

Modern Slavery Statement

Healthe Care Group

This joint modern slavery statement covers the activities of the reporting entities Healthe Care Surgical Holdings Pty Ltd (ACN 636 439 524) (**Healthe Care Surgical Holdings**), Healthe Care Surgical Group Pty Ltd (ACN 636 440 134) (**Healthe Care Surgical Group**), Healthe Care Surgical Pty Ltd (ACN 636 289 686) (**Healthe Care Surgical**) (and its owned and controlled entities), Healthe Care Valley Pty Ltd (ACN 117 484 698) (**Healthe Care Mulgrave**) and Healthe Care North Gosford Pty Ltd (ACN 117 484 812) (**Healthe Care Gosford**) (**Healthe Care Group**) during the reporting period 1 January 2021 to 31 December 2021. This Statement also covers the activities of Healthe Care Surgical Holdings, Healthe Care Surgical Group and Healthe Care Surgical for the reporting period 1 January 2020 to 31 December 2020.

References in this statement to 'Healthe Care', 'we', 'our' and 'us' are references to the Healthe Care Group.

This is our first modern slavery statement under the *Modern Slavery Act 2018* (Cth) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

About us

At Healthe Care, we respect the human rights of those affected by our business activities. Our broader purpose and values include:

- Best Practice;
- Best Experience;
- Respect;
- It's Personal; and
- Positive Energy.

Healthe Care Australia Pty Ltd

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Healthe Care is a leading private hospital operator of tertiary hospitals and day surgeries in Australia (New South Wales, Victoria and Tasmania).

We employ over 4,600 people across Australia, and operate a portfolio of 17 private healthcare facilities (12 hospitals and 5 day surgeries).

Healthe Care provides a full spectrum of surgical and medical services. Our hospitals provide both day only and overnight care and focus on complex and specialised work including:

- Advanced Surgery (e.g. Neurology, Cardiothoracic);
- Cardiology;
- Colorectal;
- Critical Care (ED, CCU and ICU);
- Gastroenterology;
- General Surgery;
- Mental Health;
- Obstetrics and Gynaecology;
- Orthopaedics;
- Rehabilitation;
- Urology; and
- Other Specialties.

Healthe Care Group was acquired by Pacific Equity Partners (PEP) in September 2021. PEP has a commitment to responsible investing where it evaluates environmental, social and governance (ESG) risks and opportunities. Healthe Care Group works with PEP to deliver results supported by strong ESG practices.

Our structure

The Healthe Care Group consists of:

- Healthe Care Surgical Holdings;
- Healthe Care Surgical Group, a wholly owned subsidiary of Healthe Care Surgical Holdings;
- Healthe Care Surgical, a wholly owned subsidiary of Healthe Care Surgical Group; and
- Healthe Care Surgical, the parent company of 17 subsidiaries including Healthe Care Mulgrave and Healthe Care Gosford. Healthe Care Surgical's other subsidiaries are listed in Annexure 1.

Each entity in the Healthe Care Group is a company incorporated in Australia. Each entity operates under the Healthe Care name, with a common management structure and shared operational/management staff including an executive management team, national managers, legal counsel, and procurement, risk and compliance and quality teams. Further, the directors are common between entities in the Healthe Care Group.

Healthe Care Surgical is responsible for the operation of the 17 private healthcare facilities that Healthe Care operates nationally. As these business operations are managed centrally by Healthe Care Surgical, the Healthe Care Group has common purchasing and reporting obligations. Healthe Care Surgical's registered office is located at Level 13, 160 Sussex Street, Sydney NSW 2000.

Our supply chain

Healthe Care works with around 3,700 suppliers and those suppliers are predominantly located in Australia.

The main types of goods and services that we procure are:

- prosthetics;
- medical consumables;
- pharmaceuticals;
- food;
- electricity and natural gas;
- IT and medical equipment and software;
- enviro/facility maintenance;
- printing and stationery;
- waste removal;
- travel and accommodation;
- medical gasses;
- uniforms and linen;
- security services;
- laundry and cleaning;
- recruitment and agency;
- professional services; and
- logistics.

We engage our suppliers on a long term basis, and have engaged the majority of our suppliers for over ten years with many of these agreements also being subject to regular renewals.

Modern slavery risks

Healthe Care recognises that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk of modern slavery in our operations and supply chains.

Risk assessment methodology

We utilised a risk assessment methodology which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services,

geographical location and specific entity risk. These risk factors are based on the risk indicators in the Commonwealth Guidance for reporting entities, information published by the Walk Free Foundation ([Global Slavery Index 2018](#)) and the following reports:

- ACSI Modern Slavery Risks, Rights & Responsibilities Report 2019; and
- KPMG Modern Slavery in Health Services Sector Report 2021.

Our initial risk assessment has indicated that our operations and supply chain have a medium potential for modern slavery risks. Our risk profile is summarised in the table below.

Risk profile

Risk	Description of risk
Sector / Industry	<p>The healthcare industry has been deemed as high risk in international and national guidance documentation as the following risk factors may be present:</p> <ul style="list-style-type: none"> • procurement of medical supplies and equipment that are susceptible to modern slavery risks; • supplier operations in high risk geographies; • use of migrant and base-skill workers in operational roles; and • complex and global supply chains, particularly with risks beyond first tier suppliers being more difficult to identify and manage.¹ <p>The types of modern slavery practices that may be present as a result of these risks are forced labour, exposure to toxic material, unfair wages and failure to obtain proper consent in clinical trials.² These occur primarily in the production of medical goods and raw materials for medical equipment.</p> <p>The risks of modern slavery in Healthe Care's operations and supply chains are somewhat mitigated by the fact that almost all of our suppliers are Australia based and the majority of our spend is with long term suppliers and multinational companies which we are comfortable have stringent processes in place for dealing with these types of risks. However, we recognise that there may be risks associated with second tier and indirect suppliers further down the supply chain who may be based in overseas countries where the modern slavery risks may be present.</p> <p>Therefore, the risk of Healthe Care causing, contributing to or being directly linked to modern slavery is medium.</p>

¹ ACSI Report p 25; KPMG Report.

² ACSI Report p 25.

<p>Product / Service</p>	<p>Certain goods and services may have a higher prevalence of modern slavery risks because of the way they are produced, provided or used. We have identified that the products and services we procure present a medium potential for modern slavery.</p> <p>Products</p> <p>The sourcing of raw materials used to produce medical goods and instruments are known to carry significant modern slavery risks.³ Further, production of garments, medical electronics and surgical instruments are linked to labour and human rights violations.⁴ These categories carry significant risk because of the geography, lack of oversight of third parties and the vulnerable populations involved in their production. Healthe Care procures these products largely from Australian companies. Despite this, Healthe Care appreciates that the opaqueness of third party arrangements means that the risk factor associated with these products remains high.</p> <p>In relation to non-medical products such as linen, food, stationery and telecommunications equipment, Healthe Care's suppliers are also largely Australian companies. The modern slavery risk associated with the procurement of these products is low as we have more visibility over suppliers and the vast majority of these goods are procured in Australia, which is a low risk country (as detailed further below).</p> <p>Services</p> <p>We understand that some types of services may have a higher prevalence of modern slavery practices because of their characteristics, products and processes, including financial, cleaning and security services which are provided by migrant workers, low skill workers or labour hire contractors.</p> <p>In relation to the facilities services (including utilities, food, security, waste, laundry and cleaning), Healthe Care's suppliers are locally based. The modern slavery risk associated with the procurement of these services is low as we have more visibility over these suppliers and Australia is a low risk country (as detailed further below).</p>
<p>Geographic</p>	<p>We understand that certain countries may have a higher prevalence of modern slavery due to factors such as poor governance, compromised</p>

³ KPMG Report p 21.

⁴ KPMG Report p 21.

	<p>rule of law, conflict zones, high migration inflows and socio-economic issues such as poverty.⁵ The Asia-Pacific region is considered to be a high risk geography for such reasons.</p> <p>The vast majority of our products and services are procured from Australian suppliers and Australia is considered a low risk country for modern slavery. We procure IT software from the US, which is also considered a low risk country.</p> <p>Despite this, we recognise that our goods and services may come from countries other than those of the suppliers' 'headquarters' which means there is a risk that Australian based suppliers procure goods from overseas high risk countries. For example, we are aware that some Personal Protective Equipment (PPE) products are sourced from the Asia Pacific region and the hospital beds we buy from Australian suppliers are made with steel from Russia and are built in Poland. As we have less oversight over these second tier/indirect suppliers, we consider that the geographical risk is medium.</p>
<p>COVID 19 risks</p>	<p>We recognise that the pressure on the healthcare industry as a result of COVID 19 increased the risks to vulnerable workers.⁶ Like many other organisations in the health care sector, we experienced significant supply change disruptions with our contracted and uncontracted suppliers alike, and their ability to fulfil our requirements for PPE and other clinical products. This required us to look beyond our normal supply lines and establish relationships with alternate suppliers operating in high risk product categories. These alternate suppliers were Australian based companies and the arrangements were temporary. However, we recognise that the same risks applied to these suppliers as it relates to potential risks in source countries further down the supply chain for these products.</p>

Actions to assess and address risk

We understand the importance of working collaboratively with our employees, suppliers and the broader industry to combat modern slavery. We plan to build on our governance framework and the policies and procedures (detailed below) to introduce targeted steps to assess and address modern slavery in our operations and supply chains and have committed to further actions in the interests of continuous improvement.

⁵ Commonwealth Guidance p 44.

⁶ KPMG Report, p 16.

Policies and procedures

Healthe Care's governance framework includes a number of policies and procedures to ensure we have strong frameworks to assist us to assess and address risks in our business and supply chains, including:

- **Code of Conduct Policy:** The code of conduct provides explicit explanation of the appropriate and acceptable behaviours when working at Healthe Care.
- **Contractor Management Handbook:** This includes the Contractor and Personnel Management at Off-site Locations and Purchasing Procedures for Goods and Services Flowchart to ensure that health and safety are considered in the development of tenders and implementation of contracts for goods and services at a national, state and/or site-based level within or across businesses and to ensure health and safety are considered prior to Healthe Care personnel providing goods and services to external parties.
- **Corporate Responsibility Policy:** Encompasses a framework that outlines the way in which Healthe Care conducts its business, adheres to governing regulations and instils ethical standards across the Group.
- **Health, Safety, Environment & Community Policy:** This policy sets out Healthe Care's commitment to continual improvement in our performance, efficient use of resources, and aspire to zero harm to people and the environment
- **Whistleblower Policy and handbook:** This policy sets out who is entitled to protection as a Whistleblower under this policy; the protections Whistleblowers are entitled to under this policy; and how disclosures made by Whistleblowers in accordance with this policy will be handled by Healthe Care.

Future actions

We have also planned to undertake further actions to identify and address our modern slavery risks as set out in the '2022 and beyond' section below.

Assessing our effectiveness

With a focus on continuous improvement, we are committed to reviewing the effectiveness of the actions we have planned to undertake which we have set out in the '2022 and beyond' section below.

2022 and beyond

We are developing our modern slavery framework and we recognise there are further steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

Governance and accountability framework

Healthe Care is focusing on developing an action plan to focus and prioritise our actions for future reporting periods. We also intend to establish the roles and responsibilities of people in our business who will be responsible for developing a modern slavery framework.

Policies and procedures

Healthe Care intends to implement in its existing governance framework a number of new policies and procedures to ensure we have strong frameworks to enable us to assess and address modern slavery risks. These include:

- Modern Slavery Policy for our business that establishes our commitment to addressing modern slavery risks in our business and driving an accountability for ethical business practices across our organisation.
- Supplier Code of Conduct that sets out the minimum expectations for our suppliers and third party labour providers related to ethical practices including addressing modern slavery risks in their business, and also establishes an expectation with our suppliers that they will engage with their suppliers on similar terms. We wish to work in partnership with our suppliers to address risks of modern slavery that may exist in our suppliers.

Contracts and supplier engagement

Healthe Care is committed to introducing clauses in our standard form contracts to assist us to assess and address modern slavery in our supply chains. We also intend to undertake further supply chain mapping to better understand our supply chain and modern slavery risks. This will assist us in developing a supplier questionnaire to engage with our suppliers and develop our modern slavery risk assessment procedures. Supplier questionnaires, modern slavery statements and other information provided from suppliers will also be reviewed to assess the modern slavery risks in our supply chains.

Training

We intend to conduct targeted training to raise modern slavery awareness throughout our various teams, including training on modern slavery risks in our supply chain and operations. We are currently implementing the first training module to be released by the end of 2022.

In order to assess the effectiveness of these actions, we will:

- when commencing a new operation or engaging a new supplier, assess whether our existing risk management processes remain appropriate;
- track our actions completed against our action plan;
- monitor the number of suppliers committing to our policies and procedures;
- track the percentage of employees who have completed training on modern slavery;
- monitor the number of contracts with modern slavery clauses included; and
- track the number of suspected or identified modern slavery incidents identified and remediated.

Given that healthcare organisations use common distributors, Healthe Care considers that there would be benefits of working with others in the health sector to address this and other modern slavery risks in our operations and supply chain. Healthe Care will consider how it

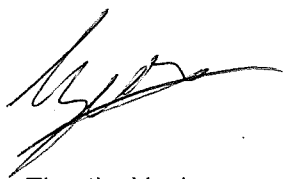
can engage with industry partners and affiliations and will consider using relevant platforms for collaboration.

Consultation

Prior to being put to the Board of Health Care Surgical Holdings for review and approval, this statement was reviewed by the Chief Financial Officer and Legal Counsel of Health Care Surgical Group, Health Care Surgical, Health Care Mulgrave and Health Care Gosford. As each of the entities have a common management structure, consultation with the reporting entities and other entities in the Health Care Group has occurred through their common management and reporting channels.

This statement was approved by the Board of Health Care Surgical Holdings in their capacity as the principal governing body and the parent entity for each other reporting entity on 11 October 2022.

This statement is signed by Timothy Yeoh in their role as Chief Executive Officer of Health Care Surgical Holdings on 11 October 2022.



Timothy Yeoh
Chief Executive Officer
11 October 2022

Annexure 1

Healthcare Surgical is the parent company of the following subsidiaries:

- Healthcare Valley Pty Ltd (ACN 117 484 698) trading as Mulgrave Private Hospital;
- Healthcare North Gosford Pty Ltd (ACN 117 484 812) trading as Gosford Private Hospital;
- Maitland Private Hospital Pty Ltd (ACN 086 450 660) trading as Maitland Private Hospital;
- Healthcare Lingard Pty Ltd (ACN 117 484 438) trading as Lingard Private Hospital;
- Healthcare Properties Pty Ltd (ACN 136 984 784);
- Mayo Healthcare Group Pty Ltd (ACN 001 346 952) trading as Mayo Private Hospital;
- Healthcare Care Dubbo Pty Ltd (ACN 121 815 870) trading as Dubbo Private Hospital;
- Healthcare Burnie Pty Ltd (ACN 121 815 807) trading as North West Private Hospital;
- Brisbane Waters Equities Pty Ltd (ACN 000 878 919) trading as Brisbane Water Private Hospital;
- Forster Private Hospital Pty Ltd (ACN 128 758 958) trading as Forster Private Hospital;
- Hobson Healthcare Wernibee Pty Ltd (ACN 606 320 316) trading as Hobson Health Care Wernibee;
- Hobson Healthcare Sydenham Pty Ltd (ACN 606 320 263) trading as Hobson Health Care Sydenham;
- Wollongong Day Surgery Pty Ltd (ACN 612 370 779) trading as Wollongong Day Surgery;
- Shellharbour Private Hospital Pty Ltd (ACN 152 608 029) trading as Shellharbour Private Hospital;
- Healthwoods Day Surgery Pty Ltd (ACN 606 320 245) trading as Healthwoods Endoscopy Centre;
- Hobson Healthcare Altona Pty Ltd (ACN 606 320 227) trading as Hobson Health Care Altona; and
- Central Coast Private Hospital Pty Ltd (ACN 003 308 192) trading as Tuggerah Lakes Private Hospital.