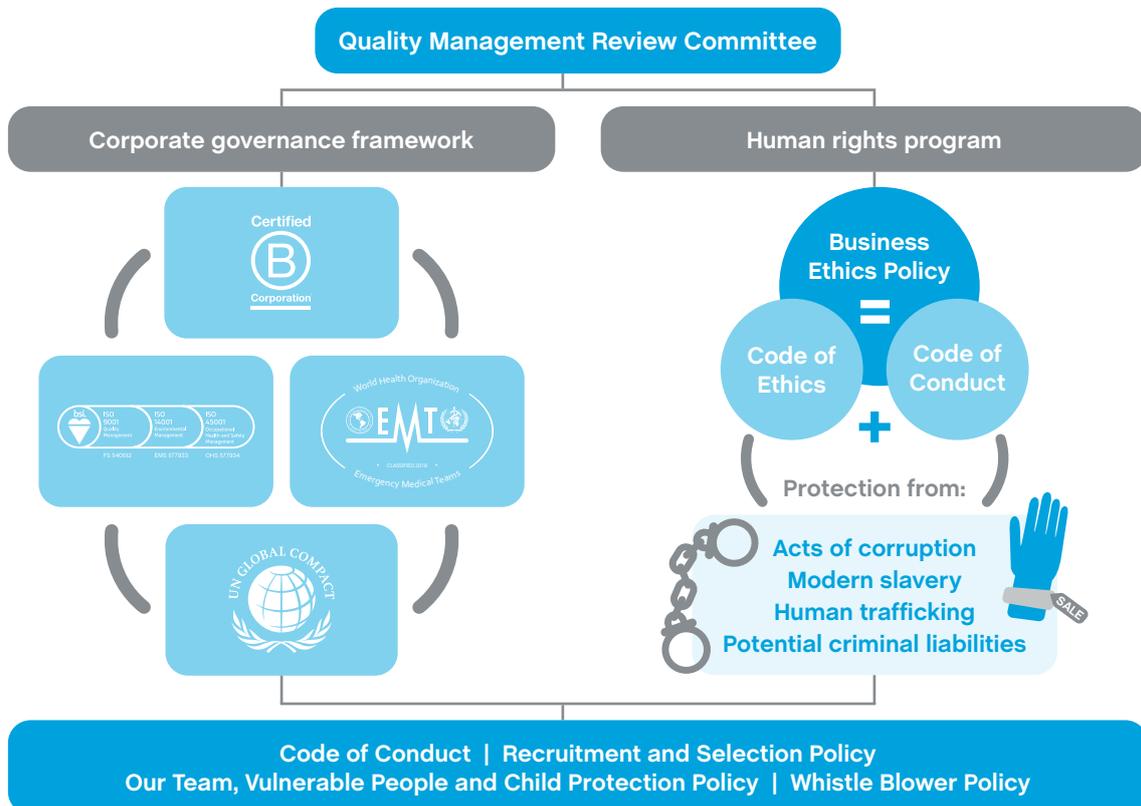
Aspen Medical has been accredited as an RMT under the WHO for international humanitarian work and, as such, our policies and procedures relating to human rights and labour has been rigorously reviewed by the WHO prior to accreditation being awarded.

Aspen Medical is also a certified B Corporation. Certified B Corporations are businesses that meet the highest standards of verified social and environmental performance, public transparency and legal accountability to balance profit and purpose.

Aspen Medical has a policy that outlines its approach to business Integrity in two parts: A Code of Ethics and a Code of Conduct. This policy applies to Aspen Medical and all its subsidiaries and affiliates. Our Code of Ethics outlines the ethical principles of Aspen Medical and its team members, representing the aspirations of the company at the business level. Our Code of Conduct translates these principles into practical guidance that guides and empowers Aspen Medical team members, its business partners, and their employees to realise these aspirations. Our Business Ethics Policy – the combination of these

two codes – has been developed to reinforce our commitment to honest and truthfulness and for the practical purpose of protecting Aspen Medical, its team members and business partners from acts of corruption, modern slavery (slavery, servitude, forced or compulsory labour, bonded labour) or human trafficking and the potential criminal liabilities. Specifically, it recognises the responsibilities of Aspen Medical under the Criminal Code Act 1995 and its responsibilities in accordance with the relevant laws, statutes, and codes applicable in the countries in which we operate. Aspen Medical will amend this code as and when necessary to reflect changes in national legislation and international agreements.

Underpinning this framework are the Group’s suite of policies and procedures, several of which are relevant to modern slavery. These include our Code of Conduct, Recruitment and Selection Policy, and Our Team, Vulnerable People and Child Protection Policy and Whistle Blower Policy.





Risk Management and Mitigation

Our management of modern slavery risk in our operations and supply chains, falls within our broader approach to human rights risk and is assessed and managed consistently within our established organisational-wide risk framework. This includes the Group's Risk Management Policy which is implemented at the Group level and includes all operations teams and contracts. Each client contract undergoes a risk assessment that includes the risk of modern slavery under our operational and people risk categories. This is particularly important for any humanitarian contracts awarded by the WHO. The Group's Quality Management Review Committee is responsible for providing oversight on behalf of the Board.

Whilst we recognise that modern slavery and human trafficking risk may occur in our organisation and extended supply chain, we know that the level of risk is influenced by factors such as vulnerable populations, product and service category, industry and geographic location. Accordingly, we have tailored our risk processes to ensure that we are focusing our efforts on those areas that present an elevated risk of exposure. We have assessed that of all the products and services we procure, those within the categories of medical consumables, medications, catering, information technology supplies and people services, could present a risk of modern slavery.



Due Diligence and Supply Chain Assurance

As part of the development of our Supply Chain Assurance Program, all new suppliers, as well as renewing suppliers, will be subjected to our due diligence process, prior to onboarding or contract award. Initially, suppliers will be requested to respond to a brief prequalification questionnaire administered in the Group procurement contract management system. This process helps us to identify potential areas of risk, and where identified, the supplier will be referred for further due diligence.

Supply chain assurance

We procure a large range of goods from a broad range of industries both domestically and internationally, and we acknowledge that modern slavery may occur in our global supply chain.

Our Supply Chain Assurance program will standardise the Group's approach to modern slavery and human trafficking due diligence. Importantly, this program will help us to understand how our suppliers are producing or sourcing the goods and services we procure, to ensure they comply with the Group's Supplier Requirements.

We are committed to the protection and respect of human rights across our business and supply chain. Where we identify impacts that we may have caused, or to which we may have contributed or be directly linked, we will seek to address this in line with the guidance provided under the United Nations Guiding Principles on Business and Human Rights (UNGPs). By focusing our efforts to avoid involvement in modern slavery and using the UNGPs we are taking a recognised, coordinated, integrated and rights-based approach to this important issue.

Grievances and remediation processes

We are going to establish reporting procedures and mechanisms where team members and third parties can report any concerns regarding unethical or illegal conduct, including in relation to modern slavery and human trafficking. Team members can report to their manager, or if they wish to remain anonymous, team members and third parties are able to report through our independently-operated Whistleblower Policy, via phone, email or an online portal.

We need to establish internal grievance resolution guidelines, which outline procedures and resolution options for our team members, under new Australian legislation designed to protect vulnerable workers under the Fair Work Act, the Modern Slavery Act and Whistleblower Protection Act. We will continue to evolve our approach to deal with any issues, including development of external grievance procedures for third parties, which we will make available to our suppliers and business partners.

Stakeholder Engagement

Cooperation with our suppliers, business partners and relevant government agencies to effect change is a key feature in our strategy to eradicate modern slavery. We are committed to collaborating with government and other businesses to eradicate modern slavery. We recognise the need for, and support of, a coordinated approach to addressing human rights issues, including the risk of modern slavery in our collective supply chains.

We are a member of the UN Global Compact and we are committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals. This we will do in a general statement to the public. We have completed the annual submission on our Communication on Progress (COP) and were awarded an "Active" status. We support public accountability and transparency and therefore commit to report on progress annually.

We are also committed to Corporate Sustainability through our membership of B Corp, which starts with a company's value system and a principles-based approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption. Aspen Medical, as a responsible business enacts the same values and principles wherever we have a presence and know that good practices in one area do not offset harm in another. By incorporating the Ten Principles of the UN Global Compact into our strategies, policies and procedures, and establishing a culture of integrity, we are not only upholding our responsibilities to people and planet, but also setting the stage for long-term success.

Training and Capacity Building

Training and awareness are a key control in addressing the risk of modern slavery and human trafficking. We recognise the need to build the capability of our employees, particularly our procurement practitioners, our recruiters and our front-line teams, to identify potential red flags of modern slavery and human trafficking and the actions required to respond appropriately.

We need to provide training in the following areas:

- Our group Procurement team and Recruitment team with tailored training on risk identification and due diligence processes.
- For other team members, we are focusing on building their awareness of global modern slavery and human trafficking and helping them understand the issues and to better understand, identify and report incidents.

Measuring Effectiveness

While there is extensive work being undertaken at a global level to understand and value respect for human rights, there are currently no fundamental units of measurement or international standards for measuring human rights impact. This is a complex issue that presents a challenge for us in terms of providing credible measurements as to their effectiveness in addressing modern slavery risk.

Certain processes within our Supply Chain Assurance program will provide us with a mechanism to help track the effectiveness of our program. We still need to design credible measurements as we develop our Supply Chain Assurance Program.

Looking Ahead

Modern slavery risk management requires continuous commitment and ongoing collaboration, both from within our company and through ongoing multi-stakeholder dialogue in international and domestic policy forums, the WHO and with local governments of host countries we are operating or are about to operate in.

Looking ahead there are three main areas we will be focusing on:

Risk Management

Developing an IT Risk Management solution to assist on classifying Suppliers

Developing a procurement IT solution identifying risk factors in our supply chain

Building capability in our procurement and recruitment teams in the use of an IT Risk Management System

Due Diligence

Implementing our Supplier Code of Conduct and Supplier Questionnaire amongst our targeted Suppliers

Assessing responses from Suppliers and integrating with the IT Risk Management Solution

Developing remediation process with our Suppliers who expose a risk to us

Raising Awareness

Brief our Board and the Senior Management Team to raise awareness of our approach to modern slavery

Developing a training course to target expertise within our procurement and recruitment teams especially those in humanitarian and overseas deployments

Developing a training course to raise awareness amongst our team members at our sites domestically and internationally so they can better identify and act on any indication of modern slavery

Provide an overview of our approach to modern slavery in mandatory induction training

Raise awareness amongst our Suppliers to comply with the Australian Modern Slavery Act, and where necessary, build capacity amongst our Suppliers

Glenn Keys AO

Executive Chairman



23 November 2020

This statement has been approved by the Board of Aspen Medical Pty Ltd

CONTACT

2 King Street
Deakin, ACT 2600
Australia
Phone +61 (0)2 6203 9500

FOLLOW



aspenmedical.com

