

GenesisCare Modern Slavery Statement

2023 – 2024



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 no tolerance for modern slavery and we apply this approach both internally in respect of our staff and externally 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 a joint statement made on behalf of GenesisCare Australia Holdings Pty Ltd ACN 674 439 359 (**GenesisCare**) and its Australian wholly-owned subsidiaries that are reporting entities under the Modern Slavery Act 2018 (Cth) (**AU MSA**), namely:

- Adelaide Radiotherapy Centre Pty Ltd ACN 008 128 845;
- GenesisCare Australia Pty Ltd ACN 674 439 377;
- Genesis Cancer Care Qld Pty Limited ACN 010 830 583;
- Genesis Cancer Care WA Pty Limited ACN 150 562 913;
- Genesis Cancer Care Victoria Pty Ltd ACN 152 415 373;
- Genesis Cancer Care Pty Ltd ACN 155 449 200;
- Genesis Care Finance Pty Ltd ACN 137 193 125;
- Genesis Care Pty Ltd ACN 137 188 464;
- Genesis Specialist Care Pty Ltd ACN 111 943 161; and
- Radiation Oncology Associates Pty Limited ACN 057 705 441.

This Statement is made for the purposes of GenesisCare and those relevant Australian reporting entities meeting their reporting obligations under the AU MSA. This Statement covers the reporting period 1 July 2023 to 30 June 2024 (**Reporting Period**).

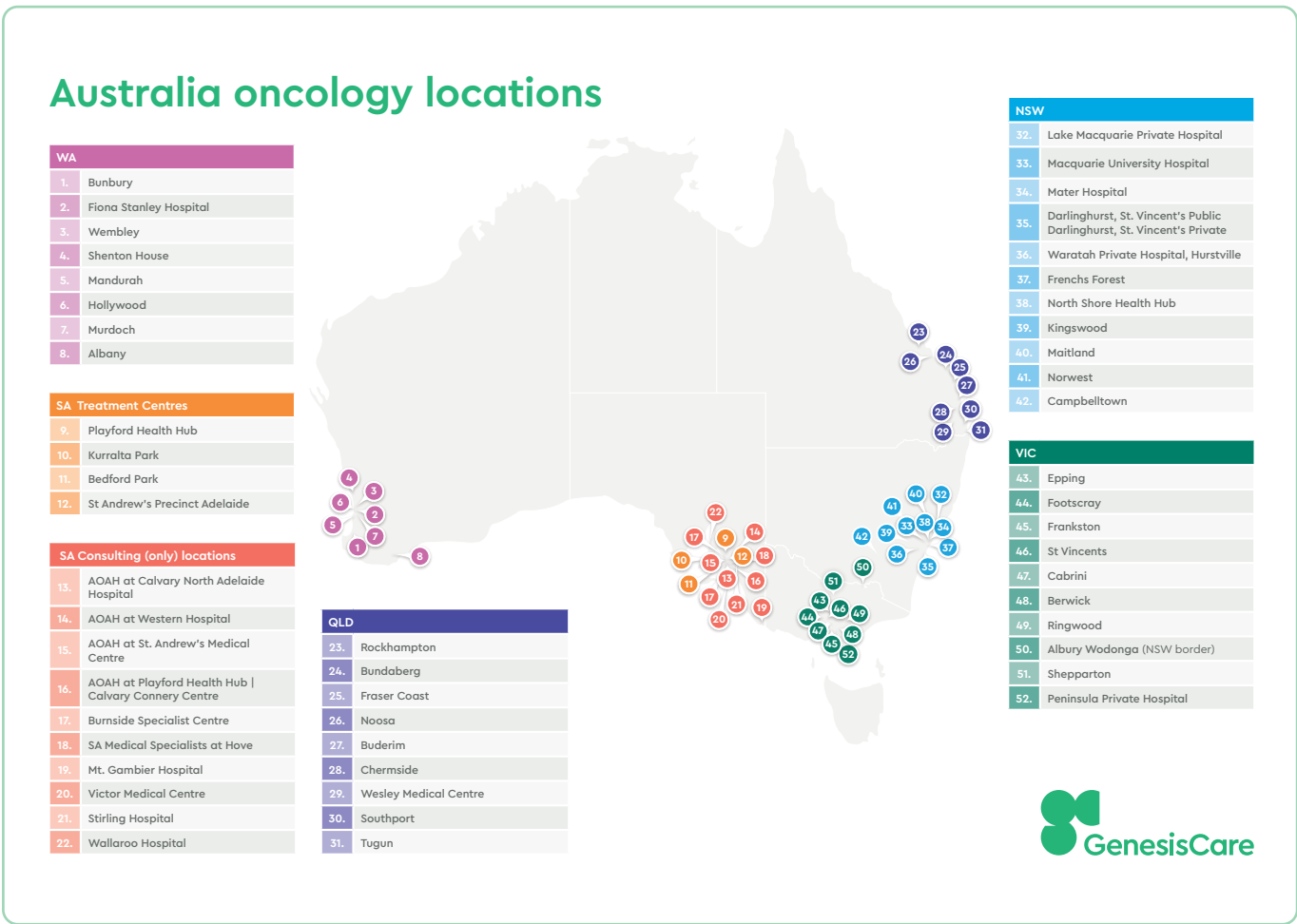
This is GenesisCare's fifth Statement issued and prepared in accordance with the AU MSA. Certain affiliates under the control of GenesisCare's immediate parent also prepare a separate annual modern slavery statement in respect of their UK operations in accordance with the Modern Slavery Act 2015 (UK) (**UK MSA**). As at the end of the Reporting Period, GenesisCare did not own these UK operations. This Statement is accordingly focused on the efforts of GenesisCare to combat modern slavery risks arising from its Australian based business operations.

1. Structure and operations

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.

During the Reporting Period, GenesisCare delivered treatment to people with cancer. We are committed to leading the change in how care is given and are currently leading or participating in more than 130 clinical trials in Australia.

During the Reporting Period, the organisation employed or otherwise engaged more than 2400 highly trained physicians, healthcare professionals and support staff across Australia. Every year GenesisCare's clinical teams see more than 30,000 patients at more than 50 locations across Australia.



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. In accordance with the AU MSA, the GenesisCare Board has approved this Statement.

Our values

GenesisCare purpose and values reflect our organisation today and guide our actions for the future. They are focused on designing care experiences that achieve the best life outcomes possible. and embody our 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.

3. Our supply chains

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.

We have actively sought to rationalise our key suppliers for various reasons, including to reduce our potential exposure to modern slavery risks.

During the Reporting Period, approximately 92% of our procurement spend in Australia was with our top 150 suppliers.

4. Modern slavery risks

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

GenesisCare continues working on safeguarding the health and wellbeing of our employees, contractors and business partners.

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.

The majority of our external suppliers are based in countries where modern slavery is not classified as high risk based on geography (e.g Australia, U.S, Europe, New Zealand and Canada). However, there are some suppliers that reside in higher risk jurisdictions (e.g India), where there is an inherent increased risk that modern slavery may be present in the extended external supply chain.

The majority of our external suppliers providing goods or services in industries where modern slavery is not classified as high risk (e.g professional legal, tax and accounting advice, pharmaceutical and medical equipment. However, there are some suppliers that operate in higher risk industries (e.g cleaning and IT).

With all suppliers, particularly suppliers which our systems and processes indicate could operate in a higher risk industry or geography, GenesisCare asks for a revalidation of their Modern Slavery requirements. In one instance, GenesisCare had key personnel attend the suppliers sites in two countries.

GenesisCare continues to rationalise suppliers, implementing key Modern Slavery terms in our contracts and ensuring new suppliers have completed the questionnaire.

We are not currently aware of any actual 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.

5. Managing modern slavery risks

GenesisCare has put in place and continues to develop a number of measures to assess and manage supply chain and modern slavery risks.

Set out below is some of the key ways GenesisCare manages the modern slavery risks arising in its Australian business.

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GenesisCare endeavours at all times to operate our business in a responsible and ethical manner; strive to be excellent corporate citizens and contribute to the communities in which GenesisCare does business. GenesisCare has no tolerance for any form of human exploitation within its business or its supply chain.

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Due diligence process overview

Modern Slavery Due Diligence Scope

Our commitment to combatting modern slavery involves a focused due diligence process applied to our procurement activities. This due diligence, including the requirement to incorporate a Modern Slavery Provision, specifically applies to high-value material contracts identified and assessed by our Procurement team. This approach ensures that our efforts are concentrated where the risk of modern slavery is most significant, rather than being uniformly applied to all contracts. By targeting high-value and high-risk engagements, we aim to effectively manage and mitigate the potential for modern slavery in our supply chain.

Due diligence process overview (continued)

Supplier Risk Strategy

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 relevant 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, we applied our modern slavery due diligence process to our suppliers located in high-risk countries, to ensure that those existing suppliers met our expectations of our modern slavery risk management commitments. We have approximately 8 suppliers in high-risk locations.

Our review and assessment of the completed Questionnaires including additional requests for further information and due diligence processes has not identified any material modern slavery risks in respect of these key suppliers.

Due diligence of new suppliers

During the Reporting Period, we have engaged no new supplier in high-risk countries.

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.

In late 2020, our template suite of global master services agreements were updated to include modern slavery provisions, which we continue to use.

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.

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 personnel.

We have identified particular roles that require training in legal, procurement, human resources and others. In the next reporting period, modern slavery training will be provided to Australian Leadership Team (ALT) members. (minimum quorum of ALT attendance being Legal, Procurement & P&C members).

Focus on best practice

In 2023, GenesisCare engaged a third party to work on our risk profile to ensure what we were doing is aligned with best practice.

Key outcomes from their engagement included:

- preparation of a draft Modern Slavery Risk Framework
- revised Code of Conduct Policy
- revised Supplier Questionnaire
- overview of top 50 global suppliers and their risk profile
- process for identifying modern slavery risks in the supply chain.

We continue to implement these best practice strategies and processes in our operations and ensure we monitor modern slavery risks as a priority.

6. Assessing our approach

We recognise the importance of continual 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, modern slavery will be on the agenda of the Compliance and Risk Committee which will meet on an annual basis and help to drive a continued focus on modern slavery risk mitigation and other ESG issues, including climate change reporting and resilience.

7. Scope and consultation

The GenesisCare group operates under a common and consistent governance framework.

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.

8. 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.

This Statement is signed by a responsible member of GenesisCare, being the Chief Executive Officer and managing director of the GenesisCare board.



Richard Lizzio

GenesisCare
Chief Executive Officer (Australia)

A handwritten signature in dark ink, appearing to read 'Richard Lizzio', written over a horizontal line.

