

Modern Slavery Statement 2021

ForHealth Group includes:

Limestone Holdco Pty Ltd (ACN 639 416 667)
Limestone Mezzco Pty Ltd (ACN 641 667 781)
Limestone Midco Pty Ltd (ACN 639 417 280)
Limestone Finco Pty Ltd (ACN 641 434 433)
Limestone Bidco Pty Ltd (ACN 639 417 511)
Bourke Street Clinic Pty Ltd (ACN 123 076 906)
Brindabella Medical Practice Services Pty Ltd (ACN 618 932 291)
Cooper Street Clinic Pty Ltd (ACN 002 974 058)
Health & Co Pty Ltd (ACN 614 349 585)
Healthyu Corporation Pty Ltd (ACN 123 076 915)
HLS Medical Centre Holdings Pty Ltd (ACN 088 128 787)
Idameneo (No 123) Pty Ltd (ACN 002 968 185)
Idameneo (No 125) Pty Ltd (ACN 162 662 919)
Medical Centre Services Pty Ltd (ACN 621 584 067)
Occupational Health Holdings Pty Ltd (ACN 626 660 795)
Pacific Medical Centres Pty Ltd (ACN 002 866 382)
Park Family Practice Services Pty Ltd (ACN 617 747 725)
Primary Health Care Pty Ltd (ACN 169 588 096)
Sidameneo (No. 456) Pty Ltd (ACN 089 995 817)
Logic Enterprises (WA) Pty Ltd (ACN 154 027 559)

(the '**Company**', '**ForHealth Group**' or '**Group**')

Contents

ForHealth Group includes:	1
Contents	2
1. Reporting Entities.....	3
2. Our business & operations.....	4
3. Identification & assessment of risks	6
4. Actions taken to address the risk of modern slavery risks	7
5. Assessing the effectiveness of our actions	10
6. Consultation between Group entities.....	11
7. Board Approval	11
Annexure A – Modern Slavery Risk Matrix	12

1. Reporting Entities

(a) Introduction

This is ForHealth Group's Modern Slavery Statement (**Statement**) covering the period from 1 July 2020 to 30 June 2021 (**Relevant Period**), made in accordance with the *Modern Slavery Act (Cth) 2018* (the **Act**). This Statement sets out the steps taken by the ForHealth Group during the Relevant Period to identify and minimise potential human rights and modern slavery risks in our operations and supply chains.

The Group considers human rights and workplace rights of utmost importance and supports the intent of international covenants such as the *United Nations' Universal Declaration of Human Rights*¹ and the *International Labour Organization's Declaration on Fundamental Principles and Rights at Work*.²

The Group's commitment to human rights and its identification and minimisation of modern slavery risks has been overseen by the ForHealth Modern Slavery Committee, its Risk Committee and ultimately its Board. Our approach to modern slavery risk management builds upon our established frameworks as an accredited healthcare service provider in Australia.

This Statement has been prepared by the Modern Slavery Committee in consultation with the business and has been approved by the Board of Limestone Holdco Pty Ltd.

(b) Reporting Entities

In accordance with the Act, the reporting entities for this Statement are:

- Limestone Holdco Pty Ltd ACN 639 416 667,
- Limestone Mezzco Pty Ltd ACN 641 687 781,
- Limestone Midco Pty Ltd ACN 639 417 280,
- Limestone Bidco Pty Ltd ACN 639 417 511, and
- Idameneo (No. 123) Pty Ltd ACN 002 968 185,

(collectively the **Reporting Entities**).

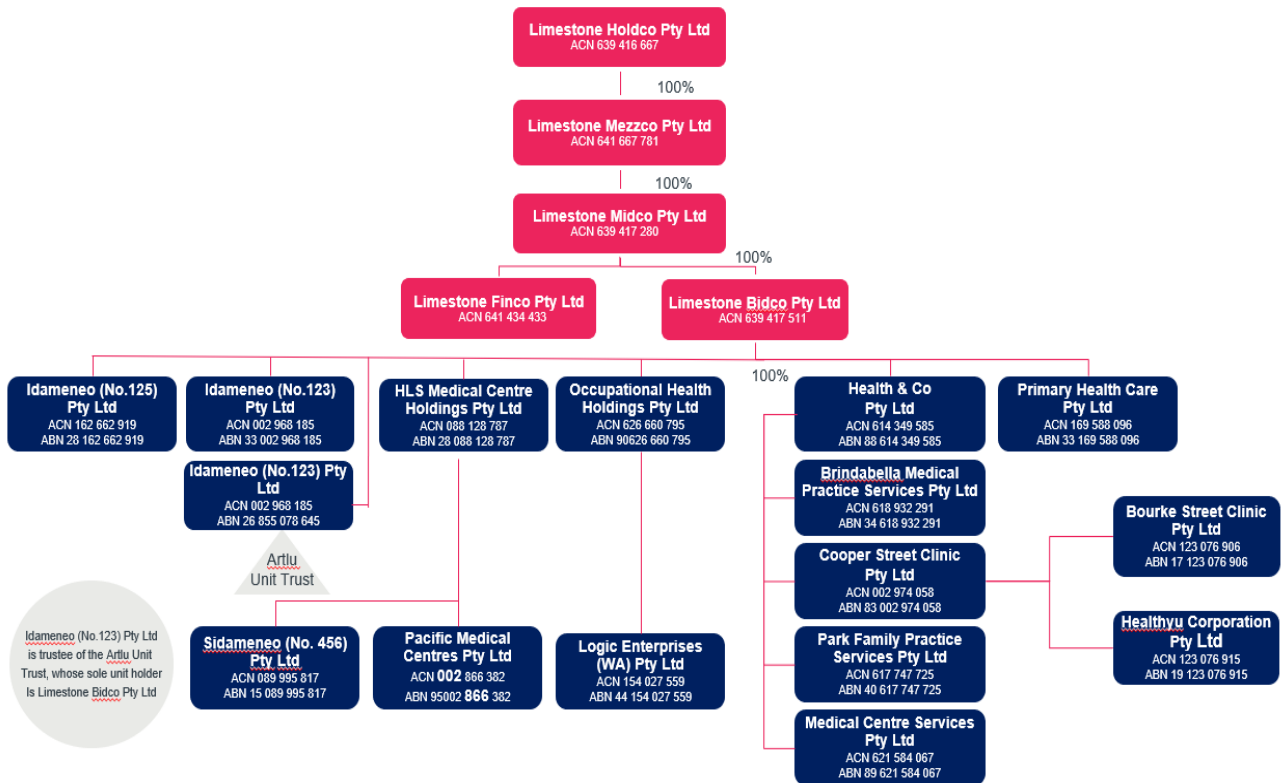
This is a joint statement under section 14 of the Act with respect to all Reporting Entities.

Acquisition during Relevant Period

By way of background, the ForHealth Group (previously known as 'Healius Medical & Dental Centres') was acquired by BGH Capital on 23 November 2020 from Healius Limited, which resulted in the divestment of the medical and dental centres division from Healius Limited to Limestone Bidco Pty Ltd (the **Acquisition**). Accordingly, this statement is based on information we have been able to access since the Acquisition.

¹ United Nations, 1948. Universal Declaration of Human Rights available at <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

² International Labour Organization, 1998. ILO Declaration on Fundamental Principles and Rights at Work Available at www.ilo.org/declaration/thedeclaration/textdeclaration/WCMS_716594/lang--en/index.htm



2. Our business & operations

(a) Our business

The ForHealth Group has its registered office in Leichhardt, New South Wales and through accessible, high-quality, consumer-centric healthcare services, the Group is committed to delivering excellence in healthcare in Australia.

We provide facility and services to more than 1,000 independent General Practitioners (GPs) who operate their own businesses from within our more than 80 large multi-services medical and dental centres and who provide health services to more than 7 million patient visits and 1.5 million individual patients each year. Our 70+ large multi-service medical and dental centres include 40 outer metro / regional sites. We also support more than 180 independent dentists from 62 dental centres.

ForHealth sites operate as a single point of primary care for their community. This includes independent GPs, nursing treatment rooms, chronic disease facilities, pathology, extensive imaging capabilities, medical specialists, independent allied practitioners, dental services and pharmacy. We also focus on sub-specialty care such as women’s health, skin, occupational health, refugee support, Aboriginal and Torres Strait Islander support, immigration, and mental health.

The primary health sector is the gateway to our healthcare system. Its importance to preventative care is increasingly relevant and underpinned by an ageing population and nearly one-in-two incidence of chronic disease illnesses. The sector plays a vital role in triaging urgent care patients to protect our hospital system from overcrowding and to serve patients at a third of the public cost.

We are playing an essential role in the COVID-19 pandemic by delivering over 350,000 COVID immunisations.

Our mission is **high quality, accessible healthcare for all Australians**. We believe that accessible healthcare is one of the best things about our country and are proud to be a leader in this field. Nine out of ten centres in our network are bulk billing, and half are in outer metropolitan, regional and rural areas. The bulk billing model is the foundation of our primary care system. The right to accessible healthcare remains a defining characteristic of our national identity.

(b) Our operations

Medical Centres

As noted above, ForHealth Group provides facilities and services to more than 1,000 independent GPs who operate their own businesses from within our more than 80 large multi-services medical and dental centres and who provide health services to more than 7 million patient visits each year. Our 80+ large multi-service medical and dental centres include 60 outer metro / regional sites.

The facilities and services we provide to our independent GPs include (without limitation) the provision of premises, facilities management, nurses, reception staff, practice managers, practice management software, administrative and financial services, IT support, and other non-medical services such as cleaning, waste removal, maintenance, and provision of medical consumables.

ForHealth Group allows the operation of imaging, pathology collection, pharmacy and physiotherapy premises within many medical centres by way of lease agreements.

Primary Dental

The Group also operates 62 dental facilities primarily co-located in its medical centres and provides facilities and services to over 180 independent dentists.

Allied Health

In addition, we provide facility and services to various allied health professionals who provide their patients with services including physiotherapy, podiatry, dietetics and psychology. Some allied health professionals lease part of our premises within the medical centres.

Other Services

Other services provided by healthcare professionals from our medical centres include:

- **Chronic Disease Management** | supporting the management of chronic disease in our community
- **Urgent Care** | working with local hospitals to reduce pressure on emergency departments by allowing the redirection of category 4 and 5 injuries to our urgent care treatment rooms
- **LogicHealth** | supporting occupational health and workers compensation injury management, onsite health and injury prevention solutions as well as job specific pre-employment medical systems
- **Skin2** | a doctor-led service dedicated to the diagnosis and treatment of skin cancer
- **Immigration services** | supporting medicals for new immigrants into the country.

(c) Our values

We are a value-based organisation. We have defined our 10 values that bring our Group and its people together – known as the '10 things that make us tick'. These are:

Our Values: The 10 things that make us tick



1. Accessible health at our heart

We aspire to be Australia's first choice service provider for healthcare practitioners and their patients; ForHealth GPs conduct more than 7m patient consultations per year.



2. Good medicine is good business

When ForHealth practitioners put clinical excellence, GP autonomy and lifetime care first, we know that everything else will follow.



3. We treat patients like family

Every patient could be our mum, dad, partner, sibling or child and we want the patient experience to reflect this; and we will continually strive to improve it.



4. Teaming ForHealth

Quality and continuity of care can only be delivered through effective collaboration between a team of independent practitioners, nurses, and practice staff.



5. People are our lifeblood

We are a team of over 3,500 people with independent frontline doctors, dentists, allied health practitioners, as well as our nurses and practice staff at the helm.



6. #1 love local

Our business should orbit the practice and GP because we know that all practices are unique and the best results come when we focus on the needs of the local community.



7. In it together

We are one family. There is no "us vs. them", independent practitioners, nurses, operations and the support team are all "us".



8. Every step counts in a race

We will become a high performance culture, move with agility, reward courage and invest from the outset (both in our people and our business).



9. It is personal

When we take things personally we take true ownership and act like founders.



10. R. E. S. P. E. C. T.

It doesn't cost anything to be kind, presume trust and show respect. If there is a moment when you don't, call it and we will be closer for it.

3. Identification & assessment of risks

(a) Our Supply Chain

ForHealth Group sources an array of healthcare-related products and services, as well as more usual business-related products and services. ForHealth Group draws from both domestic and international suppliers to ensure the provision of quality and, where possible, ethical products to generate optimum value including the following:

(b) Assessing the Risk in our Supply Chain

During the Relevant Period, the Modern Slavery Committee mapped our supply chain and completed an assessment of each key supply category³³ to identify potential risks of modern slavery by evaluating each first-tier supplier and class of product/service against a risk matrix as follows:

- Each supplier and class of product/service was plotted on a modern slavery risk matrix (**Modern Slavery Risk Matrix**) which considered the likelihood of the risk by country and by industry (see **Annexure A**) which is consistent with and drawn from the Global Slavery Index 2018.
- Following this risk assessment, the following existing supplier were identified as having an unmitigated high risk of modern slavery:
 - Personal Protective Equipment (**PPE**) including gloves (sourced from China, Malaysia and Thailand)
 - Uniforms (sourced from China and India)
 - Coffee (sourced from Colombia)
 - IT Hardware (sourced from China)

³³ **Key supply categories** is defined as the highest suppliers by spend and risk incorporating at least 80% of total spend (excluding employee payables and GP disbursements)

- The following categories were identified as having an unmitigated moderate risk of modern slavery:
 - Medical consumables other than PPE (sourced from China and Malaysia)
 - Dental consumables other than PPE (sourced from China and Malaysia)
 - Stationary (sourced from China)
 - IT Hardware and IT Software (sourced from China & India)
 - Dental laboratory services (sourced from China)
 - Offshore accounting services (sourced from the Philippines)
 - Offshore typists (sourced from India)
- The Modern Slavery Committee also identified waste, typists services and offshore accounting services as having low or some risk of modern slavery.

4. Actions taken to address the risk of modern slavery risks

ForHealth Group is committed to ensuring that everyone working throughout our operations and supply chain is treated with dignity and respect. During the Relevant Period, the Group has conducted various actions to address the risks identified as part of the risk assessment.

(a) Establishment of relevant policies

During the Relevant Period, the Group has established a Modern Slavery Committee as well as the development of the following policies and procedures:

- ForHealth Code of Conduct
- Modern Slavery Policy
- Procurement Policy
- Supplier Code of Conduct
- Supplier Engagement Questionnaire
- Modern Slavery Risk Matrix
- Whistle-blower Policy

Details of some key policies relating to Modern Slavery are outlined below.

Modern Slavery Policy

The Policy endorses international conventions, treaties and protocols relevant to combatting modern slavery including the *United Nations' Universal Declaration of Human Rights*, the *International Labour Organisation's Declaration on Fundamental Principles and Rights at Work* and the *Modern Slavery Act (Cth) 2018*.

It sets out our expectation and required procedures in relation to identifying and, where possible, eliminating modern slavery risks in our supply chain.

Procurement Policy

This policy is guided by key principals including:

Fair Dealings: ForHealth Group operates with the highest ethical and professional standards in its business dealings, ensuring the integrity of its procurement activities through transparent processes and committing to trading on fair terms with small businesses.

Supplier Questionnaire: As part of our procurement process, our suppliers must complete a detailed supplier questionnaire which sets out various questions relating to modern slavery.

Compliance with Supplier Code of Conduct: All suppliers must comply with the Company’s Supplier Code of Conduct Policy and complete the Supplier Questionnaire.

Supplier Code of Conduct

This code sets out the standards expected by us from our suppliers including:

Integrity, ethics and conduct: We expect all aspects of our suppliers’ business to be conducted in an ethical manner and in compliance with all applicable laws or international standards (where international standards are higher).

Labour & human rights: We expect our suppliers to provide a fair and ethical workplace and uphold high standards of human rights for all workers. We require our suppliers to have appropriate labour and human rights policies and practices in place to ensure that they do not engage in or are complicit with human rights abuses, including modern slavery.

ForHealth Code of Conduct

Our Code of Conduct sets out the Group’s high expectations regarding employee and contractor’s conduct, including:

- an expectation that they will conduct themselves with honesty and integrity
- an understanding that the Group will not condone unlawful discrimination, bullying, harassment or victimisation.



Whistle-blower Policy

Through our Whistle-blower Policy, the Group encourages and expects our employees, contractors and suppliers to report concerns regarding our ForHealth Group Code of Conduct, our Modern Slavery Policy and any other concerns they may have with respect to modern slavery. Our Whistle-blower hotline (which is managed by a third party to ensure confidentiality and integrity) is clearly displayed on the policy is available to our employees, contractors, subcontractors and suppliers to raise concerns which in turn allows us to appropriately address any potential human rights impacts or modern slavery concerns. Training on the policy is required at least annually for all staff and is part of all onboarding of new starters.

(b) Modern Slavery warranties

In addition, the Group has incorporated clauses into its procurement contracts requiring suppliers to warrant that they adhere to all relevant labour laws, not engage

in any practices that could be perceived as modern slavery and take reasonable steps to ensure that modern slavery practices are eradicated from within their operations and supply chains.

(c) Development of a robust Corporate Risk framework

As a facility and services provider to healthcare professionals, our operations are highly regulated and subject to a range of State and Commonwealth legislation and accreditation requirements. ForHealth operates within an accountable system that includes corporate governance policies and practices, and risk management processes. These are designed to promote and strengthen the Group’s responsible management.

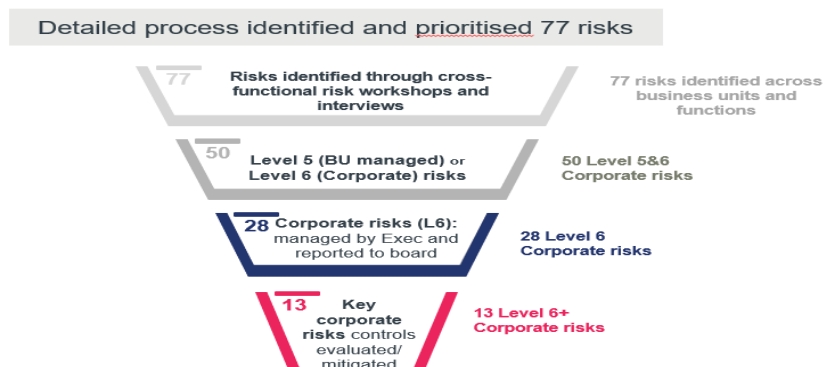
ForHealth manages risk through robust governance structures that includes 12 separate risk registers which identify and prioritise all business and operational risks, various state operational risk management committees, a Modern Slavery Committee, a Clinical Governance Committee and a Risk Committee which escalates required matters to the Board of Directors.

Our Risk Governance Framework includes modern slavery risks

Structure	Responsibility	Governing document
Board	Approves governance framework Oversee Risk Management Receive reports on key L6 risks Consider key risks & control effectiveness Sufficiency of resources	Risk Management & WHS Governance Policy
Risk Committee Made up executives, GMs and clinical & function leads	Design Framework Identify, Prioritise, Manage & Mitigate Risks Reports Material Risks to Board (owner of Corporate Risk Register) Ensure WHS team is adequately resourced	Risk Committee Charter Corporate Risk Register Functional Risk Registers for Corporate, MC, Dental, IT, Property, Finance, Legal, Clinical
Modern slavery committee Clinical governance committee State Medical Centre risk committees Dental national meeting Nursing national meeting Function head meeting	Considers modern slavery risks Considers clinical risks & governance Has Risk & Safety on every agenda Report on new risks, near misses, incident investigations and update mitigation actions Compliance management Report risks/concerns to Risk Committee	Modern Slavery Policy Medical Centres Compliance Program Medical Centres Clinical Governance Primary Dental Governance systems Nursing Care Governance Functional Risk Registers (Finance, Property, IT, HR, Operational, Legal, Clinical)
1 on 1 meetings between National WHS, Chair of Risk Committee & each Member Risk Committee	Discuss, Identify and Report on Risks & Near Misses	Software system which captures and manages incidents and complaints
Regional Manager meetings Practice Manager meetings	Hazard identification & day to day compliance of risk management system	

The Risk Committee actively manages and works to mitigate 28 key corporate risks (including 13 high level risks) via 12 separate risk registers.

Key risks have been identified & controlled in 12 functional & business risk registers



Source: See Functional & Business Risk Registers for more details and specific mitigation strategies

5. Assessing the effectiveness of our actions

Next Steps

We acknowledge that addressing modern slavery risks can be a complex and challenging process and the ForHealth Group is committed to continuing to evolve and strengthen its response and strategies toward mitigating and, where possible, eliminating such risks in our supply chain.

Over the next reporting period we will assess the effectiveness of our actions as follows:

Existing Suppliers – high risk

- Following the modern slavery risk assessment conducted in this Reporting Period, our procurement team will ensure each supplier identified as having a high risk of modern slavery completes a Supplier Questionnaire, receives a copy of our Supplier Code of Conduct and confirms their agreement to comply with it.
- The procurement team will also obtain copies of such supplier's key modern slavery documentation and procedures such as their modern slavery policy, supplier codes of conduct and supplier questionnaires.
- The procurement team will confirm the country that such products or services are sourced from including, where possible, the suppliers of our suppliers (2nd tier).
- Once the above is complete, our Modern Slavery Committee will reassess the risk rating of these suppliers and consider next steps which could include conducting further interviews or audits on how the supplier ensures against modern slavery in their own supply chains and ways they mitigate their risks.
- If following the above, the risk rating of such supplier remains high, the procurement team will attempt to work with the supplier to encourage the development of processes and practices which mitigate the risks of modern slavery in their supply chain and may ultimately consider engaging a different vendor if unsatisfied with the supplier's mitigation actions and progress.

New Suppliers

- As part of our new supplier engagement program, the procurement team will ensure that potential suppliers complete the Supplier Questionnaire which includes detailed modern slavery questions.
- The team will also ensure new suppliers receive a copy of our Supplier Code of Conduct and confirm compliance with it, which sets out our expectation for suppliers to develop and implement appropriate business processes to ensure against modern slavery in their operations and in the operations of their suppliers.
- As part of this process, our procurement team will confirm which country products/services are sourced from and will rank potential suppliers against the Modern Slavery Risk Matrix. For any identified as having high or moderate modern slavery risks, the procurement team will conduct further analysis including interviews or audits and the collection, where possible, of further policies and procedures which help to mitigate modern slavery risks before engaging further.
- We will also continue to ensure that modern slavery warranties are included in our supplier procurement agreements.

Training

- All existing and new employees will be given training on our Modern Slavery Policy, Procurement Policy and Supplier Code of Conduct. The Group recognises that training

on these processes will help the identification of modern slavery practices in our supply chain.

- At the completion of the training, we will conduct a survey/short test to ensure the training was effective in understanding our obligations, expectations and policies.

Monitor Whistle-blower complaints

- We will ensure we monitor complaints provided to our third-party under our Whistle-blower policy and ensure they escalate any queries or issues raised that relate to modern slavery to the Modern Slavery Committee.

Continued review of all relevant policies and procedures

- Our ForHealth Group policies which ensure compliance with all legislation and help to mitigate modern slavery risks will be regularly reviewed, updated and communicated.

6. Consultation between Group entities

As noted in the chart in section 1 of this Statement, all ForHealth Group entities are wholly owned subsidiaries of Limestone Holdco Pty Ltd ACN 639 416 667. Further, all ForHealth entities have largely common directors and company secretaries and from a procurement and supply chain perspective, they operate as one common entity.

The Modern Slavery Committee is responsible for considering all ForHealth Group entities and our procurement team is responsible for the procurement across the supply chain of all Group entities.

Given the above, we are comfortable that modern slavery risks have been appropriately identified, assessed and addressed and all the entities are aware of what actions they need to take.

7. Board Approval

This Statement has been prepared by the Modern Slavery Committee in consultation with each of the ForHealth Group subsidiaries and has been reviewed and approved by Board of Directors of Limestone Holdco Pty Ltd.



Andrew Cohen
Director / CEO
Limestone Holdco Pty Ltd

Dated: 1 December 2021

Annexure A – Modern Slavery Risk Matrix

Risk matrix showing assessing unmitigated modern slavery risks

This risk assessment reviews the categories of spend by their likelihood to have modern slavery in their supply chain based on the country where they operate or source goods and the industry they are in

		Likelihood assessed by country risk							
		Low	Minor	Moderate	Major	High			
		Australia Scandinavia United States Austria Belgium United Kingdom Singapore Japan	Croatia Albania Japan Argentina Hong Kong Vietnam Brazil	Mexico Peru Ecuador Malaysia Guyana Honduras	PNG Vietnam Colombia Turkey Russia	Venezuela Sudan DRC Chad Somalia Taiwan	Pakistan Belarus Macedonia Turkmenistan China Colombia	Philippines Cambodia The Central African Republic PNG North Korea Pakistan	Thailand India
Likelihood assessed by industry	Highly likely <i>There is a high likelihood of modern slavery in these industries. Examples include:</i>		Uniforms (Vietnam) Coffee (Brazil)	Medical PPE (including gloves) (Malaysia)	Medical PPE (China) Uniforms (China) Coffee (Colombia) IT Hardware (China)	Uniforms (India) Medical PPE (Thailand)			
	Likely <i>There is likely to be a risk of modern slavery. Examples include:</i>	Cocoa Rice Textiles PPE Electronics	Fishing Diamonds Palm Oil Coffee		IT Software (various) IT Hardware (various)				
	Possible <i>It is possible there is a risk of modern slavery. Examples include:</i>	Timber Sugarcane Gold Tobacco	Construction Wheat Rice Corn	Dental lab services (HK)	Medical Consumables (not PPE) Dental Consumables (not PPE)	Medical Consumables (China) Dental equipment (China) Stationery (China)			
	Unlikely <i>It is unlikely there will be a risk of modern slavery. Examples include:</i>	Professional services	Dental lab services (Aust)		Dental lab services (China)	Offshore Accounting (Philippines) Typists (India)			
		Low risk	Some risk	Moderate risk	High risk				

Footnote: Based from the Global Slavery Index 2016