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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

The Slade Pharmacy Group understands its responsibility to deliver 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.

The Slade Pharmacy Group 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 statement, pursuant to the Australian Modern Slavery Act 2018 (Cth) sets out the actions taken by The Slade Pharmacy Group to address modern slavery risks in its business and supply chain over the financial year ending 30 June 2024. It outlines the current and ongoing activities The Slade Pharmacy Group 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, The Slade Pharmacy Group 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 The Slade Pharmacy Group's continued commitment to maintaining rigorous safeguards and promoting ethical business practices in its operations and supply chain.

Reporting entity

This report relates to the following entities that have reached the required threshold:

- D Slade Pharmacies as trustee for D Slade Pharmacies Unit Trust – ABN:58 689 652 969
- W.H. McCarthy Pty Ltd – ABN:73 000 004 893
- D Slade (sole trader) – ABN:69 315 076 159

For the purposes of this report, these entities are referred to as **The Slade Pharmacy Group**.

Entity structure, operations and supply chain

The Slade Pharmacy Group has been providing outsourced services to the hospital, pharmacy and aged care sectors for close to 60 years. We receive back of house services from the Icon Group (Icon), a world leading integrated healthcare provider, which delivers services to pharmacies owned by the The Slade Pharmacy Group.

The Slade Pharmacy Group is headquartered in Victoria, Australia. The diverse workforce consists of direct employees and locums or contractors.

Icon's supply chain includes the products and services used to deliver healthcare services and manufacture patient specific medications. Pharmaceuticals account for over 80% of total expenditure of goods and services. Other goods and services include medical equipment and consumables, ICT equipment and personal protective equipment for staff and patients. The Slade Pharmacy Group's supply chain includes the products and services used to deliver pharmacy services to patients.

Risks of modern slavery practices in operations and supply chain

The Slade Pharmacy Group acknowledge that as its workforce continues to grow, the potential for modern slavery risks increases. It also acknowledges that risks of modern slavery exist in our operations and supply chains. The Slade Pharmacy Group is committed to continually improving their approach to identify, assess and manage modern slavery-related risks in its operations and supply chain.

The greatest area of risk for The Slade Pharmacy Group relates to supplier partnerships for the provision of products used in pharmaceutical compounding.





Actions taken to assess and address modern slavery risks

Human rights risks

As The Slade Pharmacy Group receives relevant services from Icon, we have chosen to adopt and align with Icon’s Board-approved ESG strategy and Modern Slavery Policy that provides focus and oversight on modern slavery risks as well as a number of key sustainability topics. Modern slavery concerns are addressed though the ESG Strategy which reflects on our commitment to the principles of the UN Compact Strategy, and which supports several of the UN Sustainability Goals and Targets.

The Slade Pharmacy Group 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 live a life of freedom and opportunity. In particular, we are committed to ensuring human rights and modern slavery risks are minimised within our supply chain and operations, and any potential cases are investigated, with appropriate actions taken to address any cases that are identified.

We respect workers’ ability to enter employment voluntarily and freely, without the threat of a penalty. We also respect our employees’ freedom to terminate employment without penalty, excepting reasonable notice or as per any relevant contract or industrial instrument.

The Slade Pharmacy Group 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. We do not engage in misleading or fraudulent practices during the recruitment of employees or when offering employment and does not require workers to pay for their jobs.

Additional Icon policies which The Slade Pharmacy Group have adopted and are relevant 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 & 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 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, we will take appropriate action to remedy.

Supply chain and operations risks

We deal with existing and potential business partners and suppliers fairly and ethically and in accordance with this policy. We endeavour to procure from business partners and suppliers that align with our commitments to human rights, good governance and the environment.



- We have implemented procedures to identify, assess and address risks of modern slavery in the operations and supply chains. This includes but is not limited to:
- **Supplier due diligence:** we conduct screening of all new suppliers and evaluate 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 our Procurement team prior to engaging the supplier.
 - **Supplier communication:** we require suppliers to notify the Procurement 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:** where any allegations of Modern Slavery have occurred with suppliers in previous years, we have worked with them to ensure any grievances are clarified and all staff are paid in accordance with relevant awards.
 - **Evaluation of Suppliers of Suppliers:** we have engaged with vendors of supply chain risk management solutions and have completed the screening process of Tier 2 suppliers. Subsequent tiers to be screened during the next reporting year.
 - **Supplier compliance with minimum standards:** we expect all supplier partners and all parts of our operations to comply with supplier minimum standards. Where a supplier is, or appears, unable to meet any of the supplier minimum standards, we will work with the supplier to understand their limitations and determine how compliance may be achieved.
 - **Training on modern slavery concerns:** we are committed to ensuring training is provided so that our workers and other third parties or entities undertaking activity for or on behalf of us 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 relaunch campaign is planned to help achieve compliance goals.
- The publication of this statement will provide an opportunity for The Slade Pharmacy Group team members, customers and suppliers to ascertain activities undertaken each year to reduce modern slavery. Modern Slavery reporting is provided to the owner of The Slade Pharmacy Group.
- Any suspected instance or risk of modern slavery in the supply chain operation should be reported to the Procurement team. We 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. We reserve the right to terminate any commercial relationship with suppliers if they breach our Supplier Minimum Standards or are found to have been involved in unethical business practices that cannot be addressed.

“We 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

Given The Slade Pharmacy Group’s association with the Icon Group (including key services it receives from Icon Group), we are aligned with and adopt the Icon Group’s delivery of its key objectives for 2024, with work continuing into 2025 to fully implement the approach. We are investing time and resources to help end modern slavery and are tracking and reporting on the delivery of our initiatives and actions.



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) superceded. 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	<p>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.</p> <p>UK deployment of training via Litmus learning platform is under consideration</p>
		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	<p>Procurement to review policies and training materials for suppliers</p> <p>Commitment to review policies with modern slavery impacts. Remain compliant and fit for purpose</p>	<p>Procurement is committed to undertaking annual reviews</p> <p>Policy reviewed in June 2024 by People and Capability (HR) team</p>

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
		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
	Annual Risk Assessment Workshop	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

The 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.

Pharmacy Proprietor approval

This Modern Slavery Statement meets the requirement for approval and was reviewed and approved by the board of W.H. McCarthy Pty Ltd on 10 December 2024. W.H. McCarthy also approved this statement on behalf of the other two reporting entities covered by this statement: D Slade Pharmacies as trustee for D Slade Pharmacies Unit Trust and D Slade (sole trader), which together make up the Slade Pharmacy Group. Supporting documentation of this approval is attached to this statement by way of a confirming letter from sole director and secretary David Slade.

This statement is made in accordance with the Modern Slavery Act 2018 (Cth), it represents the Australian Reporting Entities on modern slavery for the financial year ended 30 June 2024.

David Slade
Proprietor and Managing Director of The Slade Pharmacy Group.



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