

## 2024 Modern Slavery Statement

Our commitment to addressing Modern Slavery

### CEO's Message

Modern slavery continues to be one of the most pressing human rights challenges of our time, with an estimated 40 million people worldwide trapped in conditions of exploitation, including forced labour, debt bondage, human trafficking and child labour. As an organisation operating in the real estate and construction sectors, which are susceptible to modern slavery risks, we remain committed to doing all we can to identify, address and mitigate all forms of human exploitation.

Since our last statement, our commitment to addressing modern slavery has evolved, with deeper engagement across all levels of our business, from our supply chain partnerships to our internal governance framework. We have expanded our risk identification and mitigation processes, strengthened our partnerships with suppliers, and increased our collaboration with peers to further our understanding of the challenges faced.

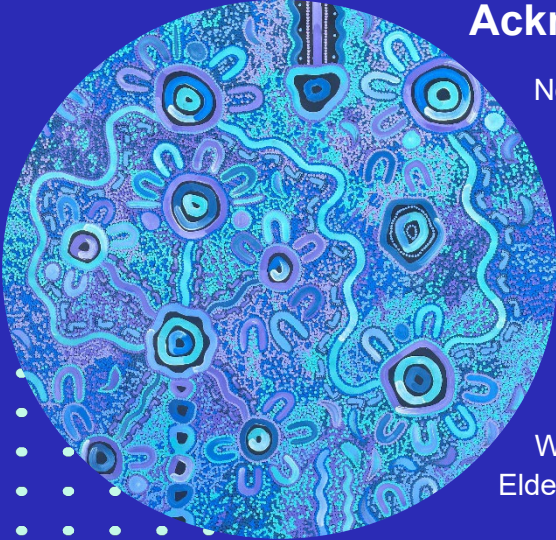
This modern slavery statement reflects these efforts, demonstrating the steps we have taken to ensure transparency, accountability and ethical conduct. This report outlines the enhancements to our governance framework and the actions we have implemented to uphold the dignity and rights of workers in our operations and those connected to us through our supply chains. The wellbeing of the communities in which we operate continues to be a guiding principle in all our actions, as we strive to improve the impact of our business on human rights.



**Craig Mitchell**

CEO – Northwest Healthcare Properties REIT Director of Northwest Healthcare Australian Property Limited and Northwest Healthcare Australia RE Limited

### Acknowledgement of Country



Northwest, as manager of Vital Healthcare Property Trust, acknowledges the Traditional Owners of Country throughout Australia, especially the lands on which we live and work, and recognises their continuing connection to lands, waters and communities.

We also acknowledge the Rangatiratanga of Māori as Tangata Whenua and Treaty of Waitangi partners in Aotearoa New Zealand.

We pay our respects to all First Nations peoples and to Elders past, present and emerging.



This joint statement is made by Northwest Healthcare Australian Property Limited ACN 083 065 034 (**NWHAPL**) and Northwest Healthcare Australia RE Limited ACN 612 310 148 (**NWHARE**) (each a Company and together the Companies, we or our), who are each reporting entities under the *Modern Slavery Act 2018* (Cth) (**Act**).

The Companies make this statement in accordance with section 14 of the Act. The Act requires reporting entities subject to the Act to produce an annual modern slavery statement.

This is NWHAPL's fifth annual statement and NWHARE's third annual statement and is for the Australian Financial Year ended 30 June 2024.

This statement was prepared in consultation with each of the Companies. The draft statement was provided to the Board of each of the Companies for consideration and comment, including on the date on which this statement was approved. Each Company was given an opportunity to consider and provide comments on this statement prior to publication. This statement was also prepared in consultation with the entities owned or controlled by the Companies.

This modern slavery statement has been approved by the principal governing body of each of the Companies, namely the Board of Directors of each Company on 12 December 2024.

The statement has been prepared in accordance with the requirements of the Act, and we remain committed to complying with the highest standards of governance in our efforts to address modern slavery.

## Our Structure

NWHAPL and NWHARE are public companies, incorporated in Australia, with their registered office at Level 45, Rialto South Tower, 525 Collins Street, Melbourne, Victoria, Australia.

The Companies are 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**).

NWHAPL is the trustee of two Australian healthcare real estate owning trusts which are subsidiaries of the New Zealand Exchange (the **NZX**) listed Vital Healthcare Property Trust (NZX: VHP) (the **Trust**).

NWHARE acts as trustee of a number of real estate owning trusts or funds in Australia.

We operate as a single platform across Australia and New Zealand and have substantially the same systems, information sharing protocols and processes across all our operations, whether in Australia or New Zealand. To the extent this statement describes operations and the risk of modern slavery in the operations and supply chains, the descriptions apply to all reporting and controlled entities.

We have 58 members of staff in Australasia and have offices in Auckland, Melbourne and Sydney.

A significant number of our activities are performed in-house which, together with our centralised management function, means we retain a high degree of oversight over many aspects of the business, reducing the risks of modern slavery in our direct operations.





## Our Operations

Our primary business operations involve acquiring, developing, managing and maintaining healthcare real estate assets, including private hospitals, outpatient clinics, medical office buildings and, until recently, aged care facilities.

As at 30 June 2024 the Trust owned approximately NZ\$3.2 billion healthcare real estate in Australia and New Zealand and is New Zealand's largest specialist, and only NZX listed, owner of healthcare real estate. We have a committed development pipeline with approximately NZ\$106 million remaining to be spent and provide asset management services for 36 properties.

As at 30 June 2024 NWHARE provides trustee services to an approximate A\$2.9 billion healthcare property portfolio owned by a number of trusts and funds in Australia, with a committed fund through development spend of approximately A\$42 million remaining to be spent. NWHARE provides asset management and facility management services to 26 properties.

## Our Supply Chains

Whilst most of our workforce is employed locally in professional services roles, our supply chains include a diverse range of services integral to our operations, such as construction, property maintenance and facility management.

Our preferred suppliers are premium grade, reputable suppliers whose values align with ours. On a monthly basis, at our Operational Risk Committee (**ORC**) meetings, senior executives across the acquisition, management, development, treasury and legal teams consider the business risks which we face. This includes testing the adequacy of our suppliers, their performance over the past month and any issues which may have arisen which could pose a risk to our business, including from a modern slavery perspective.

We categorise our primary supply chains into two key areas: asset management and construction and development. We also acknowledge the operational supply chain which supports our day-to-day business operations.

**1 Asset management supply chain:** This includes local service and equipment providers, facility maintenance, cleaners, security personnel, landscapers, and professional service firms, many of which are located in proximity to our real estate assets in Australia and New Zealand.

**2 Construction and development supply chain:** This aspect of our business involves subcontractors, material suppliers, design and project management teams and equipment suppliers. Many of these suppliers are located in proximity to our real estate assets in Australia and New Zealand. We recognise the inevitability that some of our construction materials are sourced internationally, where the risks of modern slavery can be higher.



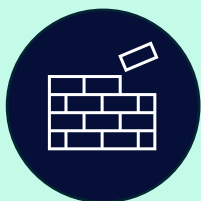
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**Operational supply chain:** This supports the broader business functions and includes hotel accommodation, travel, entertainment, office equipment providers, professional services such as lawyers, auditors, IT services, and procurement of goods such as furniture and stationery.

The real estate and construction sectors, particularly in the procurement of materials, continue to face significant modern slavery risks. We understand the importance of remaining vigilant about pin-pointing and eradicating modern slavery risks across our operations and supply chains.

The risk of modern slavery in our direct operations is assessed to be low, largely because we have a local professional workforce who provide in-house services for a significant number of our activities. All employees hold either permanent or contract positions and are paid competitive wages and have available to them clear corporate policies (such as our Code of Business Conduct and Ethics) and grievance mechanisms. During the reporting period, the Companies had robust systems in place regarding local labour law compliance in Australia and New Zealand.

Whilst we are not aware of any modern slavery risks in our own operations, we want to ensure our suppliers continue to uphold the highest standards expected of them. We have identified several key risk areas within our supply chains:



**Raw material sourcing:** The risk of modern slavery is most pronounced in the sourcing of raw materials, such as bricks, cement and other items which are not produced in region, as well as plant and equipment, such as elevators and air-conditioning systems. These products are often procured from regions where labour exploitation is prevalent.



**Labour practices in construction:** Whilst much of the construction workforce in Australia and New Zealand is covered by stringent labour laws, we accept that there are aspects of the sectors in which we operate which are vulnerable to exploitation, especially where cheap labour reduces costs and enhances returns. We recognise that robust oversight of these tiers is essential to preventing modern slavery.



**Offshore suppliers:** Our reliance on offshore suppliers for certain construction and technology products, which can involve complex and opaque supply chains, presents an ongoing challenge for risk management. We remain focused on improving transparency and due diligence across these tiers.





## Case Study – how we manage modern slavery risks

A core part of our business is construction and development. We are mindful of the modern slavery risks inherent in supply chains which engage offshore suppliers to procure materials from locations which are considered to have a high risk of modern slavery.

To address these risks, we are committed to ensuring that appropriate due diligence and risk assessment is undertaken before we enter into agreements with suppliers and over the course of administering those agreements. Where any suspected or actual modern slavery is identified, we are committed to ensuring appropriate remedial actions are taken.

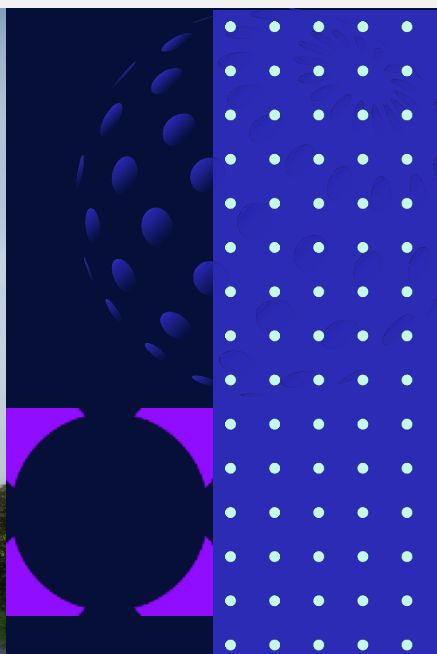
An example of how we have approached this at one of our development sites is demonstrated through our approach at RDX, Lumina within the Gold Coast Health and Knowledge Precinct:

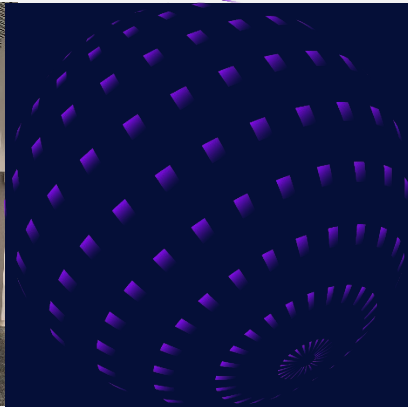
### Step One: Contractor Procurement

From the outset during the contractor procurement phase and before engaging the contractor, we were clear around our expectations from our suppliers. Our current 2023 Modern Slavery Statement was included in our procurement documentation and our contractors were required, under their contracts with us, to warrant that their businesses will:

- *comply with legislative requirements and policies in relation to the Act;*
- *establish suitable processes to review the risks of modern slavery practices in their operations and supply chains; and*
- *have processes to ensure their conduct aligns with the principles and objectives of the Act.*

Our contractor on the RDX project, Icon, committed to these requirements. We also sought to understand what controls were in place at Icon in respect of managing modern slavery risks. We identified that Icon has their own Modern Slavery Policy which applies a similar rigour around their subcontractor and supplier selection process. Icon requires all subcontractors and suppliers to complete a modern slavery check prior to engagement via the iPro Modern Slavery Assessment tool, which is Icon's internal risk assessment platform.





## Step Two: Modern Slavery Risk Assessment

As part of Icon's monthly reporting, a thorough risk assessment is undertaken across all trades. These trades are evaluated by reference to a 'high', 'medium' or 'low' rating using the iPro Modern Slavery Assessment tool.

The report also provides recommendations on how to reduce modern slavery risk based on inherent and unmitigated risks.

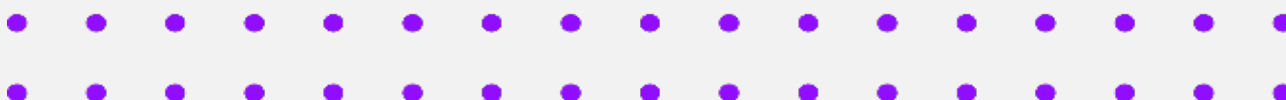
In addition, we conducted a formal check-in with Icon and requested they complete our self-assessment modern slavery questionnaire designed to assist us in understanding how modern slavery risks are being addressed.

## Step Three: Modern Slavery Training

All new contractors and employees were required to complete modern slavery training as part of the onboarding and induction process. The training covers information about what modern slavery is, how to identify red flags, processes in place to adhere to Icon's Modern Slavery Policy, and reporting requirements.

## Spotlight on a risk trade:

The RDX façade is procured from a country which has a relatively high risk rating from a modern slavery perspective. To mitigate these risks, the façade supplier was required to complete a modern slavery check by way of the iPro Modern Slavery Assessment tool prior to being selected and engaged. The façade supplier has their own Modern Slavery Policy which includes their approach to managing modern slavery risks. The responses provided by the façade supplier were a sufficient comfort to all parties involved that any risks of modern slavery were low or adequately mitigated.





## Actions taken to address modern slavery risks

We have taken decisive steps to further mitigate the risks of modern slavery across our operations and supply chains.

### 1 Supplier due diligence and Code of Conduct

Since lodging our 2023 Modern Slavery Statement, we have now finalised and launched our Supplier Code of Conduct (the **Code**) which summarises our commitment to conducting business in an ethical, responsible and sustainable manner. The Code sets out the expectations we have for our suppliers in relation to human rights, complying with laws, engaging in lawful labour practices and the unacceptability of modern slavery. It is a requirement that all new suppliers commit to complying with the Code. We have also expanded the scope of our financial and human due diligence to include more detailed risk assessments of high risk suppliers and subcontractors.

### 2 Modern Slavery Supplier Questionnaires

We have been working with technology provider Informed 365 and the Property Council of Australia to assess and address modern slavery risks in our supply chains.

By collecting, comparing and collating information on suppliers, the Informed 365 platform is designed to assist us in assessing and reporting more easily on our supply chain networks. The platform also provides updates on year-on-year progress. Informed 365 is free for suppliers to register, access and use, and assessment information is updated annually with suppliers, who are prompted to record improvements in their business operations.

Since our involvement with Informed 365 is in its infancy, this year we engaged a sample of 89 suppliers to report on modern slavery risks in their operations and supply chains, ranging from security firms to data procurement, professional services firms and construction related businesses. We received an impressive 84% response rate, with the majority of respondents having sophisticated or well-advanced thinking on modern slavery, including an understanding of the steps required to mitigate the risks of modern slavery in their respective sectors.

Of the suppliers from whom we have received responses, 47% are deemed to be at low risk of having modern slavery in their supply chains and 36.4% at medium risk.

### 3 Increased industry collaboration

We continue to strengthen our engagement with industry bodies and peers to share and understand how to enhance practices around reducing modern slavery risks, particularly in relation to high-risk material procurement. This collaboration has been critical in developing industry-wide solutions to modern slavery challenges.



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## Staff training

We have expanded our internal staff training programme to include modern slavery risk management as a key focus. All employees, especially those in procurement and supply chain management, are required to complete annual refresher courses on modern slavery. Additionally, modern slavery training has been incorporated into our onboarding processes for new hires.

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## Grievances

We maintain a robust system for receiving and investigating non-compliance issues through our Whistleblower Policy which provides us with sound procedures and mechanisms to allow current and former employees, suppliers, employees of suppliers and their families to identify and report genuine concerns about any misconduct or improper state of affairs without fear of reprisals.

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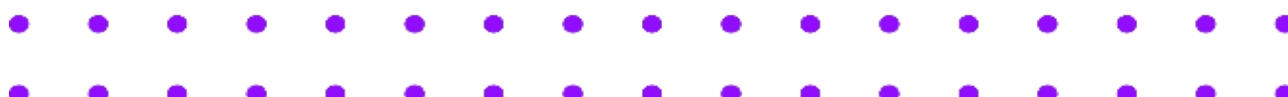
## Assessing the effectiveness of our actions

We continually assess the effectiveness of our modern slavery mitigation measures through a structured framework of governance and oversight. The operation is led by the Regional General Counsel ANZ, who remains responsible for compliance with the Act across Australia and New Zealand in consultation with the Modern Slavery Working Group (**MSWG**) and the ORC.

Since our 2023 Modern Slavery Statement, we continue to strengthen our compliance with the Act and monitor our progress in reducing modern slavery risks within our business.

The MSWG consists of representatives from our legal, procurement and risk management teams. The MSWG meets quarterly to evaluate ongoing modern slavery risks, review supplier assessments and refine our strategy for addressing a number of risks, including that of modern slavery.

Similarly, the ORC is responsible for the supervision of policies related to reputation, legal matters, compliance, operational issues, climate related risks, health and safety and other relevant risks which may impact our business. A key role of the ORC is to review the effectiveness of the processes in place to identify, mitigate and remediate the risks of modern slavery in our supply chains. The ORC's monthly agenda incorporates modern slavery to ensure our exposure to risks is considered and addressed at each meeting.







# Looking ahead to 2025

In the ensuing year, we are committed to these key areas of focus by reference to the actions which we targeted last year.

Pillars 2024 Actions		Tracking against actions and 2025 priorities
Thriving Partners	Ongoing assessment of the potential modern slavery risks in our operations with an emphasis on identifying any medium to high risk areas or changes to risk profiles of any of our suppliers.	<p>This year, we have expanded the scope of our assessment by increasing the number of suppliers receiving our modern slavery questionnaire, enabling us to gain deeper insights into their practices and risk exposure. By expanding the questionnaire reach, we can better identify emerging risks, particularly as our supply chain continues to grow and diversify.</p> <p>We are looking to increase our reach by 50% in 2025.</p>
	The MSWG will conduct further and ongoing due diligence on potential and current suppliers with a view to formalising a selection process based on an acceptable level of risk in the context of each Company’s risk appetite and the supplier’s take-up of the Code.	<p>This year, we have strengthened our due diligence processes to better assess suppliers’ adherence to ethical practices, ensuring that our partners understand and uphold the values outlined in our Code. This approach helps us mitigate potential risks and promotes a stronger alignment with suppliers who are equally committed to ethical operations, positioning us to make informed, risk-based decisions in our supplier selection and engagement.</p> <p>We will continue to monitor our due diligence processes and review suppliers prior to engagement.</p>
	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.	<p>Based on responses from our suppliers this year, we have not identified any potential modern slavery risks. However, we will continue to monitor our suppliers to ensure we are able to address and mitigate any risks if and when identified.</p>
	Embed supplier training on modern slavery by qualified professionals into our ESG training schedule to address select groups of suppliers at a time.	<p>This is a work in progress for the Companies, noting that in the Icon case study referred to above, this training has been implemented by our contractor.</p>





Strong Communities	Review supplier contracts (using data sets) to ensure they contain terms consistent with the Act and, where possible, require suppliers to use template documents which we have prepared, and which oblige compliance with these terms.	<p>This year our Code has been embedded in all new supplier contracts.</p> <p>We will continue to monitor uptake of the Code.</p>
Inclusive Company	Ongoing staff training carried out by qualified professionals across the key risk areas (including construction). A briefing to all staff was again provided in 2023 and training is to be done annually.	<p>We undertook all staff training with case study examples to ensure our team is equipped with the knowledge needed to identify and report any potential modern slavery in our supply chains and construction sites.</p> <p>We are committed to providing training to the team on an annual basis.</p>
	Formal risk management training including refresher courses for key staff and the MSWG to ensure modern slavery risks can be identified within daily operations.	
	Incorporate modern slavery training into all onboarding processes for new staff to be delivered by the Regional General Counsel.	<p>We remain committed to providing this training to all new staff.</p>
Enablers (Governance)	Review and refine policies on the possible impacts of modern slavery on our operations, including establishing sustainable procurement policies and implementing the Code.	<p>We launched the Code this year and all new suppliers must now commit to complying with the Code.</p>
	Expand work done by MSWG to address all aspects of our business	<p>The is an ongoing commitment of the Companies.</p>

