



# Modern Slavery Statement

For the financial year ended 30 June 2024

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# Mandatory Reporting of the Modern Slavery Act

Viney HoldCo Pty Ltd (ABN 81 658 290 898) and its wholly-owned and controlled entities (**Virtus** or **Virtus Health**) takes the need to manage, measure and report on environmental, social and governance risks seriously, including modern slavery risks, human rights and labour practices.

Virtus Health is committed to reporting under the *Modern Slavery Act 2018* (Cth) (the **Act**). This Modern Slavery Statement meets the mandatory reporting criteria set out in Act. The following table illustrates our compliance and provides a cross reference to the sections in which the criteria apply to.

Mandatory Reporting Criteria	Reference in this statement
Identify the reporting entity	Page 3
Describe the reporting entity's structure, operations and supply chain	Page 5 - 7, 16
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Page 8 - 10
Describe the actions taken by the reporting entity and any entity it owns or controls, to assess and address those risks, including due diligence and remediation processes	Pages 11 - 12
Describe how the reporting entity assesses the effectiveness of these actions	Page 13
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Page 14
Provide any other relevant information	Page15

## Statement of reporting entity

Viney HoldCo Pty Ltd (ABN 81 658 290 898) with its registered office is at Level 26, 101 Collins Street, Melbourne VIC 3000 makes this joint Modern Slavery Statement for the period commencing 1 July 2023 to 30 June 2024 (**Reporting Period** or **FY24**) on behalf of all its wholly owned and controlled entities (Refer to list of entities in the Schedule on page 16) (**Virtus Health Group**).

Virtus Health's Modern Slavery Statement has been published in accordance with the *Modern Slavery Act 2018* (Cth). This is a joint statement of all the entities under the Virtus Health Group that meets the reporting threshold for the Act and the UK Modern Slavery Act 2015.

## Section 1

### CEO MESSAGE

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At Virtus Health, we are committed to respecting human rights and upholding ethical standards across our operations and supply chains.

Modern slavery, in all its forms, is a profound violation of human dignity, and addressing it is a fundamental responsibility for businesses worldwide.

Currently, it is estimated that 49.6 million people are living in modern slavery globally, with women and girls disproportionately impacted. In Australia it is estimated that over 1,900 people are victims of modern slavery and only one in five is detected<sup>1</sup>.

This Modern Slavery Statement has been prepared in accordance with the requirements of the Act and the UK Modern Slavery Act 2015. It details the steps we have taken during the Reporting Period to identify, assess, and mitigate the risks of modern slavery within our operations and supply chains.

We recognise the importance of transparency and accountability in combating modern slavery. Over the past year, we have continued to reassess our operations and supply chain to identify new risks and take any actions that are necessary to mitigate any potential modern slavery,

While we have made positive progress, we understand that addressing modern slavery is a complex and ongoing challenge. It requires continuous improvement, collaboration, and innovation. This Modern Slavery Statement represents not only our compliance with legislative obligations but also our broader commitment to fostering a culture of respect, equity, and integrity.

We will continue to refine our approach, leveraging insights from our work to date and listening to the voices of those impacted by our business activities. Our focus remains on creating long-term, sustainable solutions that safeguard human rights and promote ethical practices throughout our value chain.

We began our modern slavery journey in 2019 with the objective to educate ourselves on modern slavery risks in our operations and supply chain. I would like to thank our employees, partners, and stakeholders for their ongoing dedication and support in this important work. Together, we can contribute to eradicating modern slavery and building a more equitable and just global economy.

I am very pleased to publish our FY24 Modern Slavery Statement, which sets out the work we have done to mature our modern slavery framework and our commitments for the reporting period between 1 July 2023 to 30 June 2024.



**James Pyne**

Chief Executive Officer – Virtus Health



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<sup>1</sup> Anti-Slavery Australia 2024

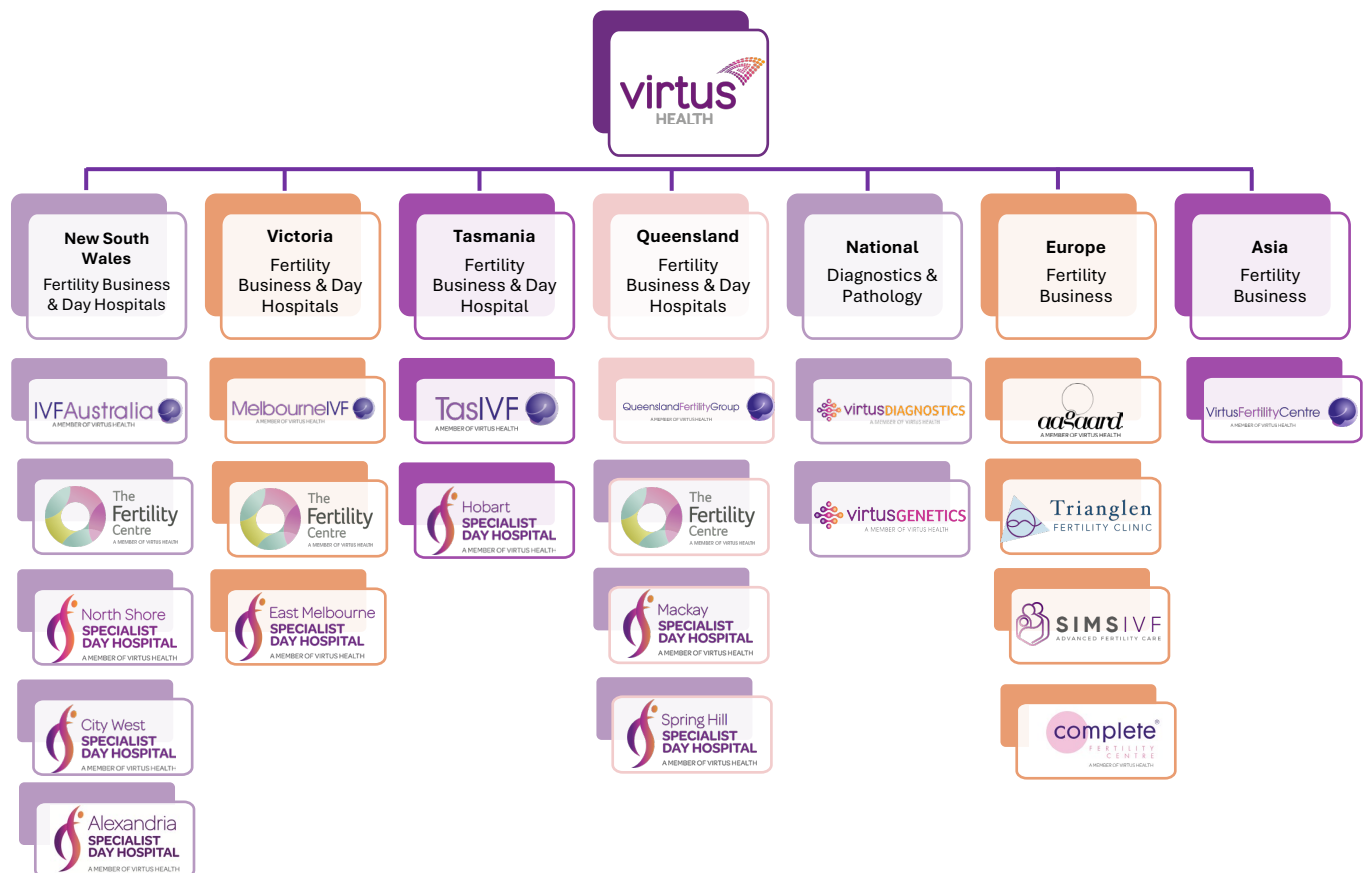
## Section 2

### Our Structure, Operations and Supply Chain

#### Corporate Structure

Virtus Health is an Australian proprietary limited company registered with the Australian Securities and Investments Commission. Virtus Health is considered a “reporting entity” under the Act, as it is Australian entity that has consolidated revenue of at least \$100 million during the Reporting Period.

The Virtus Health Group head office is located at Level 3, 154 Pacific Highway, Greenwich, Sydney, New South Wales 2065, Australia. The Virtus Health Group corporate structure comprises a holding company (Viney HoldCo Pty Ltd) which has 100% ownership of entities in the Virtus Health Group entities that operate Virtus Health’s comprehensive range of fertility services, day hospitals and advanced genetic diagnostics and pathology businesses.

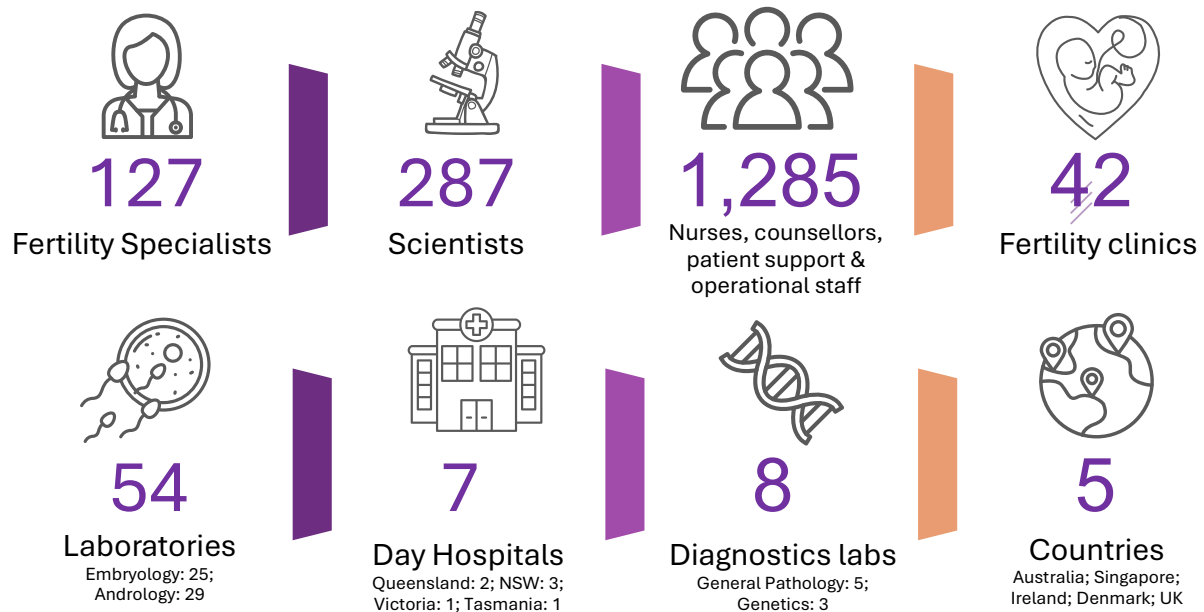


Schedule 1 of this Modern Slavery Statement contains a list of the Australian reporting entities and controlled entities of the Virtus Health Group.

## Our operations

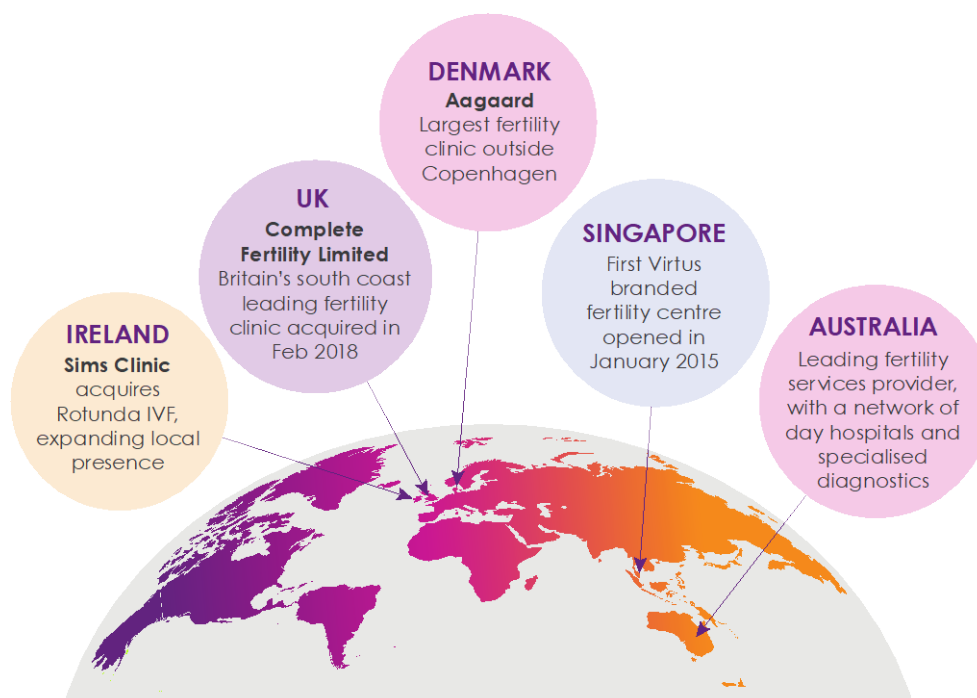
Virtus Health is one of the leading Assisted Reproductive Services (**ARS**) provider in the world with a market-leading position in Australia, Ireland and Denmark and a growing presence in the UK and Singapore.

Globally we have more than 40 fertility clinics. In Australia, we also operate seven day hospitals and the Virtus diagnostics and reproductive genetics service. We bring together leading doctors, scientists, researchers, nurses, counsellors and operational staff to provide the highest quality of care across the full range of reproductive and fertility issues. We help thousands of people each year to become parents. Our operations are supported by our supply chain in ensuring we have the necessary products and equipment to provide care to our patients.



## Our locations

In FY24, Virtus Health continued to operate in low-risk countries that have a strong modern slavery and human rights framework.



## Our Network

Our Group		Our Locations		Our Suppliers	
Total staff in Australia:	1,337	Total fertility clinics:	42	Total direct suppliers:	1,492
Total staff outside Australia:	246	Total fertility clinics in Australia:	30	Total % of spend in Australia:	>95%
Contracted Medical Professionals globally:	141	Total fertility clinics in high-risk countries	0	Total % of spend overseas:	<3%

## Our Supply Chain

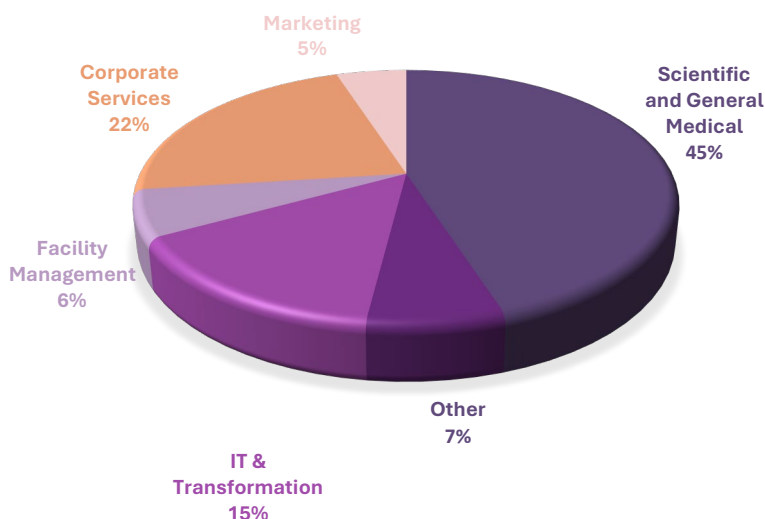
In FY24, Virtus Health had a direct supplier spend of approximately \$130m. These figures reflect how critical our suppliers are in ensuring we deliver affordable and sustainable healthcare to our patients.

Our supply chain comprises the following vendors:

Scientific and General Medical	Corporate Services	IT & Transformation	Marketing	Other
Includes scientific & medical equipment and consumables	Includes office suppliers, legal, training and education	Includes IT software, hardware and services	Includes digital marketing, advertisement, branding	Includes hospitality, travel & entertainment, donor sperm & eggs, freight, logistics and fleet maintenance

When considering the modern slavery risk in its supply chain, Virtus Health takes a risk-based approach to ensure resources are targeted to those direct suppliers that have higher modern slavery risk profile. Virtus Health continues to have the majority of its direct supply spend (>95%) in Australia, where direct supplier risk profiles are understood to be lower.

Our direct spend by vendor:



In FY24, **>95%** of our direct spend was with organisations registered in Australia



## Section 3

### Identifying modern slavery risks

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Virtus Health is committed to identifying, addressing, and managing risks of modern slavery and human rights. In FY24, we continued to take steps to review our operations to identify risks and understand how modern slavery is related to our supply chains and operations.

The Australian Government describes 'Modern slavery' as situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. It defines eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

#### Our Modern Slavery Risk Profile

While approximately 95% of our direct supplier spend is in Australia and the balance is overseas, Virtus Health recognises that a broad approach should be taken to consider the full spectrum of the Virtus Health Group's modern slavery and human rights risks and impacts caused by our activities and relationships we engage in.

When identifying potential modern slavery risks Virtus Health aligns with UN Guiding principles, that is to consider whether Virtus may have the potential to:

- Directly cause modern slavery practices through our direct operations;
- Contribute to modern slavery practices; or
- Be directly linked to modern slavery practices due to the products we procure through our supply chain.

#### Risk identification activities

In FY24, Virtus Health assessed its modern slavery and human rights risks using various risk factors including the following:

- Monitoring our suppliers and supplier agreements;
- Reviewing modern slavery statements of direct suppliers; and
- Monitoring publications and government reporting.

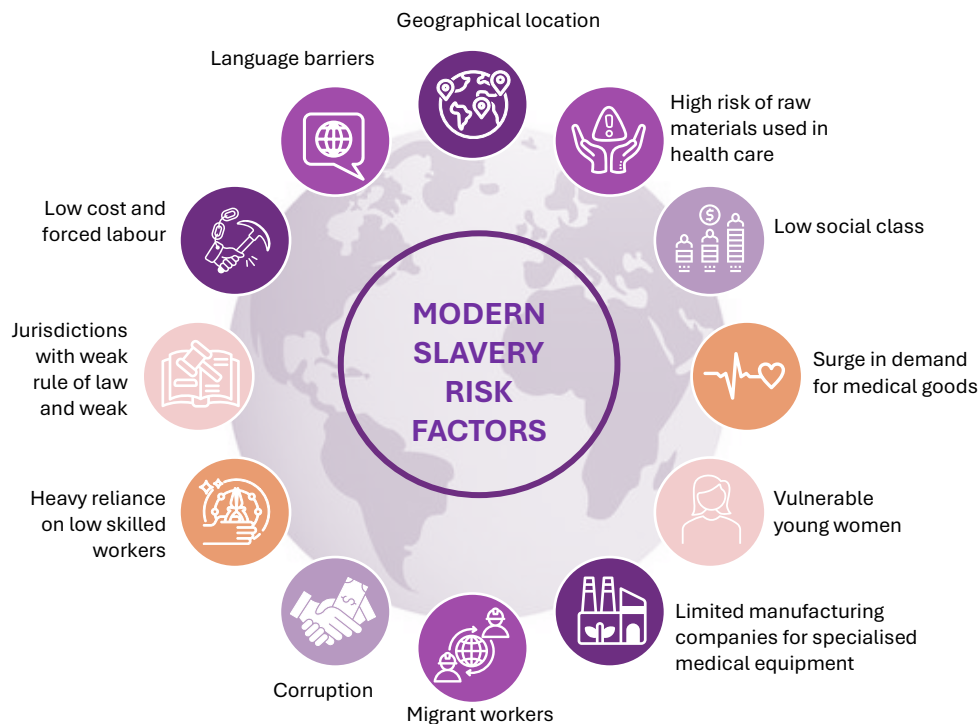
#### Risk factors

Virtus Health has identified that certain procurement categories in healthcare have more significant inherent modern slavery risks. In FY24 we continued to assess and review our risk areas and factors to further understand our risk profile. There are four key factors in our supply chain which elevate our risks of modern slavery:

- Suppliers with a high reliance on vulnerable populations;
- Suppliers with high-risk business models;
- Goods and services that are in high-risk categories; and
- Goods and services sourced from high-risk geographies.



Other factors have been identified to increase risks of modern slavery across our supply chain include, but are not limited to:



Where multiple high-risk factors are present, the chances of modern slavery risks are higher. Where this occurs Virtus Health will add additional resources and controls to prevent harm.

In FY24, modern slavery risks within Virtus Health's operations and direct suppliers remains low given the location of our operations and our direct supplier spend, being predominantly in Australia, where governance and federal legislation protecting against modern slavery is strong. However, there is a higher risk of modern slavery in our broader supply chain.

## Risk in procurement

Given risk identification activities undertaken across previous reporting periods, Virtus Health understands that certain procurement categories in healthcare have more significant inherent modern slavery risks.

The following risk areas and factors have been identified for our operations and supply chain:

- **Use of overseas subcontractors and multi-tiered supply chain.** For example, limited visibility over working conditions and employment practices that may exploit workers.
- **Procurement of medical goods.** For example, setting unrealistic costs targets and delivery timeframes that can only be met by exploited labour.
- **Sourcing of raw materials for healthcare.** For example, child labour and forced labour involving deceptive contracting.
- **Manufacturing of healthcare products in high-risk geographical locations.** For example, migrant illegal workers working in sub-standard working conditions and exposed to toxic materials.
- **Overseas gamete donor banks.** For example, due to commercialising eggs in countries and global shortage of gametes, vulnerable groups may be forced to donate eggs.

## Supply Chain – Supplier High-Risk Profiles

Analysis conducted in previous reporting periods has identified high-risk supplier profiles, focused on manufacturers; distributors, commodity production; and offshore services. The table below provides further details on these supplier profiles:

High Risk Supplier Sectors	High Risk Products and Services	Direct vs Extended Supply Chain	High Risk Countries	Our Comments and Actions
Manufacturing	Suppliers that manufacture and supply medical goods such as gloves and garments	Extended supply chain	Malaysia Thailand Sri Lanka	No direct spend with suppliers in this sector.  Virtus Health monitors modern slavery instances of manufacturers used in our extended supply chain through consultation with our direct spend suppliers.
	Suppliers that supply surgical instruments	Extended supply chain	Pakistan	
Distribution	Supplying of pharmaceuticals	Direct	Asia	Virtus Health only uses distribution suppliers that are located in Australia
Commodities	Suppliers that source raw materials for healthcare electronics including tin, copper, gold and tantalum	Extended supply chain	Malaysia China	No direct spend with suppliers in this sector.  Virtus Health monitors modern slavery instances of manufacturers used in our extended supply chain through consultation with our direct spend suppliers.
Offshore services	Overseas gamete donor banks	Direct	Ukraine India Eastern Europe	Virtus Health uses strict due diligence processes to assess the use of gamete donor banks from high-risk countries

## Section 4

### Actions taken to assess and to address modern slavery risks

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Virtus Health understands that modern slavery cannot be addressed in isolation from other human rights issues. Our response to both is aligned with the UN Guiding Principles on Business and Human Rights. That is why we integrate modern slavery risk management with our broader procedures to protect and respect human rights.

#### Governance Policies

Our robust governance policy framework continues to provide our foundation to mitigate modern slavery and human rights risks in our operations and supply chain. This consists of our:



##### WHISTLE-BLOWER POLICY

Outlines Virtus Health's process for managing unethical, illegal, fraudulent or undesirable conduct as well as concerns that modern slavery has occurred. Including protecting those people who come forward and report unlawful or unethical behaviour being conducted in our operations. This includes modern slavery conduct.



##### EQUAL EMPLOYMENT OPPORTUNITY POLICY

Virtus Health's Equal Employment Opportunity Policy promotes diversity within the workplace and equal opportunities for all employees within its operations. The Policy sets out processes and responsibilities with the aim of providing a workplace in which all workers are treated in accordance with the fundamental principles of equality.



##### CODE OF CONDUCT

Virtus Health's code of conduct sets out the values, commitments, ethical standards and policies of Virtus and outlines the standards of conduct expected of our business and people, taking into account Virtus' legal and other obligations to its stakeholders. Our employees receive annual mandatory Code of Conduct training through our learning management system.



##### GRIEVANCE POLICY

We have established grievance policy to set out the process for grievances and facilitate the appropriate dispute resolution in a timely and confidential manner. Our policy enables any modern slavery concerns to be identified and addressed by incorporating remediation process such as, whistle-blower hotlines and contract clauses with suppliers for dispute resolution.



##### HUMAN RIGHTS POLICY

In 2022 Virtus Health drafted its first Human Rights Policy. The purpose of this policy is to set out our commitment to protect and uphold fundamental human rights at all our operations and projects. The Policy shows that Virtus Health understands its responsibility in protecting human rights and identifies clear mechanism for when human rights have been infringed.

## Governance Structure

Our governance structure is designed to oversee our management of modern slavery and human rights risk across our operations and supply chain. The framework structure sets out key responsibilities at each level and promotes collaboration and communication across the business.

Virtus Health's General Counsel is responsible for leading its response to modern slavery and human rights risks. Collaboration with Virtus Health Group's Quality & Risk Managers and Head of Procurement is necessary to ensure coverage of risk factors identified in Section 3 of this Modern Slavery Statement.

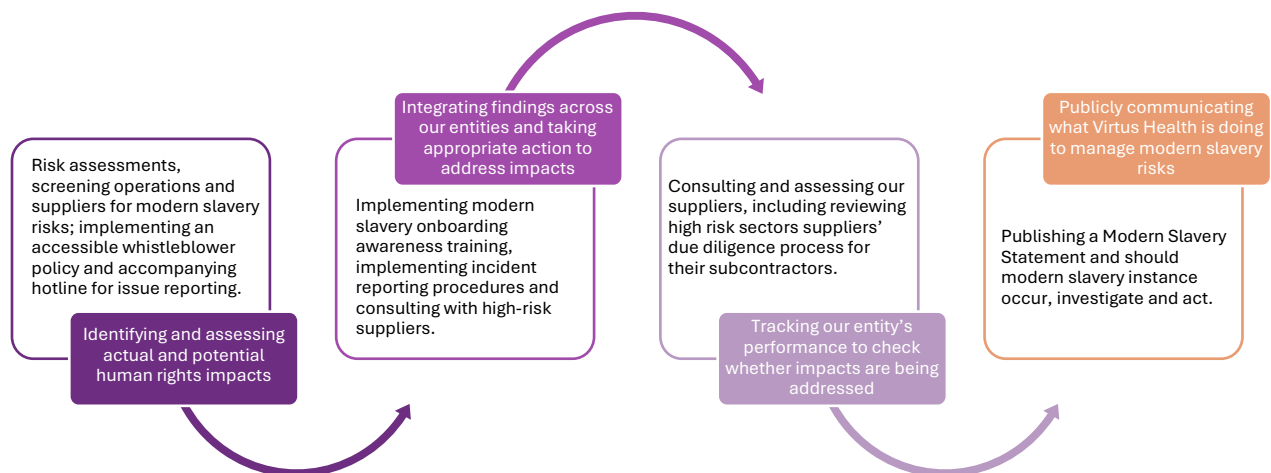
## Overseas Operations

Virtus Health regularly reviews overseas operations and industry news to ensure risks of modern slavery in our overseas operations are assessed and actions required are taken. This includes consulting with our direct suppliers to determine whether there has been any modern slavery instances or new risks in our extended supply chain. As relevant, Virtus Health may consult with our direct suppliers to determine whether there has been any modern slavery instances or new risks across our extended supply chain, and to understand what actions they had taken to mitigate modern slavery risk with their own overseas suppliers.

## Due diligence

Virtus Health is committed to identifying, preventing and mitigating actual and potential adverse human rights impacts in our operations and supply chains, including modern slavery.

Virtus Health's due diligence process consists of four key parts.



## Remediation processes

Virtus Health has an established remediation process in place for handling grievances. Virtus Health's whistleblower policy and contract clauses, with dispute resolution provisions, establish our remediation processes and aim to ensure cooperation in remediation from the relevant parties.

Virtus Health remediation steps vary according to the context and need of the instance. Remediation activities include formal apologies; working with suppliers to remediate an instance of modern slavery; and/or ceasing procurement operations from suppliers that are causing adverse impact and have proven unwillingness or inability to change practices.

In FY24, there was no modern slavery instances that required remediation.

## Section 5

### Assessing the Effectiveness of our Actions

Assessing the effectiveness of Virtus Health's actions is an important step in determining the success of our modern slavery program, and subsequently, identifying any changes that may be beneficial to make.

Virtus Health assesses the effectiveness of its actions taken to address modern slavery through the following avenues.

Avenue	Details
<b>Risk Management</b>	Reviewing risk management processes and risk assessments to ensure risks remain current and to capture any new risk which may be present due to any operational or supplier changes.
<b>Quality, Risk &amp; Compliance Committees</b>	Established committees provides Virtus Health with feedback on whether actions are effectiveness for operational areas and provides Virtus Health a method of consultation with all entities.
<b>Collaboration with Suppliers</b>	Meeting with high-risk suppliers to review whether: <ul style="list-style-type: none"> <li>any modern slavery instances have occurred</li> <li>audits have been conducted</li> <li>contracts include modern slavery clauses and to review any actions they have put in place to address modern slavery risks.</li> </ul>
<b>Tracking Modern Slavery Instances</b>	Tracking and reviewing any trends in modern slavery instances across the world or reported in our operations and supply chain.
<b>Modern slavery maturity framework</b>	Independent assessment of Virtus' progress against nine criteria. Scoring against four stages of maturity, from 'basic' to 'best practice' provides an objective measure on how mature – and likely effective – our approach is to manage this risk.

## Section 6

# Consultation, collaboration and forward commitments

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### Consultation and Collaboration

Virtus Health takes a collaborative approach when it comes to consulting with its entities on how to deal with modern slavery and human rights risks. This includes ensuring all entities are aware of what actions they need to take. Virtus Health's approach considers the relationship between each entity and the risk profile of that entity.

Virtus Health's consultation approach to manage modern slavery and human rights risks, and to produce this Modern Slavery Statement, includes interactions with:

- Virtus Health's General Counsel;
- Executive Leadership Team; and
- Quality, Risk & Compliance Committees.

Consultation focused on assessing Virtus Health's maturity in managing modern slavery and human rights risks via use of external experts and the modern slavery maturity framework, including recommendations for improvement.

More broadly, Virtus' entities have been involved in the review and approval process of this Modern Slavery Statement and the Modern Slavery Statement has been approved by the Board.

### Forward Commitments

Virtus Health is committed to continuous improvement in our management of modern slavery and human rights risks. We intend to continue to current commitments and set new goals in FY25 reporting period.

#### Our ongoing commitments:

- Undertaking further modern slavery awareness training;
- Ongoing embedding of modern slavery clauses into supplier contracts;
- Consulting and collaborating with suppliers on modern slavery and human rights risks;
- Improving supplier due diligence and onboarding, focused on higher-risk suppliers;
- Consulting with Virtus Health entities on identifying modern slavery risks and actions;
- Reviewing and implementing policies and procedures around modern slavery and human rights risks;
- Reviewing our risk assessment to ensure modern slavery and human rights risks are current and mitigants and actions to address such risks are effective; and
- Creating and actioning improvement plans for high-risk suppliers.

## Section 7

### Other Relevant Information

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#### Modern Slavery Act 2015 (UK)

This Modern Slavery Statement has also been prepared to meet the requirements of the Modern Slavery Act 2015 (UK) (**UK Act**) and will be published on our UK entity's website including our Virtus Health Group website as required by the UK Act.

#### Modern Slavery Act 2018 (Cth)

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018 (Cth)* for Viney HoldCo Pty Ltd (ABN 81 658 290 898) and its wholly-owned and controlled entities and constitutes our modern slavery statement for the financial year ended 30 June 2024. Please refer to Schedule 1 for list of entities.

#### Approval

This Modern Slavery Statement was reviewed and approved by the Board of Viney HoldCo Pty Ltd on 16 December 2024.



## Schedule

### Corporate entities – Virtus Health Group

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*(In alphabetical order; \* “Reporting Entities” for the purposes of the Modern Slavery Act 2008 (Cth))*

- Aagaard Fertilitestklinik Aps
- Alexandria Specialist Day Hospital Pty Ltd
- Bremiera Pty Limited
- City West Specialist Day Hospital Pty Ltd
- Complete Fertility Limited
- Fertilitestklinikken Trianglen Aps
- Gold Coast Obstetrics & Gynaecology Specialist Services Pty Ltd
- HARI Limited
- Hobart Specialist Day Hospital Pty Ltd
- Hunter Fertility Pty. Limited
- IVF Australia Pty Ltd\*
- IVF Australia Research Foundation
- IVF Finance Pty Limited\*
- IVF Sunshine Coast Pty Ltd
- IVFA Sub-Holdings Pty Ltd\*
- Labservices Pty Ltd
- Mackay Specialist Day Hospital Pty Limited
- Melbourne I V F Pty. Ltd.\*
- Melbourne IVF Holdings Pty Ltd
- North Shore Specialist Day Hospital Pty Ltd
- Oceania Viney BidCo Pty Ltd\*
- Queensland Fertility Group Gold Coast Pty Ltd
- Queensland Fertility Group Pty. Ltd.\*
- Queensland Fertility Group Research Foundation Limited
- Sims Clinic Limited
- Skejby Cryobank APS
- Spring Hill Specialist Day Hospital Pty Limited
- Tas IVF Pty Ltd
- Viney BidCo Pty Ltd\*
- Viney FinCo Pty Ltd\*
- Viney HoldCo Pty Ltd\*
- Viney MidCo Pty Ltd\*
- Virtus Andrology Laboratory Singapore Pte. Ltd
- Virtus Fertility Centre Singapore Pte. Ltd
- Virtus Health Ireland Limited
- Virtus Health Pty Ltd\*
- Virtus Health Singapore Pte. Ltd
- Virtus Health Specialist Diagnostics Pty Limited\*
- Virtus Innovations Pty Ltd
- Virtus Ventures Pty Limited
- Xentra Pharm Limited