

GenesisCare Modern Slavery Statement

2022–2023

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 a joint statement made on behalf of Genesis Care Pty Ltd (ACN 137 188 464) (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;
- Genesis Cancer Care Qld Pty Limited ACN 010 830 583;
- Genesis Cancer Care WA Pty Limited ACN 150 562 913;
- Radiation Oncology Associates Pty Limited ACN 057 705 441;
- Genesis Cancer Care Victoria Pty Ltd ACN 152 415 373;
- Genesis Care Finance Pty Ltd ACN 137 193 125;
- Genesis Specialist Care Pty Ltd ACN 111 943 161; and
- Genesis Cancer Care Pty Ltd ACN 155 449 200.

This Statement is made for the purpose of GenesisCare and those relevant Australian reporting entities meeting their reporting requirements under the AU MSA. This Statement covers the reporting period 1 July 2022 to 30 June 2023 (Reporting Period).

This is GenesisCare's fourth Statement issued and prepared in accordance with the AU MSA. GenesisCare also prepares a separate annual modern slavery statement in respect of its UK operations in accordance with the Modern Slavery Act 2015 (UK) (UK MSA).

While GenesisCare is committed to combatting modern slavery risks across all the jurisdictions in which it operates, namely Australia, UK, Spain and US – this Statement is necessarily focused on the Australian business operations of GenesisCare and those relevant Australian reporting entities.

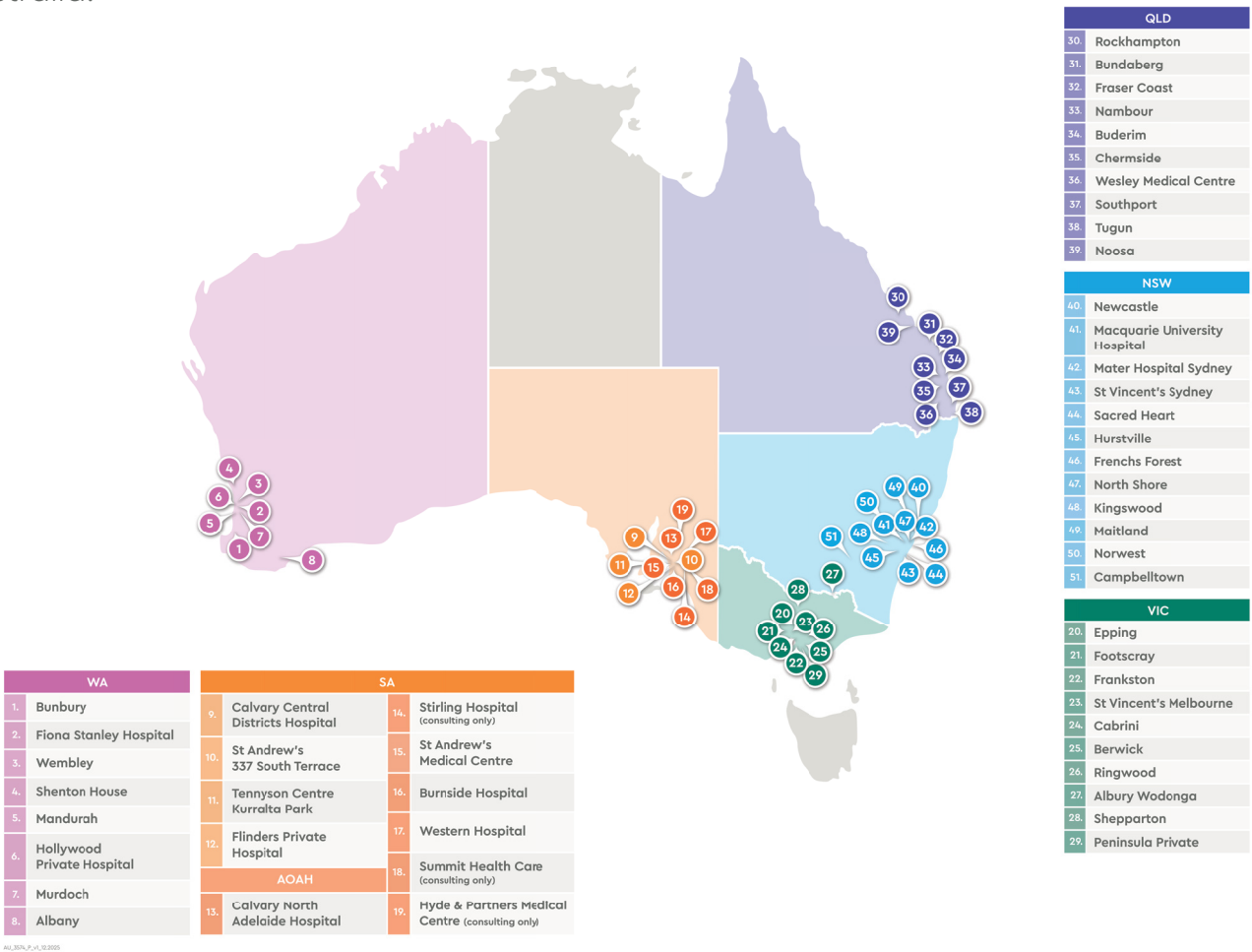
1. Structure and operations

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 strong patient satisfaction ratings.

GenesisCare delivers treatment to people with cancer. During the Reporting Period, GenesisCare also delivered treatment to people with heart disease and sleep conditions, until the cardiology and sleep services business was sold on 30 September 2022.

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.

We currently employ or otherwise engage more than 1,300 highly trained physicians, healthcare professionals and support staff across Australia. Every year GenesisCare's Australia clinical teams see between 28,000–30,000 patients at more than 40 locations in 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:

- 81% of our procurement spend in Australia was with our top 160 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.

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.

A recent external review of our top 50 global suppliers indicated that only a couple of suppliers were flagged as high risk across all modern slavery risk indicators. GenesisCare continues to work closely with these suppliers, ensuring adequate education for their employees and contractors is on their agenda, with evidence of training provided when requested. 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.

“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.”

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.

GenesisCare recently commissioned an external third party to review our existing Questionnaire and recommend updates.

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 a request to existing suppliers where a new risk was identified.

The response to our request, assisted 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 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

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 over 50 new suppliers; and
- Considered refining 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.

In late 2020, our template suite of global 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.

We have also started creating 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 early 2024.

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 2024.

Focus on best practice

This year 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:

1. Modern Slavery Risk Framework
2. Revised Code of Conduct Policy
3. Revised Supplier Questionnaire
4. Overview of top 50 global suppliers and their risk profile
5. Process for identifying modern slavery risks in the supply chain

An additional deliverable is training, where key stakeholders within GenesisCare will run train the trainer sessions on Modern Slavery in March 2024, ensuring all stakeholders who have an active position in engaging vendors have had refresher training aligned to new legislation requirements and our current supplier base.

6. Assessing our approach

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

In the Reporting Period, we commissioned an external review of our modern slavery practices and the following recommendations were made for future modern slavery risk management:

- a revision of the Modern Slavery Questionnaire;
- introduction of a New Supplier Code of Conduct;
- endorsement of a Modern Slavery Risk Framework; and
- a repository of each Supplier assessment rating the suppliers.

During the next reporting period, we will be focused on implementing the initiatives and policies that were reviewed, ensuring they are an embedded part of our working day. We will also review our performance against each of the initiatives outlined in section 5 of this Statement (above).

7. Scope and consultation

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

This Statement has been drafted by our internal Procurement team, with contributions from a range of functions, including Legal and People & Culture. We also obtained third party feedback in relation to our supplier 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 (being the principal governing body of GenesisCare) and is made pursuant to section 14 of the AU MSA.

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



A handwritten signature in white ink, appearing to be 'D Young', written over a horizontal line.

David Young
GenesisCare
Global Chief Executive Officer

