

# Modern Slavery Statement 2022

# 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 'Group', 'ForHealth' or 'ForHealth Group')



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# 1. The identity of the Reporting Entities

# (a) Introduction

This is ForHealth Group's Modern Slavery Statement (**Statement**) covering the period from 1 July 2021 to 30 June 2022 (**Relevant Period**) and made in accordance with the *Modern Slavery Act (Cth) 2018* (the **Act**). This is ForHealth's second modern slavery statement, and has built on the work delivered in our first reporting period. We continue to dive deeper and learn more about our supply chain and the associated risks.

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.

We consider 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*<sup>1</sup> and the *International Labour Organization's Declaration on Fundamental Principles and Rights at Work*.<sup>2</sup>

Our commitment to human rights and its identification and minimisation of modern slavery risks has been overseen by the ForHealth Modern Slavery Committee, our Risk Committee and ultimately our 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 Group's Modern Slavery Committee in consultation with the business and has been approved by the Board of Limestone Holdco Pty Ltd.

<sup>&</sup>lt;sup>1</sup> United Nations, 1948. Universal Declaration of Human Rights available at <a href="https://www.un.org/en/about-us/universal-declaration-of-human-rights">https://www.un.org/en/about-us/universal-declaration-of-human-rights</a>

<sup>&</sup>lt;sup>2</sup> International Labour Organization, 1998. ILO Declaration on Fundamental Principles and Rights at www.ilo.org/declaration/thedeclaration/textdeclaration/WCMS\_716594/ lang--en/index.htm



# (b) <u>Reporting Entities</u>

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.



# 2. Our business, structure, operations & supply chains

# (a) Our business

The ForHealth Group has not changed its business structure from our first Statement during the Relevant Period.

It's registered office is in Leichhardt, New South Wales and it provides accessible, highquality, patient-centric healthcare services. ForHealth is committed to delivering excellence in healthcare in Australia.

We provide facilities 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 80+ large multi-service medical and dental centres include 40 outer metro / regional sites. We also support more than 180 independent dentists from 60 dental centres.



ForHealth sites operate as a single point of primary care for the community. This includes independent GPs, nursing treatment rooms, chronic disease facilities, pathology, extensive imaging capabilities, medical specialists, independent allied practitioners, dental services and pharmacies. 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 continue to play an essential role in the COVID-19 pandemic by delivering to date over 460,000 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 we 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 provides facilities and services to independent GPs who operate their own businesses from within our various large multi-services medical and dental centres.

The facilities and services we provide to our independent GPs include 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 also supports the operation of imaging, pathology collection, pharmacy and physiotherapy services within many medical centres by offering facilities via lease agreements to these providers.

#### **Primary Dental**

ForHealth also operates 60 dental facilities primarily co-located in its medical centres and provides facilities and services to over 180 independent dentists. Similar to the services we provide to our independent GPs, ForHealth provides similar facilities and services to its independent dentists.

#### **Allied Health**

Further, we provide facilities and services to various allied health professionals who provide their patients with physiotherapy, podiatry, dietetics and psychology services. 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; and

- **LogicHealth** | supporting occupational health and workers compensation injury management, onsite health and injury prevention solutions as well as job specific preemployment medical systems. We also have various GPs dedicated to the diagnosis and treatment of skin cancer and provide immigration services to new migrants into the country.

# (c) Our Supply Chains

Details of our supply chain and countries of origin are set out in **Annexure B.** 

# 3. FY22 Assessment of Modern Slavery risks

ForHealth sources various healthcare-related products and services, as well as usual business-related products and services and draws from both domestic and international suppliers to ensure the provision of quality and, where possible, ethical products.<sup>3</sup>

# (a) <u>Assessing & identifying key risks in our supply chain</u>

During the Relevant Period, our Modern Slavery Committee continued to map the Group's supply chain and completed an updated assessment of each first-tier supplier in all of the key supply categories<sup>4</sup> to identify potential risks of modern slavery by evaluating each first-tier supplier and class of product/service against a risk matrix. Specifically,

- our Modern Slavery Risk Matrix (see **Annexure A**) was updated for the Relevant Period, prioritising suppliers by spend (and therefore our influence), the risk by country and by industry consistent with the *Global Slavery Index 2018*.
- we updated our supply chain categories by source of country (see **Annexure B**).
- the following categories of goods in our supply chain were identified as having a <u>high</u> <u>risk of modern slavery</u>:
  - Personal Protective Equipment (PPE) including gloves (sourced from China, Malaysia and Thailand)
  - **Cotton Uniforms** (sourced from China and India)
  - **Coffee** (sourced from Colombia)
  - **IT Hardware** (sourced from China, India and Vietnam)
  - IT Software (sourced from China, Indonesia, India and Thailand)
- the following categories were identified as having a **moderate risk of modern** slavery:
  - Medical Consumables other than PPE and gloves (sourced from China and Malaysia)
  - Dental Consumables other than PPE and gloves (sourced from China, Malaysia and Japan)
  - **Stationary** (sourced from China)
  - **Dental laboratory services** (sourced from China)
  - Professional Services such as offshore debt collecting services (sourced from the Philippines) and IT Support (sourced from India)
  - Offshore typists (sourced from India)
  - **Cleaning** (sourced in Australia).

<sup>&</sup>lt;sup>3</sup> Ethically sourced means that products and services from each point of a business's supply chain are obtained in an ethical way, which includes upholding rights, decent working conditions, health and safety, good business ethics and more

<sup>&</sup>lt;sup>4</sup> **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)



# 4. FY22 Actions taken to Assess & Mitigate Modern Slavery Risks

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

## (a) Existing Suppliers Due Diligence

During the Relevant Period, for all suppliers identified as high risk (all tier 1 suppliers), we have:

- continued to confirm the countries that such suppliers supply products or services from including, where possible, suppliers of those suppliers (2<sup>nd</sup> tier);
- sent all such suppliers a copy of our Supplier Code of Conduct and received confirmation that they will comply;
- required each such supplier to complete a detailed Supplier Questionnaire which includes various detailed questions on modern slavery governance and employee conditions;
- requested copies of such suppliers' Modern Slavery governance documentation including modern slavery policies, procurement policies supplier codes of conduct and supplier questionnaires; and
- reviewed responses to the Supplier Questionnaire from all such suppliers and identified areas of improvement.

## (b) Deep Dives into high-risk suppliers

During the Relevant Period, ForHealth conducted various *deep dives* into our highest risk supplier categories **that we could influence a change in behaviour over**. These were suppliers providing:

- Medical PPE sourcing from China, Malaysia, Thailand and Vietnam; and
- **<u>Cotton Uniforms</u>** sourcing from **China**, **Vietnam and India**.

## The 'deep dive' process

For the above high-risk suppliers, ForHealth performed further due diligence by sending a 'deep dive' questionnaire to be completed.

The 'deep dive' questionnaire was designed with external experts with specific questions to gain a better understanding of the suppliers' supply chain, their ultimate source countries for raw materials and specific risk regions (such as the *Xinjiang Uyghur Autonomous Region of China*), their labour hire practices (including whether any of their suppliers are on the *Uyghur Forced Labour Prevention Act Entity List*) and their processes to mitigate risks of modern slavery.

## Key learnings from deep dives

Key take outs from the 'deep dive' process included:

- all Suppliers identified completed the 'deep dive' questionnaire.
- <u>no</u> Supplier reported having any raw material or supplier who manufactured products or purchased products in or around the *Xinjiang Uyghur Autonomous Region of China* and no supplier is aware of any of their suppliers being on the *Uyghur Forced Labour Prevention Act Entity List.*
- most suppliers were fairly sophisticated and organised having Modern Slavery policies and compliance training in place;



• some suppliers were less advanced and are in the early stages of mapping their supply chains. Our Modern Slavery Committee will continue to work with these suppliers to improve their processes and procedures.

## (c) Updating existing whistle-blower reporting processes

ForHealth has an existing whistle-blower policy through which we encourage and expect our employees and contractors to report concerns. Our Whistle-blower hotline is managed by **a third party to ensure confidentiality and integrity**.

During the Relevant Period, ForHealth updated its existing whistle-blower reporting process to include a separate category for '*Modern Slavery*' concerns in addition to the existing categories of:

- Fraud and Corruption;
- Bullying, harassment or discrimination;
- Unethical Conduct or Conflict of Interest;
- Workplace health & safety;
- Data, information security or privacy; and
- Security issue or incident.

This change has been communicated to our employees and contractors.

Training on the policy is mandatory annually and is part of all onboarding process.

## (d) Introduction of supplier modern slavery reporting (online)

In addition to updating the existing whistle-blower reporting process for employees and contractors, ForHealth has also introduced a new **Supplier Modern Slavery Reporting form** which is primarily designed for our suppliers, employees or contractors of our suppliers or their suppliers. This initiative allows the employees of our suppliers to raise any concerns they have about their own practices and procedures in a confidential way.

This change has been communicated to all our suppliers that form the key supply categories.

## (e) Modern Slavery training

In our inaugural Modern Slavery Statement, ForHealth recognised that training our employees will help the identification of modern slavery practices in our supply chain.

During the Relevant Period, a Modern Slavery training module was developed and implemented. Completion of the module is mandatory for all existing and new employees and includes training on the Modern Slavery Policy, Procurement Policy and Supplier Code of Conduct.

The e-learning module for all staff will be renewed every 2 years and is included as part of the Group's onboarding process for new employees and contractors.

## (f) Adherence to established policies

During the Relevant Period, the Group has maintained compliance with, and adherence to, the existing following policies and procedures:

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



The Modern Slavery Committee meets monthly to discuss any required updates to policies, compliance and training.

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

#### Modern Slavery Policy

This 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.

#### **Remediation Plan**

ForHealth Group recognises the importance of not only identifying potential modern slavery risks but also developing a plan for what actions may be appropriate if a risk was found in the Group's supply chain, or one of our supplier's supply chains.

In the next reporting period, ForHealth will look to develop a remediation framework that will guide us in dealing with any such instances of suspected modern slavery practices (**Remediation Plan**). The Remediation Plan will provide actions in respect of ensuring that a response is appropriate and proportionate to the breach and that the parties are properly remediated, recognising the survivor's needs and safety and taking into account our level of influence over the relevant supplier.

#### **Procurement Policy**

This policy is guided by key principles including:

**Fair Dealings:** ForHealth 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:** our suppliers must complete a supplier questionnaire which sets out various questions relating to modern slavery.

Supplier Code of Conduct: all suppliers are required to comply with our Supplier Code of Conduct.

#### **Supplier Code of Conduct**

This code sets out the standards expected 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.

#### 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.

#### Whistle-blower Policy

Through our Whistle-blower Policy, the Group encourages and expects our employees, contractors and suppliers to report concerns including Modern Slavery concerns or breaches of our Procurement Policy and Supplier Code of Conduct.



## (g) Impact of Covid-19

We have, and will continue, to support suppliers in impacted countries by engaging fairly including maintaining orders, fostering open communication with suppliers about COVID-19 risks and being flexible with delayed timelines.

## (h) Modern Slavery warranties

We continue to incorporate clauses into our 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 their operations and supply chains.

## (i) <u>A robust Corporate Risk framework</u>

ForHealth operates within an accountable system that includes corporate governance and risk management policies and practices. These are designed to promote and strengthen the Group's responsible management.

ForHealth manages risk through robust governance structures that include 13 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.

# Risk Governance Framework incl. responsibilities and governing documents

Structure	Responsibility	Governing document
Board	Approves governance framework Oversee Risk Management Receive reports on key L6 risks Consider key risks & effectiveness of controls Considers sufficiency of resources	<ul> <li>Risk Management Policy</li> <li>WHS Governance (POL-003-02)</li> <li>Risk Committee Charter</li> </ul>
Risk Committee Made up of executives, GMs and clinical & functional leads	Design Framework Identify, Prioritise, Manage & Mitigate L6 Risks Reports Material Risks to Board (owner of Corporate Risk Register) Ensure WHS team is adequately resourced	<ul> <li>Risk Committee Charter</li> <li>Corporate Risk Register</li> <li>Functional Risk Registers for Corporate, MC, Dental, IT, Property, Finance, Legal, Clinical</li> </ul>
Modern Slavery committee Clinical Governance committee State Medical Centre risk committees Dental national meeting Nursing national 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 material risks/concerns to Risk Committee	<ul> <li>Modern Slavery Policy</li> <li>Medical Centres Compliance Program (GUI- 002-01)</li> <li>Medical Centres Clinical Governance</li> <li>Primary Dental Governance systems</li> <li>Nursing Care Governance</li> </ul>
1 on 1 meetings between National WHS, Chair of Risk Committee & each Member Risk Committee	Discuss, Identify and Report on Risks & Near Misses	<ul> <li>Functional Risk Registers (Finance, Property, IT, HR, Operational, Legal, Clinical)</li> </ul>
MC, Dental & Nursing Regional & 3 Pillars meetings	Risk/hazard identification & day to day compliance of safety/risk management system	As above

The Risk Committee actively manages 25 key level 6 corporate risks (including 15 high level risks) via 13 separate risk registers.





# 5. Assessment of Effectiveness of Risk Reduction Actions

ForHealth is committed to continuing to evolve and strengthen its response and strategies toward mitigating and, where possible, eliminating Modern Slavery risks in our supply chain. We assess our effectiveness of our risk reduction actions in FY22 as follows:

- our Modern Slavery Committee has ensured that each supplier identified as having a high risk of modern slavery has completed a Supplier Questionnaire, received a copy of our Supplier Code of Conduct and confirmed their agreement to comply with it. We can confirm that **all 13 high-risk suppliers** (with expenditure over \$100,000 in FY22) have responded to the Supplier Questionnaire. The responses have been reviewed by the Modern Slavery Committee and some gaps have been identified with 4 of the 13 suppliers. Those gaps have been followed up with the relevant suppliers and we continue to work with these suppliers in FY23 to support them in closing these gaps. Our process of ensuring we have a completed Supplier Questionnaire from each of our 'high-risk' suppliers and our deep dives has raised awareness and education amongst our suppliers.
- No reports were received during the previous relevant period through whistle-blower hotline. The Modern Slavery Committee will closely monitor any reports that are received via the whistle-blower hotline (or otherwise) of suspected or actual modern slavery and will review communication of this hotline to our employees and suppliers in the next reporting period.
- In accordance with our commitments in our previous year's Modern Slavery Statement, we can confirm that the new training module, Modern Slavery e-learning, is now available for all staff and will be renewed every 2 years. It is included as a mandatory training module as part of the Group's onboarding process for new staff members. For the next reporting period, we will endeavor to conduct a survey to assess the effectiveness of this training module.



## Next Steps

We acknowledge that addressing modern slavery risks can be a complex and challenging process. We are committed to continuing to evolve and strengthen our 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:

## (a) Existing Suppliers – high risk

- Our Modern Slavery Committee will continue to assess and reassess the risk rating of our tier 1 suppliers in accordance with our Risk Matrix (see **Annexure A**).
- If the risk rating of a supplier remains high, ForHealth will 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 supplier if unsatisfied with the supplier's progress or if the risk is too high (e.g. if they operate or obtained supplies from the *Xinjiang Uyghur Autonomous Region of China*) or any of their suppliers are on the *Uyghur Forced Labour Prevention Act Entity List*.

#### (b) Existing Suppliers – moderate risk

We will commence a due diligence process for all suppliers' identified as having a moderate risk by sending Suppliers Questionnaires to such existing suppliers.

## (c) Further 'deep dives'

We will perform further '*deep dives*' into identified high-risk suppliers by performing additional due diligence on their supply chains and practices adopted to aid mitigation of risk of modern slavery.

This process will include sending a 'deep dive' questionnaire to be completed with specific questions around the suppliers' supply chain, their ultimate source countries for raw materials and specific risk regions (such as the Xinjiang Uyghur Autonomous Region of China), their labour hire practices (including whether any of their suppliers are on the Uyghur Forced Labour Prevention Act Entity List) and their processes to mitigate risks of modern slavery.

The Modern Slavery Committee will ensure that responses to the deep dive questionnaire are satisfactory and regular follow-ups will be scheduled for suppliers that may not have formal processes and policies in place to mitigate risks of modern slavery.

#### (d) <u>New Suppliers</u>

- As part of our new supplier engagement program, we will continue to ensure that potential new suppliers complete the Supplier Questionnaire which includes various questions on modern slavery and employee labour compliance.
- We will also ensure new 'high & medium risk' suppliers with a budgeted spend of over \$100K in FY23 receive a copy of our Supplier Code of Conduct and confirm compliance with it.
- As part of this process, we will confirm which country products/services are sourced from and will rank potential suppliers against our Risk Matrix.
- We will also continue to ensure that modern slavery warranties be included in our supplier procurement agreements.

## (e) <u>Training</u>

As noted above, the Modern Slavery e-learning module is now available for all staff and will be renewed every 2 years. It is included as a mandatory training module as part of the Group's



onboarding process for new staff members.

## (f) Collaboration

In order to demonstrate ForHealth's ongoing commitment to identifying modern slavery risks, the Group will consider initiatives that involve business units regularly collaborating through human rights forums to share lessons learned and build knowledge. This will continue to build human rights awareness and knowledge among team members.

## (g) Monitor Whistle-blower complaints

We will ensure ForHealth continues to monitor complaints provided to our third-party under our whistle-blower policy from employees, contractors and suppliers.

## (h) <u>Continued review relevant policies and procedures</u>

Our ForHealth Group policies which ensure compliance with all legislation and help to mitigate modern slavery risks will be reviewed annually and communicated to all employees when changes are made.

# 6. Consultation between Owned & Joint Reporting Entities

As noted in the company 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 and they operate as one common entity.

The Modern Slavery Committee is responsible for consulting with all ForHealth Group entities and our procurement team is responsible for procurement across the supply chain of all Group entities. For the Relevant Period, the membership of the Modern Slavery Committee was Melinda Harrison, General Counsel for all ForHealth Group entities, Saheba Kaur, Senior Legal Counsel for all ForHealth Group entities and Maddy Ragula, Head of Procurement for all ForHealth Group entities. The Modern Slavery Committee consulted with all Group entities as part of their function.

Further, when determining high risk suppliers, the Modern Slavery Committee considered suppliers of each Group entity and ranked them according to the Modern Slavery Matrix set out in **Annexure A**.

Given the above, we are comfortable that modern slavery risks have been appropriately identified, assessed and addressed and each entity has been consulted and is aware of their agreed actions.

# 7. Board Approval

This Statement has been prepared by the Modern Slavery Committee in accordance with section 13 of the Modern Slavery Act 2018 (Cth) in consultation with each of the ForHealth Group subsidiaries and has been reviewed and approved by Board of Directors of Limestone Holdco Pty Ltd on 29 November 2022.

Andrew Cohen Director / CEO Limestone Holdco Pty Ltd Dated: 6 December 2022





# Annexure A – Modern Slavery Risk Matrix

# Risk matrix assessing unmitigated modern slavery risks Some risk

Low risk

Moderate risk High risk

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

Footnote: Based from the Global Slavery Index 2018





# Annexure B – ForHealth supply chain

# ForHealth | supply chain categories by country sourced

Property & Facilities	Vendor Origin (s)	Sourced	Corporate Supplies	Vendor Origin (s)	Sourced
easing property		Australia	IT hardware*	Australia	China, USA, Singapore, India, Japan
utgoings expenditure			IT Software & Subscription Services	Australia	Australia, India, USA, China, Japan,
Cleaning			(e.g., Seek, LinkedIn, HotDocs)	Australia	Singapore, Thailand, Indonesia,
Waste management	Australia		Professional Services (e.g., Legal, Accounting, Recruiting)	Australia	Australia, India
Construction	Australia		Offshore accounting	India	India, Philippines
HVAC maintenance			Print Services	Australia	Australia
Fire systems maintenance			Travel	Australia	Australia
Trade services				Australia	India
	Consumables		Typists	Australia	
Medical consumables		China, Malaysia &	Print Service	Australia	Australia
	Thailand	Medical Accreditation	Australia	Australia	
Dental consumables		Eur, USA, Japan, China & HK			
Dontal aquinment		Eur, USA, Japan & China	Utilities		
Dental equipment			Electrical		Australia
Dental laboratory Services		Australia, China & HK	Gas		
Uniforms	Australia	China, Vietnam & India		Australia	
Paper		Australia	Water		
Medical Gas		Australia			
Stationery		China			
Coffee	1	Brazil, Colombia			

Dell – Hardware supplier As production levels around the world shift daily, supplier volumes also shift to meet demand. Dell will not be able to provide list of suppliers. Refer to link for list of suppliers : <a href="http://i.dell.com/sites/doccontent/corporate/corp-">http://i.dell.com/sites/doccontent/corporate/corp-</a>

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