

Modern Slavery Statement

Our structure, operations and supply chains

Our structure

NorthWest Healthcare Australian Property Limited ACN 083 065 034, a public company, is incorporated in Australia (the **Company**). The registered office of the Company is Level 45, Rialto South Tower, 525 Collins Street, Melbourne, Victoria, Australia.

The Company is ultimately majority owned by NorthWest Healthcare Properties REIT which is a publicly traded REIT listed on the Toronto Stock Exchange (TSX:NWH.UN) (the **REIT**).

The Company is the trustee of two property-owning trusts which own healthcare real estate in Australia.

The Company also operates in New Zealand, through a New Zealand entity, wholly-owned by the REIT, which acts as manager of the New Zealand Exchange (the **NZX**) listed Vital Healthcare Property Trust (NZX: VHP) (the **Trust**).

Our operations

Our business, which is conducted in New Zealand and Australia, involves acquiring, managing, maintaining and developing high quality healthcare real estate. Our portfolio is diversified across private hospitals, out-patient facilities, medical office buildings and aged care facilities. As at the date of this statement the Trust is owner of a A\$2.36 billion healthcare property portfolio in New Zealand and Australia and is the only NZX-listed specialist healthcare landlord. We have a committed construction development spend of A\$345 million and provide asset management and facility management services to 41 properties.

We have 41 members of staff in Australasia and have offices in Auckland, Melbourne and Sydney.

The REIT believes that environmental, social responsibility and corporate governance (**ESG**) factors can have an impact on investment performance and must be considered when evaluating real estate investment opportunities and managing real estate assets. The REIT values transparency with its investors, tenants and the communities it serves.

The REIT has committed to continue to evolve its ESG policies to ensure:

- I. ESG considerations are incorporated into our decision-making processes;
- II. staff are provided with guidelines for implementing ESG initiatives at our properties;
- III. we define our position on ESG for the benefit of stakeholders as required; and
- IV. ESG policies and practices reflect the diversity, health and safety and wellbeing of our staff.

The Company makes this statement under the Modern Slavery Act 2018 (Cth) (**Act**) which commenced on 1 January 2019. The Act requires reporting entities subject to the Act to produce an annual modern slavery statement. This modern slavery statement has been approved by the principal governing body of the Company, namely the Board of Directors of the Company on 25 June 2021.

This is the Company's second annual statement and is for the Australian Financial Year ended 30 June 2021.

Our supply chains

We consider our main supply chains can be categorised into two main functions, **asset management supply chain** and **construction and development supply chain**.

We also recognise the role of our **operational supply chain** which supports our business operations.

Asset management supply chain

Our asset management supply chain involves providers of services and equipment; facility maintenance providers; professional service firms, including lawyers and valuers; cleaners and landscapers and providers of security services.

Construction and development supply chain

The construction and development aspect of our business involves providers of project management, design and construction services; equipment and construction materials; professional service firms, including lawyers and valuers.

When our role is that of principal, development manager or financier of construction and development projects, we seek to address any supply chain risk by obliging our contractual counterparties to comply with all laws relating to Modern Slavery and to notify us promptly on becoming aware of any actual or suspected Modern Slavery in a supply chain connected with those contractual arrangements.

Operational supply chain

This supply chain includes professional service firms, including lawyers, accountants and auditors; the landlords of our premises and suppliers of office equipment and supplies.

Our commitment

Our relationship with stakeholders, tenants, counterparties and suppliers is key to our success and our relationship-focused business model enables us to select premium grade and reputable suppliers whose values align with ours.

We recognise the significant impact human slavery, people trafficking and forced labour have on society and are committed to ensuring our operations are conducted to the highest ethical standards and in compliance with all applicable laws.

Our staff are part of a unique and challenging business, where they are given the opportunity to grow and develop their careers in a collaborative culture. We are

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committed to providing a workplace which is free from any form of discrimination and in which all staff and prospective staff are treated with respect and dignity.

Fair and equitable treatment applies to all aspects of employment including, but not limited to, recruitment, selection, placement, training, development, promotion, compensation, benefits, termination and the work environment.

This commitment is evidenced by the many corporate policies we have in place, for example, we have a well-developed whistleblower policy and an employee assistance programme which provides emotional and psychological assistance to staff.

All staff are required to commit annually to compliance with the REIT's global Code of Business Conduct and Ethics which was most recently reviewed on 4 December 2020 (the **Code**). The Code sets the tone for the collaborative and non-discriminatory culture which is a cornerstone of our business operations.

We also have policies which support our day-to-day operations and provide guidance to staff in their interactions with others to ensure our core values are maintained.

Compliance and effectiveness measures

We endeavour to conduct appropriate due diligence and risk assessments when we onboard new suppliers and are committed to having processes in place to identify and address any risks of modern slavery practices in our supply chains.

In 2020, in satisfaction of this ongoing commitment, our teams asked a broad selection of suppliers and tenants, across the asset management, construction and development and operational supply chains a series of questions designed to assist us in assessing the potential modern slavery risks in our operations. We received a 100% response rate which confirmed to us that all entities surveyed were alive to modern slavery risks applicable to their operations. An overwhelming majority have already adopted mitigation strategies to address these risks and many of them have published their own modern slavery statements.

We rolled out a training programme for our staff in 2020, one year ahead of the targeted date, to provide practical tools to identify and mitigate modern slavery in our supply chains.

In Australasia we have prepared proforma contracts, for use in tender processes, which oblige third party contractors to demonstrate their commitment to compliance with all laws, including those set out in the Act.

In preparing for our first and second annual modern slavery statements, we have consulted with senior executives to establish the key areas of focus in the relevant period. The Regional General Counsel ANZ has taken ownership and responsibility for compliance with the Act across the Australian and New Zealand business together with the Operational Risk Committee (**ORC**) which comprises several senior executives across the acquisition, management, development and treasury teams. The ORC meets monthly to consider and evaluate the risks which our business faces and to implement steps to mitigate or remediate those risks. The agenda for each ORC meeting has been updated to include a line item on modern slavery to ensure this is considered at each meeting.

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Particular steps which we will undertake, include¹:

1. consulting and developing with the REIT global policies which respond to our ESG commitment and reviewing existing policies to ensure they reflect best practice;
2. ongoing assessment of the potential modern slavery risks in our operations with an emphasis on high risk areas;
3. ongoing training for staff in modern slavery requirements;
4. conducting further and ongoing due diligence on potential and current suppliers;
5. reviewing supplier contracts to ensure they contain terms consistent with the Act and, where possible, obliging suppliers to use proforma documents which we have prepared and which oblige compliance with these terms; and
6. taking steps to address any potential modern slavery risks identified and implementing effective mitigation and, if necessary, remediation steps throughout our business in addition to those which are already in place.

Craig Mitchell



Director of NorthWest Healthcare Australian Property Limited ACN 083 065 034

¹ This list includes the steps identified in our first Modern Slavery Statement