

## 1. Policy Statement

Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, whether adults or children, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain (**Modern Slavery**).

Sigma Healthcare Limited and its wholly owned subsidiaries (**Sigma Group**) have a zero-tolerance approach to Modern Slavery and is committed to an ethical and transparent approach to business, and the eradication of Modern Slavery. The Sigma Group expect its suppliers, contactors, business partners and external stakeholders to work with them to fulfil these common goals. Forced labour and the exploitation of vulnerable workers are abuses of basic human rights and have no place in the Sigma Group's operations or supply chains.

The *Modern Slavery Act 2018 (Cth)* (the **Act**) commenced 1 January 2019 and requires the Sigma Group to publish an annual report (**Modern Slavery Statement**) which documents Sigma Group's approach to assessing and addressing the risks of Modern Slavery in its operations and supply chains.

## 2. Purpose & Application

The purpose of this policy is to ensure that the Sigma Group:

- sets minimum Modern Slavery standards for their business and supply chains;
- helps prevent Modern Slavery in their business operations and supply chains;
- is compliant with the obligations set out in the Act;
- work with suppliers, contactors, business partners, and external stakeholders to ethically source goods and services; and
- assess, mitigate, and where appropriate, remedy the harm caused by Modern Slavery occurring in their business operations and supply chains.

This policy applies to all persons working for any member of the Sigma Group, or on their behalf, in any capacity, including (but not limited to) employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, supply chain participants and business partners (**Sigma Group Personnel**).

The Sigma Group expects the same standards from all of their suppliers, contractors, business partners and external stakeholders within their supply chains. The Sigma Group also expects that their contractors, business partners and external stakeholders will hold their own suppliers and other business partners to the same standards.

This policy does not form part of any employee's contract of employment and may be amended at any time.

## 3. Minimum Standards of Ethical Sourcing and Modern Slavery

The Sigma Group values, and is committed to, protecting human rights, eradicating Modern Slavery and ethical sourcing of goods and services across all areas of the Sigma Group's business. It is underpinned by the following minimum standards:

- Complying with the obligations set out in the Act;
- Providing safe and clean working conditions and workplace;
- Complying with relevant laws, including without limitation employment related laws; providing reasonable working hours and fair remuneration;

- Providing employment that is freely chosen and not forced<sup>1</sup> or bonded labour<sup>2</sup>;
- Not tolerating child labour and requiring compliance with the minimum legal working age (or absent such law, in compliance with the ILO Convention 138);
- Providing a work environment that is free from discrimination, harassment or any other inappropriate workplace behaviour;
- Promoting equal employment opportunities based on ability, performance and potential;
- Encouraging and respecting freedom of association and movement, and providing grievance mechanisms for workers to access;
- Prohibiting bribes, favours, benefits or other similar unlawful or improper payments in cash or kind in exchange for business or otherwise; and
- Seeking assurance from, or perform due diligence on, new (or renewing) suppliers to determine their risk, and their procedures adopted in relation to responsible and ethical sourcing and Modern Slavery.

## 4. Responsibility for the Policy

The Sigma Healthcare Limited Board of Directors has overall responsibility for ensuring this policy complies with its legal and ethical obligations, and that the Sigma Group's business and supply chains comply with it. The Sigma Group Board of Directors is also responsible for approving the Sigma Group's annual Modern Slavery Statement.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate time to attend and complete relevant training.

Employees and Sigma Group contractors are responsible for ensuring they understand this policy, participate in training, following this policy in their day-to-day activities and reporting any risks of Modern Slavery they identify in the Sigma Group's business or supply chains.

Suppliers to the Sigma Group are responsible for ensuring their employees and suppliers involved in the supply of goods or services to the Sigma Group understand and comply with this policy.

## 5. Communication

The Sigma Group will provide regular training to all employees on Modern Slavery and this policy. This will include training on how to identify Modern Slavery practices, and the business functions and supply chains that are subject to a greater risk of Modern Slavery practices. This training will also form part of the induction process for all individuals who work for us, whether as an employee or a contractor.

The Sigma Group's commitment to addressing the issue of Modern Slavery throughout the groups business and supply chains must be communicated to all contractors and supply chain participants at the outset of any business relationship with them and reinforced as appropriate thereafter (including by way of obligations included in the supply contract).

## 6. Complying with the Policy

All Sigma Group Personnel must ensure that they have read, understand and comply with this policy.

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<sup>1</sup> Forced labour is any work or service extracted from any person under the menace of any penalty, where such work has not been freely chosen by the person.

<sup>2</sup> Bonded labour is any work which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker's labour in exchange.

The prevention, detection and reporting of Modern Slavery in any part of the Sigma Group's business or supply chains is the responsibility of all Sigma Group Personnel. Sigma Group Personnel are required to avoid any activity that might lead to a potential or actual breach of this policy or relevant laws making Modern Slavery an offence (including but not limited to, Divisions 270 and 271 of the Criminal Code 1995 (Cth)). Sigma Personnel are encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of the Sigma Group's business or supply chains at the earliest possible stage.

If unsure about whether a particular act, the treatment of workers more generally or their working conditions within the Sigma Group's business or supply chain constitutes any of the various forms of Modern Slavery, raise it through the process set out in the Sigma Group's Whistleblowing Policy.

The Sigma Group aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Sigma Group is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery of whatever form is or may be taking place in any part of the group's business or supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should raise it using the process set out in the Sigma Group Whistleblowing Policy.

## 7. Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

A member of the Sigma Group may terminate their relationship with other individuals and organisations working on behalf of the Sigma Group if they breach this policy.

## 8. Supporting Policies

This policy intended to be read in conjunction with the Sigma's other governance policies and frameworks including:

- Code of Conduct;
- Health and Safety Policy;
- Diversity Policy;
- Anti-bribery and Corruption Policy;
- Whistleblower Policy;
- Environmental Management and Sustainability Policy; and
- Sigma's general approach to sourcing and contracting.

## 9. Reporting

In accordance with the Act, Sigma Management will develop and prepare a combined Modern Slavery Statement for Sigma and the Sigma Group for each financial year.

The Modern Slavery Statement must be endorsed by the Risk Management and Audit Committee and approved by the Board. The Board approved Modern Slavery Statement must be provided to the applicable regulatory authority for publication on an online central register within six months of the end of Sigma's financial year.

## 10. Document control and related documents

This policy will be periodically reviewed in accordance with the table below to check that it is operating effectively and whether any changes are required to the policy.

<b>Name of document</b>	Ethical Sourcing & Modern Slavery Policy		
<b>Document Author</b>	Senior Corporate Counsel		
<b>Document Reviewers &amp; Approvers</b>	CEO & Managing Director	CFO	
	General Counsel & Company Secretary		
<b>Review Period</b>	Two-yearly		
<b>Related documents</b>	Code of Conduct; Health and Safety Policy; Diversity Policy; Anti-bribery and Corruption Policy; Whistleblower Policy; Environmental Management and Sustainability Policy; and Sigma’s general approach to sourcing and contracting.		
<b>Change record</b>	Version	2.0	Change Notes
	Publish date	21 November 2024	See policy version register