

# Modern Slavery Statement 2023 for FY2022/2023

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## Introduction

Aspen Medical Pty Ltd is the parent entity of the entities found in Appendix 1 (all together making up the Aspen Medical Group) and is a privately owned company (ABN 32 105 250 413), registered and headquartered at 2 King Street, Deakin. ACT, 2600 Australia (referred to throughout as “**Aspen Medical**,” “**we**,” “**our**” and “**the Group**”). Aspen Medical is an Australian and veteran-owned global provider of innovative healthcare solutions across a diverse range of clients in the government, non-government organisation (**NGO**) and the private sector. We are also the only commercial organisation in the world accredited by the World Health Organisation (**WHO**) as an Emergency Medical Team for infectious disease outbreak management and trauma surgical operations.

The information in this statement is a consolidated statement made on behalf of the entities within the Group. Furthermore, this statement, pursuant to the *Australian Modern Slavery Act 2018* (Cth) (the **Act**), sets out the actions taken by the Group to detect the risks of modern slavery and human trafficking across our business and supply chain for the financial year ending 30 June 2023 and outlines the appropriate responses we have in place to manage the risks imposed.

With this statement, we further express our intent to implement the Act and the principles as outlined in the diagram below into the strategy, culture, and day-to-day operations of the company, and to engage in collaborative actions to ensure we meet the requirements we have set. The Group makes this statement our commitment to our teams, our stakeholders, and the public. We recognize our commitment to report annually on our progress.



## Structure, Supply Chains and Operations

### Where we are

Our headquarters are in Canberra, Australia, and we have a key operations hub and logistics center in Brisbane Australia. However, we operate across Australia, the Pacific, the United States of America, Canada, Europe, Africa, and the Gulf Region. We employ experienced and highly trained professionals dedicated to providing healthcare wherever it is needed.

### What we do – Operations

The Group provides various services, including the following, to our clients:

Service	Description
Healthcare Solutions	We are a global leader in the provision of healthcare services in Indigenous, rural, and remote communities. We have unparalleled experience in developing solutions and delivering best-in-class healthcare and dental services where traditional models of care are not available or are inappropriate.
Health Technology	We offer a variety of flexible virtual health models of care so that we can provide a higher level of care for our remote and regional clients. These include telehealth and remote patient monitoring.
Health Advisory	Aspen Medical Advisory Services provides highly credentialed experts to a wide range of local and international clients. Our experienced team members are practicing leaders in their fields at senior and executive levels. Teaming with Advisory Services offers our clients access to an unrivalled suite of multidisciplinary skillsets.
Healthcare Infrastructure and Logistics	We offer construction planning, immediate deployment of mobile hospital units, and on-site logistics or management of the final outcome.
Health Administration	Management services offered include: <ul style="list-style-type: none"> <li>• Implementation of ICT systems with a focus on patient management administration</li> <li>• Financial and building management services</li> <li>• Staff management, including training and mentoring</li> <li>• Multi-site coordination of services</li> </ul>
Humanitarian and Disaster Response	Our experienced team design and develop solutions quickly, with the ability to deliver them in even the most remote and challenging locations. This includes deployment of facilities, equipment, staffing, medical evacuation, training, consultancy, environmental and public health services.
Occupational Health	We offer proactive healthcare programs designed to minimise risk at work, including: <ul style="list-style-type: none"> <li>• Pre-employment medicals</li> <li>• Fitness for duty assessments</li> <li>• Workplace health checks and wellness programs</li> <li>• Toolbox meetings specific to industry risks such as venomous bites, hydration, or injury prevention</li> <li>• Skin checks, physiotherapy, and on-site vaccinations</li> <li>• Drug and alcohol testing.</li> </ul>

Aero-Medical Retrievals	We have extensive experience in the provision of Aero-Medical Evacuation (AME) solutions for clients in a range of industries across the globe. We work with companies in the oil and gas industries both in Australia and the Middle East, and with the Australian Defense Force, the Australian Federal Police and other Commonwealth personnel at home and internationally.
Medical Supplies	We have established a network providing independent quality inspections of medical products before they are shipped from the manufacturers/suppliers to our clients. Procurement professionals rigorously consider medical regulatory requirements in addition to international and domestic clinical standards and Modern Slavery requirements before supplies and equipment are ordered. Through our national and global network, supplies can be shipped and tracked from our our high-quality suppliers to client work sites. This is achieved through our responsive contracted distribution services and Oracle-based logistics information system..
Training	Aspen Medical's Training Academy specialises in providing world-class and innovative healthcare and first-aid training courses to customers globally.

Visit our website for further information: [www.aspenmedical.com](http://www.aspenmedical.com)

## Our Supply Chains

In general, modern slavery is when an individual is exploited by others, for personal or commercial gain, whether tricked, coerced, or forced, they lose their freedom.<sup>1</sup> It includes but is not limited to human trafficking, forced labour and debt bondage.<sup>2</sup>

We undertake activities all over the world and take note of the fact that the level of risk concerning modern slavery is not the same across all jurisdictions, including, for example:

- Australia
- Papua New Guinea
- Fiji
- Indonesia
- Somalia
- United Arab Emirates
- United Kingdom
- United States of America

## Modern Slavery Risks

We are aware that there is a risk of modern slavery existing in our supply chains. We know that the level of risk is influenced by factors such as vulnerable populations, product and service category, industry, and geographic location. Accordingly, we have tailored our risk processes to ensure that we are focusing our efforts on those areas that present an elevated risk of exposure. We have assessed that all the products and services we procure, including those within the categories of medical

<sup>1</sup> <https://www.antislavery.org/slavery-today/modern-slavery/>.

<sup>2</sup> Ibid.

consumables, medications, catering, information technology supplies and people services, could present a risk of modern slavery.

We are aware that the majority of our staff are highly skilled individuals, such as doctors, lawyers and business consultants in countries that are lower risk, based on the 2023 Global Slavery Index.<sup>3</sup> This includes countries such as Australia and the United States of America which were rated BBB in relation to Government Response to Modern Slavery. However, we also acknowledge we operate in high-risk jurisdictions and may on occasion either directly or through contractors, employ the likes of cleaners and cooks in jurisdictions like that of Somalia, which is rated as the second most vulnerable country, to modern slavery, in the world in the 2023 Global Slavery Index.<sup>4</sup>

### Actions Taken

In our first statement from 2021, we highlighted several actions we were prepared to undertake to meet our objectives. We are also aware that modern slavery risk management requires continuous commitment and ongoing collaboration. In this light, our current and next steps are set out in the table below:

Action Area	Planned actions	Progress	Progress in FY 2022-2023	Continuing Progress
Risk Management	Developing an IT or Non-IT Risk Management solution to assist in classifying suppliers.	Complete	A Non-IT Risk Management solution implemented with a future desire via Oracle	Further expansion envisioned via the use of systems provided by Oracle.
	Developing a procurement IT solution identifying risk factors in our supply chain	In Progress	To be combined with existing IT Risk Management Solution	To be combined with existing IT Risk Management Solution
	Building capability in our procurement and recruitment teams in the use of an IT or non-IT Risk Management System	Complete	Training provided to our Procurement Team staff	Further ongoing training to be provided
Due Diligence	Implementing our Supplier Code of Conduct amongst our targeted suppliers	Complete	Developed in consultation and implemented with specific focus on our Procurement Team and our Culture and Performance Teams	To continue to improve our Supplier Code of Conduct and ensure new suppliers are informed and comply with it
	Implementing our Supplier Questionnaire amongst our targeted suppliers	Complete	Developed in consultation and implemented with specific focus on our Procurement Team and our Culture and Performance Teams	To continue to improve our Supplier Questionnaire and ensure new suppliers are provided with the Supplier Questionnaire and that they complete it
	Review current international suppliers and assess for risk	Complete	A review was conducted of our international suppliers in which we reduced them from seventeen to ten as those seven that were removed	To continue to review our suppliers. A risk-based program of cyclic reviews of suppliers has been implemented.

<sup>3</sup> <https://www.walkfree.org/global-slavery-index/>.

<sup>4</sup> Ibid.

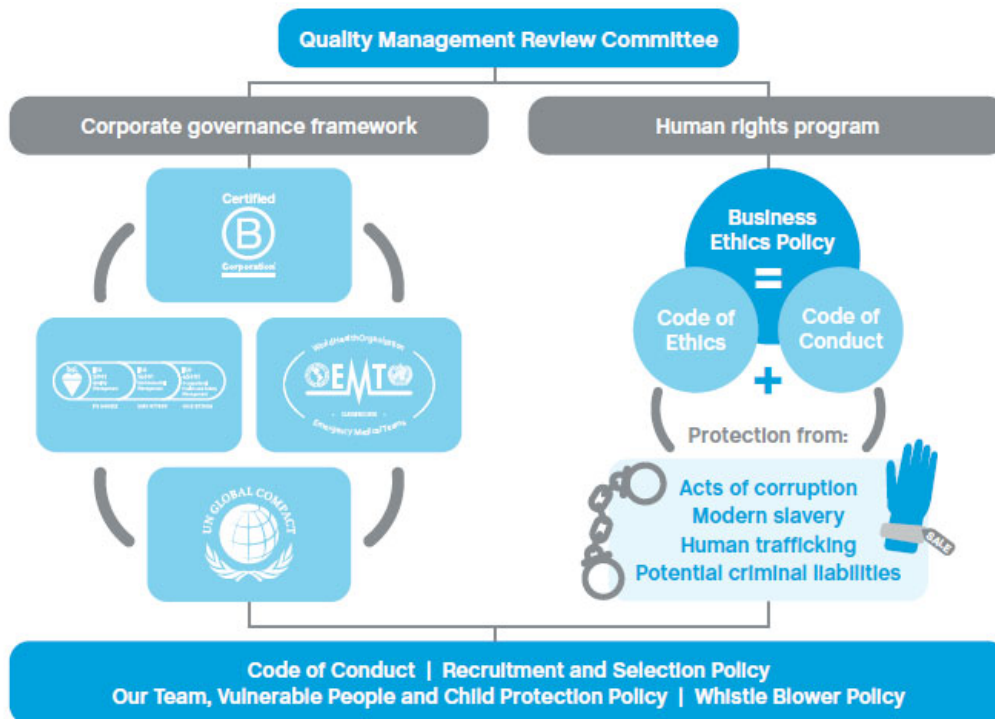
Action Area	Planned actions	Progress	Progress in FY 2022-2023	Continuing Progress
			were no longer applicable for our supply requirements. Through this review, we identified our top suppliers, and we have either partially or fully mapped the supply chains for key products and services. For medical supplies into Australia, we currently only source from Australian-based suppliers.	
	Developing remediation process with our suppliers who expose a risk to relating to modern slavery	In Progress	No remediation actions identified so far. Education is needed in how remediation may be conducted.	Selection for remediation and remediation processes will be included in the Supply Chain Management Policy.
Raising Awareness	Brief our Board and the Senior Management Team to raise awareness of our approach to modern slavery	Complete	Briefing for our Board and Senior Management Team completed. Now part of induction training for new senior managers	To continue to brief the Board and Executive Management Team on activities and progress
	Developing a training course to target expertise within our Procurement and Recruitment Teams especially those in humanitarian and overseas deployments	Complete	An on-line training course published in our web portal from Anti-Slavery Australia. <sup>5</sup> All staff in our procurement and recruitment teams completed this training in 2022. All personnel on overseas humanitarian deployments are now required to undergo Red Cross Mandatory modular training in International Humanitarian Law fundamentals, and enforcement.	To continue to ensure new staff complete the training and to ensure existing staff receive revised and updated training as is applicable. Annual refresher training has been implemented.
	Developing a training course to raise awareness amongst our team members at our sites domestically and internationally so they can better identify and act on any indication of modern slavery	Complete	All staff completed this training in 2022. Any Humanitarian Projects completed the training in 2022 and now a standard training course within Humanitarian Projects.	To continue to ensure new staff complete the training and to ensure existing staff receive revised and updated training as is applicable.
	Provide an overview of our approach to modern slavery in mandatory induction training	Complete	A Modern Slavery web portal developed to provide a general overview of Modern Slavery and links to Anti-Slavery Australia and other useful sites.	To ensure materials are kept up to date and that staff review the materials as is relevant.
	Raise awareness amongst our suppliers regarding compliance with the Act, and	Complete	A revised contract document was developed with Modern Slavery commitment	To ensure the contract document is continued to be used and updated.

<sup>5</sup> <https://antislavery.org.au/modern-slavery/>.

Action Area	Planned actions	Progress	Progress in FY 2022-2023	Continuing Progress
	where necessary build capacity amongst our suppliers		statements and is used amongst our suppliers	

## Our Governance

We have a robust corporate governance framework in place, as evidenced by the diagram below.



At the top, the Board oversees the Group’s broader human rights program through the Quality Management Review Committee (the **Committee**). The purpose of the Committee is to review the organisation’s management systems across all sites at planned intervals, to ensure the organisation’s continuing suitability, adequacy, effectiveness, and alignment with our strategic direction. This review includes assessing opportunities for improvements and the need for changes to the management systems, including the policies, objectives, and targets.

Our Quality Management System is an accredited Integrated Management System that is audited by a third-party accreditation body, comprising:

- ISO 9001:2015 Quality Management System
- ISO 14001:2015 Environmental Management System
- ISO 45001: 2018 Occupational Health and Safety Management System
- ISO 27001:2015 Information Technology – Security techniques – Information Management Systems

We conduct humanitarian work internationally, and we have been accredited by the WHO as an Emergency Management Team (EMT). Our EMT policies and procedures have undergone third party auditing by the WHO as part of our accreditation. All staff who are employed as humanitarian workers are made aware of the Sphere Project and the Humanitarian Charter and Protection Principles.<sup>6</sup> Sphere's philosophy is based on two core beliefs:

- first, that those affected by disaster or conflict have a right to live with dignity and, therefore, a right to assistance.
- and second, that all steps should be taken to alleviate human suffering arising out of disaster or conflict.

We offer our services as a humanitarian agency based on the principle of humanity and the humanitarian imperative, recognising the rights of all people affected by disaster or conflict – women and men, boys, and girls. These include the rights to protection and assistance reflected in the provisions of international humanitarian law, human rights, and refugee law. We summarise these rights as follows:

- The right to life with dignity.
- The right to receive humanitarian assistance.
- The right to protection and security.

We are also a certified B Corporation which means we meet the highest standards of verified social and environmental performance, public transparency, and legal accountability to balance profit and purpose.

We have committed ourselves to being a signatory to the UN Global Compact, and we are committed to making the Compact and its principles part of the strategy, culture, and day-to-day operations of our company.<sup>7</sup> In this compact we commit to making a clear statement of this commitment to our stakeholders and the general public by addressing the ten principles:

## Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2: make sure that they are not complicit in human rights abuses.

## Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: the elimination of all forms of forced and compulsory labour.

Principle 5: the effective abolition of child labour.

Principle 6: the elimination of discrimination in respect of employment and occupation.

## Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges.

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<sup>6</sup> <https://spherestandards.org/>.

<sup>7</sup> <https://unglobalcompact.org/>.



Principle 8: undertake initiatives to promote greater environmental responsibility.

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

## Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

## Policies

We have developed a specific suite of policies that supports our efforts to prevent modern slavery risks:

### Global Responsible Sourcing Policy

We expect that all our suppliers, whether directly or through their supply chain, will conduct themselves in accordance with relevant principles and standards that support the aims of the Act and implement suitable management systems and processes. A supplier's ability to meet and exceed the relevant principles and standards will be considered when we make procurement decisions.

### Whistleblowing Policy

We are committed to a culture of corporate compliance and the promotion of lawful and ethical behaviour and transparency in commercial, legal, and other stakeholder dealings. We will take all reasonable steps to ensure that employees, agents, and contractors (including temporary contractors) and other stakeholders are able to report Reportable Conduct without fear for their job security or their professional reputation. All reports are treated seriously and investigated promptly. In this light we have developed a Whistleblowing Policy.

### Supplier Code of Conduct

We as well as our suppliers and their employees are bound by relevant state federal legislation, including as well, where relevant, international legislation, in relation to Code of Conduct. The Supplier Code of Conduct comprises legally binding obligations on the supplier and are incorporated by reference into an Agreement or Contract. The supplier must ensure that its employees comply with the Supplier Code of Conduct.

### Anti-Money Laundering Policy

An Anti-Money Laundering Policy has been developed that sets out our approach to ensuring compliance with applicable laws and regulations to prevent money laundering and appropriately manage money laundering risks.

### Fraud Control Plan

A Fraud Control Plan has been developed to raise awareness of fraud at work. It aims to help staff and other people who deal with us to prevent, detect and report suspected fraud. We do not tolerate or condone fraudulent conduct. All reports are treated seriously and investigated promptly.

## Code of Ethics and Code of Conduct

We have a policy that outlines our approach to business integrity in two parts: A Code of Ethics and a Code of Conduct. The Code of Conduct applies to the Group.

Our Code of Ethics outlines the ethical principles of the Group and represents the aspirations of the Group.

### Business Ethics Policy

This policy has been developed in order to combine the Code of Ethics and a Code of Conduct. Its aim is to reinforce our commitment to honesty and truthfulness, and for the practical purpose of protecting the Group, our team members and business partners from acts of corruption, modern slavery or human trafficking, and the potential criminal liabilities. Specifically, it recognises the responsibilities of the Group under the *Criminal Code Act 1995* (Cth) and its responsibilities in accordance with the relevant laws, statutes, and codes applicable in the countries in which we operate. We will amend this code as and when necessary to reflect changes in national legislation and international agreements.

### Other Policies

Underpinning this framework are other policies and procedures developed by the Group. These include our Recruitment and Selection Policy and our Vulnerable People and Child Protection Policy.

## Training and Capacity Building

Training and awareness are key in addressing the risk of modern slavery and human trafficking. We recognise the need to ensure the capability of our employees, particularly our procurement practitioners, our recruiters, and our front-line teams, to identify potential red flags of modern slavery and human trafficking, and the actions required to respond appropriately.

To assist in mitigating modern slavery risks, all personnel on overseas humanitarian deployments are required to undergo Red Cross Mandatory modular training in International Humanitarian Law Fundamentals, Enforcement and for Medical Personnel.

The Aspen Medical Training Academy has developed and implemented a Modern Slavery Awareness Training Course for team members who may be involved in procurement (goods and services) and recruitment. This training course is provided to team members in the following areas:

- Our Group Procurement Team and Recruitment Team, with tailored training on risk identification and due diligence processes.
- For other team members, we are focusing on ensuring their awareness of global modern slavery and human trafficking, helping them understand the issues, and helping them to better understand, identify and report incidents.

## Measuring and Assessing Effectiveness

Whilst there is extensive work being undertaken at a global level to understand and value respect for human rights, there are currently no fundamental units of measurement or international standards for measuring the impact of human rights. This is a complex issue that presents a challenge

for us in terms of providing credible measurements that are proven effective in addressing modern slavery risk.

However, with that being said, we have developed a risk assessment approach which uses a combination of risks in order to provide an effective tool to combat modern slavery risks. It begins by reviewing country risks (using the 2023 Global Slavery Index to determine the risk level of each country).<sup>8</sup> Following on we review industry-related risk factors, sector, product, and service-related risks. Our risk assessment approach is conducted by teams where the risk has been identified by our Logistics and Procurement Team (Goods), Operations Team (Services) and our Culture and Performance Team (Recruitment).

In order to support the risk assessment of suppliers, we have additionally established a Supplier Code of Conduct which aims to outline the processes to follow to ensure legally binding obligations on suppliers. The code of Conduct is incorporated by reference into an agreement or contract. A Supplier Self Assessed Questionnaire is also made available for suppliers to demonstrate that they are conducting their business ethically.

Overall, suppliers are required to:

- Complete the Supplier Self Assessed Questionnaire.
- Ensure that their employees working under a contract are appropriately skilled, qualified, and where relevant, correctly certified, licensed, and exercise the necessary levels of care, skill, and diligence.
- Prevent any of their employees from undertaking any work for which they have not received training to a level that allows them to carry out the work competently and safely.

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<sup>8</sup> <https://www.walkfree.org/global-slavery-index/>.



Where risks are identified, we have also commissioned an external due diligence and risk analytics company to screen our listed suppliers and ascertain if they are associated with modern slavery-related allegations or controversy flags. Where this has been confirmed, further communications will cease with the supplier.

Finally, certain processes under development within our Supply Chain Assurance Program will aim to provide us with a mechanism to help track the effectiveness of our program. We continue to work towards designing credible measurements as we develop our Supply Chain Assurance Program

### Consultation Process

In preparing this statement, all the entities, both owned and controlled, that make up the Aspen Medical Group were actively engaged and consulted. The consultation also involved our Chief Executive Officer, General Counsel, General Manager Supply Chain, General Manager Culture and Performance, General Manager International Operations, the Director Corporate Sustainability, and the wider senior management team. A draft statement was provided to all that were involved in the consultation. It was subsequently reviewed and approved by the Executive Chair and the Chief Executive Officer of Aspen Medical’s board. It was signed by the Executive Chair of the Board.

This statement was approved by the Board of Aspen Medical Pty Ltd on behalf of all reporting entities (acting as a higher entity under section 14(2)(d)(ii) of the Act) and signed by Glenn Keys, Executive Chair.

Signed

Glenn Keys AO  
Executive Chair  
13 December 2023



## Appendix 1 – List of Entities

Entity Name	Company Number	Holding	Location
Aspen Medical Pty Ltd	ACN 105 250 413	100%	Australia
Aspen Medical Pty Ltd (Somalia) Branch	b/n 029494	100%	Africa
Aspen Medical USA Inc.	USA A/N 9000010	100%	Americas
Aspen Medical Services Pte Ltd	Fiji 2022RC001103	100%	Asia Pacific
Aspen Medical SG Pte Ltd	Singapore r/n 202104119D	100%	Asia Pacific
Health Care (Fiji) Pte Ltd	Fiji RCBS2018L16298	20%	Asia Pacific
Paradise Health Solutions Ltd	Papua New Guinea e/n 1-78055	50%	Asia Pacific
PT Aspen Medical Group Indonesia	Indonesia r/n 1200000612321	100%	Asia Pacific
PT Aspen Medical Hospitals	Indonesia r/n 0811210016434	90%	Asia Pacific
PT Sanusa Medika Bogor	Indonesia r/n 2401230007036	>1%	Asia Pacific
PT Aspen Medical Depok	Indonesia r/n 1406230101136	>1%	Asia Pacific
Aspen & Docta Pty Ltd	ACN 644 511 240	50%	Australia
Aspen Corporate Medical Options Pty Ltd (trading as Aspen Corporate Health)	ACN 142 501 111	100%	Australia
Aspen Medical Advisory Services Pty Ltd	ACN 660 632 146	100%	Australia
Aspen Medical Manufacturing Pty Ltd	ACN 640 278 995	50.10%	Australia
Aspen Medical Retrieval Services Pty Ltd	ACN 648 677 696	100%	Australia
Aspen Technology Pty Ltd	ACN 662 430 051	100%	Australia
Equity Health Solutions Pty Ltd	ACN 621 280 162	49%	Australia
Exemplar International Pty Ltd	ACN 652 533 241	100%	Australia

Entity Name	Company Number	Holding	Location
Global Medical Supplies Pty Ltd	ACN 641 151 993	100%	Australia
Mobile Medical Facilities Pty Ltd	ACN 609 873 047	60%	Australia
Peak Medical Recruiting Pty Ltd (t/a Peak Healthcare Recruitment)	ACN 132 690 585	100%	Australia
Remote Area Health Corps Ltd (t/a RAHC)	ACN 134 215 768	100%	Australia
Rural Locum Scheme Ltd (t/a Rural LAP)	ACN 150 395 618	100%	Australia
Aspen Medical D.O.O. Beograd (Serbia)	Serbia c/n 21715433	100%	Europe
Aspen Medical Arabia	Kingdom of Saudi Arabia	100%	Middle East
Aspen Medical Pty Ltd UAE Branch	United Arab Emirates CN-2047748	100%	Middle East
Aspen Medical Assistance LLC	United Arab Emirates CN-1099714	49%	Middle East
Edraq QSTP-LCC	Qatar QFC 20190514-1	49%	Middle East