



**National
Dental Care**

**National Dental Care
(NDC Group)**

Modern Slavery Statement 2021



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1. Introduction & description of the reporting entity

Overview

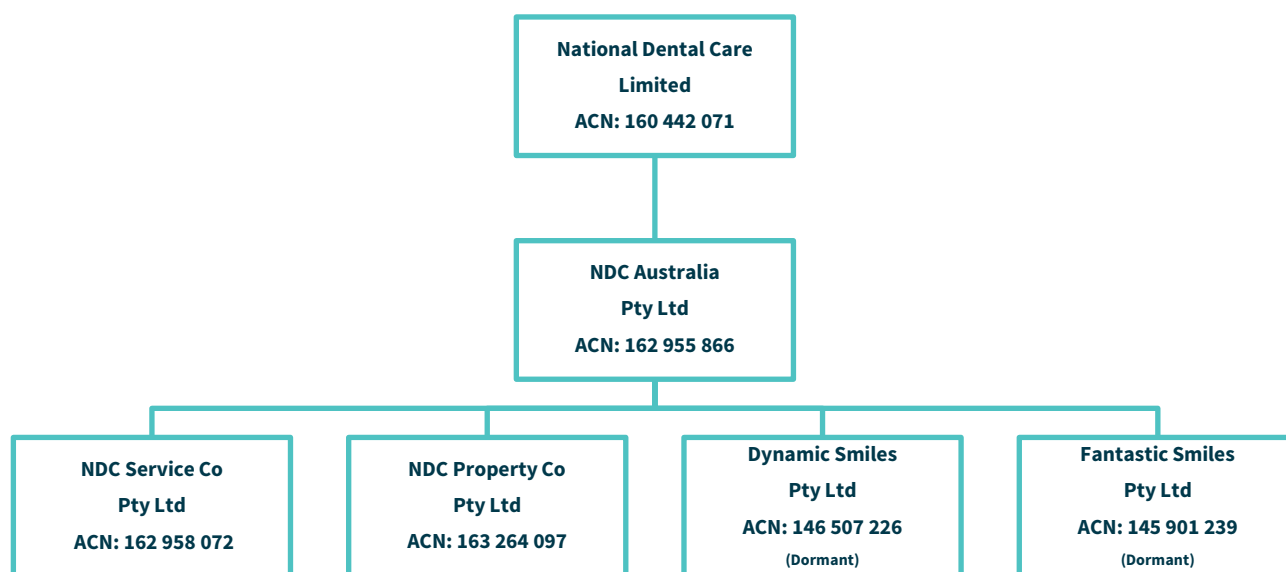
National Dental Care Limited ACN 160 442 071 (NDC) and its related subsidiaries (detailed below) will be reporting in joint as it pertains to the modern slavery statement and will be referred to throughout the statement as **NDC Group**.

- NDC Group is deemed a Reporting Entity as per section 5.1 of the ‘Modern Slavery Act 2018 (Cth)’ (‘the Act’) and makes this statement under section 13 of the Act.
- This statement is the first required of NDC Group and covers the reporting period starting from 1 July 2020 to 30 June 2021.

The majority of NDC Group operations occurs within the **NDC Service Co Pty Ltd ACN 162 958 072** entity however for the purpose of the statement we will report jointly as NDC Group, as stated above.

The NDC Board of Directors is committed limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relation, as well as ensuring high standards of service and the maintenance of effective clinical and corporate governance across all related entities set out below.

NDC Group Company Structure and Organisation Chart





2. Company overview, operations and supply chain

Company & Operations Overview

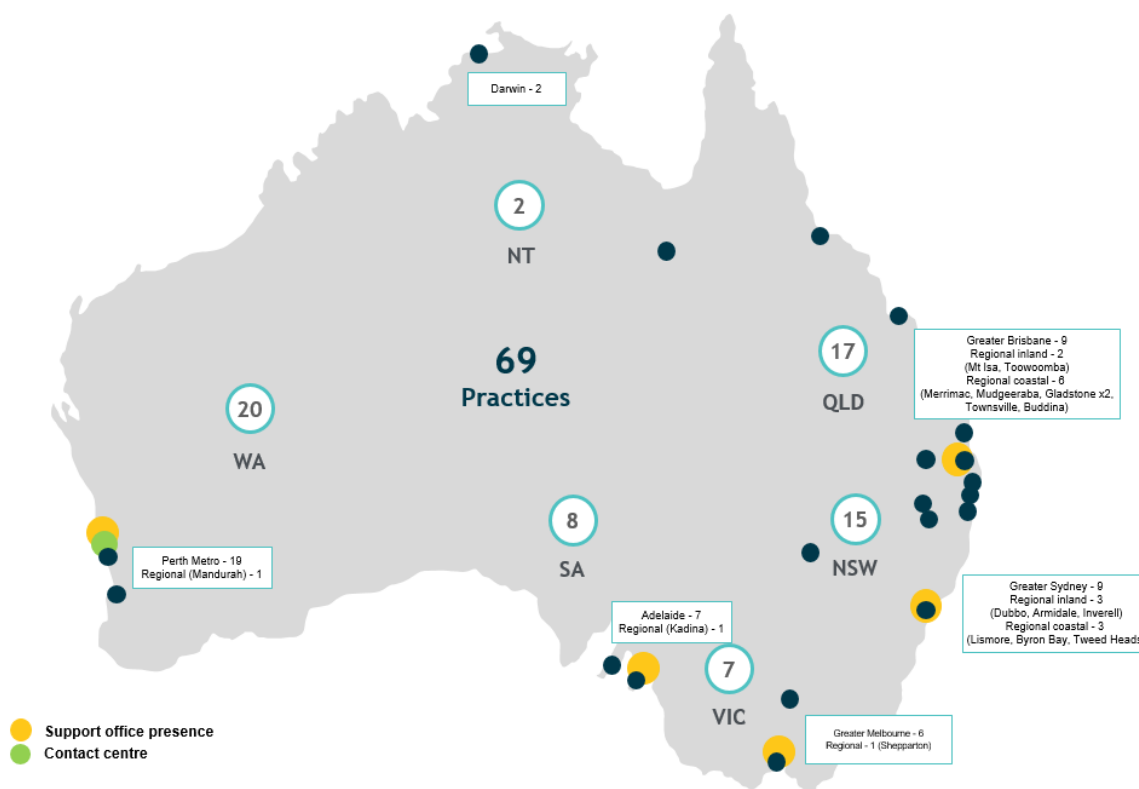
National Dental Care Ltd (NDC Group) is a privately held Australian company with ownership structure described above.

Founded in 2013, NDC Group is a leading Australian corporate dental group, currently operating 69 practices across all mainland states with ~300 dental chairs. NDC Group, across its network, provides oral related health and cosmetic services, which include preventative and diagnostic, specialist and restorative services. NDC Group engages and provides facilities for ~400 providers and employs ~750 practice and support office staff.

The NDC Group facility offering to providers includes a practice network supported by a centralized Contact Centre, and three support offices located throughout Australia. This support function provides HR, Marketing, Finance and Admin, Corporate and Clinical governance and procurement services. This is delivered by an integrated strategy across patient experience, technology, systems, branding and culture.

NDC Group primarily operates under two main brands National Dental Care and DB Dental, as well various individual brands across the network.

NDC Network Map





Supply Chain

NDC Group is supplied by various supply companies primarily based in Australia – see breakdown in the table below: Supplier Geographic Breakdown.

The NDC Group procurement function operates between the Finance and Operations departments, overseen by the Chief Financial Officer and Chief Operating Officer.

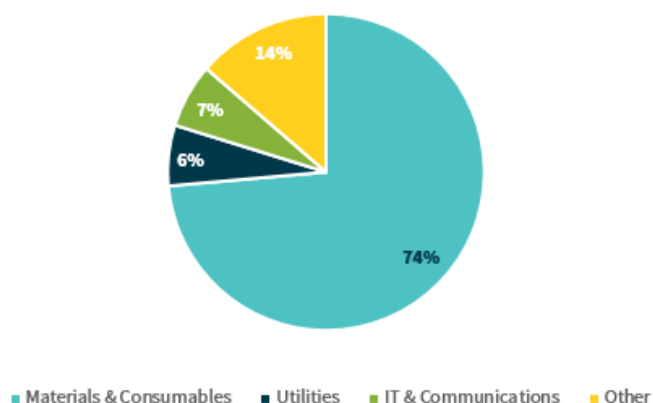
All major suppliers must enter into a supplier agreement detailing terms of that agreement and are reviewed at the end of the agreed term.

Supplier Geographic Breakdown

Supplier Geographic Breakdown	
Country	% sourced
Australia	99.9%
New Zealand	<0.01%
United Kingdom	<0.01%
United States of America	<0.01%

Supplier Category Breakdown

In FY2021 the majority of spend was in the Materials & Consumables category as detailed in the chart below. The rest of spend occurred in Utilities, IT & Communications and Other categories. Given the majority of spend in FY21 is sitting in the largest spend category of Materials & Consumables are from Tier 1 suppliers based in Australia, we consider the overall risk from a Modern Slavery perspective as low.





3. Supply chain risk assessment

Definition

Modern Slavery can take many forms; it is a complex and multi-faceted problem. The Modern Slavery Act (MSA) 2015 covers four key criminal activities:

1. **Slavery:** where ownership is exercised over an individual.
2. **Servitude:** involves the obligation to provide service imposed by coercion.
3. **Forced and compulsory labour:** all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
4. **Human trafficking:** involves arranging or facilitating the travel of another with a view to exploiting them.

Other forms of modern slavery, which will not be tolerated but are not specifically referenced in the MSA, include but are not limited to:

5. **Child labour:** whilst not always illegal in the jurisdiction in which it takes place, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Risks of modern slavery practices in the operations and supply chains of the company

Employees

Tackling modern slavery requires colleagues to play a part and remain vigilant to the risk in all aspects of the NDC Group and business relationships.

All dental service operations and facilities are conducted and based in Australia, which is regarded as a low risk for modern slavery practices. Further to this, operations are governed by an Employee Code of Conduct which outline human rights considerations and behaviours at all Group practice locations and temporary site locations. This is supported by NDC Group Whistleblower Policy which supports anonymous and protected reporting of any breaches.



Material & Consumable Supply Chain

The risks of modern slavery in the supply chain of materials & consumables has overall been assessed as Low. As detailed above, the majority of spend in FY21 was spent with Australian based companies, considered to be either Low or Tier 1 low risk.

NDC has also confirmed that companies supplying a large portion of the NDC materials & consumables, are also subject to Modern Slavery reporting, therefore further supporting the low risk assessment.

Utilities, IT & Communications and Other Suppliers

The risks of modern slavery in the supply chain of Utilities, IT & Communications and Other categories such as marketing, property suppliers, printing & stationary, medical emergency and radiation governance and other minor suppliers has overall been assessed as Low and Tier 1 Low Risk. The sourcing for these supplies is minor overall and also Australian based operations, which is a low risk for Modern Slavery activities.

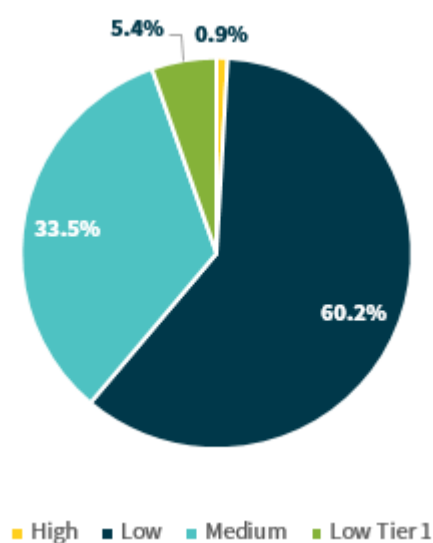


NDC Risk Assessment Matrix

NDC Group has assessed the overall supply chain as predominantly Low or Low Tier 1 Risk, as outlined below. However, in the following reporting period, NDC Group will be prioritising surveying the suppliers identified as either High or Medium risk in the first instance, to confirm the practices present in their own supply chains.

Low	Low risk represents suppliers that NDC Group anticipates operate in Australia and are subject to Modern Statement reporting
Low Tier 1	Low Tier 1 represents suppliers that NDC Group anticipates have the majority of their operations in Australian however do not have a Modern Slavery Statement
Medium	Medium represents suppliers that NDC Group anticipates operate in Australia which may have downstream suppliers outside of Australia. In addition, these suppliers either are not subject to, or do not have a Modern Slavery Statement or reporting requirement.
High	High represents overseas suppliers with no modern slavery statement, as well as other suppliers that are based in Australia however, have potentially high risk supply chains or activities such as cleaning contractors.

NDC Risk Assessment Breakdown





4. Actions

Actions taken to assess and address modern slavery risks.

NDC Group understands that Modern Slavery in the context of business is a complex and global problem transpiring in various forms. In order to actively identify and address Modern Slavery across its suppliers and employees, has the following actions in place:

1. Identified key categories within Tier 1 and Tier 2 of the supply chain, and undertaken a preliminary assessment to identify the categories and suppliers most at risk of Modern Slavery within these categories
2. Identified a set of priority activities in coming 1-3 reporting periods so that efforts can be focused on the areas that are most at risk (further below)
3. Implemented explicit modern slavery governance with key individuals responsible for overseeing the development and implementation of modern slavery risk management who report directly to CEO and CFO
4. Undertaken Modern Slavery training for priority staff members
5. Established suite of policies and procedures to measure and assist with the risk of Modern Slavery in operations and supply chain including:
 - i. Established **Whistle-blower Policy** which facilitates the disclosure of reportable conduct being made with full anonymity and outlines the protections afforded to the employee making the report.
 - ii. Reviewed current **Code of Conduct** describing and outlining a set of standards and behaviours required in the NDC Group workplace, premises and engagements with NDC Group.
6. Reporting of these activities in line with the Modern Slavery act, as required for the first time, 31 December 2021



Future actions to further address Modern Slavery risks

To underpin the commitments laid out in NDC Group Modern Slavery commitment, NDC Group commits to taking the following steps towards implementing the below outlined measures through the course of the reporting year to 30 June 2021 and following 1-2 reporting periods.

NDC Group will:

1. Create and implement an **Anti-Slavery Policy** and framework to ensure it meets best practice in respect of Modern Slavery identification and avenues for reporting including the introduction of a **Supplier Code of Conduct**.
2. Create and implement a **Supplier Code of Conduct**, to be signed and agreed to by all suppliers over the course of the next 12 months, or at the renewal of the supplier agreement, whichever is sooner.
3. Where appropriate as informed by the risk assessment, require from any new or existing supplier engagements an understanding of the measures they have in place to ensure that modern slavery is not occurring within their own business or supply chain including but not limited to a copy of their own Modern Slavery Statements as an annexure of future supplier agreements, moving forward.
4. Revise contractual documentation where appropriate to incorporate specific prohibition against slavery, servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy. This includes:
 - a) Updating new supplier contracts to ensure that we reserve the right to terminate any contractual arrangement if there is a breach of this policy, and;
 - b) Making provisions for contracted suppliers to hold their own suppliers to the same standards.
5. Implement Modern Slavery communication and employee awareness training, ensuring that relevant colleagues receive adequate training on the Anti-Slavery Policy and any supporting processes applicable to their role.
6. Continue to engage with employees and suppliers on matters related to modern slavery mitigation



5. Assessing the effectiveness of the actions taken:

During the Reporting Period, NDC Group has reviewed some of its policies and made changes to make them more effective. For example, the Code of Conduct was reviewed and reissued to all providers and staff.

NDC Group will continue to assess the effectiveness of its actions through:

1. regularly reviewing supplier compliance with a newly created Anti-Slavery Policy
2. implementation of a supplier questionnaire where appropriate to assess the perceived risk levels of current suppliers
3. reviewing all Whistle-blower Policy effectiveness feedback from staff

Our leadership team will track implementation of relevant policy commitments and due diligence processes. The leadership team will add Anti-Slavery requirements to the regularly agenda for discussion, implementation and tracking of identified modern slavery risks and mitigation efforts.

The effectiveness of these actions will become more evident as we start implementing and measuring the outcomes of the actions identified in Section 4 in the new reporting period and beyond.

NDC Group will continue to work to prevent modern slavery and has a continual and ongoing improvement approach to all business operations to ensure the processes and policies remaining current and compliant.

NDC Mission:

“To provide Australians with superior dental services, underpinned by a strong culture on ongoing training and clinical development.”

NDC Values:

Trust | Excellence | Experience | Teamwork | Honesty



6. Consultation process

NDC Group and the related entities, as detailed in Item 1. (*Introduction & Description on the reporting entity*) and the Directors of all entities, have been consulted with in preparing this Modern Slavery Statement.

Mr. Mark Fisher is the Director and/or Company Secretary of all the Reporting Entities and has taken an active role in ensuring there has been engagement and consultation with each entity.

This statement is made pursuant to the Act and constitutes NDC Group Modern Slavery statement in respect of 31 December 2021 reporting year and is approved by the principal governing body of National Dental Care Limited and its related entities, being its Board of Directors.

C Stevens.

Signed: Craig Stevens
Position: Chief Executive Officer
National Dental Care