



Modern Slavery Statement 2023





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Introduction

As a world-leading integrated healthcare provider, Icon Group (Icon) has global reach and impact.

We understand our responsibility to deliver our services sustainably across environment, social and governance (ESG). This commitment is at the heart of our mission to deliver the best care possible – for our patients, our people and our planet.

We do this through care for:

-  **PATIENTS** – working to expand cancer awareness, clinical competency and access and quality care for at risk communities
-  **PEOPLE** – establishing a diverse, inclusive and attractive working environment; set up to deliver the best possible patient outcomes
-  **PLANET** – actively working towards a lower waste and carbon footprint.

Our commitments are underpinned by good governance – demonstrated through transparent and repeatable reporting and communication to all our stakeholders.

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.

Modern slavery is one of the world's largest and most complex human rights issues.

Icon is committed to conducting our 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. We are 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 concerns that are identified.

We are working proactively with our supply chains and operations to reduce the risk of modern slavery and support human rights and we expect all organisations we engage with to do the same.

This is Icon's third Modern Slavery Statement. This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth) sets out the actions taken by Icon to address modern slavery risks in our business and supply chain over the financial year ending 30 June 2023. It outlines the current and ongoing activities Icon has committed to identify, assess and remedy risks relating to modern slavery in our business and supply chain and its goals for 2024.



Reporting entity

Icon has met the reporting threshold and this report relates to APOG Topco Pty Ltd (ACN 654 198 268) and its subsidiaries.

The wider Icon Group has a number of related entities involved in the provision of integrated cancer care. While not all of these entities meet the threshold for reporting entities for the purposes of the Modern Slavery Act, this statement is provided on behalf of all entities within Icon, given Icon conducts procurement and manages human resources for these entities.

Entities, structure, operations and supply chain

Icon is Australia's largest dedicated private provider of cancer care, with a growing global reach. Icon is a vertically integrated oncology business that offers services in medical and radiation oncology, haematology, compounding and pharmacy management services.

Icon was founded and is headquartered in Queensland, Australia. Our diverse team comprises multidisciplinary divisions, with operations spanning Australia, New Zealand, Singapore, Hong Kong and Mainland China. We also operate a joint venture in New Zealand and management agreement in Vietnam, and, at the time of publication, signed new partnerships in Malaysia and the United Kingdom. This statement does not include these new partnerships as they were not formed in this reporting period.

With more than 30 years of experience in private cancer care, Icon employs close to 3,500 people across several operational divisions and support functions globally. Our global workforce consists of direct employees, contractors, and medical partners. Medical partners and direct team members are engaged either by contract, award, or a collective industrial agreement.

Icon is private equity owned by several consortium investors. We operate our business under several brands that span cancer care, pharmacy, and compounding divisions.

- **Icon Cancer Centre Australia and New Zealand** – Radiation Oncology including treatment to patients in hospitals and medical precinct outpatient clinics. Medical Oncology including medical oncology and haematology services for private patients in hospital day centres.
- **Slade Health Compounding Australia and New Zealand** – Provides customised drug compounding for hospitals, oncology centres and individual patients.
- **Pharmacy Services** – Major provider of outsourced hospital pharmacy services in Australia under the brand names: Icon Cancer Centre, Epic Pharmacy and Slade Pharmacy.
- **Icon Cancer Centre Mainland China** – Radiation Oncology management services in partnership with local operators.
- **Icon Cancer Centre and Icon Specialist Centre Hong Kong** – Icon Cancer Centre provides comprehensive oncology services, and Icon Specialist Centre provides colorectal surgical services for patients in Hong Kong.
- **Icon Cancer Centre and Icon Health Screening Singapore** – Icon Cancer Centre provides medical oncology, radiation oncology and haematology services for patients across the ASEAN region. Icon Health Screening provides comprehensive screening services for patients in ASEAN.
- **Research** – provides Phase I to Phase IV clinical trials in medical oncology, radiation oncology and haematology sponsored by the pharmaceutical industry and collaborative groups, as well as Icon Investigator Initiated Trials, clinical registries, medical physics and dosimetry research.



Icon's supply chain includes the products and services used to deliver healthcare services and manufacture patient specific medications. Pharmaceuticals account for over 80% of total expenditure on goods and services. Other goods and services include medical equipment and consumables, ICT equipment and personal protective equipment for our employees and patients.

80%

Icon pharmaceutical goods and services total expenditure

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 increases. We acknowledge that risks of modern slavery exist in our operations and supply chains. Icon is committed to continually improving the organisations approach to identify, assess and manage modern slavery-related risks in our 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 masks, 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 and beyond, 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 a value led organisation. Our values express what we stand for and are at the heart of our culture and guide how we work together. Our values are Innovate, Connect, On Purpose, Nurture and Energy. Our approach to responsible business practice, good corporate governance and corporate social responsibility reflects our commitment to our values.

Icon has a Board approved ESG strategy that provides focus and oversight on modern slavery risks as well as a number of key sustainability topics. Modern slavery concerns are addressed through the ESG strategy which reflects our commitment to the principles of the UN Compact Strategy, and which supports several of the UN Sustainability Goals and Targets.

We are committed to conducting our 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. In particular, Icon is committed to ensuring human rights and 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.

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

Icon continues its commitment to good governance and strong institutions through its policy framework that ensures our policies set out in detail the behaviour we expect from employees and partners. A Modern Slavery Policy was released in March 2021 and is reviewed annually.

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 and Selection Policy
- ✓ Health and Safety Policy
- ✓ Whistleblower and Protection Policy
- ✓ Volunteering at Icon Group Policy
- ✓ Icon's Human Rights Statement
- ✓ Financial Delegations Policy

Icon 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 Head of Legal, the People and Culture (Human Resources) team or via the Whistleblower email address. Leaders are educated and informed on the importance of promptly acting on behalf and managing grievances. Methods for reporting grievances, in person and anonymously, are published broadly across the organisation. Where issues are investigated and substantiated, Icon takes appropriate action to remedy.

Supply chain and operations risks

Icon deals with existing and potential business partners and suppliers fairly and ethically and in accordance with this policy. We endeavour to procure from business partners and suppliers that are aligned with our commitments to human rights, good governance and the environment.



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

- **Supplier due diligence:** Icon conducts screening of all new suppliers and has evaluated 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 requires screening by Icon's procurement team prior to engaging the supplier.
- **Supplier communication:** Icon requires suppliers to notify Icon's Procurement team 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.
- **Alleged modern slavery:** Icon has worked with suppliers where allegations of modern slavery have occurred to ensure any grievances are clarified and all staff are paid in accordance with relevant awards.
- **Evaluation of suppliers of suppliers:** Icon has engaged with vendors of supply chain risk management solutions and completed the screening process of Tier 2 suppliers. Subsequent tiers to be screened during the next reporting year.
- **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. Current training modules will be reviewed and refined during the next reporting period.

Icon's annual Modern Slavery Statement is publicly available for review. The publication of the report provides an opportunity for our team members, customers, investors and suppliers to see the 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 is provided to the Board and Senior Leaders of Icon.

Any suspected instance of modern slavery in our supply chain operation should be reported to Icon's 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 our 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 is committed to addressing the risks of modern slavery and delivered a number of key objectives for 2023, with work continuing into 2024 to fully implement the approach. We are investing time and resources to help end modern slavery and are tracking and reporting on the delivery of our initiatives and actions.



Key Objectives	Initiative	FY2023 KPI	FY2023 Actions
Group Risk Assessment and Mitigation	Identifying and addressing modern slavery risks	Procurement will identify impacts in our supply chains and any actions required to address and engage software vendor for next phase of supply chain review.	Software vendors were engaged and monitoring of all significant and high-risk suppliers was undertaken.
		Continued review of modern slavery identification and reporting processes to align with Icon's ESG Council.	Reviews were performed in FY23.
		Review of reporting platforms and mechanisms for employees and/or individuals to disclose potential modern slavery risk.	P&C reviewed in FY23.
	Annual Risk Assessment Workshop	Group risk assessment across all divisions and operating countries annually. Reported to Icon's Board and ESG Council.	Completed in FY23.

Key Objectives	Initiative	FY2023 KPI	FY2023 Actions
Group Governance and Systems	Risk assessment of supply chains and procurement operations with focus on Modern Slavery compliance	Review of initial tier 2 supplier report from software vendor.	Completed in FY23.
		Next phase will be to implement supplier survey risk rating tool to review next supply chain tier.	These were deployed during the biennial tender process for all pharmaceuticals in FY23.
		Any modern slavery risk issues identified to be reported to Icon's ESG Council along with recommended action.	Completed in FY23.
	External publishing of modern slavery action within Sustainability Impact Report	Report on compliance with modern slavery within Icon's Sustainability Impact Report which will be published annually.	This will be included in our 2023 Sustainability Impact Report submission.
ESG Council	Continued review & alignment of modern slavery working group composition and terms of reference to align with corporate governance and reporting requirements.	The establishment of Icon's ESG council was achieved in FY23.	

Assessment of the effectiveness of actions taken to address modern slavery

Key Objectives	Initiative	FY2023 KPI	FY2023 Actions
Group Human Rights Responsibilities	Training	Establish Leader training to incorporate supply chain operations and supplier arrangements, with a view to scaling across global operations.	Ethical Business Training was completed and is available as a resource on the intranet.
		Procurement to develop and offer to suppliers training on our approach and policy and on the supplier minimum standards, with a view to scaling across global operations.	Training offered to high-risk suppliers during FY2023.
	Onboarding new acquisitions or new business	A due diligence checklist will be developed to proactively identify any potential threats of human rights violations in any acquired business.	Initial draft has been developed and this will be revised when new businesses are acquired.
		Onboarding processes will include specific training on Icon's commitment to modern slavery.	Modern Slavery training is currently under development for internal stakeholders.
	Policies and Procedures	Procurement to review policies and training materials for suppliers.	Annual review performed.
		Commitment to review policies with modern slavery impacts. Remain compliant and fit for purpose.	Annual review performed.



Assessment of the effectiveness of actions taken to address modern slavery

Key Objectives	Initiative	KPIs to Measure Effectiveness	Current Status	Lead
Group Risk Assessment and Mitigation	Identifying and addressing modern slavery risks	Procurement will identify impacts in our supply chains and any actions required to address and engage software vendor for next phase of supply chain review.	Expansion across all suppliers required.	Procurement
		Continued review of Modern slavery identification and reporting processes to align with Icon's ESG Council.	Annual review mechanism in place.	Procurement
		Review of reporting platforms & mechanisms for employees and/or individuals to disclose potential modern slavery risk.	Expansion across all suppliers required.	Procurement
	Annual Risk Assessment Workshop	Group risk assessment across all divisions and operating countries annually. Reported to Icon's Board and ESG Council.	Annual review mechanism in place based on benchmarking with our industry.	Procurement

Key Objectives	Initiative	KPIs to Measure Effectiveness	Current Status	Lead
Group Governance and Systems	Risk assessment of supply chains and procurement operations with focus on modern slavery compliance	Review of initial tier 2 supplier report from software vendor.	Next phase will be to implement supplier survey risk rating tool to review next supply chain tier.	Procurement
		Any modern slavery risk issues identified to be reported to Icon's ESG Council along with recommended action.	Responsibility matrix to be developed to ensure consistent approach.	Procurement
	External publishing of modern slavery action within sustainability impact report	Report on compliance with modern slavery within the Sustainability Impact Report which will be published annually.	This will be included in our 2024 Sustainability Impact report submission.	Executive Management
ESG Council	Continued review and alignment of modern slavery working group composition and terms of reference to align with corporate governance and reporting requirements.	Review mechanism in place in consultation with ESG Council.	Executive Management	

Assessment of the effectiveness of actions taken to address modern slavery

Key Objectives	Initiative	KPIs to Measure Effectiveness	Current Status	Lead
Group Human Rights Responsibilities	Training	Establish leader training to incorporate supply chain operations and supplier arrangements, with a view to scaling across global operations.	Ethical Business Training to be incorporated into induction of all management positions.	Executive Management
		Procurement to develop and offer to suppliers training on our approach and policy and on the supplier minimum standards, with a view to scaling across global operations.	Biannual training sessions to be offered to all suppliers.	Procurement
	Onboarding new acquisitions or new business	A due diligence checklist will be developed to proactively identify any potential threats of human rights violations in any acquired business.	Checklist to be evaluated with any acquisitions in FY2024.	Executive Management
		Onboarding processes will include specific training on Icons commitment to modern slavery.	Ethical Business Training to be completed as part of any transition of employees.	Executive Management
	Policies and Procedures	Procurement to review policies & training materials for suppliers.	Annual review mechanism in place.	Procurement
		Commitment to review policies with modern slavery impacts. Remain compliant and fit for purpose.	Annual review mechanism in place.	Procurement





Process of Consultation

Icon's ESG Council has been consulted on the development of the Modern Slavery Statement and the progress of its initiatives. Objectives have been discussed and agreed in collaboration and broadly socialised across the organisation and extended leadership teams. Feedback has been sought and integrated from multiple stakeholders. Expert guidance has been provided by internal and external industrial relations and legal specialists. The Icon procurement team has been heavily involved in the development of the policy and the statement. Discussion approval and endorsement from the Board has been achieved.

Board approval

This Modern Slavery Statement meets the requirement for approval and was reviewed and approved by the Icon Group Board of Directors on (4 December 2023). The Icon Group Board is the principal governing body for Icon and its subsidiaries. Supporting documentation of this approval is attached to this statement by way of a confirming letter from the Company Secretary.

This statement is made in accordance with the Australian Modern Slavery Act 2018, it represents the Australian Reporting Entities on modern slavery for the financial year ended 30 June 2023.

Mark Middleton OAM
Icon Group Chief Executive Officer

Paul McClintock AO
Icon Group Board Chair



Our commitments are underpinned by good governance – demonstrated through transparent and repeatable reporting and communication to all our stakeholders.





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