

Modern Slavery Statement 2024



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Introduction

Healthscope is pleased to present this modern slavery statement in line with the reporting criteria (RC 1-7) under the Modern Slavery Act 2018 (Cth). This statement covers ANZ Hospitals Topco Pty Ltd (ACN 631 014 965) and its wholly owned subsidiaries, together trading as “Healthscope” (**Healthscope**). It is submitted by Healthscope in respect of the period ending 31 December 2024.

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Reporting Criteria 1: About Healthscope

Overview

Healthscope is a privately owned Australian company and a leading national provider of healthcare services. Our purpose is to deliver the highest standard of care to the communities we serve. We are known for our strong clinical outcomes, transparent public reporting, and consistently high levels of patient satisfaction.

Healthscope is firmly committed to identifying and addressing the risk of modern slavery within our operations and supply chains. As both a purchaser and provider of services, we understand our responsibility to take meaningful action to prevent practices such as slavery, forced labour, and involuntary servitude. These efforts align with our core values and ethical foundations.

Healthscope is a values-driven organisation that expects all team members to exceed compliance with laws and regulations, upholding high standards of personal and professional conduct. Every day, across all roles, our people positively impact the lives of patients and their families—an opportunity we view as both a responsibility and a privilege.

We recognise that fostering a safe, supportive, and inclusive workplace where employees can grow and thrive not only enhances our business performance but also strengthens our broader commitment to eliminating modern slavery.

Our values reflect who we are, how we collaborate, and how we treat each other and our patients. Developed through the voices of thousands of people across the Healthscope network, our four values are grounded in everyday reality and define the spirit of our organisation.

We care. It's at the heart of who we are. We care for ourselves, for each other, for our patients, and for our communities. We prioritise the physical and emotional safety and wellbeing of everyone.

We do. We roll up our sleeves and take responsibility. We follow through on our commitments, speak up, listen, and learn from our mistakes. We build trust by being open about the 'why' behind what we do.

We strive. We're always looking to do better. We're ambitious, adaptable, and open to change. We share ideas, learn from each other, and grow stronger by challenging ourselves.

We're a team. We're united as One Healthscope. We welcome and respect everyone, celebrate wins big and small, and work together to create the best place to give and receive care.

Safety is at the heart of everything we do. It underpins our values and reflects our commitment to protecting ourselves and those around us. At Healthscope, we proactively identify and address unsafe conditions, speak up when something doesn't seem right, and reject the idea that injury is an acceptable part of work. We are genuinely dedicated to creating a safe environment for everyone—because we care.

Reporting Criteria 2: Our structure, operations and supply chain

Healthscope employs 19,895 people, across 38 healthcare facilities in all Australian states and territories. Healthscope's corporate office is located on Level 1, 312 St Kilda Road, Melbourne, Victoria.

We deliver a wide range of healthcare services, including medical, surgical rehabilitation and maternity services. These are delivered through a diverse and highly skilled workforce, comprising employees, contractors, doctors, and agency partners.

Each year, across our 38 hospitals, we care for over 640,100 patients, deliver more than 10,600 babies, and perform more than 393,000 surgical procedures. Healthscope acts as the Manager of hospital operations for three hospitals owned by Adelaide Community Healthcare Alliance Incorporated ABN 99 367 793 956 ("ACHA"), which are located in South Australia.

This means Healthscope enters contracts on behalf of ACHA for the majority of goods and services required for the operation of the ACHA hospitals. Healthscope acquires goods and services on behalf of ACHA where there is a clear nexus between the goods or services provided under the contract and the operations conducted at the ACHA hospital.

Due to the nature of the management relationship between Healthscope and ACHA, Healthscope provide ACHA with:

- all material contracts entered into on behalf of ACHA as part of Healthscope's procurement activities, at the end of every financial year; and
- a copy of its Modern Slavery Statement.

Healthscope's supply chain includes a diverse range of local and international suppliers, with most relationships managed directly through formal commercial agreements. The goods and services procured span from local contingent labour and travel services to corporate office supplies and critical medical consumables. The largest areas of expenditure are clinical equipment and medical materials, which are sourced by a centralised procurement team. This team comprises dedicated professionals who are required to complete Healthscope's Employee Code of Conduct training, as well as specific training on modern slavery risks, including the Australian Government's Modern Slavery in Public Procurement module provided by the Attorney-General's Department.



Reporting Criteria 3: Risk of Modern Slavery practices in our operations and supply chains

Healthscope's primary operations are based in Australia, where the risk of direct involvement in modern slavery practices is considered extremely low. However, greater consideration is given to the extended supply chain, where potential risks may arise.

Healthscope's suppliers span both local and international markets and include manufacturers, distributors, agencies, brokers, consultants, and other service providers.

Our supply chain covers a wide range of spend categories, including:

- **Clinical products and equipment** – such as prostheses, medical consumables, surgical equipment, instruments, and pharmaceuticals
- **Utilities** – including gas and electricity
- **Indirect Corporate spend** – such as IT contractors, professional services, software licences, and hardware
- **Facilities management** – such as maintenance, security and fire protection services

- **Site services** – including contingent labour, cleaning, catering, waste and linen services
- **Corporate services** – such as travel and entertainment

Healthscope has assessed these categories for modern slavery risks and recognises potential exposure, particularly with suppliers that manufacture or distribute products in higher-risk countries including China, Hong Kong, Taiwan, Malaysia, Pakistan, and India.

The most significant risk lies in the limited transparency of our second- and third-tier suppliers—commonly referred to as “downstream” suppliers—where modern slavery practices may be more prevalent and difficult to detect.

In summary, Healthscope has identified two primary sources of risk:

1. Direct engagement with suppliers operating in high-risk countries; and
2. Indirect exposure through downstream supply chains that currently lack visibility.



Reporting Criteria 4: Assessing and addressing modern slavery risks

Internal Policies and Practices

Healthscope continues to operate under an Enterprise Risk Management Framework overseen by the Audit, Risk & Compliance Committee. This framework, underpinned by our Risk Management Policy, strengthens the organisation's capability to identify, assess, and manage enterprise-wide risks, including modern slavery.

Healthscope's Board and management are committed to upholding our Employee Code of Conduct, which reflects our core values and the ethical expectations of the broader community. The Code explicitly prohibits all forms of modern slavery and aligns with relevant laws and ethical guidelines.

The Code of Conduct applies to all individuals associated with Healthscope, including employees, contractors, subcontractors, consultants, Visiting Medical Officers, and agency staff. It sets clear expectations for professional and ethical behaviour in the workplace and aims to:

- Promote high standards of professionalism and ethical conduct across all roles and functions;
- Foster a respectful, safe, and inclusive work environment;
- Raise awareness of the consequences of breaching the Code; and
- Reinforce the responsibility of all individuals to embody Healthscope's values and maintain the trust and confidence of our patients, colleagues, and community.

The Employee Code of Conduct is supported by a comprehensive suite of corporate policies and procedures applicable to all Healthscope facilities and staff. This includes a robust Whistleblower Policy, which provides access to a Toll-Free Ethics Hotline, an internal Whistleblower Protection Officer, and a structured response framework to address reported concerns.

Healthscope delivers mandatory eLearning modules to ensure employees understand and apply these expectations in their roles. Over the past 12 months, 3,847 employees have completed the online training module for the Employee Code of Conduct.

Supplier Code of Conduct

Healthscope also maintains a Supplier Code of Conduct, which outlines our expectations of ethical business practices and compliance with modern slavery laws. All suppliers are required to:

- Operate in accordance with applicable national and international laws and regulations;
- Demonstrate integrity and transparency in all business dealings; and
- Ensure their own supply chains are free from modern slavery and related exploitative practices.

Suppliers are expected to cascade these standards throughout their own networks and take appropriate action if any risks or breaches are identified.

Healthscope's Supplier Code of Conduct is publicly accessible via our website: <https://healthscope.com.au/internal-pages/sustainability>



Actions taken

To mitigate the potential risk of modern slavery within Healthscope's supply chain, a structured and ongoing program of action has been implemented. Guided by a continuous improvement framework **Plan, Do, Check, Act** our approach enables Healthscope to adapt and strengthen our compliance efforts as the program matures. This model has proven effective across various domains and has been deliberately applied to our modern slavery response.

During the reporting period, Healthscope undertook the following actions to address modern slavery risks within its direct operations:

1. Policy updates:

- Healthscope enhanced its processes for third-party due diligence. The Procurement Policy was revised to require all staff to complete due diligence checks when engaging with suppliers. This includes mandatory completion of the Supplier Due Diligence Workbook, now accessible via the Healthscope intranet. The workbook assesses supplier compliance across several domains, including Work Health and Safety (WHS), anti-bribery and corruption, and modern slavery.
- The revised policy also includes a dedicated section on modern slavery, reinforcing staff responsibilities to identify, escalate, and act on modern slavery risks. It mandates that supplier contracts include modern slavery provisions, with any deviations subject to review by the Healthscope Legal team.

2. Modern slavery training:

- The Healthscope Corporate Procurement and Supply Chain team completed the Australian Government's Modern Slavery in Public Procurement training module. In addition, work is underway to develop a broader internal training program on modern slavery obligations, which will be rolled out across the wider organisation.

3. Due diligence:

- In 2024, Healthscope conducted annual audits of several critical suppliers. These audits helped assess each supplier's modern slavery compliance status and identified any known risks within their extended supply chains. Where gaps were identified, Healthscope worked collaboratively with suppliers to address and close them.
- A new requirement was also introduced for the head office procurement team: new suppliers must now complete the Third-Party Due Diligence Questionnaire before engagement.

Reporting Criteria 5: Evaluating effectiveness and looking ahead

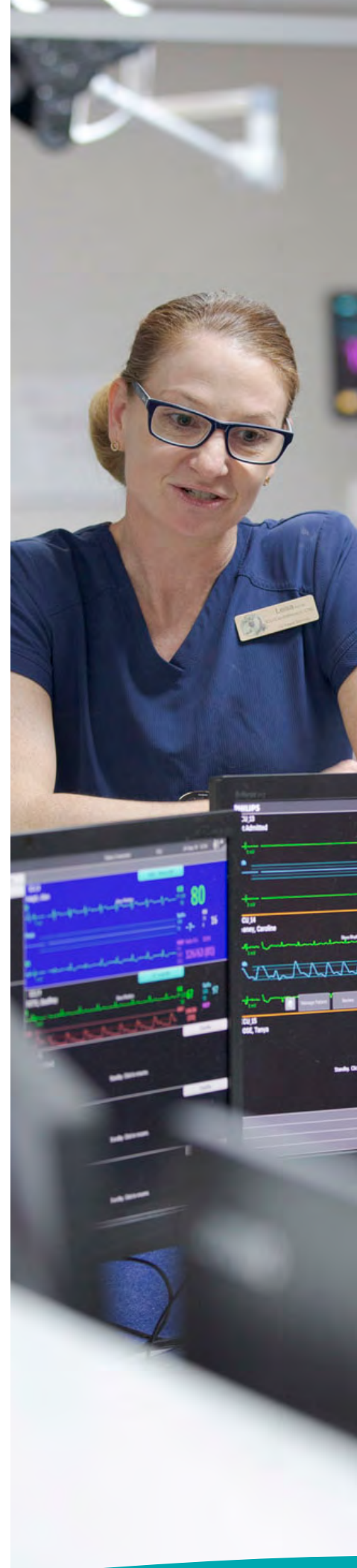
Healthscope recognises the importance of continual improvement in our efforts to combat modern slavery. In the previous reporting period, we set several key objectives: to strengthen our response to potential non-compliance, update relevant organisational policies, embed modern slavery risk management into corporate governance processes (including Board-level reporting), and assess the effectiveness of our due diligence processes with top-tier suppliers.

The actions outlined in Reporting Criteria 4 demonstrate meaningful progress toward these goals. However, we acknowledge that further work is required, particularly in establishing clearer internal protocols for responding to suspected non-compliance with modern slavery standards within our supply chain.

Key Focus Areas for the Next Reporting Period:

- **Supplier Audits in High-Risk Regions:**
To address identified risks associated with direct sourcing from high-risk countries, Healthscope will continue auditing selected direct suppliers. This will include on-site visits by procurement team members to assess third-party risks—particularly modern slavery—at primary manufacturing facilities for new suppliers.
- **Modern Slavery Policy Development:**
Healthscope will seek executive endorsement to develop a standalone Modern Slavery Policy, providing clear organisational direction and accountability by the end of 2025.
- **Policy Review and Staff Guidance:**
We will continue to assess and revise relevant Healthscope policies, ensuring they include updated guidance for staff on recognising and responding to potential instances of non-compliance with modern slavery expectations.
- **Procurement Policy Evaluation:**
The newly introduced procurement policy mandate—which requires robust due diligence for supplier engagement—will be evaluated for effectiveness and uptake across the broader organisation.
- **Employee Engagement and Training:**
We will collaborate with the People & Culture team to enhance staff engagement with the Employee Code of Conduct training module, ensuring modern slavery awareness becomes embedded in day-to-day responsibilities.

Progress against these focus areas will be monitored by the Audit & Risk Committee, with regular updates provided to the Executive Leadership Team through the third-party risk management reporting process.



Reporting Criteria 6 & 7: Consultation, endorsement and other matters

Throughout the reporting period, Healthscope engaged in a consultative process with the Directors of all entities we own or control to inform the development and review of this statement. Input was also sought from key internal stakeholders, including representatives from Procurement, Operations, and Legal, to ensure a comprehensive and accurate reflection of Healthscope's approach to modern slavery risk management.

This statement was approved by the Board of Directors of Healthscope on 13th June 2026 and has been authorised for signature by the Chief Executive Officer.



Tino La Spina

Chief Executive Officer, Healthscope





Healthscope

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V5_06/2025