

ICON MODERN SLAVERY STATEMENT

2022

CONTENTS

Introduction	3
Reporting entities	3
Entities, structure operations and supply chain	4
Risks of modern slavery practices in operations and supply chain	6
Actions taken to assess and address modern slavery risks	7
Human rights risks	7
Supply chain and operations risks	10
Assessment of the effectiveness of actions taken to address modern slavery	13
Group risk assessment and mitigation	14
Group governance and policy	15
Group assurance program	16
Group training and education	17
Group risk assessment and mitigation	18
Group governance and systems	19
Group human rights responsibilities	20
Process of consultation	21
Board approval	22

INTRODUCTION

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 these principles across all aspects of the business through our global sustainability strategies in line with our ESG (Environmental, Social and Governance) program.

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. In particular, Icon is committed to conduct business that ensures 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.

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. Under the Icon ESG Strategy that includes; charters for care for patients, care for people, care for planet and ESG stewardship, Icon will work 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 2022. This Statement also 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 our goals for 2023.

REPORTING ENTITIES

Icon has met the reporting threshold for the following entities:

- D Slade Pharmacies as trustee for D Slade Pharmacies Unit Trust - ABN:58 689 652 969
- PharmaHR P/L as trustee for Slade-Epic Employment Trust - ABN:46 559 360 701
- W.H. McCarthy Pty Ltd - ABN:73 000 004 893
- ACT Pharmacies Pty Ltd - ABN:47 120 406 886
- D Slade [sole trader] - ABN:69 315 076 159
- APOG Topco Pty Ltd - ABN:66 654 198 268

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 Icon Group entities, 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 and beyond. Icon brings together all aspects of quality cancer care, including - medical oncology, radiation oncology, haematology, research, pharmacy and chemotherapy compounding to deliver a true end-to-end seamless service.

Icon was founded and is headquartered in Queensland and operates in Australia, New Zealand, Singapore, Mainland China and Hong Kong. Icon also operates a joint venture in New Zealand and a management agreement in Vietnam. Icon has over 30 years of experience in private cancer care and 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.

Our direct team members are engaged either by contract, award, or a collective industrial agreement.

Icon is private-equity owned and operates businesses under several brands spanning cancer care, research, pharmacy and compounding:

Icon Cancer Centre - Australia and New Zealand

Provides a mix of radiation oncology, medical oncology, haematology and research for patients in varied settings, including; stand-alone centres, hospital departments and private outpatient clinics.

Slade Health - Australia and New Zealand

Operates TGA-licensed manufacturing facilities that provide drug compounding for hospitals, oncology centres and patients across public and private healthcare.

Pharmacy - Australia

Provides a complete suite of pharmacy management services to support the operations of Epic and Slade pharmacies, that deliver medicine management services to the hospital and oncology sectors. The group also owns and operates Icon pharmacies located within Icon's cancer centres in Australia.

Icon Cancer Centre - Mainland China

Provides radiation oncology management services in partnership with local Mainland China hospitals and healthcare organisations.

Icon - Hong Kong

Under the brands Icon Cancer Centre and Icon Specialist Centre, we provide oncology and specialist services for patients in Hong Kong.

Icon - Singapore

Under the brands; Icon Cancer Centre, Icon Haematology and Icon Health Screening, the group's Singapore operations deliver medical oncology, radiation oncology, haematology, research and health screening services.

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 rises. It also acknowledges that risks of modern slavery exist in our operations and supply chains. Icon is committed to continually improving the organisation's 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 in the provision of products used in the pharmaceutical compounding facilities and medical supplies to cancer centres (including, but not limited to, personal protective equipment such as masks, 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, and potential new markets in Europe, risk could emerge relating to human rights and labour sourcing, such as deceptive recruiting for labour or services by third-party employment services providers.

Icon continues to improve our approach to identifying, assessing and managing modern slavery-related risks.



ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS HUMAN RIGHTS RISKS

Icon is committed to conducting 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.

Icon respects workers' ability to enter employment voluntarily and freely, without the threat of a penalty and respects 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. Icon 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 of Innovate, Connect, On Purpose, Nurture and Energy express what we stand for and are at the heart of our culture and guide how we work together. 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 initiatives. Modern slavery concerns are addressed through the ESG Strategy which reflects Icon's commitment to the principles of the UN Compact Strategy, and which supports several of the UN Sustainability Goals and Targets.

THE FRAMEWORK AND COLLABORATIVE TEAMS DELIVER ICON'S SUSTAINABILITY OBJECTIVES TO:



Deliver sustainable, integrated cancer treatment solutions for patients globally



Create a sustainable global workforce



Enable global management practices that promote social, environmental and economic sustainability



Icon continues its commitment to good governance and strong institutions through a policy framework that ensures our policies detail the behaviour Icon expects from employees and partners. Our 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
- ✓ Workplace Health and Safety Policy
- ✓ Whistleblower Policy
- ✓ Volunteering at Icon Group Policy
- ✓ Icon's Human Rights Statement
- ✓ Financial Delegations of Authority



Team members are encouraged to report any concerns of unethical or illegal conduct, instances of modern slavery, either to their leader, the procurement team, Icon's People and Capability team or via Icon's Whistleblower email address.

Leaders are educated and informed on the importance of promptly acting on and managing grievances.

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 work with current and potential business partners and suppliers fairly and ethically and in accordance with our Modern Slavery Policy.

Icon will endeavour to procure from business partners and suppliers that are aligned with its commitments to human rights, good governance, and the environment.

Icon has implemented procedures to identify, assess and address risks of modern slavery in our 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 screen all relevant suppliers and 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 requires suppliers to notify Icon’s procurement team, or a member of the Icon 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.



Evaluation of supplier of suppliers

Icon has engaged with vendors of supply chain risk management solutions and has completed the screening process of Tier 2 suppliers. Plans to screen subsequent tiers is scheduled for completion during the next reporting year.



Supplier compliance with minimum standards

Icon expects all supplier partners and all parts of 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 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 providing training 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.



ASSESSMENT OF THE EFFECTIVENESS OF ACTIONS TAKEN

TO ADDRESS MODERN SLAVERY

In 2022 Icon committed to and delivered a number of key objectives to address modern slavery, with work continuing into 2023 to fully implement our approach and actions. Icon will track and report on the delivery of these objectives and is committed to investing time and resources to help end modern slavery.

Icon's annual Modern Slavery Statement is made 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 previously 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 supply chain operations should be reported to the 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 the Supplier Minimum Standards or are found to have been involved in modern slavery that cannot be addressed.



GROUP RISK ASSESSMENT AND MITIGATION

Key objectives	FY2022 KPI	FY2022 actions
Group level risk assessment identifies where modern slavery risks are most likely to occur and considers insights from across divisions	Working group to continue ongoing with bi-monthly meetings	<ul style="list-style-type: none"> ESG Council has been convened as the working group to review modern slavery matters
	Working group to be chaired by CEO-level position	<ul style="list-style-type: none"> Executive representative to Chair the working group and participate as members
	Working group to review identified Modern Slavery risks and mitigation strategies and make recommendations on outcomes	<ul style="list-style-type: none"> Working group includes subject matter experts in; labour relations, governance, finance, supply chain and Diversity, Equity and Inclusion (DE&I)
	Working group to report quarterly to the Icon Board on Group Governance and Assurance Strategy	<ul style="list-style-type: none"> Working group continues to meet and consider any identified modern slavery risks and make recommendations on corrective action as required Any modern slavery issues reported to the Icon Board during board reporting cycles

GROUP GOVERNANCE AND POLICY

Key objectives	FY2022 KPI	FY2022 actions
Group level policy and governance is functioning with sufficient business unit oversight in place to engage and execute policy and governance	Implemented reporting operating rhythm across all divisions and countries of operation	<ul style="list-style-type: none"> Policies and procedures, with relevance to human rights, were reviewed during the reporting period to ensure fit for purpose
	New Board members to be inducted on obligations and requirements	<ul style="list-style-type: none"> Identification and appointment of new dedicated resource to support modern slavery governance
	Policies and procedures to be updated and reviewed in July 2022	<ul style="list-style-type: none"> Reporting and cadence have been developed and agreed with the executive team and has been implemented and ongoing from July 2022
	Identify a dedicated resource to lead modern slavery governance and track and monitor success against goals	<ul style="list-style-type: none"> New Icon Board established in FY22 with induction and onboarding of company policy. Other obligations scheduled for the new calendar year

GROUP ASSURANCE PROGRAM

Key objectives	FY2022 KPI	FY2022 actions
Increasing global footprint calls for strong local expertise to engage and execute policy and governance	Engagement with supply chain software vendor for assessment of Tier 2 suppliers	<ul style="list-style-type: none"> Supply chain software vendor engaged, reported on initial Tier 2 suppliers. Primary Labour Hire providers to Icon operations were included in this initial supply chain review and assessment. Software vendor has global capacity to assess suppliers Continued scoping of requirements for anticipated growth in Icon's global markets
	Specific HR risks in labour hire to be assessed and a strategy for ongoing monitoring to be implemented	
	Proactive identification of requirements and planning for action in anticipated new global markets in and beyond 2022	

GROUP TRAINING AND EDUCATION

Key objectives	FY2022 KPI	FY2022 actions
Education and training are integral parts of building awareness and capability	All suppliers will be offered training on our approach and policy and on the supplier minimum standards	<ul style="list-style-type: none"> All Icon suppliers provided with relevant policy on supplier minimum standards Leader training regarding supply chain operations and supplier arrangements under scoping
	Localised training to be incorporated into local onboarding processes	
	Specific training on supply chain operations for leaders with accountability for supplier arrangements	
	Training to be delivered digitally in multiple languages	

GROUP RISK ASSESSMENT AND MITIGATION

FY2023 initiative	KPIs to measure effectiveness
Identifying and addressing modern slavery risks	<ul style="list-style-type: none"> 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 Continued review of modern slavery identification and reporting processes to align with Icon ESG Council Review of reporting platforms and mechanisms for employees and/or individuals to disclose potential modern slavery risk
Annual risk assessment workshop	<ul style="list-style-type: none"> Group risk assessment across all divisions and operating countries conducted annually. Reported to the Icon Board and ESG Council

GROUP GOVERNANCE AND SYSTEMS

FY2023 initiative	KPIs to measure effectiveness
Risk assessment of supply chains and procurement operations with focus on Modern Slavery compliance	<ul style="list-style-type: none"> Review of initial Tier 2 supplier report from software vendor Next phase includes implementing supplier survey risk rating tool to review next supply chain tier Any identified modern slavery risk issues to be reported to the Icon ESG Council along with recommended action/s
External publishing of modern slavery action within Sustainability Impact Report	<ul style="list-style-type: none"> Report on compliance with modern slavery within the Sustainability Report which will be published annually
Continued review of ESG Council	<ul style="list-style-type: none"> Continued review and alignment of modern slavery working group composition and terms of reference to align with corporate governance and reporting requirements

GROUP HUMAN RIGHTS RESPONSIBILITIES

FY2023 initiative	KPIs to measure effectiveness
Training	<ul style="list-style-type: none"> Establish leader training in regard to supply chain operations and supplier arrangements. With a view to scale across global operations Procurement to develop and offer supplier training on our approach and policy and on the supplier minimum standards. With a view to scale across global operations
Onboarding new acquisitions or new business	<ul style="list-style-type: none"> A due diligence checklist will be developed to proactively identify any potential threats of human rights violations in any acquired business Onboarding processes will include specific training on Icon's commitment to modern slavery
Policies and procedures	<ul style="list-style-type: none"> Procurement to review policies and training materials for suppliers Commitment to review policies with modern slavery impacts. Remain compliant and fit for purpose

PROCESS OF CONSULTATION



The ESG Council has been consulted on the development of the Modern Slavery Statement and the progress of its initiatives.

The objectives have been discussed and agreed upon 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 sought from internal and external industrial relations and legal specialists. The Icon procurement team have been heavily involved in the development of the policy and the statement.

Discussion, approval, and endorsement from the Icon 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 October 2022.

The Icon Group Board is the principal governing body for the reporting entities. 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 2022.

MARK MIDDLETON
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Icon Group Board Chair



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