

GenesisCare Modern Slavery Statement

2020–2021

Introduction

Our commitment

At GenesisCare we recognise that risks of modern slavery are present throughout our value chain and in our operations. We understand that managing these risks requires collaboration with our suppliers, our workforce and other key stakeholders. Respecting human rights is one of our core values – integrity always. We have committed to adopting a zero-tolerance approach to modern slavery both internally and in relation to the third-party suppliers with whom we engage. We are continuing to develop and implement practices and processes that identify and mitigate the risk of our business and our external supply chains from being impacted or influenced by modern slavery.

This Statement

This Modern Slavery Statement (**Statement**) is made on behalf of Genesis Care Pty Ltd (ACN 137 188 464) (**GenesisCare**) and its Australian subsidiaries to meet the requirements of the Modern Slavery Act 2018 (Cth) (**MSA**). It covers the reporting period 1 July 2020 to 30 June 2021. While not all of GenesisCare's subsidiaries are considered to be reporting entities for the purposes of the MSA, we have adopted a "whole of business" approach to our modern slavery initiatives and voluntarily report on the activities of the GenesisCare subsidiaries on that basis.

This is GenesisCare's second Statement issued and prepared in accordance with the MSA. GenesisCare also prepares an annual modern slavery statement in respect of its UK operations in accordance with the Modern Slavery Act 2015 (UK) (**UK MSA**). While we report separately to explain how we have addressed the respective reporting criteria under the Australian MSA and the UK MSA, our commitment to combatting modern slavery risks remains consistent across these jurisdictions.

COVID-19 impact

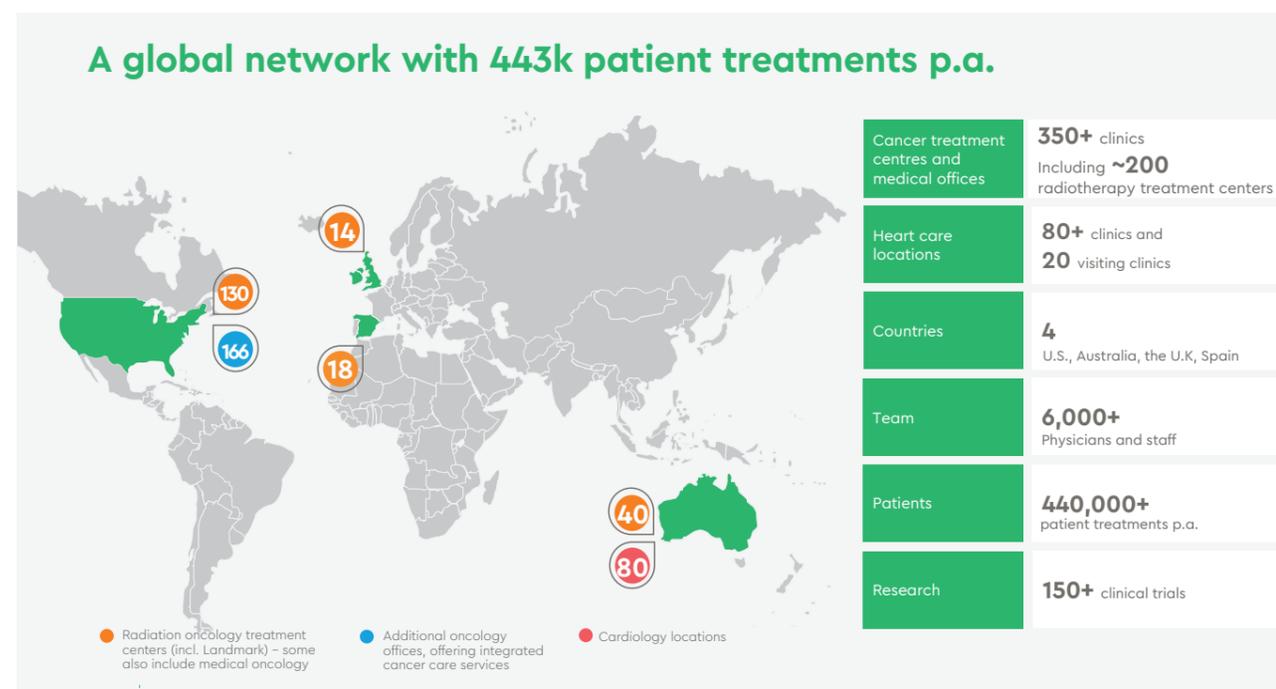
COVID-19 has continued to cause unprecedented challenges to businesses worldwide. GenesisCare remains committed to acting promptly to ensure the welfare of its patients and staff, and to maintain open lines of communication with suppliers to understand how COVID-19 impacted their operations and supply chains. With significant and ongoing pressure on global businesses, GenesisCare remains vigilant in its approach to identification and assessment of modern slavery risks during this prolonged period of heightened risk.

1. Structure and operations

GenesisCare delivers treatment to people with cancer and heart disease, the two largest disease burdens globally. We are committed to leading the change in how care is given and are currently leading or participating in more than 150 clinical trials.

The organisation employs or otherwise engages more than 5,500 highly trained physicians, healthcare professionals and support staff across Australia, UK, Europe, and the U.S. Every year GenesisCare's clinical teams see more than 440,000 patients at more than 440 locations. For cancer treatment, that includes more than 300 locations in the U.S., 40 locations in Australia, 14 in the UK and 18 in Spain, with more than 30 new centres under development.

GenesisCare also offers cardiology and sleep services at more than 80 locations across Australia. Our purpose is to design care experiences that get the best possible life outcomes. We believe that care should be focused on the individual, not the condition, and we are proud of our world-class patient satisfaction ratings.



2. Governance and values

Our governance and leadership structure

The GenesisCare Board is responsible for overseeing the performance and operation of the GenesisCare group. The Board and the Board's sub-committees develop the group's vision, values and governance framework and monitors the group's culture and clinical and corporate risks.

Oversight and reporting regarding anti-slavery initiatives is overseen by the Board's Audit & Risk Committee and People & Culture Committee. Responsibility for the

day-to-day implementation of the group's vision and values is delegated to GenesisCare's Executive Leadership Team.

Our values

GenesisCare has five key values which underpin all that we do. Our values embody a commitment to act ethically and with integrity in all our relationships; with our patients, our staff and our suppliers.

Empathy for all

We understand the needs, emotions and ambitions of our patients and each other.

Through listening, understanding and acting with purpose, we make a difference to the experiences and outcomes of patients and each other. We "walk in their shoes"; we challenge ourselves not to judge but to support, we care for and improve the experience and outcomes for all.

Partnership inside and out

We work as one to achieve more, both inside and outside of GenesisCare.

We achieve more together than apart. We collaborate, we partner to deliver exceptional outcomes to patients, each other and all stakeholders. Together, we execute with excellence.

Innovation every day

We all contribute insightful, innovative ideas, both big and small.

We believe that great ideas can come from anyone and anywhere. We're all constantly challenging ourselves and each other to find a better way that translates into innovative ideas that improves outcomes and experience. We share ideas across our network and we readily embrace innovation everyday.

Bravery to have a go

We dare to make ideas happen, to make the impossible a reality.

We go above and beyond to make ideas a reality. Bravery to have a go is finding a way to "yes" when others can't. We do this because our patients need and want us to be brave. We are considered and focused on making a profound, positive impact.

Integrity always

We do the right thing for our patients, our partners and each other.

We make evidence-based decisions and take every action and face every challenge in the best interests of our patients and each other. We build trust and lead by example by acting in a safe, honest and transparent way, and call out when things are not right.

Our policy framework

GenesisCare's values form the foundation of its policies and procedures, each of which seek to ensure that GenesisCare operates ethically and with integrity.

GenesisCare has a broad suite of policies the implementation of which is overseen by its People & Culture team, including its Employee Code of Conduct, Whistleblower Policy and Grievance Resolution Policy. The GenesisCare Employee Code of Conduct outlines the minimum standards of behaviour that are expected of GenesisCare employees and contractors to ensure GenesisCare achieves its vision and values. The Employee Code of Conduct, supported by the group's policies and training, are an important part of GenesisCare's internal governance framework.

Our UK business has implemented an Anti-slavery and Human Trafficking Policy which is being reviewed and updated so that it has global application to our business. We are continuing our efforts to update and implement this policy on a global scale, including to our recently acquired U.S. operations.

GenesisCare currently publishes its modern slavery statement in respect of its UK operations on its UK website. GenesisCare intends to also make this Statement accessible on its website.

3. Our supply chains

As a global organisation, GenesisCare acquires a wide range of goods and services, including products and services used in the provision of medical treatment to our patients and goods and services to support our corporate business needs. Multiple suppliers fulfil these needs, each of which has its own supply chain, resulting in a complex variety of end-to-end supply chains.

The key categories of goods and services procured by GenesisCare include:

- Medical equipment (including associated maintenance services) and medical consumables
- Corporate business products and technology, and professional services; and
- Facilities management services, cleaning services and linen supply services

Our suppliers range in size from those with a global footprint to local suppliers servicing rural and regional areas. In all cases GenesisCare seeks to partner with suppliers that align with our values and commitments to mitigating the risks of modern slavery.

As our organisation continues to grow and as part of recent integration activities following our expansion into the U.S. we have actively sought to rationalise our key suppliers to reduce our potential exposure to modern slavery risks. During the reporting period, approximately:

- 85% of our global procurement spend was with our top 153 suppliers; and
- 99% of our global procurement spend was with suppliers headquartered in Australia, the U.S., Europe, New Zealand or Canada

4. Modern slavery risks and mitigation actions

Modern slavery risks

We recognise that modern slavery risks can arise both internally within our organisation and within our external supply chains.

The COVID-19 pandemic had an unprecedented impact on the healthcare sector. As we manage the ongoing disruptions to global supply chains caused by this pandemic, we recognise that strong due diligence in relation to business integrity and the protection of human rights are more important than ever – in particular, in the procurement of medical goods where there may be hazardous working conditions, exploited labour and/or complex multi-tiered supply chains operating in higher-risk jurisdictions.

We continue to work to safeguard the health and wellbeing of our employees, contractors and business partners as the pandemic persists.

The majority of our suppliers are based in countries where modern slavery is not classified as high risk based on geography. However, for the few that do operate in a higher risk jurisdiction, there is an inherent increased risk that modern slavery may be present in the extended external supply chain.

We are not currently aware of any realised material issues relating to modern slavery risks or practices impacting a supplier engaged by GenesisCare. If such an issue were to arise, we would assess alternative suppliers and either (depending on the circumstances and nature of the non-compliance) immediately cease dealings with the supplier, or work with that supplier to obtain appropriate assurances before determining whether it is acceptable to continue working with them.

Internally, GenesisCare has implemented and continues to develop systems and processes to manage the raising of grievances and whistleblowing which allow us to identify and mitigate potential risks of modern slavery. Given the level of control we exercise over our day-to-day operations and the increasing maturity of our internal policies and procedures, we consider that our internal risk of modern slavery is relatively low. The majority of GenesisCare staff are engaged directly by a GenesisCare entity, which also reduces the risk of modern slavery within our workforce. As such, our focus remains on identifying and addressing any material risks of modern slavery which may exist in our external supply chains.

Managing modern slavery risks

To ensure that supplier organisations adopt appropriate standards and practices regarding the management of modern slavery risks, we have put in place and will continue to develop a number of measures to assess and manage supply chain risk. One way we are strengthening our modern slavery mitigation is by working with our key suppliers and business partners to build their capacity to manage modern slavery and other labour exploitation risks. For example, we are actively collaborating with our national facilities service provider to institute a mechanism that gives us transparency of award wage application to sub-contractors who may be at risk of modern slavery or other forms of labour exploitation during COVID-19.

Formation of Australian Modern Slavery Working Group

GenesisCare's internal Modern Slavery Working Group was formed to establish and monitor measures to assess and address modern slavery risks.

This Group is currently led by the Australian Procurement and Legal teams working closely with senior management and our colleagues in the UK. The group includes representatives from across the business, including, from the company's People & Culture team and Finance team.

Mapping of key suppliers

GenesisCare has mapped its key suppliers in respect of modern slavery risk for the reporting period. Suppliers were risk-assessed based on several indicia including the geographical location of their operations, value of the contract and the type of supply e.g. medical consumables.

Our assessment identified 15 suppliers with a potentially 'high' modern slavery risk profile. We undertook modern slavery due diligence on these suppliers (see below) and continue to work with them to ensure that modern slavery risks are identified and appropriately mitigated. We are not currently aware of any material issues relating to modern slavery risks or practices impacting a supplier engaged by GenesisCare, including these 15 suppliers.

Due diligence of suppliers – process

Our supplier risk strategy is first implemented during our vendor pre-qualification phase and then involves an on-going risk assessment. The initial phase includes a specific human rights risk-based questionnaire that suppliers must complete (**Questionnaire**). The Questionnaire includes specific questions regarding workers rights' and child labour, as well as bribery and corruption matters.

Once completed by a supplier, the Questionnaire is assessed by our Procurement team. The Questionnaire is designed to identify suppliers at risk of modern slavery based on a score/rating system. Depending on the outcome of the assessment, further investigation may be required having regard to the level and nature of identified risk.

The responses inform our understanding of our suppliers':

- Supply chain relationships
- Employment conditions; and
- Compliance and grievance mechanisms

Due diligence of existing suppliers

During the reporting period, to ensure existing suppliers met the expectations of our modern slavery risk management commitments, we applied the due diligence process, including issuance of the Questionnaire to the top 15 suppliers which we identified as having a potentially 'high' modern slavery risk profile.

The response to these Questionnaires assist us to form a view as to whether the third party has modern slavery-related policies or procedures in place including training for employees.

As noted above, our review and assessment of the completed Questionnaires and due diligence processes has not identified any material modern slavery risks in respect of these key suppliers.

Due diligence of new suppliers

We also continue to adopt the same risk-based due diligence process and Questionnaire to assess prospective suppliers.

In this reporting period, GenesisCare has:

- Undertaken modern slavery due diligence including the issuance of the Questionnaire to approximately 50 new suppliers; and
- Refined our Questionnaire to align with best industry practice and actively sought feedback from key suppliers in respect of our due diligence process

Standard contractual clauses

GenesisCare's standard contractual clauses and supplier terms and conditions have included modern slavery provisions since 2019. These contractual provisions include:

- Warranties from the third-party supplier in respect of its business operations and activities
- Requirement that the supplier undertakes investigations into the activities of its own suppliers; and
- Reporting and notification requirements in relation to modern slavery risks and incidents that become known to the supplier during the course of their engagement with GenesisCare

During the reporting period, these clauses were reviewed and updated to reflect the latest developments and regulation relating to modern slavery.

In late 2020, our template suite of master services agreements were updated to include modern slavery provisions. These agreements were used in this reporting period to engage several new suppliers, including certain key suppliers engaged by our U.S. subsidiaries.

Training our people

We understand that our employees are our first line of defence in identifying and helping us address any instances of modern slavery. It is critical employees understand the key signs of modern slavery, in particular those most likely to be exposed to it in interacting with our supply chains. We use a variety of different forums and tools to raise this awareness and build this capability of our people.

During the reporting period, the Procurement team, key General Managers and senior members of the GenesisCare business received training via our e-learning module in respect of our commitments to human rights, identifying and managing risks of modern slavery and human trafficking awareness. We are continuing to develop our UK focussed e-training module to ensure it has broader application to our business across Australia and the U.S.

We have also created an internal intranet page dedicated to how we manage human rights and modern slavery risks globally. This site includes access to the various tools and assessments we currently use. The page is intended to launch in 2022.

GenesisCare continues to progress its development of its human rights and modern slavery risk training program with a focus on delivering this training to key leadership and commercial Procurement personnel. We have engaged an external specialist to assist in preparing and delivering this training. It is intended that the training be deployed in 2022.

Future initiatives

Refine due diligence process

GenesisCare will continue to refine its supplier due diligence process to ensure that it remains current and effective. This will include reviewing the content of the Questionnaire and staying abreast of best practice within the industry.

Expand & refine due diligence on existing suppliers

We will expand the due diligence undertaken in respect of existing suppliers with a focus on strategically important suppliers and those that are considered to operate within a higher risk category having regard to the sector or geography in which they operate. For the next reporting period, a key aspect of this will be focusing on the identification and assessment of risks arising in relation to our U.S. operations.

Where a supplier is unable to satisfy us of their approach to modern slavery, we will review the continued use of that supplier with a view to selecting an alternative supplier which is able to meet appropriate standards.

Training our people & increased employee engagement

GenesisCare will seek to deliver the updated modern slavery training to new employees joining the organisation in 2022. As GenesisCare's training program develops, we will also ensure it is provided to all current Procurement team members, General Managers and other key personnel within the business.

GenesisCare will seek to provide meaningful and practical modern slavery training to the Procurement team and provide the participants with an understanding of modern slavery including: what modern slavery is, categories and countries where we may have risks, an outline of why managing modern slavery risks is important, an overview of our approach and clear actions that can be taken. In efforts to ensure that participants understood how the risk management approach applies to their everyday roles. We intend to include a live discussion with a human rights expert facilitator and a senior Procurement manager.

Further, we intend to issue a survey to training participants to obtain feedback to inform ongoing training initiatives, level of understanding of the training content and to provide insight into how we can improve.

Update policies and procedures

In 2022, we intend to release a revised global procurement policy to align our expectations and management of modern slavery risks in our supply chains and to ensure compliance with relevant regulation, including the MSA. The policy will:

- Outline GenesisCare's position in relation to business conduct risks including human rights, bribery and corruption, money laundering, trade sanctions or denied party transactions; and
- Provide the framework for identifying potential risks of engaging, renewing or extending a supplier relationship

Contract governance too

GenesisCare plans to implement an electronic system to assist in our management of contracts and associated risks.

This system will store the results of the Questionnaire, including the score / rating assigned to the supplier and will be used in the ongoing risk assessment regarding modern slavery and responsible business practices.

Modern Slavery Working Group

GenesisCare intends to expand the membership of its internal Modern Slavery Working Group to formally include representation from other key teams to ensure there is appropriate input received from all key stakeholders across the business.

GenesisCare also intends to formalise the Working Group's terms of reference, objectives and reporting commitments to senior management by mid-2022.

5. Assessing our approach

We recognise the importance of monitoring and assessing the effectiveness of the measures we are implementing to manage and mitigate the risk of modern slavery in our business operations.

During the next reporting period, we will be reviewing our performance against each of the initiatives outlined in section 5 of this Statement (above). A progress report will be provided to the appropriate sub-committee of the Board for their review and oversight. Feedback from their review will be included in our updated road map and set of future initiatives as we continue to further strengthen our approach to managing and mitigating the risks of modern slavery.

6. Scope and consultation

The GenesisCare group operates under a common and consistent governance framework. This statement is primarily focused on GenesisCare's activities in Australia, the U.K. and Spain.

This Statement has been drafted by our internal Legal team, with contributions from a range of functions, including Procurement and People & Culture. We also obtained third party feedback in relation to our due diligence processes and Questionnaire including from key suppliers and stakeholders.

GenesisCare's expansion into the U.S. market occurred in May 2020. While our primary focus during the reporting period has been ensuring MSA compliance and best practice for our Australian business, we have also initiated several processes in respect of our U.S. business, including:

- Identifying suppliers to our U.S. business who potentially have a 'high' modern slavery risk rating (based on our due diligence assessment referred to above); and
- Undertaking modern slavery risk assessments, including issuance of our Questionnaire, to new suppliers engaged by our U.S. business

In the next reporting period, we intend to build on these initiatives, particularly as they relate to our U.S. operations.

7. Approval

The risks and potential impacts of modern slavery are matters that are taken seriously by GenesisCare and inform the way in which we engage our people and how we select our suppliers. GenesisCare's approach to identifying and addressing modern slavery risks continues to evolve and mature as our business grows. We will continue to regularly review our approach to assessing and managing these risks, including the effectiveness of the initiatives we are introducing.

This Statement has been approved and is supported by the management and board of GenesisCare and is made pursuant to section 14 of the MSA.



Dan Collins

GenesisCare

Global CEO, Managing Director
and President U.S.

