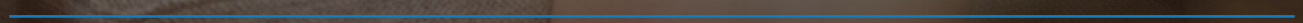


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**Modern
Slavery
Statement** _____



We understand our responsibility to deliver our services sustainably across environment, social and governance."





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Introduction

As a world-leading integrated health care provider, Icon Group (Icon) has global reach and impact.

We understand our responsibility to deliver our services sustainably across environment, social and governance (ESG). This commitment is at the heart of our mission to deliver the best care possible – for our patients, our people and our planet.

We do this through care for:

-  **PATIENTS** – working to expand cancer awareness, clinical competency and access and quality care for at risk communities
-  **PEOPLE** – establishing a diverse, inclusive and attractive working environment; set up to deliver the best possible patient outcomes
-  **PLANET** – actively working towards a lower waste and carbon footprint.

Our commitments are underpinned by good governance – demonstrated through transparent and repeatable reporting and communication to all our stakeholders – to ensure real progress and accountability.

Playing our part

Modern slavery is an umbrella term used to describe human trafficking, slavery, and slavery-like practices. It occurs when coercion, threats or deception are used to exploit individuals and deprive them of their freedom.

Modern slavery is one of the world's largest and most complex human rights issues.

Icon is committed to conducting its business in a manner consistent with internationally proclaimed human rights, including all workers' fundamental human right to be treated with dignity and respect, and to live a life of freedom and opportunity.

We are committed to conduct business to ensure modern slavery risks are minimised within our supply chain and operations, any potential cases are investigated, and appropriate actions are taken to address any concerns that are identified.

We work proactively with our supply chains and operations to reduce the risk of modern slavery and support human rights and we expect all organisations we engage with to do the same.

Our progress

This is Icon's fourth Modern Slavery Statement. This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth) sets out the actions taken by Icon to address modern slavery risks in our business and supply chain over the financial year ending 30 June 2024. It outlines the current and ongoing activities Icon has committed to identify, assess and remedy risks relating to modern slavery in our business and supply chain and its goals for 2025.



Recognising its critical role in combating modern slavery, particularly in the pharmaceutical sector, which accounts for over 80% of its total expenditure, Icon has implemented a series of robust actions throughout the reporting period. These initiatives focussed on regular policy updates, thorough supplier evaluations, risk assessments, and internal training based on real-world evidence to ensure heightened vigilance across the team against modern slavery risks.

Key deliverables during this period include:

Extensive Supplier Screening: Over 50 high-risk suppliers were rigorously screened, with no evidence of modern slavery identified.

Whistleblower and Management Reporting: No incidents of modern slavery were reported through the whistleblower inbox or management channels.

Annual Risk Assessment: Risk assessments were conducted annually, with additional sectors included for more intensive monitoring.

Updated Policies and Training: Policies and training materials were reviewed and updated, especially for suppliers in sectors with heightened risks due to recent developments.

Mock Incident Drills: Annual mock modern slavery incidents were introduced to test and ensure that the responsibility matrix aligns with operational practices.

Training Compliance: A target was set to achieve 90% compliance with Ethical Business Practices training by 30 June 2025.

These actions reflect Icon's continued commitment to maintaining rigorous safeguards and promoting ethical business practices in its operations and supply chain.



Reporting entity

This statement is made on behalf of APOG Topco Pty Ltd (ACN 654 198 268) and its below Australian subsidiaries (Icon) that meet the reporting requirements pursuant to the Act:

- Integrated Clinical Oncology Network Pty Ltd (ACN 151 293 891)
- Slade Health Pty Ltd (ACN 151 218 978)
- Tabitha Pharmacy (Qld) Pty Ltd (ACN 131 698 658)

The wider Icon group has a number of related entities involved in the provision of integrated cancer care. While not all of these entities meet the threshold for reporting entities for the purposes of the Modern Slavery Act, this statement is provided on behalf of all entities within Icon, given Icon conducts procurement and manages human resources for these entities.

Entity structure, operations and supply chain

Icon is Australia's largest dedicated private provider of cancer care, with a growing presence in Asia, and United Kingdom.

Icon is a vertically integrated model oncology business offering services in medical oncology, haematology, radiation oncology, research, compounding and hospital pharmacy. Icon was founded and is headquartered in Queensland Australia with operations in Australia, New Zealand, Singapore, Hong Kong, Mainland China, and United Kingdom.

Icon operates joint ventures (JV) in New Zealand, Malaysia, and in FY24, entered into a JV with 5D Clinics, Australia's leading provider of robotic radiation therapy using the CyberKnife system.

Icon has over 30 years of experience in private cancer care and employs close to 3,500 people across several operational divisions and support functions globally. The global workforce consists of direct employees, contractors and medical partners. Direct team members are engaged either by contract, award or a collective industrial agreement.

Icon is private equity owned by several consortium investors. Icon operates its business under several brands that span cancer care, pharmacy and compounding divisions.

- **Icon Cancer Centre Australia and New Zealand** – Radiation oncology including treatment to patients in hospitals and medical precinct outpatient clinics. Medical oncology including medical oncology and haematology services for private patients in hospital day centres.
- **Slade Health Compounding Australia and New Zealand** – Provides customised drug compounding for hospitals, oncology centres and individual patients.
- **Pharmacy Services** – Major provider of outsourced hospital pharmacy services in Australia under the brand names: Icon Cancer Centre, Slade Pharmacy, and Epic Pharmacy.
- **Icon Cancer Centre Mainland China** – Radiation oncology management services in partnership with local operators.
- **Icon Cancer Centre and Icon Specialist Centre Hong Kong** – Provides oncology services and specialist centres for patients in Hong Kong.
- **Icon Cancer Centre and Icon Health Screening Singapore** – Provides oncology services including radiation oncology, medical oncology and haematology for patients across Asia in private clinics. Icon Health Screening provides comprehensive screening services for patients in the ASEAN region.
- **Research** – provides Phase I to Phase IV clinical trials in medical oncology, radiation oncology and haematology sponsored by the pharmaceutical industry and collaborative groups, as well as Icon Investigator Initiated Trials, clinical registries, physics and dosimetry research.





Risks of modern slavery practices in operations and supply chain

Icon acknowledges that as its global workforce continues to grow, the potential for modern slavery risks rises. It also acknowledges that risks of modern slavery exist in its operations and supply chains. Icon is committed to continually improving the organisation's approach to identify, assess and manage modern slavery-related risks in its operations and supply chain.

The greatest area of risk for Icon relates to supplier partnerships for the provision of products used in the pharmaceutical compounding facilities and in the provision of medical supplies to cancer centres (including but not limited to personal protective equipment such as masks, gloves and clinical equipment). As many suppliers provide these types of products from overseas, the most significant risk of modern slavery is in the manufacturing of these goods.

Additionally, as Icon's employment footprint expands in Asia and the United Kingdom, we are conscious of the risk that could emerge relating to human rights and labour sourcing, such as the possibility of deceptive recruiting for labour or services by third party employment services providers.

Actions taken to assess and address modern slavery risks

Human rights risks

Icon respects workers' ability to enter employment voluntarily and freely, without the threat of a penalty, and respect workers' freedom to terminate employment without penalty, excepting reasonable notice or as per any relevant contract or industrial instrument. Icon complies with local laws and regulations regarding minimum worker entitlements, including maximum hours of work and minimum wages and ensure workers are paid a living wage. It does not engage in misleading or fraudulent practices during the recruitment of employees or when offering employment and will not require workers to pay for their jobs.

Icon is a value-led organisation. Our values express what we stand for and are at the heart of our culture and they guide how we work together. Our values are Innovate, Connect, On Purpose, Nurture and Energy. Our approach to responsible business practice, good corporate governance and corporate social responsibility reflects our commitment to our values.

Icon has a board approved ESG strategy that provides focus and oversight on modern slavery risks as well as a number of key sustainability topics. Modern slavery concerns are addressed through the ESG strategy which reflects Icon's commitment to the principles of the UN Compact Strategy, and which supports several of the UN Sustainability Goals and Targets.

Icon continues its commitment to good governance and strong institutions through its policy framework that ensures our policies set out in detail the behaviour we expect from employees and partners. Our first Modern Slavery Policy was released in March 2021 and is reviewed annually.

Some of our policies with relevance to human rights include:

- ✔ Icon Group Code of Conduct
- ✔ Treating People Fairly at Work Policy
- ✔ Ethical Business Conduct Policy
- ✔ Recruitment and Selection Policy
- ✔ Health and Safety Policy
- ✔ Whistleblower and Protection Policy
- ✔ Volunteering at Icon Group Policy
- ✔ Icon's Human Rights Statement
- ✔ Financial Delegations Policy

Team members are encouraged to report any concerns of unethical or illegal conduct, in relation to modern slavery, either to their leader, the Procurement team, the Head of Legal and Company Secretary, the People and Capability team (HR) or via the Whistleblower email address – whistleblower@iconcore.com.au

During the reporting period, no notifications were received in the inbox or via our leaders. Leaders are educated and informed on the importance of promptly acting on behalf and managing grievances. Methods for reporting grievances, in person and anonymously, are published broadly across the organisation. Where issues are investigated and substantiated, Icon will take appropriate action to remedy.

Supply chain and operations risks

Icon will deal with business partners and suppliers, and potential business partners and suppliers, fairly and ethically and in accordance with this policy. It will endeavour to procure from business partners and suppliers that are aligned with its commitments to human rights, good governance and the environment.



Icon has implemented procedures to identify, assess and address risks of modern slavery in the operations and supply chains. This include but is not limited to:

- **Supplier due diligence:** Icon conducts screening of all new suppliers and has evaluated current suppliers based on a risk-based matrix to ensure all relevant suppliers are screened to identify potential instances of modern slavery. Any employee seeking to purchase goods or services from a new supplier will require screening by Icon's procurement team prior to engaging the supplier.
- **Supplier communication:** Icon requires suppliers to notify Icon Procurement, or a member of the Icon Team as soon as is reasonably practicable after they become aware that modern slavery has occurred or is occurring in their operations or supply chain, or that there is a real and substantial prospect that it has occurred or is occurring.
- **Alleged Modern Slavery:** Icon has worked with suppliers where allegations of Modern Slavery have occurred in the past, to ensure any grievances are clarified and all staff are paid in accordance with relevant awards.
- **Evaluation of Suppliers of Suppliers:** Icon has engaged with vendors of supply chain risk management solutions and has completed the screening process of Tier 2 suppliers. Subsequent tiers to be screened during the next reporting year.
- **Supplier compliance with minimum standards:** Icon expects all supplier partners and all parts of the Icon operations to comply with its supplier minimum standards. Where a supplier is, or appears, unable to meet any of the supplier minimum standards, Icon or the relevant Icon Entity may work with the supplier to understand their limitations and determine how compliance may be achieved.
- **Training on modern slavery concerns:** Icon is committed to ensuring training is provided so that its workers and other third parties or entities undertaking activity for or on behalf of Icon understand modern slavery, and what is required to identify, assess and address modern slavery as well as their responsibilities under this policy. Current training modules will be reviewed and refined during the next reporting period, and a relaunch campaign is planned to help achieve compliance goals.

Icon's annual Modern Slavery statement is made available for all members of the organisation and public to review. The publication of the statement provides an opportunity for Icon's team members, customers, investors and suppliers to ascertain activities undertaken each year to reduce modern slavery. In addition, Icon's activities in this area serve to engage team members in any previous hidden or undisclosed human rights issues within business and operations. Modern Slavery reporting is provided to the Board and Senior Leaders of Icon.

Any suspected instance of modern slavery in the supply chain operation should be reported to Icon's Procurement team. Icon will work with the supplier to identify whether modern slavery has occurred, or may be occurring, and if so, how the situation will be rectified. Icon reserves the right to terminate its commercial relationship with suppliers if they breach its Supplier Minimum Standards or are found to have been involved in unethical business practices that cannot be addressed.

“Icon will deal with business partners and suppliers, and potential business partners and suppliers, fairly and ethically and in accordance with this policy.”

Assessment of the effectiveness of actions taken to address modern slavery – FY24

Icon is committed to address the risks of modern slavery and delivered a number of key objectives for 2024, with work continuing into 2025 to fully implement the approach. Icon will track and report on the delivery of these objectives. Icon is committed to investing time and resources to contribute to the fight to end modern slavery.



Key Objectives	Initiative	FY24 KPI	FY24 Actions
Group Risk Assessment and Mitigation	Identifying and addressing modern slavery risks	Procurement will identify impacts in our supply chains and any actions required to address and engage software vendor for next phase of supply chain review	In FY24, we conducted extensive screening of over 50 suppliers in high-risk categories to ensure we are conducting business with safeguards in place
		Continued review of modern slavery identification and reporting processes to align with Icon ESG Governance Framework	ESG Governance Committee replaced ESG Council with quarterly meetings scheduled. Reviews were performed in FY24
		Review of reporting platforms and mechanisms for employees and/or individuals to disclose potential modern slavery risk	Reviews were performed in FY24
	Annual Risk Assessment Workshop	Group risk assessment across all divisions and operating countries annually. Reported to the board and Audit and Risk Committee	Annual risk assessment workshop undertaken. Additional sectors were added to the risk register for heightened monitoring

Key Objectives	Initiative	FY24 KPI	FY24 Actions
Group Governance and Systems	Risk assessment of supply chains and procurement operations with focus on modern slavery compliance	Review of initial tier 2 supplier report from software vendor	Review of Tier 2 suppliers performed with no instances of modern slavery identified
		Any modern slavery risk issues identified to be reported to the ESG SteerCo along with recommended action	Responsibility matrix was developed to ensure consistent reporting approach. No modern slavery instances were reported
	External publishing of modern slavery action within Icon Group's annual Sustainability Report	Report on compliance with modern slavery within the Sustainability Report which will be published annually	Modern slavery statements are set for publication in the Annual Sustainability report
	ESG Steerco (previously referred to as ESG Council) superseded. All matters referred to ESG Steering Committee	Continued review and alignment of modern slavery working group composition and terms of reference to align with corporate governance and reporting requirements	Reviewed and aligned with ESG Governance Framework

Assessment of the effectiveness of actions taken to address modern slavery – FY24 *(continued)*

Key Objectives	Initiative	FY24 KPI	FY24 Actions
Group Human Rights Responsibilities	Training	Establish Leader training in supply chain operations and supplier arrangements, with a view to scalability across global operations	Ethical Business Training has been incorporated into induction of all positions. Employees are required to complete this training. The compliance rate for this training (as at 30/06/2024) was at 35%. This increased significantly to 62%, at time of publishing. Icon Group has set a 90% target compliance rate by 30 June 2025
			UK deployment of training via Litmus learning platform is under consideration
		Procurement to develop and offer to suppliers training on our approach and policy and on the supplier minimum standards. With a view to scalability across global operations	Not undertaken in FY24. Bi-annual training sessions will be arranged with all preferred suppliers selected from the upcoming pharmaceutical tender. An additional training session scheduled for Q2, FY25 soon after tender closes

Key Objectives	Initiative	FY24 KPI	FY24 Actions
Group Human Rights Responsibilities	Onboarding new acquisitions or new business	A due diligence checklist will be developed to proactively identify any potential threats of human rights violations in any acquired business	Modern slavery checklist developed and included in the due diligence documents for recent acquisitions including Pharmaxo Group (Wiltshire, UK). Current modern slavery screening processes within Pharmaxo Group were reviewed and no initial signs of concern were identified
		Onboarding processes will include specific training on Icons commitment to modern slavery	Ethical Business Practices training to be completed by all staff via Litmus learning platform. Targeting 90% compliance by June 2025. Training relaunch campaign is planned to help achieve these goals
	Policies and procedures	Procurement to review policies and training materials for suppliers	Procurement is committed to undertaking annual reviews
		Commitment to review policies with modern slavery impacts. Remain compliant and fit for purpose	Policy reviewed in June 2024 by People and Capability (HR) team

Assessment of the effectiveness of actions taken to address modern slavery – current status and planned for 2025

Key Objectives	Initiative	KPI's to Measure Effectiveness	Current Status or planned 2025 objectives	Lead
Group Risk Assessment and Mitigation	Identifying and addressing modern slavery risks	Procurement will identify impacts in our supply chains and any actions required to address and engage software vendor for next phase of supply chain review	As part of the bi-annual pharmaceutical tender, screening of tier 2 suppliers will be required as a mandatory criterion prior to submission of tender responses	Procurement
		Continued review of modern slavery identification and reporting processes to align with ESG Governance Framework	Revised criteria for acceptance of new suppliers across all jurisdictions. Modern Slavery topic added as standard agenda item in the Quarterly ESG Governance meeting, with bi-annual status updates planned for the Board	Procurement
	Annual Risk Assessment Workshop	Review of reporting platforms and mechanisms for employees and/or individuals to disclose potential modern slavery risk	Enhanced promotion of whistleblower reporting within the intranet	Procurement
		Group risk assessment across all divisions and operating countries annually. Reported to the Board and Audit and Risk Committee	Annual review mechanism in place based on benchmarking with our industry	Procurement

Key Objectives	Initiative	KPI's to Measure Effectiveness	Current Status or planned 2025 objectives	Lead
Group Governance and Systems	Risk assessment of supply chains and procurement operations with focus on Modern Slavery compliance	Review of initial tier 2 supplier report from software vendor	Audit of all suppliers in high-risk category to validate tier 2 suppliers	Procurement
		Any modern slavery risk issues identified to be reported to the ESG Steering Committee along with recommended action	Modern slavery added standard agenda item on the ESG Steering Committee agenda. Mock modern slavery incident to be undertaken annually, with the first one planned for Q2, FY25 to ensure responsibility matrix meets operational requirements	Procurement
	External publishing of modern slavery action within Icon Group's annual Sustainability Report	Report on compliance with modern slavery within the Sustainability Report which will be published annually	To be published in Icon Group's Annual Sustainability Report – at the end of financial year, in line with the financial and climate reporting standards	Executive Manager – People and Culture, and Chief of Staff and Transformation
	ESG Governance Framework	Continued review and alignment of modern slavery working group composition and terms of reference to align with corporate governance and reporting requirements	Annual review mechanism in place in consultation with ESG Steering Committee (via the Board Audit & Risk Committee)	Executive Manager– People and Culture, Chief of Staff and Transformation and Head of Legal & Company Secretary

Assessment of the effectiveness of actions taken to address modern slavery – current status and planned for 2025

Key Objectives	Initiative	KPI's to Measure Effectiveness	Current Status or planned 2025 objectives	Lead
Group Human Rights Responsibilities	Training	Establish Leader training for supply chain operations and supplier arrangements, with a view to scalability across global operations	In addition to Ethical Business Practices training, a workshop to be held where leaders in the Procurement team, and others participate in mock modern slavery instances training	Executive Manager – People and Capability, and Chief of Staff and Chief Transformation Officer
		Procurement to develop and offer to suppliers training on our approach and policy and on the supplier minimum standards, with a view to scalability across global operations	Bi-annual training sessions to be offered to all Preferred suppliers in addition to screening as part of the Bi-annual pharmaceutical tender	Procurement
	Onboarding new acquisitions or new business	A due diligence checklist will be developed to proactively identify any potential threats of human rights violations in any acquired business	Checklist to be evaluated with any acquisitions in FY25	Executive Management
		Onboarding processes will include specific training on Icons commitment to modern slavery	Review the Ethical Business Practices Training and its delivery mechanisms, followed by relaunch campaign. Training via Litmus deployed globally	Executive Management

Key Objectives	Initiative	KPI's to Measure Effectiveness	Current Status or planned 2025 objectives	Lead
Group Human Rights Responsibilities (continued)	Policies and Procedures	Procurement to review policies and training materials for suppliers	Annual review mechanism in place	Procurement
		Commitment to review policies with modern slavery impacts. Remain compliant and fit for purpose	Central policy register in place with review frequency assigned for each policy	Executive Manager – People and Capability





Process of consultation

Icon Group's Audit and Risk Committee has been consulted on the development of this Modern Slavery Statement and the progress of its initiatives. The objectives have been discussed and agreed in collaboration and broadly socialised across the organisation and extended leadership teams. Feedback has been sought and integrated from multiple stakeholders. Expert guidance has been sought from internal and external industrial relations and legal specialists. The Icon Procurement team has been heavily involved in the development of the policy and this statement. Discussion approval and endorsement from the Board has been achieved.

Board approval

This Modern Slavery Statement meets the requirement for approval and was reviewed and approved by the Icon Group Board of Directors on 3 December 2024. The Icon Group Board is the governing body for Icon and its subsidiaries. Supporting documentation of this approval is attached to this statement by way of a confirming letter from the Head of Legal & Company Secretary.

This statement is made in accordance with the Modern Slavery Act (Cth), it represents the Australian Reporting Entities on modern slavery for the financial year ended 30 June 2024.

Mark Middleton OAM
Icon Group Chief Executive Officer

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