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Modern Slavery Statement 2023





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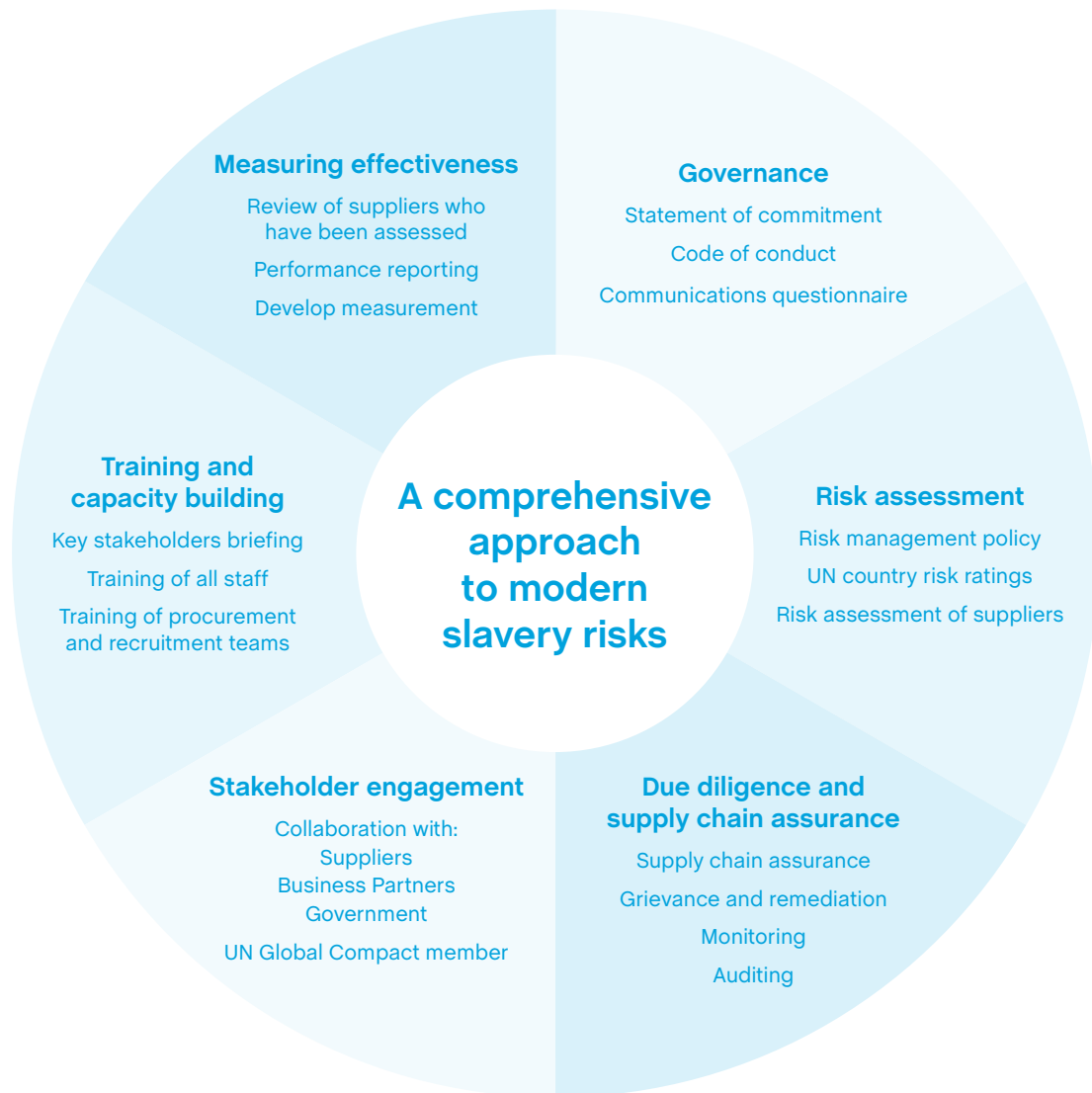
This statement, pursuant to s54(1) of the Australian Modern Slavery Act 2018 (Cth), sets out the actions taken by Aspen Medical to detect the risks of modern slavery and human trafficking across our business and supply chain for the calendar year ending 30 December 2023 and ensure we have in place the most appropriate responses to those risks.

With this Statement, we express our intent to implement those principles. We are committed to making the Modern Slavery Act, and its principles, a part of the strategy, culture, and day-to-day operations of the company, and to engage in collaborative actions to ensure we meet the requirements we have set out. Aspen Medical will make this Statement our commitment to our teams, our stakeholders, and the public. We recognise our commitment to report annually on our progress in implementing the seven mandatory statements outlined in this Statement.

In addition to the work, we are doing in our procurement, recruitment, and operations, we support the Ten Principles of the UN Global Compact, and we are an “Active” member. We commit to providing an annual Communication on Progress that describes our company’s efforts to implement the Ten Principles within the four focus groups:

- Human Rights
- Labour
- Environment
- Anti-corruption

Aspen Medical's systematic approach to modern slavery



Key Actions in 2022

- Maintained a high level of awareness of modern slavery amongst our teams.
- Improved our understanding of modern slavery risks in our supply chains.
- Implemented our Supplier Code of Conduct and self-assessed questionnaire for our suppliers who have been identified for assessment.
- Applied support processes for any of our Suppliers who require remediation.
- Developed a process to conduct regular reviews of our suppliers.
- Developed a process to conduct spot audits as part of the Supply Chain Assurance Program.

Our structure, operations, and supply chains

Aspen Medical is an Australian owned global provider of innovative healthcare solutions across a diverse range of clients in the government, non-government organisations (NGO) and the private sector. Our headquarters are in Canberra, and we have a key operations hub and logistics centre in Brisbane. Aspen Medical operates across Australia, the Pacific, the US, Europe, Africa, and the Gulf Region. We employ experienced and highly trained professionals dedicated to providing healthcare wherever it's needed.

Aspen Medical is a global leader in the provision of healthcare services in Indigenous, rural, and remote communities. We have unparalleled experience in developing solutions and delivering best-in-class healthcare and dental services where traditional models of care are not available or are inappropriate.

Aspen Medical Group reporting entities comprise of:

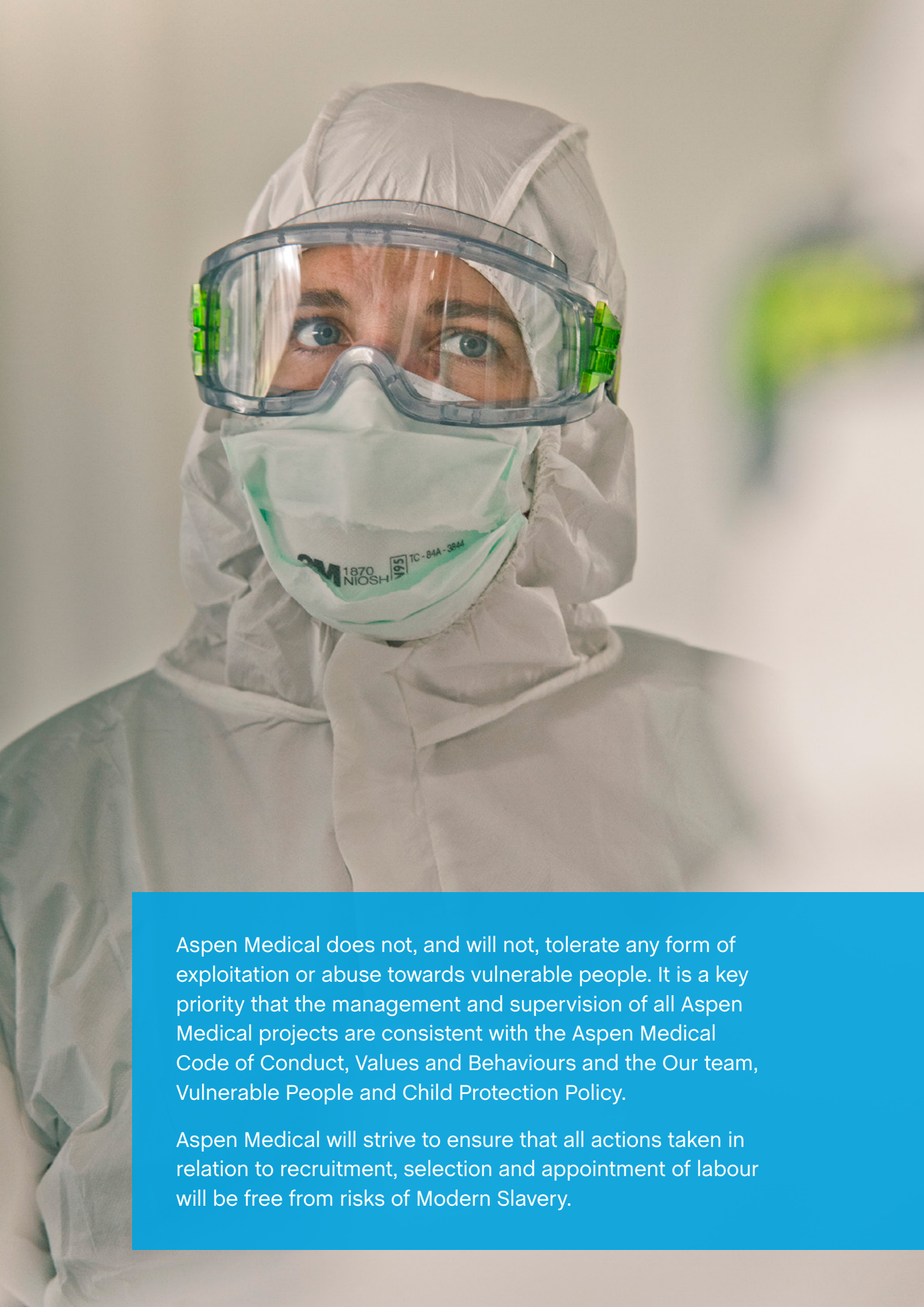
- Remote Area Health Corps (RAHC)
- Rural Locum Assistance Program (RLAP)
- Aspen Medical USA
- Aspen Medical Asia-Pacific
- Aspen Medical UK
- Aspen Medical Fiji
- Aspen Medical Qatar
- Aspen Medical PNG
- Aspen Medical KSA

Visit our website for further information:

www.aspenmedical.com

Aspen Medical operates an extensive and diverse global supply chain. Core to that supply chain is the selection and screening of suppliers for the provision of quality, well-regulated medical supplies as well as social benefit from our procurement to the affected and/or local communities. An underlying principle we apply to our global endeavours is the selection, screening, tracking and engagement of suppliers that are owned by either First Nations peoples, military veterans (also employers of military veterans), persons with disabilities and women. Through this approach we aim to not only meet the medical demands of the situation. By using a *thinking global and acting local* approach to suppliers, we offer socially responsible outcomes and local economic benefits.

Aspen Medical has established a network providing independent quality inspections of medical products before they are shipped from the manufacturers/suppliers to our clients. Procurement professionals rigorously consider medical regulatory requirements in addition to international and domestic clinical standards and Modern Slavery requirements before supplies and equipment is ordered. Through our national and global network, supplies can be shipped and tracked from our integrated global inventory or from our high-quality suppliers to client work sites. This is achieved through Aspen Medical's responsive contracted distribution services and Oracle-based logistics information system.



Aspen Medical does not, and will not, tolerate any form of exploitation or abuse towards vulnerable people. It is a key priority that the management and supervision of all Aspen Medical projects are consistent with the Aspen Medical Code of Conduct, Values and Behaviours and the Our team, Vulnerable People and Child Protection Policy.

Aspen Medical will strive to ensure that all actions taken in relation to recruitment, selection and appointment of labour will be free from risks of Modern Slavery.



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Our Governance

Aspen Medical has a robust corporate governance framework in place, with the Board overseeing our broader human rights program through the Quality Management Review Committee.

The purpose of the Committee is to review the organisation's management systems across all sites at planned intervals, to ensure its continuing suitability, adequacy and effectiveness, and alignment with our strategic direction. This review includes assessing opportunities for improvements and the need for changes to the management systems, including the policies, objectives, and targets.

Aspen Medical's Quality Management System is an accredited Integrated Management System that is audited by a third-party accreditation body, comprising:

- ISO 9001:2015 Quality Management System
- ISO 14001:2015 Environmental Management System
- ISO 45001: 2018 Occupational Health and Safety Management System
- ISO 27001:2013 Information Security Management System

Aspen Medical conducts humanitarian work internationally, and we have established a specific World Health Organisation (WHO) Emergency Management Team (EMT) Management System.

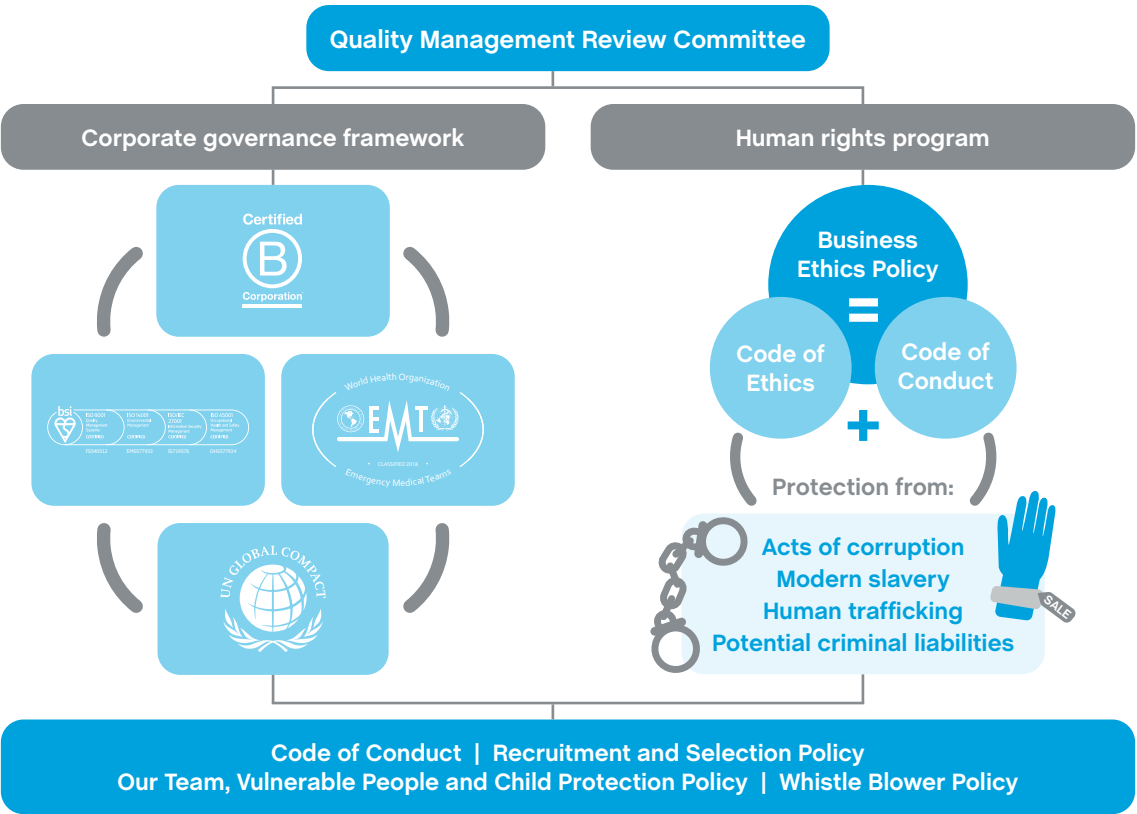
This system has undergone third party auditing by auditors from the WHO and accredited Aspen Medical as a WHO EMT for international humanitarian work and as such, our policies and procedures relating to Human Rights and Labour have been rigorously reviewed by the WHO prior to accreditation being awarded.

Aspen Medical is also a certified B Corporation which means we meet the highest standards of verified social and environmental performance, public transparency, and legal accountability to balance profit and purpose.

We have a policy that outlines our approach to business integrity in two parts: A Code of Ethics and a Code of Conduct. This policy applies to Aspen Medical and all its subsidiaries and affiliates. Our Code of Ethics outlines the ethical principles of Aspen Medical and its team and represents the aspirations of the company at the business level. Our Code of Conduct translates these principles into practical guidance that guides and empowers the Aspen Medical team, its business partners, and their employees to realise these aspirations. Our Business

Ethics Policy—the combination of these two codes—has been developed to reinforce our commitment to honesty and truthfulness, and for the practical purpose of protecting Aspen Medical, its team members and business partners from acts of corruption, modern slavery (slavery, servitude, forced or compulsory labour, bonded labour) or human trafficking, and the potential criminal liabilities. Specifically, it recognises the responsibilities of Aspen Medical under the Criminal Code Act 1995 and its responsibilities in accordance with the relevant laws, statutes, and codes applicable in the countries in which we operate. We will amend this code as and when necessary to reflect changes in national legislation and international agreements.

Underpinning this framework are the Aspen Medical Group’s suite of policies and procedures, several of which are relevant to modern slavery. These include our Code of Conduct, Recruitment and Selection Policy, Our Team, Vulnerable People and Child Protection Policy, and Whistle Blower Policy.



Risk Management and Mitigation

We are aware that there is a potential for forced labour and modern slavery practices to exist in our supply chains in every region of the world.

Our management of modern slavery risk in our operations and supply chains falls within our broader approach to human rights risk and is assessed and managed consistently within our established, organisation-wide risk framework. This includes our Risk Management Policy, which is implemented at the Group level and includes all operations teams and contracts. Each client contract undergoes a risk assessment that includes the risk of modern slavery under our operational and people risk categories. This is particularly important for any WHO Humanitarian contracts awarded by the WHO. The Group's Quality Management Review Committee is responsible for providing oversight on behalf of the Board.

Whilst we recognise that modern slavery and human trafficking risk may occur in our organisation and extended supply chains, we know that the level of risk is influenced by factors such as vulnerable populations, product and service category, industry, and geographic location. Accordingly, we have tailored our risk processes to ensure that we are focusing our efforts on those areas that present an elevated risk of exposure. We have assessed that of all the products and services we procure, those within the categories of medical consumables, medications, catering, information technology supplies and people services, could present a risk of modern slavery.

Our risk assessment approach uses a combination of risks and commences with reviewing country risks (using the UN Global Slavery Index to determine the risk level of each country), industry-related risk factors, sector, product, and service-related risks. Our risk assessment approach is conducted by teams where the risk has been identified by

our Logistics and Procurement Team (Goods), Operations Team (Services) and our Culture and Performance Team (Recruitment). In support of the risk assessment of suppliers, Aspen Medical has established a Supplier Code of Conduct defining the processes to follow to ensure legally binding obligations on the Supplier, and these are incorporated by reference into an agreement or contract. A Supplier Self Assessed Questionnaire is available for suppliers to demonstrate that they are conducting their business ethically. They are required to:

- complete the Supplier Self Assessed Questionnaire.
- ensure that their employees working under an Aspen Medical contract are appropriately skilled, qualified, and where relevant, correctly certified, licensed, and exercise the necessary levels of care, skill, and diligence.
- prevent any of their employees from undertaking any work for which they have not received training to a level that allows them to carry out the work competently and safely.

Where significant risks are identified, we have will commission an external due diligence and risk analytics company to screen our listed suppliers and ascertain if they are associated with modern slavery-related allegations or controversy flags. Where this has been confirmed, further communications will cease with the supplier.



Due Diligence and Supply Chain Assurance

As part of the development of our Supply Chain Assurance Program, all new suppliers, as well as renewing suppliers, will be subjected to our due diligence process prior to onboarding or contract award. Initially, suppliers will be requested to respond to a brief prequalification questionnaire administered in the group procurement contract management system. This process helps us to identify potential areas of risk, and where identified, the supplier will be referred for further due diligence.

Supply Chain Assurance

We procure a broad range of goods from a broad range of industries, both domestically and internationally, and we acknowledge that modern slavery may occur in our global supply chain. Our Supplier Code of Conduct and Supplier Self Assessed Questionnaire has been established to support our supply teams. We have established a Modern Slavery contract clause and will update contracts where appropriate.

Our Supply Chain Assurance program has standardised the Aspen Medical's approach to modern slavery and human trafficking due diligence. Importantly, this program will help us to understand how our suppliers are producing or sourcing the goods and services we procure, to ensure they comply with our supplier requirements.

We are committed to the protection and respect of human rights across our business and supply chain. Where we identify impacts that we may have caused, contributed to, or been directly linked with human rights offences, we will seek to address this in line with the guidance provided under the United Nations Guiding Principles on Business and Human Rights (UNGP). By focusing our efforts to avoid involvement in modern slavery and using the UNGP, we are taking a recognised, coordinated, integrated and rights-based approach to this important issue.

Grievances and Remediation Processes

We have established reporting procedures and mechanisms where team members and third parties can report any concerns regarding unethical or illegal conduct, including in relation to modern slavery and human trafficking. Team members can report to their manager, or if they wish to remain anonymous, team members and third parties are able to report through our independently operated Whistleblower Policy, via phone, email, or an online portal.

Our internal grievance resolution guidelines in our supply policies and procedures outlines the resolution options for our team members. Under new Australian legislation, the guidelines are designed to protect vulnerable workers under the Fair Work Act, the Modern Slavery Act and Whistleblower Protection Act. We will continue to evolve our approach to managing any issues, including development of external grievance procedures for third parties, which we will make available to our suppliers and business partners.



Stakeholder Engagement

Cooperation with our suppliers, our business partners and relevant government agencies to effect change is a key feature in our strategy to eradicate modern slavery. We are committed to collaborating with government and other businesses to eradicate modern slavery, and we both recognise the need for, and support of, a coordinated approach to addressing human rights issues, including the risk of modern slavery in our collective supply chains.

We are a member of the UN Global Compact, and we are committed to making the Compact and its principles a part of the strategy, culture, and day-to-day operations of our company. We are also committed to engaging in collaborative projects that advance the broader development goals of the United Nations, particularly the Sustainable Development Goals. We will do this in a general statement to the public. We recently completed the annual submission on our Communication on Progress (COP) and were awarded an "Active" status. We support public accountability and transparency, and therefore commit to report on progress annually.

Aspen Medical is also committed to Corporate Sustainability through our membership of B Corp, which starts with a company's value system and a principles-based approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment, and anti-corruption. Aspen Medical, as a responsible business, enacts the same values and principles wherever we have a presence, and we know that good practices in one area do not offset harm in another. By incorporating the Ten Principles of the UN Global Compact into our strategies, policies, and procedures, and establishing a culture of integrity, we are not only upholding our responsibilities to people and planet, but also setting the stage for long-term success.

Training and Capacity Building

Training and awareness are key in addressing the risk of modern slavery and human trafficking. We recognise the need to ensure the capability of our employees, particularly our procurement practitioners, our recruiters, and our front-line teams, to identify potential red flags of modern slavery and human trafficking, and the actions required to respond appropriately.

To assist in mitigating modern slavery risks, all personnel on overseas humanitarian deployments are required to undergo Red Cross Mandatory modular training in International Humanitarian Law Fundamentals, Enforcement and for Medical Personnel.

The Aspen Medical Training Academy has developed and implemented a Modern Slavery Awareness Training Course for team members who may be involved in procurement (goods and services) and recruitment.

This training course is provided to team members in the following areas:

- Our Group Procurement Team and Recruitment Team, with tailored training on risk identification and due diligence processes.
- For other team members, we are focusing on ensuring their awareness of global modern slavery and human trafficking, helping them understand the issues, and helping them to better understand, identify and report incidents.

Measuring effectiveness

Whilst there is extensive work being undertaken at a global level to understand and value respect for human rights, there are currently no fundamental units of measurement or international standards for measuring human rights impact. This is a complex issue that presents a challenge for us in terms of providing credible measurements that are proven effective in addressing modern slavery risk.

Certain processes under development within our Supply Chain Assurance program will provide us with a mechanism to help track the effectiveness of our program. We still need to design credible measurements as we develop our Supply Chain Assurance Program.

Looking Ahead

Modern slavery risk management requires continuous commitment and ongoing collaboration. This is both from within our company and through ongoing, multi-stakeholder dialogue in international and domestic policy forums, the World Health Organisation and with local governments of host countries we are operating in, or about to operate in.

Our next steps are set out below:

Steps	Actions
Maintain a high level of awareness of modern slavery amongst our teams	<ul style="list-style-type: none">• Regular reinforcement of our strategies to mitigate the risk of Modern Slavery in our supply chain.• In-depth procurement in our Supply Chain training with our Logistics and Procurement Team (Goods), Operations Team (Services) and our Culture and Performance Team (Recruitment).• Modern Slavery Awareness Induction training for all new staff.
Improve our understanding of modern slavery risks in our supply chains	<ul style="list-style-type: none">• Establish a supplier risk assessment rating mapped against our suppliers.• Undertake Risk Assessments of our operational supply requirements.
Implement our Supplier Code of Conduct and self-assessed questionnaire for our suppliers who have been identified for assessment	<ul style="list-style-type: none">• Underway, with the questionnaire having been reviewed.• This will be included in the processes for uploading suppliers to Oracle.
Apply support processes for any of our suppliers who require remediation	<ul style="list-style-type: none">• Selection for Remediation and Remediation processes will be included in our supply policies and procedures.



Steps	Actions
Develop a process to conduct regular reviews of our suppliers	<ul style="list-style-type: none">• Process will be included in the supply policies and procedures.• A regular alert built into outlook to assist scheduling of regular reviews.
Develop a process to conduct spot audits as part of the Supply Chain Assurance Program	<ul style="list-style-type: none">• Part of the governance line of development in the creation of Global Medical Supplies, as part of a business wide procedure. Process will be included in our supply policies and procedures.• The process will include the Culture and Performance Team.• A regular alert built into outlook to assist scheduling of spot audits.

Signed

Glenn Keys AO
Executive Chairman
14 December 2022

This statement was approved by the Board of Aspen Medical Pty Ltd

CONTACT

2 King Street
Deakin, ACT 2600
Australia
Phone +61 (0)2 6203 9500

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