

MODERN SLAVERY STATEMENT

1 January 2021 to 31 December 2021

Introduction

Fullerton Health Australia's Modern Slavery Statement is issued pursuant to s54(1) of the *Modern Slavery Act 2018* (Cth).

Fullerton Health Australia (Company) has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its business partners or suppliers, consistent with its obligations under the *Modern Slavery Act 2018* (Cth).

Fullerton Health Australia

Fullerton Health Australia (ABN 41 164 892 924) was established in 2013 and is headquartered in North Adelaide, South Australia. The group is made up of a number of established businesses that have been delivering health services to more than five million people over the last 25 years including [Jobfit Health Group](#), [Fullerton Health Medical Centres](#), [Northcare Physio](#) and [Baseline Group](#). These entities are not reporting entities for the purposes of the Act. However, this Statement is provided on their behalf as entities of Fullerton Health Australia, given that this company conducts all sourcing and procurement on behalf of these entities and is responsible for compliance with the Act.

Fullerton Health Australia Pty Ltd (ABN 41 164 892 924) is the reporting entity for the purposes of the Act, having met the reporting threshold in the Reporting Period.

Our parent company, Fullerton Health, is a leading vertically integrated healthcare platform in the Asia Pacific region. We own and operate an extensive network of healthcare facilities across 8 countries and partner with established and reputable healthcare providers in the region. We employ approximately 2,000 workers in Australia and New Zealand in management, administration, and clinical roles.

Information about the history, operations and services of Fullerton Health Australia are available on our website: www.fullertonhealth.com.au

Supply Chains

Fullerton Health Australia strongly believes in, supports and adheres to principles of ethical conduct and procurement involving all businesses it transacts with and in particular, compliance with Australian and international Modern Slavery legislation, especially relating to the exploitation of children, women and vulnerable workers.

We procure a range of products from supply chains both domestically and internationally that includes medical goods, technology, and equipment. We are yet to identify any specific instances of modern slavery, however, acknowledge that there may be a risk of sourcing products from supply chains associated with modern slavery overseas.

Procurement and Finance will work closely with our Management teams to ensure that Fullerton Health Australia and its suppliers comply with the Modern Slavery Act. We will enter into open and transparent communication with our suppliers on the changes we will be making in our business to identify risks on modern slavery, and introduce a prequalification supplier questionnaire for all new and existing suppliers.

Due to the large number of suppliers, Fullerton Health Australia will focus on those that present an elevated risk of exposure due to the country of operation. High risk suppliers will be monitored and reported on by Procurement to the Board.

During the tender process, Fullerton Health Australia will communicate to suppliers its newly created Supplier Code of Conduct and integrate this into the due diligence process. Any supplier that is identified as being a potential risk will be assessed further by Procurement and Finance.

New and renewed supplier agreements will include obligations on suppliers to continuously monitor and report on modern slavery. We will engage with our existing suppliers to provide them with our newly created Supplier Code of Conduct, to ensure that they are aware of the requirement to comply with the Modern Slavery Act, and provide all new suppliers with this document as part of the procurement process.

Effectiveness Measures

Fullerton Health Australia is committed to manage and mitigate risks of modern slavery, and for the first reporting period will undertake the following actions:

- Board and management oversight – Modern Slavery Act to be discussed at meetings and work groups.
- Develop work group that consists of staff in Procurement, Finance and Management – regular meetings and reports to the Managing Director.

- Assess our policies and procedures, approvals and controls, and the grievance process and remediation over the next 12 months to ensure they meet with the minimum standards for human rights set out in the *United Nations Guiding Principles on Business and Human Rights*.
- Grievance mechanisms established and communicated to wider business and suppliers.
- Conduct a review of all current suppliers to identify the country of operation – assess risks of country and modern slavery.
- Review and implement measurable actions to control and/or address the risks, i.e introduction of prequalification questionnaire as part of the due diligence process for new and existing suppliers.
- Create a Supplier Code of Conduct and ensure that contractual provisions on modern slavery.
- Collaborate with existing suppliers to inform them of the company’s approach to managing modern slavery risks and the introduction of the Supplier Code of Conduct.
- Ensure that current Modern Slavery Policy is aligned to the Supplier Code of Conduct.
- Introduction of Modern Slavery training for all Managers and any staff that are involved in procurement or in approvals for new supply chains.

Consultation

The Modern Slavery Statement in consultation with Directors, Procurement, Finance, Human Resources and the Senior Management team, has been reviewed and approved by the Board of Directors for Fullerton Health Australia.

The Statement together with the Modern Slavery Policy and a dedicated online course will form part of an internal training program for Managers, to improve their knowledge on modern slavery risk management and the risk to those impacted by modern slavery.

This Modern Slavery Statement is made in accordance with section 14 of the *Modern Slavery Act 2018* (Cth) and represents the Fullerton Health Australia statement by the Board of Directors for Fullerton Health Australia.

Signed by the Board of Directors for Fullerton Health Australia on 1 March 2021.



Steven Harvey
Director



Dr Michael Tan
Director



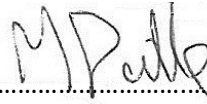
Dr Daniel Chan
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