

# Modern Slavery Statement for Financial Year 2023-24

aspenmedical



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# 1. Our Business

Aspen Medical Pty Ltd is pleased to issue this statement, made pursuant to the *Australian Modern Slavery Act 2018 (Cth)* (“the Act”). It sets out the actions taken to detect and address the risks of modern slavery and human trafficking across our business and supply chain for the financial year ending 30 June 2024.

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 321 052 0413), registered and headquartered in Canberra Australia (referred to throughout as “Aspen Medical,” “we”, “our” and “the Group”). The information in this statement is a single consolidated statement made on behalf of all the entities within the Group. Aspen Medical Pty Limited is the only entity in the Group that meets the definition of “reporting entity” under the Act.

We are an Australian-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 operate across Australia, the Pacific, the United States of America, Europe, Africa, and the Gulf Region.

Aspen Medical is a Certified B Corporation, having demonstrated that it meets the highest standards of verified social and environmental performance, public transparency and legal accountability.

## 2. High level risk assessment of our operations and supply chain

Aspen Medical operates in a diverse array of countries, and take note of the fact that the level of risk concerning modern slavery is not the same across all jurisdictions. We are aware that in many of these jurisdictions there is an elevated risk of the presence of modern slavery. At present, our main areas of activity include the following nations:

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

Aspen Medical strives to act ethically in all its dealings, understanding the nature of modern supply chains means that the risks of modern slavery being present at some level can never be fully discounted., and therefore the need for continual diligence is assessing and mitigating risks.

Most relevantly, we currently operate in Somalia, which was rated as the second most vulnerable country to modern slavery in the world according to the 2023 Global Slavery Index, and also in Haiti, which remains the poorest country in the Western Hemisphere.<sup>12</sup>

For our projects in Haiti and in Somalia, all supplies and services are provided through the US Government (in Haiti) and through the United Nations (in Somalia). Both of these projects are associated with separate international security missions, and our staff remain within a secure compound.

In jurisdictions like Papua New Guinea and the UAE, to the greatest extent possible we hire staff directly, so we have visibility over their wages and conditions. The majority of Aspen Medical's staff are highly skilled professionals, predominantly doctors, nurses and paramedics.

Due to the largely professional cadre of employees, the direct risks of modern slavery within Aspen Medical's core workforce are low to non-existent.

### 3. Our supply chains and Supplier Code of Conduct

Aspen Medical has developed a Supplier Code of Conduct which sets out requirements that apply our suppliers providing goods or services to, or performing work for Aspen Medical. Our Supplier Code of Conduct is also linked to our responsible sourcing policy.

The Code of Conduct incorporates the "Supplier Questionnaire". Amongst other things the Supplier Questionnaire asks various questions of suppliers to gauge their awareness of and susceptibility to supply chain modern slavery risk. The Supplier Questionnaire is being applied to prospective suppliers and our aim is to do this in a more in a systematic way, to continually improve on our supply chain understanding and to illuminate areas of potential risk.

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<sup>1</sup> <https://www.walkfree.org/global-slavery-index/>.

<sup>2</sup> <https://www.cia.gov/the-world-factbook/countries/haiti/factsheets/>

## 4. What other policies and procedures are in place

Apart from the Supplier Code of Conduct, we have a number of policies and procedures which are relevant to combating modern slavery risks. These policies are not static and are continually reviewed to ensure they are responsive to emerging risks. **The policies below apply to all Aspen Medical staff, regardless of seniority or position.**

### Whistleblowing Policy

All staff and 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. Staff are encouraged to report any possible evidence of modern slavery or related conduct.

Reportable Conduct is defined in the policy to mean:

- conduct of a Workplace Participant, an Affiliate of Aspen Medical or any stakeholder of Aspen Medical that adversely affects, or could adversely affect, either directly or indirectly, the honest and/or proper performance of a workplace participants of Aspen Medical or an Affiliate of Aspen Medical of their duties to Aspen Medical;
- conduct of a Workplace Participant or an Affiliate of Aspen Medical that amounts to the performance of their functions dishonestly, unlawfully or with inappropriate partiality;
- conduct of a current or former Workplace Participant or Affiliate of Aspen Medical that amounts to the wrongful use of their Aspen Medical position or of information or material acquired during the performance of their functions (whether for the benefit of that person or Aspen Medical or otherwise); or
- a conspiracy or attempt to engage in conduct referred to above.

### Responsible Sourcing Policy

This policy applies to all of Aspen Medical's suppliers. The policy stipulates that Aspen Medical expects all its suppliers, whether directly or through their supply chain to conduct their business in a manner consistent with the United Nations Guiding Principles on Business and Human Rights. It notes that Aspen prefers to partner and work with organisations that share similar values, and as a Benefits Corporation member it will give weight to other Benefit Corporation organisations in any value for money considerations.

### Business Ethics Policy

This policy's 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. The policy applies to all staff members of Aspen Medical at all times.

**The policy is comprised of both Aspen's Code of Conduct and its Code of Ethics.**

### **Code of Conduct**

Aspen Medical's Code of Conduct is based on the fundamental principles that all Aspen Medical's dealings are conducted legally, ethically and honestly, with civility, respect and integrity. All staff are required to act in a manner that is considered ethical and law abiding. It applies to all Aspen Medical staff, regardless of seniority or position. It is the baseline documents which outlines the ethical standards to which all staff are expected to always adhere.

The policy specifically commits to adopting a "zero tolerance" approach to all forms of corruption, modern slavery and human trafficking.

### **Code of Ethics**

The Code of Ethics is a pledge that Aspen Medical and its staff will at all times uphold the dignity, standing and reputation of our Profession, "leading by example" as advocates of good governance and strong moral and ethical codes of practice. Along with echoing the Code of Conduct's zero tolerance approach to all forms of modern slavery and human trafficking, the Code of Ethics commits Aspen Medical to:

- Perform appropriate due diligence on all potential partners, and refuse to associate with any company, or employ any individual suspected of partaking in modern slavery and/or human trafficking;
- Immediately report to the relevant authority any known act of modern slavery, or human trafficking committed by its staff, contractors, partnering companies or any third-party agent in the course of their commission on any lead, bid or project; and
- Suspend any employee suspected of partaking/aiding/abetting/failing to recognise and notify and forms of modern slavery and/or human trafficking, subsequently terminating their contract should any later investigation find they have acted in direct contravention of our "Code of Conduct".

More consistent use of the Business Ethics Policy along with the Supplier Questionnaire will be a focus of improvement next year.

**All of the above policies operate together to create a set of expectations, principles and ethical standards that govern how Aspen Medical conducts its operations.**

## 5. Measuring effectiveness of actions through KPIs and Auditing

To date, Aspen Medical has not identified any instances of modern slavery in its current supply chains.

Nevertheless, Aspen Medical is committed to improving the way it interacts with its suppliers and increasing its vigilance with respect to modern slavery risks in its supply chain. We conduct an annual, risk-based, evaluation of our suppliers to ensure our responses to modern slavery risks are refreshed on an ongoing basis.

A measure that will be implemented going forward is strengthening the application of our “Supplier Questionnaire”, ensuring our key suppliers have undertaken this process and provided a response as well as ensuring it is completing it before entering into new business relationship.

This will be part of a renewed effort on the part of Aspen Medical to increase visibility over its supply chain risks.

### Actions taken

Below is a summary of the current and ongoing actions being taken by Aspen Medical to address modern slavery risks. Aspen Medical's subsidiary entities were consulted in compiling this table.

| Actions Area    | Actions                                                                                                                           | Progress                                                                                                               | Continuing Progress 2025 and beyond                                                                                                                                                                                                                   |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Risk Management | Update oracle ERP to hold the new Supplier Questionnaire against supplier records - this will be part of key supplier onboarding. | Risk solution (Supplier Questionnaire) development for inclusion on supplier database. Preferred suppliers identified. | New Digital form ( <a href="https://aspenmedical.jotform.com/build/243371586530963">https://aspenmedical.jotform.com/build/243371586530963</a> ) designed for completion of Supplier Questionnaire - this will feed into the Oracle supplier profile. |
|                 | Consider procurement within risk management plans to identify supply chain risk factors.                                          | Integrated with existing framework to enhance supplier risk assessment.                                                | Development of a dashboard for real-time supplier risk profiling - this will be fed from the Questionnaire database and be updated in real time                                                                                                       |
|                 | Build procurement and recruitment team capability.                                                                                | Providing targeted training to procurement teams on using risk management systems effectively.                         | Continue role-based training with periodic refreshers and updates on system capabilities.                                                                                                                                                             |
| Due Diligence   | Standardise supplier onboarding program across all entities.                                                                      | Reviewing onboarding tools; human rights and incorporating modern slavery clauses embedded in key contracts.           | Finalise centralised onboarding system, ensuring consistent application across all entities.                                                                                                                                                          |
|                 | Review supplier list as part of an annual review.                                                                                 | Supplier audit that incorporates modern slavery risk indicators.                                                       | Issuing targeted Supplier Questionnaire to suppliers for future annual reviews.                                                                                                                                                                       |
|                 | Develop and implement a remediation framework for suppliers exposing modern slavery risks.                                        | In progress                                                                                                            | Finalise framework with detailed processes for corrective action and supplier support.                                                                                                                                                                |

| Actions Area      | Actions                                                                                   | Progress                                                                                      | Continuing Progress 2025 and beyond                                                          |
|-------------------|-------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| Raising Awareness | Employee training on modern slavery awareness and compliance.                             | Modern Slavery Awareness training to become part of annual induction training.                | Track reporting on completion. Ensure new staff complete most appropriate level of training. |
|                   | Develop grievance mechanisms for external stakeholders to report modern slavery concerns. | Planning phase initiated; draft processes under review.                                       | Implement mechanism; conduct scenario testing to evaluate effectiveness and accessibility.   |
| Policy Framework  | Develop measurable KPIs for monitoring policy effectiveness.                              | Initial KPIs established for supplier auditing, training completion, and grievance reporting. | Refine KPIs to include supplier improvement metrics and audit outcomes.                      |

## 6. Conclusion

Aspen Medical intends this to be an iterative document that is reviewed and updated progressively to provide meaningful tracking of its efforts to address modern slavery risks.

This statement was approved by the Board of Aspen Medical Pty Ltd on behalf of all reporting entity under subsection 14(2)(d)(ii) of the Act and signed by Glenn Keys.





## Appendix 1 – List of Entities – Aspen Medical Group

| Entity Name                         | Company Number<br>(where applicable) | ABN                  | Holding | Location           |
|-------------------------------------|--------------------------------------|----------------------|---------|--------------------|
| Aspen Medical Pty Ltd               | ACN 105 250 413                      | (ABN 32 105 250 413) | 100%    | <b>Head Entity</b> |
| Aspen Medical USA Inc.              | USA A/N 9000010                      |                      | 100%    | Americas           |
| Aspen Medical Limited               | Papua New Guinea<br>e/n 1-78055      |                      | 50%     | Asia Pacific       |
| Aspen Medical Services Pte Ltd      | Fiji                                 |                      | 100%    | Asia Pacific       |
| Aspen Medical SG Pte Ltd            | Singapore r/n<br>202104119D          |                      | 100%    | Asia Pacific       |
| Aspen Medical Services Pte Ltd      | Fiji                                 |                      | 100%    | Asia Pacific       |
| PT Aspen Medical Group Indonesia    | Indonesia r/n<br>1200000612321       |                      | 99%     | Asia Pacific       |
| PT Aspen Medical Hospitals          | Indonesia r/n<br>0811210016434       |                      | 90%     | Asia Pacific       |
| PT Aspen Medical Bogor              | Indonesia<br>2401230007036           |                      | 90%     | Indonesia          |
| PT Aspen Medical Depok              | Indonesia e/n<br>1406230101136       |                      | 90%     | Indonesia          |
| Aspen Medical Indonesia Pty Ltd     | ACN 644 511 240                      | (ABN 44 644 511 240) | 100%    | Australia          |
| Aspen Corporate Medical Options Pty | ACN 142 501 111                      | (ABN 42 142 501 111) | 100%    | Australia          |

| Entity Name                              | Company Number<br>(where applicable) | ABN                  | Holding | Location  |
|------------------------------------------|--------------------------------------|----------------------|---------|-----------|
| Ltd (t/a Aspen Corporate Health)         |                                      |                      |         |           |
| Aspen Medical Retrieval Services Pty Ltd | ACN 648 677 696                      | (ABN 49 648 677 696) | 100%    | Australia |
| Aspen Medical Technology Pty Ltd         | ACN 662 430 051                      | (ABN 42 662 430 051) | 100%    | Australia |
| Equity Health Solutions Pty Ltd          | ACN 621 280 162                      | (ABN 70 621 280 162) | 49%     | Australia |
| Exemplar International Pty Ltd           | ACN 652 533 241                      | (ABN 75 652 533 241) | 100%    | Australia |
| Global Medical Supplies Pty Ltd          | ACN 641 151 993                      | (ABN 77 641 151 993) | 100%    | Australia |
| Mobile Medical Facilities Pty Ltd        | ACN 609 873 047                      | (ABN 74 609 873 047) | 60%     | Australia |
| Peak Medical Recruiting Pty Ltd          | ACN 132 690 585                      | (ABN 53 132 690 585) | 100%    | Australia |
| Remote Area Health Corps Ltd             | ACN 134 215 768                      | (ABN 45 134 215 768) | 100%    | Australia |
| Rural Locum Scheme Ltd                   | ACN 150 395 618                      | (ABN 66 150 395 618) | 100%    | Australia |
| Aspen Medical Manufacturing Pty Ltd      | ACN 640 278 995                      | (ABN 13 640 278 995) | 50.1%   | Australia |
| Aspen Medical Assistance LLC             | UAE CN-1099714                       |                      | 49%     | UAE       |

| Entity Name                                          | Company Number<br>(where applicable) | ABN | Holding | Location |
|------------------------------------------------------|--------------------------------------|-----|---------|----------|
| Uniteam Primary<br>Healthcare Care<br>Centre (UPHCC) | UAE CN-2828657                       |     | 95%     | UAE      |

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