



Modern Slavery Statement

March 2021

Icon Group (Icon) acknowledges that modern slavery is one of the world's largest and most complex human rights issues. Icon is committed to prioritising the health, safety and well-being of its people and stakeholders, including people working directly or indirectly within its supply chains.

Icon is 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. In particular, Icon is 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 cases that are identified.

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. This term is defined in the *Modern Slavery Act 2018* (Cth) and includes eight types of serious exploitation: servitude, slavery, forced labour, forced marriage, the worst forms of child labour, debt bondage, deceptive recruiting for labour or services and trafficking. These are serious crimes globally and include human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

Icon will work proactively with our supply chains and operations to reduce the risk of modern slavery and promote and support human rights and we expect all organisations we engage with to do the same. This will be a continuous improvement approach as Icon gains a better understanding of the supply chain of our suppliers and works with them should instances of modern slavery be identified. Icon is committed to invest time and resources to contribute to the fight to end modern slavery.

This statement, pursuant the Australian Modern Slavery Act 2018 (Cth), sets out the actions taken by the Icon to address modern slavery risks in our business and supply chain over the financial year ending 30 June 2020. It outlines the current and ongoing activities Icon has committed to in order to identify, assess and remedy risks relating to modern slavery in our business and supply chain.

Reporting entity

Icon has met the reporting threshold and this report relates to the following companies which all reach that threshold; C0001 Pty Ltd (ABN 13 618 935 069), Slade Health Pty Ltd (ABN 59 151 218 978) and W.H. McCarthy Pty Ltd (ABN 73 000 004 893). W.H. McCarthy Pty Ltd is an independently owned pharmacy. Icon has a number of related entities involved in the provision of integrated cancer care. These entities are not reporting entities for the purposes of the Modern Slavery Act however this statement is provided on behalf of all entities in Icon, given Icon conducts procurement for these entities and manages human resources activity for these entities.

Entities structure, operations and supply chain

Icon is Australia's largest dedicated private provider of cancer care, with a growing presence in Asia. Icons is a vertically integrated model oncology business that offers services in medical and radiation oncology, chemotherapy, compounding and hospital pharmacy. Icon was founded and is headquartered in Queensland Australia and is diversified across 6 divisions, with operations in Australia, New Zealand, Singapore, Hong Kong and China. Icon operates joint ventures in New Zealand and Vietnam. Icon has over 30 years of experience in private cancer care and we employ close to 3,000 people across a number of operational divisions and support functions globally.

Our global workforce consists of direct employees, contractors and medical partners. Our direct team members are engaged either by contract, award or a collective industrial agreement. The majority of our workforce is located in Australia, our second largest workforce location is in Singapore.

Icon is private equity owned by a number of consortium investors. Icon operates its business under a number of brands that span cancer care, pharmacy and compounding divisions.

	Australia			Asia			
Division	Icon Cancer Centre – Australia & New Zealand	Compounding	Pharmacy Services	Icon Cancer Centre – Singapore	Icon Cancer Centre – Hong Kong	Icon Cancer Centre – China	
Business							
Services	Radiation Oncology provides radiation oncology treatment to patients in hospitals and medical precinct outpatient clinics	Medical Oncology provided medical oncology and haematology services for private patients in hospital day centres	Provides customised drug compounding for hospitals, oncology centres and individual patients	Major provider of outsourced hospital pharmacy services in Australia	Provides medical oncology services for patients across Asia in private clinics, with radiation oncology services under development	Provides oncology services through cancer centres and specialist centres for patients in Hong Kong	Radiation Oncology management services in partnership with local operators

Icon’s supply chain includes the products and services used to deliver healthcare services and manufacture patient specific medications. Pharmaceuticals account for over 70% 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. Pharmaceuticals account for over 90% of total expenditure on goods and services. Other goods and services include medical consumables and ICT Equipment.

Risks of modern slavery practices in operations and supply chain

Icon acknowledges that as our global workforce continues to grow, the potential for modern slavery risks rise. It also acknowledges that risks of modern slavery exist in our operations and supply chains. Icon is committed to continually improve the organisations approach to identify, assess and manage modern slavery-related risks in its operations and supply chain.

The greatest area of risk for Icon relates to supplier partnerships for the provision of products used in the pharmaceutical compounding facilities and in the provision of medical supplies to cancer centres (including but not limited to personal protective equipment such as mask and gloves and clinical equipment). As a large number of suppliers provide these types of products from overseas, the most significant risk of modern slavery is in the manufacturing of these goods.

Additionally, as Icon’s employment footprint expands in Asia risk could emerge relating to human rights and labour sourcing, such as the possibility of deceptive recruiting for labour or services by third party employment services providers.

Actions taken to assess and address modern slavery risks

Human rights risks

Icon is 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 live a life of freedom and opportunity.

Icon respects workers' ability to enter into employment voluntarily and freely, without the threat of a penalty, and respect workers' freedom to terminate employment without penalty, excepting reasonable notice or as per any relevant contract or industrial instrument. Icon will 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. It will not engage in misleading or fraudulent practices during the recruitment of employees or when offering employment and will not require workers to pay for their jobs.

Icon is a values led organisation. Our values express what we stand for and are at the heart of our culture. They guide how we work together and how we continue to create a culture that places the patient as the centre of everything we do. Our approach to responsible business practice, good corporate governance and corporate social responsibility reflects our commitment to our values.

Icon's Corporate Social Responsibility Framework has 5 key pillars: Policy Development, Privacy, Diversity and Inclusion, Environmental Sustainability and Social Impact. Modern slavery concerns are addressed through Icon's CSR framework which support the UN Sustainability Goals and Targets. Each pillar of the framework is delivered by cross-functional collaborative working groups who identify, monitor and deliver each pillars supporting initiatives.

The framework and collaborative teams deliver Icon's sustainability objectives to:

1. Deliver sustainable integrated cancer treatment solutions for patients globally
2. Create of a sustainable global workforce
3. Enable global management practices that promote social, environmental and economic sustainability

Icon will ensure workers are free from discrimination, harassment, violence and prejudicial treatment and all policies relating to employment will reflect this principle. Icon has a policy framework that delivers our commitment to good corporate governance. Policy is developed cross-functionally through collaborative working groups. As a result, Icon has robust strategies and activities in place to ensure our Policies set out in detail the behaviour we expect from employees and partners, and it provides the structure through which we maintain compliance with our legal obligations. A Modern Slavery Policy was released in March 2021.

Some of our policies with relevance to human rights include:

- Icon Group Code of Conduct
- Treating People Fairly at Work Policy
- Ethical Business Conduct Policy
- Recruitment Selection & Probity Policy
- Health & Safety Policy
- Whistleblower 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 HR team or via the Whistleblower email address. Methods for reporting grievances, in person and anonymously, are published broadly across the organisation. Where issues are investigated and substantiated, Icon will take appropriate action to remedy.

Supply Chain and Operations risks

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

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

- Supplier due diligence: Icon will undertake 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 Icon’s procurement team prior to engaging the supplier.

- **Supplier communication:** Icon will require suppliers to notify Icon Procurement or a member of the Icon 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.
- **Supplier compliance with minimum standards:** Icon expects all supplier partners and all parts of the Icon operations to comply with its supplier minimum standards. Where a supplier is, or appears, unable to meet any of the supplier minimum standards, Icon or the relevant Icon Entity may work with the supplier to understand their limitations and determine how compliance may be achieved.
- **Training on modern slavery concerns:** Icon is committed to ensuring training is provided so that its workers and other third parties or entities undertaking activity for or on behalf of Icon understand modern slavery, and what is required to identify, assess and address modern slavery as well as their responsibilities under this policy.

Icon’s annual Modern Slavery statement will be available for all members of the organisation and public to review. The publication of the report provides an opportunity for Icon’s team members, customers, investors and suppliers to ascertain activities undertaken each year to reduce modern slavery. In addition, Icon’s activities in this area serve to engage team members in a previous hidden or undisclosed human rights issue within business and commerce. Modern Slavery reporting will be provided to the Board and Senior Leaders of Icon.

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

Assessment of the effectiveness of actions taken to address modern slavery

Icon has committed to a number of key objectives for the 12 months ahead. By the end of FY22, Icon will have delivered a number of objectives that will progress our work in this area.

<div style="background-color: #008000; color: white; padding: 10px; text-align: center;"> GROUP RISK ASSESSMENT & MITIGATION  </div> <p>Group level risk assessment identifies where Modern Slavery risk are most likely to occur and considers insights from across divisions</p> <ul style="list-style-type: none"> • Cross functional team convened to work together to assess risk and to identify strategies to remedy risks at a group level. • The working group’s purpose is to discuss, test and agree on actions we could take to identify and manage modern slavery risks across our operations and supply chain. • Using the assessment process designed by the group, each division will complete an assessment of risk and compliance. 	<div style="background-color: #660066; color: white; padding: 10px; text-align: center;"> GROUP GOVERNANCE & POLICY  </div> <p>Group level policy and governance is functioning with sufficient business unit oversight in place to engage and execute policy and governance</p> <ul style="list-style-type: none"> • Modern Slavery Policy is developed and approved by the Board • Issuing of a Human Rights Policy Statement • The Board and the Executive Leadership team are briefed on their obligations and requirements • Reporting operating rhythm is established and enacted • Group policies and procedures will be annually reviewed 	<div style="background-color: #0000FF; color: white; padding: 10px; text-align: center;"> GROUP ASSURANCE PROGRAM  </div> <p>Increasing global footprint calls for strong local expertise to engage and execute policy and governance</p> <ul style="list-style-type: none"> • Due diligence approach will be strengthened across all divisions • Supplier Minimum standards will be roll out across all suppliers • High risk suppliers will be identified by business unit and assessed • Approach to monitoring effectiveness will be designed • Grievance handling and reporting processes are defined and published across the group 	<div style="background-color: #FFA500; color: white; padding: 10px; text-align: center;"> GROUP TRAINING & EDUCATION  </div> <p>Education and training is integral part of building awareness and capability</p> <ul style="list-style-type: none"> • Training is being developed for employees and suppliers • All employees will be required to complete education on our approach and policy as mandatory training • All suppliers will be offered training on our approach and policy and on the supplier minimum standards • Training to be incorporated into all corporate induction programs, onboarding programs and leadership programs
---	--	---	--



Icon will track and report on the delivery of these objectives. Icon is committed to investing time and resources to contribute to the fight to end modern slavery.

Process of Consultation

A cross divisional international working group was convened in 2020 with the specific purpose of deeply examining the risk of modern slavery in Icon's operations and supply chain. This working group, whilst slightly delayed by the impact of COVID-19, is meeting regularly to ensure that Icon's key objectives for FY22 are delivered. They have been involved in the formation of the company's approach to modern slavery and will continue to play a key conduit role consulting with the divisional teams on matters relating to the risk of modern slavery in Icon's operations.

The Policy and Statement have been broadly consulted on with the Icon Executive team and its extended leadership team. Expert guidance has been sought from internal and external industrial relations and legal specialists. The Icon procurement and human resources teams have been heavily involved in the development of the policy and the statement.

Board Approval

This Modern Slavery Statement was reviewed and approved by the Icon Group Board of directors and the W.H.McCarthy directors on behalf of Icon Group, Slade Health and W.H.McCarthy on 30 March 2021.

Mark Middleton
Group Chief Executive Officer
Icon Group

David Slade
Chief Executive Officer, Slade Health
Director, W.H.McCarthy

Professor Mark Compton AM
Chairman
Icon Group Board