

Modern Slavery Statement 2026



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Introduction

Healthscope is pleased to present this Modern Slavery Statement in accordance with the reporting criteria (RC 1–7) under the *Modern Slavery Act 2018 (Cth)*. This statement applies to ANZ Hospitals Topco Pty Ltd (ACN 631 014 965) and its wholly owned subsidiaries, together operating as “Healthscope” (**Healthscope**). It is submitted in respect of the period ending 31 December 2025.

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Reporting Criteria 1: About Healthscope

Overview

Healthscope is a privately owned Australian company and a leading national provider of healthcare services. Our purpose is to deliver the highest standard of care to the communities we serve. We focus on delivering strong clinical outcomes, transparent public reporting, and high levels of patient satisfaction.

Healthscope is committed to identifying and addressing the risk of modern slavery within our operations and supply chains. As both a purchaser and provider of services, we recognise our responsibility to take meaningful steps to prevent modern slavery practices, including slavery, forced labour, and involuntary servitude. This commitment is aligned with our organisational values and ethical foundations.

We are a values driven organisation that expects all individuals associated with Healthscope to go beyond mere compliance with laws and regulations, and to uphold high standards of personal and professional conduct. Across all roles, our people make a positive difference to the lives of patients and their families every day—an opportunity we regard as both a responsibility and a privilege.

We acknowledge that creating a safe, inclusive, and supportive workplace where employees can develop and thrive strengthens not only our workforce but also our broader commitment to addressing modern slavery risks.

Our values reflect who we are, how we work together, and how we care for our patients and communities. Developed through the contributions of thousands of people across the Healthscope network, they are grounded in day to day experience and guide our actions.

We care. It's at the heart of who we are. We care for ourselves, each other, our patients and our communities, and prioritise both physical and emotional safety and wellbeing.

We act. We take responsibility, follow through on our commitments, speak up, listen, and learn from our mistakes. We are transparent about why we do what we do.

We strive. We continuously seek improvement. We are adaptable, open to change, and committed to learning and growth.

We're one team. As One Healthscope, we value diversity, celebrate success, and work collaboratively to create the best environment to give and receive care.

Safety underpins all that we do. Healthscope is committed to proactively identifying and addressing unsafe conditions, encouraging people to speak up, and rejecting the notion that injury is an acceptable part of work. We are dedicated to maintaining a safe environment for all.

Reporting Criteria 2: Our Structure, Operations and Supply Chains

Healthscope employs 19,973 people across 36 healthcare facilities in all Australian states and territories. Our corporate office is located at Level 1, 312 St Kilda Road, Melbourne, Victoria.

Healthscope delivers a broad range of healthcare services, including medical, surgical, rehabilitation, mental health support, maternity and emergency department services. These services are provided by a diverse workforce comprising employees, contractors, doctors, and agency partners. During the reporting period, Healthscope has cared for 644,429 patients, delivered 9,350 births, and performed 395,486 surgical procedures across its hospital network.

The changes in the number of hospitals and births compared to the prior reporting period reflects portfolio changes during the year, including facility closures and/or divestments.

Healthscope acts as the manager of hospital operations for three hospitals owned by Adelaide Community Healthcare Alliance Incorporated (ABN 99 367 793 956) (“ACHA”) in South Australia. As part of this arrangement, Healthscope enters into contracts on behalf of ACHA for goods and services required for the operation of those hospitals where there is a clear operational nexus.

In line with this relationship, Healthscope provides ACHA with:

- Copies of all material contracts entered into on ACHA’s behalf as part of Healthscope’s procurement activities at the end of each financial year; and
- A copy of Healthscope’s Modern Slavery Statement.

This statement does not purport to meet the reporting obligations of ACHA under the Modern Slavery Act 2018 (Cth).

Healthscope’s supply chain consists of a diverse mix of local and international suppliers, most of which are engaged under formal commercial agreements. Goods and services procured include contingent labour, travel services, office supplies, and critical medical consumables. The largest areas of expenditure are clinical equipment and medical materials, sourced through a centralised procurement team.

Members of the procurement team are required to complete the Employee Code of Conduct training, as well as specific training on modern slavery risks, including the Australian Government’s *Modern Slavery in Public Procurement* module provided by the Attorney General’s Department.



Reporting Criteria 3: Risks of Modern Slavery in our Operations and Supply Chains

Healthscope's primary operations are based in Australia, where the risk of modern slavery within direct operations is considered low. Greater risk may arise within extended supply chains, particularly those involving international sourcing.

Our suppliers include manufacturers, distributors, labour agencies, brokers, consultants and service providers across both domestic and international markets. Key spend categories include:

- **Clinical products and equipment** - such as prostheses, medical consumables, surgical equipment, instruments, and pharmaceuticals
- **Utilities** - including gas and electricity
- **Indirect Corporate spend** - such as IT contractors, professional services, software licences, and hardware
- **Facilities management** - such as maintenance, security and fire protection services
- **Site services** - including contingent labour, cleaning, catering, waste and linen services
- **Corporate services** - including travel and entertainment

Healthscope has identified potential modern slavery risks in certain supply categories, particularly where goods are manufactured or distributed in higher risk jurisdictions, including China, Hong Kong, Taiwan, Malaysia, Pakistan and India.

Healthscope is also monitoring guidance issued by the Anti-Slavery Commissioner regarding high-risk domestic sectors, including cleaning and food services, and will incorporate these considerations into its risk assessment framework, including the use of targeted supplier declarations where appropriate.

The most significant risk relates to limited transparency in second and third tier ("downstream") suppliers, where modern slavery practices may be more prevalent and more difficult to detect.

In addition, Healthscope recognises that, without consistent modern slavery-specific training and awareness for all our staff, there is a risk that indicators of modern slavery may not be identified or escalated in a timely manner by employees or suppliers.

Accordingly, Healthscope has identified the following primary risk areas:

- Direct engagement with suppliers operating in higher risk countries; and
- Indirect exposure through downstream supply chains where visibility remains limited.

In addition to risks identified within Healthscope's supply chain, the following risk relates to internal capability and readiness to effectively identify and manage modern slavery risks.

- Limited awareness or training, which may impact the consistent identification and escalation of modern slavery risks.



Reporting Criteria 4: Assessing and Addressing Modern Slavery Risks

Internal Policies and Practices

Healthscope operates within an Enterprise Risk Management Framework overseen by the Audit, Risk & Compliance Committee. This framework is underpinned by a Risk Management Policy and supports the identification and management of enterprise wide risks, including modern slavery.

Operational responsibility for managing modern slavery risk sits with the Procurement team, with oversight and support provided by the Legal function.

Healthscope's Board and management are committed to upholding the Employee Code of Conduct, which explicitly prohibits all forms of modern slavery and applies to employees, contractors, subcontractors, consultants, visiting medical officers and agency staff.

The Code promotes ethical conduct, a respectful and safe workplace, awareness of the consequences of breaches, and accountability for upholding Healthscope's values.

Supporting this framework is a suite of corporate policies, including a Whistleblower Policy that provides access to a toll free Ethics Hotline, an internal Whistleblower Protection Officer, and defined response processes. Mandatory eLearning modules support awareness and compliance. During the reporting period, 3,841 employees completed Employee Code of Conduct training as part of new starter orientation.

Supplier Code of Conduct

Healthscope also maintains a Supplier Code of Conduct that outlines expectations regarding ethical business practices and compliance with modern slavery laws. Suppliers are required to operate lawfully, act with integrity, and take reasonable steps to ensure their supply chains are free from modern slavery. Suppliers are expected to cascade these standards and address identified risks.

The Supplier Code of Conduct is publicly available on Healthscope's website:

[Healthscope_Supplier_Code_of_Conduct.pdf](#)

Actions taken

Healthscope applies a continuous improvement approach—*Plan, Do, Check, Act*—to its modern slavery response.

During the reporting period, Healthscope underwent significant organisational change, including receivership. As a result, operational priorities were focused on maintaining critical business continuity, patient care, and essential governance processes.

Healthscope continued to rely on its existing policies, frameworks and processes to assess and address modern slavery risks within its operations and supply chains. This included embedding modern slavery considerations into supplier onboarding and contracting processes, with 48 supplier agreements executed during the period incorporating standard modern slavery provisions that require suppliers to comply with applicable modern slavery laws, take reasonable steps to address risks within their own supply chains, and notify Healthscope of any actual or suspected modern slavery incidents.

Healthscope's procurement policies and procedures support the identification and management of third party risks, including modern slavery, and are applied on a risk based basis. Suppliers are also required to complete an extensive Due Diligence Questionnaire covering WHS, anti bribery and corruption, and modern slavery.

These existing mechanisms and processes continue to support Healthscope's management of modern slavery risks, particularly those associated with higher risk jurisdictions and reduced visibility within downstream supply chains. Healthscope recognises the importance of ongoing enhancement of its modern slavery risk management approach, including supplier engagement and targeted awareness activities, as organisational priorities stabilise.

Reporting Criteria 5: Evaluating Effectiveness and Looking Ahead

Healthscope continues to refine and strengthen its modern slavery risk management approach and has identified that awareness and understanding of modern slavery indicators across the organisation remain key factors in the effective identification and escalation of risks. While ethical conduct and compliance expectations are supported through existing policies and training, Healthscope recognises that targeted, modern slavery specific awareness initiatives would further strengthen its ability to detect and respond to potential risks within its operations and supply chains.

While progress has been made across policy, training and due diligence in prior reporting periods, Healthscope recognises the need to continue enhancing internal response protocols as organisational priorities stabilise. Several of these priorities were identified in the previous reporting period. Progress was limited during the current reporting period due to organisational change, including receivership. These commitments have been carried forward as priorities for the next reporting period.

Consistent with its commitment to continuous improvement, key areas of focus for the next reporting period include:

- continued audit and review of selected suppliers operating in higher risk jurisdictions or supply categories;
- consideration of the development of a standalone Modern Slavery Policy, subject to executive endorsement;
- ongoing review of relevant corporate and procurement policies to strengthen guidance for employees in identifying and escalating modern slavery risks;
- evaluation and refinement of procurement led supplier due diligence processes to support greater consistency and risk based application; and
- increased employee engagement and targeted modern slavery awareness and training initiatives, in partnership with People & Culture, particularly for roles involved in procurement, supplier management and contract oversight

To support improved monitoring and accountability, Healthscope intends to implement measurable indicators over time, including coverage of modern slavery training for relevant employee cohorts and the proportion of critical suppliers subject to due diligence assessment. It will

Oversight of these initiatives will be maintained through the Audit & Risk Committee, with regular reporting to the Executive Leadership Team.



Reporting Criteria 6 & 7: Consultation and Approval

Healthscope consulted with Directors of owned and controlled entities during the development of this statement through formal review and approval processes including board papers. Input was also sought from key internal stakeholders, including Procurement, Operations and Legal, through targeted consultation and management review.

This statement was approved by the Director of Healthscope on 28 May 2026 and authorised for signature by the Chief Executive Officer..



Nicole Waldron

Chief Executive Officer
Healthscope





Healthscope

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