

Modern Slavery Statement 2023

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. About this Statement

Introduction

ForHealth is pleased to release its 2023 Modern Slavery Statement (**Statement**) covering the period from 1 July 2022 to 30 June 2023 (**Relevant Period**) in accordance with the *Modern Slavery Act (Cth) 2018* (the **Act**). It is our third Modern Slavery Statement.

With the number of people impacted by modern slavery rising each year and an estimated 50 million living in modern slavery on any given day in 2021¹, we consider human and workplace rights of utmost importance and support the intent of international covenants including the *United Nations' Universal Declaration of Human Rights*² and the *International Labour Organization's Declaration on Fundamental Principles and Rights at Work and its Follow-up*³.

Our ongoing commitment to identify, assess, manage and mitigate our modern slavery risks has been overseen by the ForHealth Modern Slavery Committee, our Risk Committee and ultimately our Board. We are committed to contributing to the elimination of modern slavery.

2. Our modern slavery journey so far



¹ Global Slavery Index 2023

² United Nations, 1948. Universal Declaration of Human Rights available at <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

³ International Labour Organization, 1998. ILO Declaration on Fundamental Principles and Rights and its Follow-up at <https://www.ilo.org/declaration/thedeclaration/lang-en/index.htm#:~:text=The%20ILO%20Declaration%20on%20Fundamental,our%20social%20and%20economic%20lives.>

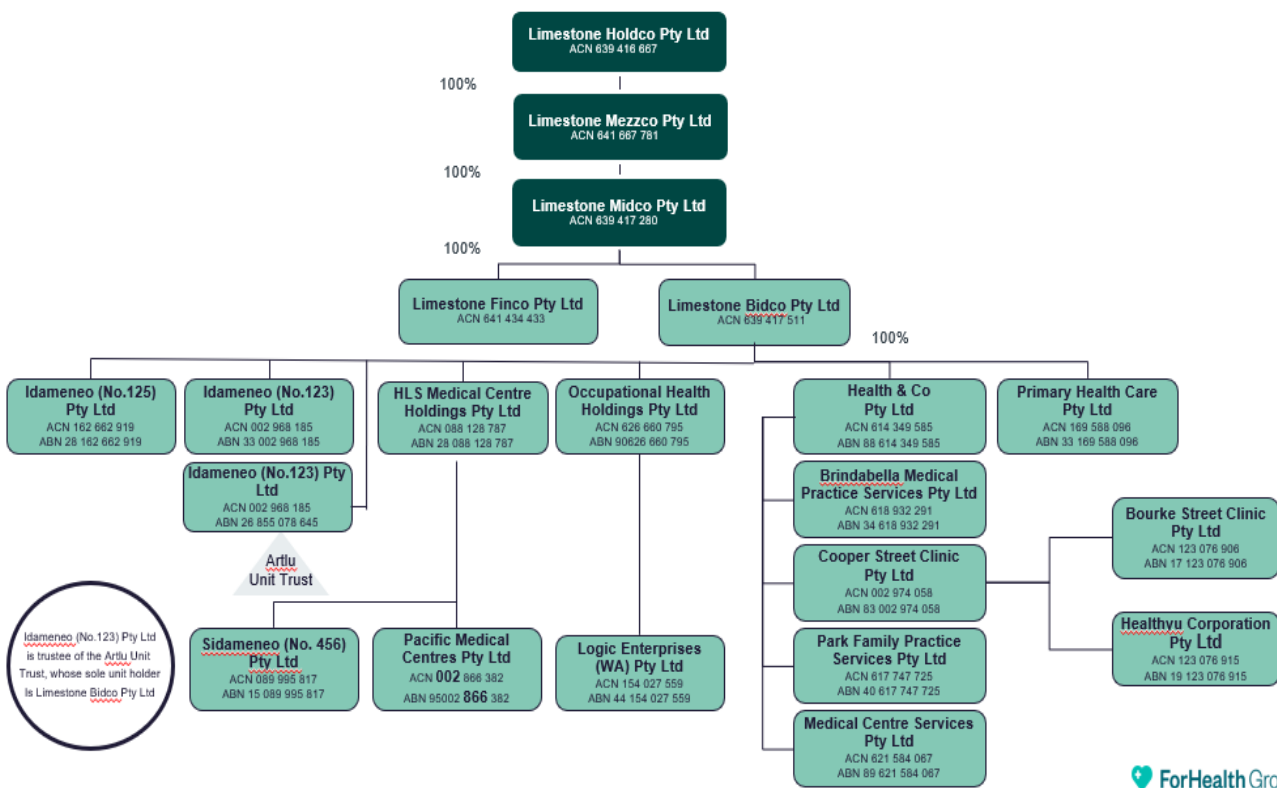
3. Our reporting entities

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,
- Idameneo (No. 123) Pty Ltd ACN 002 968 185,
- Occupational Health Holdings Pty Ltd ACN 626 660 795, and
- Health & Co Pty Ltd (ACN 614 349 585)

(collectively the **Reporting Entities**).

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



4. Our business, structure, operations & supply chains

(a) Our business

ForHealth has not changed its business structure materially from previous Statements.

ForHealth employs approximately 2,500 staff nationally (inclusive of full time, part-time and casual staff). 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 6 million patient visits and 1.5 million individual patients each year. Our 80+ large multi-service medical and dental centres include more than 40 outer metro / regional sites. We also support more than 200 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, LGBTQA+ health, immigration, and mental health.

More recently, ForHealth has been awarded 30+ urgent care facilities around Australia by Federal and relevant State governments, where we are working with relevant governments, communities and public hospitals to reduce the pressure on Australia's hospital system. These facilities play a vital role in caring for urgent care patients, which in turn, protects our hospital system from overcrowding and are able to serve patients at a third of the public cost.

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.

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.

(b) Our operations

Medical Centres

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 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 operates 60 dental facilities primarily co-located in its medical centres and provides facilities and services to over 180 independent dentists, who in turn service our communities and their patients.

Urgent Care

ForHealth has been awarded 30+ urgent care facilities around Australia, working with both Federal and State Governments to reduce pressure on emergency departments by allowing the redirection of category 4 and 5 injuries to our urgent care treatment rooms.

Allied Health

ForHealth also provides facilities and services to various allied health professionals who provide their patients with physiotherapy, podiatry, dietetics and psychology services. We also support occupational health and workers compensation injury management, onsite health and injury prevention solutions as well as job specific pre-employment medical systems. There are various independent GPs who are dedicated to the diagnosis and treatment of skin cancer and provide immigration services to new immigrants into the country.

(c) Our Supply Chain

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 products⁴.

Our supply chain is comprised of the following product / service categories:

<p>Medical consumables</p> <ul style="list-style-type: none"> • includes PPE, rubber gloves, masks, bandages, needles, etc 	<p>Dental & Laboratory services</p> <ul style="list-style-type: none"> • includes all dental consumables and dental equipment, imaging, manufacturing of crowns & bridges 	<p>General Procurement</p> <ul style="list-style-type: none"> • includes cotton uniforms, office supplies and coffee 	<p>Corporate Services</p> <ul style="list-style-type: none"> • includes stationary, training, accreditation services and travel management 	<p>IT</p> <ul style="list-style-type: none"> • includes all software and hardware components & devices
<p>Facilities Management</p> <ul style="list-style-type: none"> • includes cleaners, waste removal and general maintenance 	<p>Utilities</p> <ul style="list-style-type: none"> • includes gas, water, electricity and solar 	<p>Construction Services</p> <ul style="list-style-type: none"> • includes fit-outs, renovations, <u>greenfields</u> & brownfields construction and trade services 	<p>Professional Services</p> <ul style="list-style-type: none"> • includes marketing, offshore accounting, legal services, typists & financial auditing services 	

5. Risks - FY23 Assessment of Modern Slavery risks

When considering modern slavery risk in our supply chain, ForHealth takes a '**risk-based influence**' approach to ensure resources are directed to those suppliers that have higher modern slavery risk profile and who we also have most influence over. For example, we are unlikely to be able to influence where Apple procures its components from but, on the other hand, will have more influence over our medical consumable suppliers.

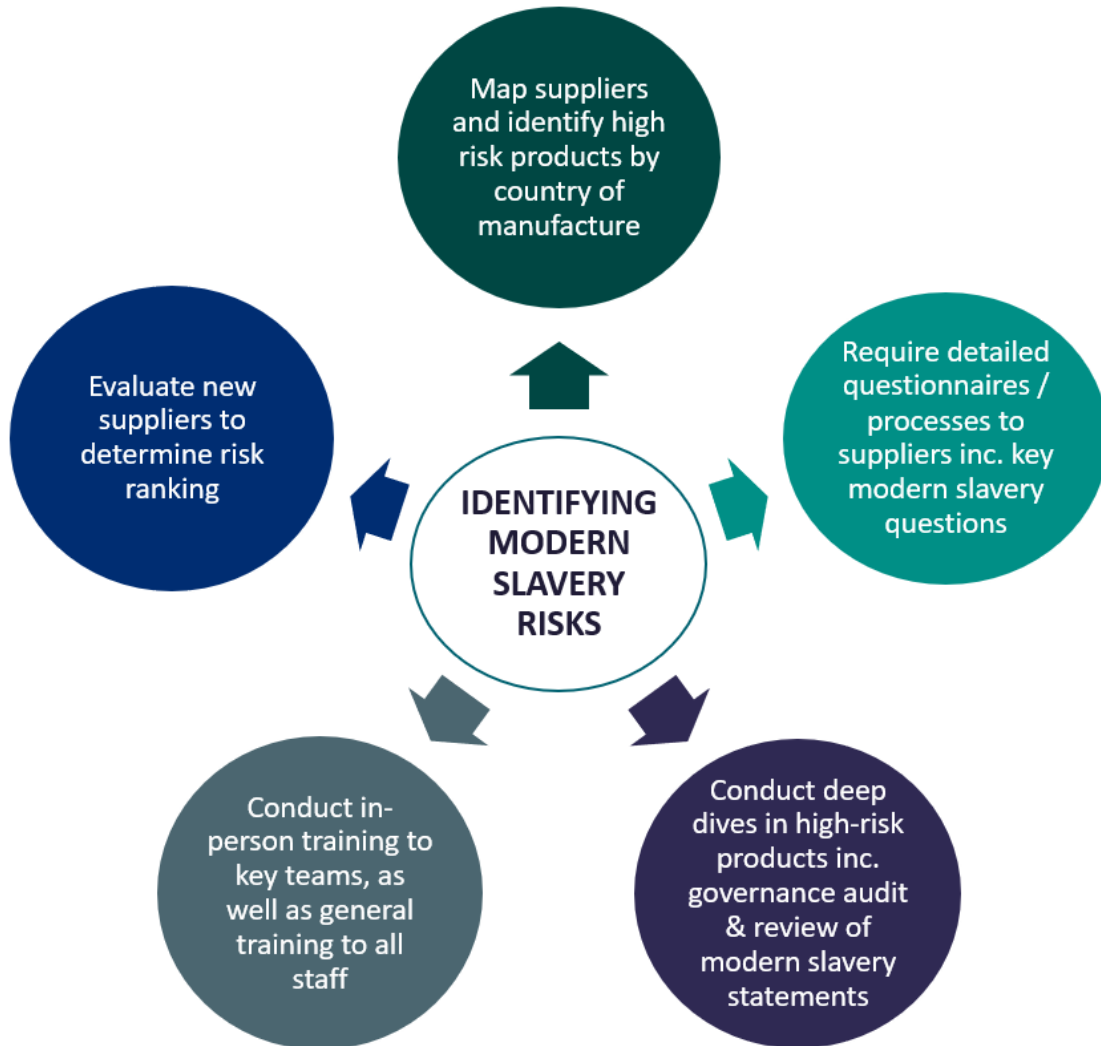
(a) Assessing & identifying key risks in our supply chain

During FY23, our Modern Slavery Committee continued to map the Group's supply chain and completed an updated assessment of each first-tier supplier in all key supply categories 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 2023*.

⁴ **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 and good business ethics

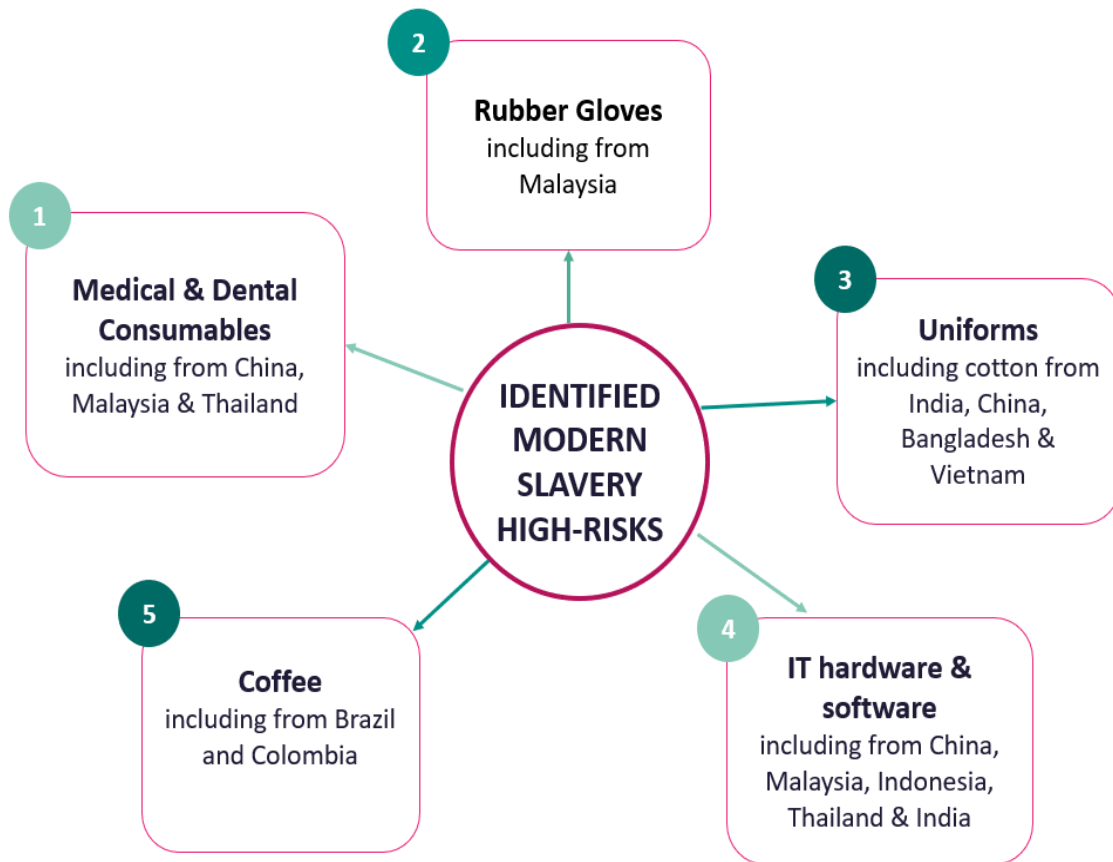
ForHealth considers its modern slavery risks using the following methods:



The following categories were identified as having a **high &/or moderate risk of modern slavery**:

- **Medical Consumables other than PPE and gloves** (sourced from China & Malaysia)
- **Dental Consumables other than PPE and gloves** (sourced from China, Malaysia & Japan)
- **Stationary** (sourced from China)
- **Dental laboratory services** (sourced from China)
- **Professional Services such as offshore accounting services** (sourced in India & Philippines)
- **Offshore typists** (sourced from India)
- **Cleaning** (sourced in Australia)
- **Coffee** (sourced in Brazil and Colombia)
- **IT Hardware & Software** (sourced in China, Indonesia, India & Thailand)
- **Uniforms** (sourced in Vietnam & China)

During FY23, the following products/services were identified by ForHealth as high-risk categories:



6. Actions – FY23 actions taken to mitigate Modern Slavery Risks

During FY23, we conducted various actions to address the risks identified as part of our risk assessment.

(a) A robust governance framework

Our robust governance policy framework provides a strong foundation for the Group to monitor and combat modern slavery risks in our operations and supply chains. In FY23, ForHealth continued to maintain, implement and monitor compliance with existing policies and procedures.



(b) A comprehensive corporate risk structure

ForHealth manages risk through robust governance structures that include 13 separate risk registers which identify and prioritise 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.

	Structure	Responsibility	Governing document
Meet monthly	Board	<ul style="list-style-type: none"> Oversee Risk Management Receive reports on key L6 risks Consider key risks & effectiveness of controls Considers sufficiency of resources 	<ul style="list-style-type: none"> Risk Management Policy WHS Governance (POL-003-02) Risk Committee Charter
Meet quarterly	Risk Committee Made up of executives, GMs and clinical & functional leads	<ul style="list-style-type: none"> Design Framework Identify, Manage & Mitigate L6 Risks Reports Material Risks to Board (owner of Corporate Risk Register) Ensure WHS team adequately resourced 	<ul style="list-style-type: none"> Risk Committee Charter Corporate Risk Register Functional Risk Registers for Corporate, MC, Dental, IT, Property, Finance, Legal, Clinical
Meet monthly	Modern Slavery committee Clinical Governance committee State Medical Centre risk committees Dental national meeting Nursing national meeting	<ul style="list-style-type: none"> 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 style="list-style-type: none"> Modern Slavery Policy Medical Centres Compliance Program (GUI-002-01) Medical Centres Clinical Governance Primary Dental Governance systems Nursing Care Governance
Meet monthly	1 on 1 meetings between National WHS, Chair of Risk Committee & each Member Risk Committee	Discuss, Identify and Report on Risks & Near Misses	<ul style="list-style-type: none"> Functional Risk Registers (Finance, Property, IT, HR, Operational, Legal, Clinical)
Meet weekly/fortnightly	MC, Dental & Nursing Regional & 3 Pillars meetings	Risk/hazard identification & day to day compliance of safety/risk management system	

(c) Deep Dive into medical rubber gloves suppliers

In March 21, U.S. Government banned imports from world's largest glove supplier with *evidence of forced labour*.



During FY23, ForHealth conducted a deep dive into one of our highest risk supplier categories – **Medical Rubber Gloves** sourced from Malaysia.

The 'deep dive' process

For these high-risk suppliers, ForHealth performed additional due diligence by sending a 'deep dive' questionnaire to each supplier of rubber gloves. The questionnaire was designed to assist us gaining a more thorough understanding of these suppliers' supply chains with targeted questions concerning:

- geographical locations of their suppliers;
- countries of origin of raw materials;
- if any of their suppliers were subject to (or have been previously subject to) 'Withhold Release Orders' issued by US Customs and Border Protection;
- the nature of suppliers' and their second-tier supplier workforce including employees on temporary visas or engaged by labour hire organisations and confirming working conditions, details of any child labour and request for provision of their and their suppliers' relevant policies and procedure;
- details around the existence of a remediation framework to respond to suspected or reported instances of modern slavery; and
- their policies, procedures and governance.

Key learnings

- All suppliers of rubber gloves completed the questionnaire;
- All suppliers of rubber gloves have a modern slavery policy;
- All of our suppliers had mapped their first-tier supply chain but most had not fully mapped their second-tier supply chain (e.g. supplier's suppliers and so forth);
- Some suppliers sourced products from Malaysia;
- More work was required in ensuring their supplier's suppliers had modern slavery policies and other good governance requirements;
- No supplier has been issued with a 'Withhold Release Order' issued by the US;
- Suppliers needed more work on their remediation framework.

(d) Map suppliers against the new Global Slavery Index of 2023

During FY23, for all suppliers identified as high risk, we have:

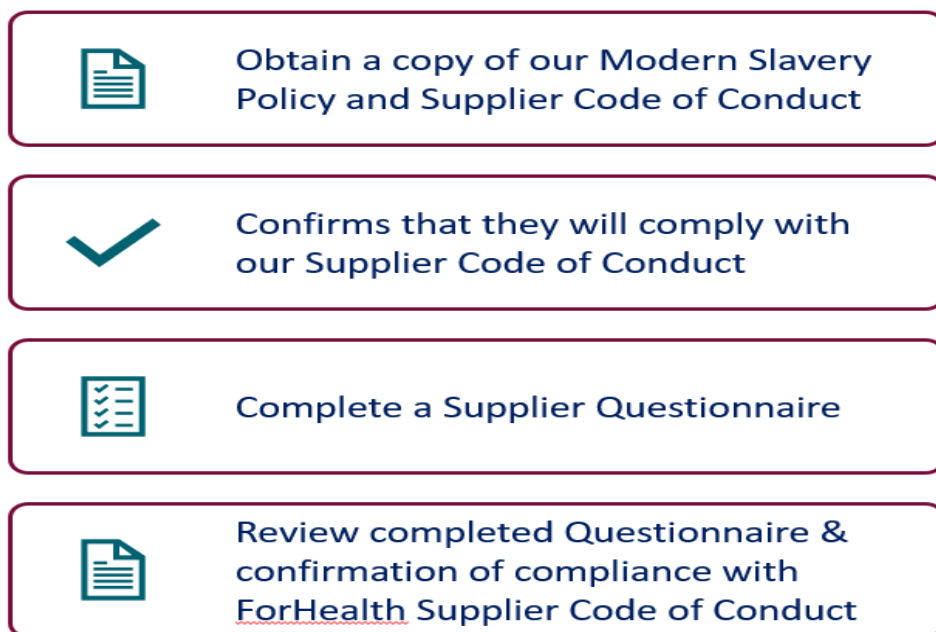
- continued to confirm the countries that such suppliers source products or services from;
- sent all such suppliers a copy of our Supplier Code of Conduct and received confirmation that they will comply;

- required each such supplier to complete a detailed Supplier Questionnaire which includes various questions on modern slavery governance and employee conditions; and
- mapped existing suppliers against the New Global Slavery Index 2023 and updated our Modern Slavery Risk Matrix accordingly (**Annexure A**).

(e) Ensure compliance against our Supplier onboarding process

During FY23, we further developed our Supplier onboarding process and conducted ‘*in person*’ training of functional leaders, managers and procurement staff on the updated Supplier on-boarding process.

Supplier on-boarding



(f) Revitalised Modern Slavery training

During FY23, we:

- revitalised our existing Modern Slavery training to all staff to ensure training incorporates:
 - changes to our Modern Slavery systems and processes
 - a broad understanding across the organisation of the business’ commitment to address risks of modern slavery in our operation and supply chain.
- developed and conducted targeted training for executive, management and procurement leads so that those liaising with suppliers were clear on the business’ requirements and objectives in relation to Modern Slavery.

(g) Conducted an external Modern Slavery assessment

We also took part in an external Modern Slavery Assessment whereby our FY22 Modern Slavery Statement was analysed by an external party to identify areas of improvement. We then implemented appropriate changes to this Statement and our procedures as a result, as well as identified areas of improvement for future improvements.

7. Effectiveness – Assessment of effectiveness of FY23 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 FY23 as follows:

- **Procurement process compliance:** Our Modern Slavery Committee ensures compliance with our procurement and onboarding processes. In FY23, the Committee reviewed and assessed a sample of high-risk suppliers' responses to our Supplier questionnaires. From the sample selected, all high-risk suppliers were compliant.
- **Modern Slavery Hotline:** The Committee continues to consider and report on whistleblower and/or modern slavery instances. No reports were received during FY23 through the whistle-blower or Modern Slavery hotline.
- **FY23 Actions:** With respect to our FY23 actions, we can confirm that:
 - Deep dives were conducted into our suppliers of rubber gloves, all 4 suppliers replied to our requests, answers were analysed and learnings documented;
 - New and existing suppliers continue to be managed and reviewed for compliance, as noted above;
 - The new training module that was introduced during FY23, has a completion rate of over 82%. The e-learning module is included as a mandatory training module as part of the Group's onboarding process for new staff members.
 - All managers involved in procurement completed personal one-on-one training to ensure they understood our processes and the reasons behind it.

8. Next Steps and forward commitments

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) Develop a remediation framework

ForHealth recognises the importance of developing a plan for what actions may be appropriate if a risk was found in our or one of our supplier's supply chains.

In FY24, ForHealth plans to establish a remediation process for handling incidences of modern slavery breaches and will help guide us in determining what steps we must take as a business if Modern Slavery is found in our supply chain. The actions provided in the framework will ensure that a response is appropriate and proportional to the breach.

In FY23, ForHealth had no reported incidents of modern slavery breaches that required remediation.

(b) Deep dive into cleaners of our medical & dental centres

ForHealth recognises that through-out the world domestic helpers and cleaners are often at high-risk of modern slavery. In our supply chain, we classify cleaners as medium risk (see **Appendix A: Modern Slavery Risk Matrix**).

In FY24, we will conduct a deep dive into our key suppliers of cleaners to understand our supply chain more closely and, where possible, minimise the risk of modern slavery.

(c) Conduct a survey to determine the effectiveness of training

The survey is currently in development, and we commit to roll it out in the next financial year. The objective is to improve our training and ensure our training goals remain relevant and are being achieved.

Questions will be designed to reveal participants' feedback. It will aim to show what improvements need to be implemented to make the training module more relevant. Key evaluation criteria will include relevance, coherence, effectiveness against goals, impact and level of engagement.

(d) Continue to work on gaps identified from our deep dives

We will continue to work with gaps identified in FY23 from our deep dives. ForHealth will continue to work with high-risk suppliers to encourage the development of processes and practices which mitigate the risks of modern slavery in their supply chain.

(e) Collaboration

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.

9. Consultation between Owned & Joint Reporting Entities

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 supply chain perspective they operate as one common entity.

The Modern Slavery Committee is responsible for consulting with all ForHealth Group entities. For the Relevant Period, the membership of the Modern Slavery Committee was Melinda Harrison, General Counsel, Saheba Kaur, Senior Legal Counsel and Tamim Rahman, Senior Legal Counsel. 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**.

Accordingly, modern slavery risks have been appropriately identified, assessed and addressed and each entity has been consulted and is aware of their required actions.

10. Board Approval

This Statement has been prepared by the Modern Slavery Committee in accordance with section 14 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 30 November 2023.



Andrew Cohen
Director / CEO
Limestone Holdco Pty Ltd
Dated: 30 November 2023

Annexure A – Modern Slavery Risk Matrix

Risk matrix assessing unmitigated modern slavery risks

Low risk Moderate risk
Some risk High risk

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							
		Low	Minor	Moderate	Major	High			
		Australia Scandinavia United States Austria Belgium United Kingdom Singapore Japan	Croatia Albania Japan Argentina Brazil	Mexico Peru Ecuador Turkey Hong Kong Honduras Vietnam	PNG Vietnam Colombia Guyana	Venezuela Sudan DRC Chad Somalia Taiwan	Indonesia Belarus Macedonia Turkmenistan Russia Colombia	Philippines Cambodia The Central African Republic PNG North Korea Malaysia	Thailand India Pakistan China Bangladesh
Likelihood assessed by industry	Highly likely <i>There is a high likelihood of modern slavery in these industries. Examples include:</i>	<ul style="list-style-type: none"> Cocoa Fishing Rice Diamonds Textiles Palm Oil PPE Coffee Electronics 	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)	Coffee (Colombia)	Uniforms (India, China, Bangladesh) Medical PPE (Thailand) IT Hardware (India) IT Hardware (China/ Malaysia) Medical & Dental PPE including gloves (Malaysia & China)		
	Likely <i>There is likely to be a risk of modern slavery. Examples include:</i>	<ul style="list-style-type: none"> Timber Construction Sugarcane Wheat Gold Rice Tobacco Corn 	Construction Services (Aust) Print service (Aust)			IT Software (Indonesia)	IT Software (India/ Thailand/ China)		
	Possible <i>It is possible there is a risk of modern slavery. Examples include:</i>	<ul style="list-style-type: none"> 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)		Dental lab services (China) Medical Consumables (China) Dental equipment (China) Stationery (China)		
	Unlikely <i>It is unlikely there will be a risk of modern slavery. Examples include:</i>	<ul style="list-style-type: none"> Professional services 	Dental lab services (Aust)				Offshore Accounting (Philippines) Typists (India) Professional services such as IT Support (India)		

Footnote: Based [from](#) the Global Slavery Index 2023