

# MODERN SLAVERY STATEMENT

This Modern Slavery Statement ('Statement') is made pursuant to Section 13 of the Modern Slavery Act 2018 (Cth) ('Act') on behalf of Varian Medical Systems Australasia Pty Ltd. ('Varian Australasia').

It covers activities during the reporting period October 1, 2021 to September 30, 2022. The purpose of this Statement is to outline our approach to ensure that Varian Australasia has a robust framework and processes in place to recognise and implement actions to minimise the risk of modern slavery and human trafficking in our business operations and supply chain.

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# Company Identity and Consultations

Varian Australasia is a subsidiary of Varian Medical Systems, Inc. ('Varian'), a leader in developing and delivering cancer care solutions that is focused on creating a world without fear of cancer. Varian Australasia is the distributor of Varian products in the Australasian region and does not own or control any entities. No consultations are required for this Statement.

Varian Australasia's headquarters is in Sydney, Australia and it employs over 100 professionals throughout Australia and New Zealand, most of whom work remotely. Varian Australasia's scope of work includes sales, installation and service of radiation treatment delivery, simulation, planning, and data management systems. Varian Australasia is committed to operating responsibly and establishing and adhering to the highest ethical standards. We will not tolerate any form of slavery or human trafficking in our business and will only work with suppliers that are aligned to our cultural beliefs.



# Company Structure, Operations, and Supply Chain

Varian Australasia has a simple supply chain that includes the purchase of products and services required for the scope of our work. Our supply chain relationships include suppliers from the following sectors: manufacturing, property services (waste management, office supplies, office cleaning), logistics, marketing, calibration services, construction services, travel consultants, staff training, and communication and IT equipment.

Our direct suppliers are established in the following locations:

Item	Country of Origin
Products and parts	Legal Manufacturer – Varian Medical Systems, Inc. Palo Alto, USA Manufacturing Sites – Haan, Germany Bavaria, Germany Beijing, China Seattle, USA Charlottesville, USA San Jose, USA Austin, USA Crawley, UK Aargau, Switzerland
Calibration tools	Australia, US, Malaysia
IT equipment	Australia, US
Construction services	Australia
Ad hoc services (i.e. marketing, training, travel) and office supplies	Various locations in Australia/New Zealand

# Risk of Modern Slavery Practices in the Operations and Supply Chains

At Varian, we recognise that slavery and human trafficking can occur in many forms. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services. Cases of forced labour exploitation in Australia predominantly occur in industries considered at risk including agriculture, construction, domestic work, meat processing, cleaning, hospitality, and food services. According to the Global Slavery Index (GSI), Australia is considered low risk for modern slavery and is listed 163 out of 167 countries on the GSI. As a professional service organisation, Varian Australasia considers the risk of local labour exploitation to be low due to minimal involvement in the domestic industries where modern slavery risk is prevalent.

Global trade and business could also expose Varian Australasia to the risk of modern slavery in other countries through the products it imports. The following lists the top five products (according to US dollar value) imported into Australia from countries that are at risk of using modern slavery in the production of these goods:

Product at Risk of Modern Slavery	Country of Origin
Laptops, computers, and mobile phones	China, Malaysia
Apparel and clothing accessories	Argentina, Brazil, China, India, Malaysia, Thailand, Vietnam
Fish	China, Ghana, Indonesia, Japan, Russia, South Korea, Taiwan, Thailand
Rice	India
Cocoa	Côte d'Ivoire, Ghana

Varian Australasia has a low risk of importing products relying on modern slavery from other countries because – similar to our exposure for local Australia products – we have very limited business volume with industries where such risk is prevalent. However, we understand that some of our products may be at risk in the manufacturing supply chain which are addressed by Varian on a global scale in our Actions to Assess and Address Risk. Varian Australasia actions for 2023 also endeavours to address some of these risks.

## Actions to Assess and Address Risks

Varian Australasia seeks to do business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights. We expect our suppliers to operate in accordance with all applicable modern slavery laws.

Varian have various policies in place to ensure all staff and suppliers meet our core values. Our formal policies are intended to promote ethical and legally compliant business conduct and include the following:

### **Varian Code of Conduct.**

The Code of Conduct provides an ethical framework to guide our daily interactions with each other, our customers, the patients who use our products, the business community and governments around the world. Varian Australasia is also a member of the Medical Technology Association of Australia (MTAA) and comply with the MTAA industry code of practice. We are involved in regular audits to ensure compliance with ethical standards, and the industry code that addresses several key areas of industry activity.

### **Supplier Code of Conduct.**

The Supplier Code of Conduct outlines Varian's expectations for suppliers and includes provisions concerning child labour, slavery and human trafficking.

### **Securities and Exchange Commission (SEC) Specialized Disclosure (SD) Form.**

Varian publishes an annual SEC SD Form which reports on our use of conflict minerals, defined as tin, tungsten, tantalum and gold (3TGs) to demonstrate due diligence in our supply chain.

## **Sustainability Report.**

We are committed to acting ethically, responsibly, and respectfully at all times. We are in full compliance with laws, wherever we operate, and we grow our business while operating with integrity. To demonstrate this commitment, Varian publishes an annual Sustainability Report that is prepared in accordance with the Global Reporting Initiative (GRI) standards.

## **Disclosure Statements.**

Varian Australasia's main supplier, Varian, has published a statement to comply with the California Transparency in Supply Chains Act of 2010. Similarly, Varian Medical Systems UK, another Varian subsidiary that serves as a supplier from the Crawley manufacturing site, has published a statement to comply with the UK Modern Slavery Act of 2015. Both laws require the respective Varian entities to disclose measures used to track possible slavery and human trafficking in their supply chains.

Varian Australasia understands that the environmental, social and governance (ESG) risks relating to suppliers will vary depending on their industry, geographic location and company size. Our procurement team have a number of risk mitigation and robust procurement processes in place to mitigate the risk of modern slavery in our supply chain, including written policies and procedures that apply to this internal team as well as on-boarding requirements that apply to suppliers. Due diligence is ensured by performing a risk assessment on all suppliers prior to engagement. Varian suppliers are categorised, evaluated, approved and monitored dependent on their identified risk.

## **Varian Australia completed the following activities during FY22 to meet requirements of the Act:**

- Engaged suppliers via a Modern Slavery questionnaire to create awareness and address risk factors in their supply chains.
- Introduced training for Varian Australasia staff to promote awareness and identification of modern slavery risks.
- Introduced policies and processes to ensure we only purchase medical consumables that meet a high level of compliance.

## **Varian Australasia is undertaking the following additional and ongoing activities to meet requirements of the Act:**

- Review responses to Modern Slavery questionnaire and identify potential risks.
- Continue a risk-based assessment of current and future suppliers, via questionnaires, to identify inherent environmental, social and governance risks
- Continue a gap analysis of Varian Australasia's current processes against the requirements of the Act
- Collaborate with our body corporate to develop a Modern Slavery Working Group to evaluate the broader supply chain and identify potential risks.

# Reporting and Feedback Mechanisms

We encourage all our employees and business partners to promptly come forward with questions or concerns about possible violations of laws, the Code of Conduct, ethical business standards, accounting and auditing standards, or Varian policies.

Reports can be made to the Varian Ethics and Compliance Program, the Varian Legal Department or via the Varian Confidential Hotline. This service may be used, where available, for raising questions or reporting concerns, and is accessible 24 hours a day, 7 days a week. Employees are also encouraged to seek guidance when in doubt about their responsibilities under the Code of Conduct, company policies, or the requirements of applicable laws or regulations.

The Supplier Code of Conduct also encourages prompt reporting of infringements by providing a list of contacts to report a violation.

Varian has a whistle-blower policy that allows employees, and other stakeholders, to raise concerns in a safe and confidential manner without the fear of retaliation.

To promote compliance with the Code of Conduct, Varian maintains a compliance program that investigates potential violations of the Code and takes disciplinary action when necessary. Where a violation is identified, it is investigated in consultation with the appropriate stakeholders. Actions may include referring the matter to the appropriate authorities and may be grounds for disciplinary action which may include termination of contract.

# Assessing the Effectiveness of our Actions

Several of our processes, including our grievance and reporting mechanisms, help track our performance. To date we have found no incidents of modern slavery in our supply chain. However, we understand that this does not mean that they do not exist. We will continue to explore key performance indicators (KPIs) that will help track the effectiveness of actions to prevent and address modern slavery.

# Training and Awareness

Promoting awareness of modern slavery issues to employees through engagement and training will assist in identifying modern slavery and human trafficking issues in our supply chain. Varian Australasian employees complete various ethics trainings, including training on the Varian Code of Conduct annually, and are expected to comply with the requirements of the Code.

Our suppliers are required to inform and train their employees with respect to the requirements of the Supplier Code of Conduct and to implement a process that is communicated to their employees to facilitate reporting concerns or violations of ethics, policy or law without fear of retaliation.

This Statement will be communicated to all Varian Australasian employees and will be reviewed annually by the business to ensure appropriateness and continuing suitability.

Varian Australasia considers its Board of Directors to be its principal governing body for the purpose of the Act. This Statement was approved by the Board of Directors of Varian Australasia on



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Rebecca Cortiula  
Director, Varian Australasia

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