

Capitol Health Limited

ACN 117 391 812

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Modern Slavery Policy

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## 1. Purpose

- 1.1. Capitol Health Limited (**Capitol Health** or **Company**) is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.

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## 2. Application

- 2.1. This Modern Slavery Policy (**Policy**) applies to all persons working for or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.
- 2.2. Capitol Health expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in a way that is consistent with its value. The Company will only do business with organisations who fully comply with this policy, or those who are taking verifiable steps towards compliance.
- 2.3. This Policy will be used to underpin and inform any statement on slavery and human trafficking that the Company is required to produce further to the transparency in supply chain requirements of the Modern Slavery Act 2018 (**MSA**).

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## 3. What do we mean by Modern Slavery?

- 3.1. Modern slavery practices are a violation of human rights. Modern slavery is an umbrella term for several serious exploitative work practices that represent violations of human rights.
- 3.2. Modern Slavery can take many forms; it is a complex and multi-faceted problem. The MSA's main classifications of 'modern slavery' are as follows:
  - a) Slavery: where ownership is exercised over an individual.
  - b) Servitude: involves the obligation to provide service imposed by coercion, threat or deception.
  - c) Forced and compulsory labour: where a person who provides labour or services if, because of the use of coercion, threat or deception, a reasonable person would not consider themselves free to cease the labour or services or leave the place or area where they provide the labour or services.
  - d) Human trafficking: involves arranging or facilitating the travel of another with a view to control and / or exploit them.
  - e) Debt bondage: describes situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
  - f) Child labour: whilst not always illegal in the jurisdiction in which it takes place, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.
  - g) Deceptive recruiting for labour or services: make misleading representations in relation to the description of the job to recruit new employees.
- 3.3. The full description of acts of 'modern slavery' can be obtained from the MSA, which also refers to Division 270 or 271 of the Criminal Code, Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on

15 November 2000 ([2005] ATS 27), and Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

- 3.4. All forms of modern slavery have in common the deprivation of a person's liberty by another to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.
- 3.5. Tackling modern slavery requires colleagues to play a part and remain vigilant to the risk in all aspects of the Capitol Health business and business relationships.

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#### **4. The Commonwealth Modern Slavery Act 2018 reporting requirement**

- 4.1. The MSA requires corporations and other entities (if they are Australian entities or carry on business in Australia) with annual consolidated revenue of at least A\$100 million for the reporting period to publicly report and explain what the entity is doing to assess and address the risks that modern slavery practices may be occurring in its domestic or global operations and its supply chains, and the operations and supply chains of any entities it owns or controls.
- 4.2. Capitol Health Limited may provide an annual 'Modern Slavery Statement' to the authorities and will provide the said statement, if the practices noted in section 3 are occurring, no later than six months after its financial year end.
- 4.3. The 'Modern Slavery Statement' report will cover the requirements prescribed under section 16 of the MSA, which includes, but are not limited to:
  - a) a description of the structure, operations, and supply chains of the Company and its controlled entities;
  - b) a description of the risks of modern slavery practices in the operations and supply chains within the Company and its controlled entities;
  - c) a description of the actions taken by the Company and its controlled entities to assess and address those risks, including due diligence and remediation processes;
  - d) a description of how the Company assesses the effectiveness of such actions;
  - e) a description of the consultation process to have the statement approved by the Board of Directors of the Company and its related entities.
- 4.4. The 'Modern Slavery Statement' report will be made available on a repository maintained by the Department of Home Affairs and on the Company's website.

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#### **5. How the Company seeks to embed the Modern Slavery Policy in practice**

- 5.1. To underpin the commitments laid out in this policy, the Company aims to implement the following measures:
  - a) The Company will conduct risk assessments to determine which parts of the business and which supply chains are at risk of perpetrating modern slavery so efforts can be focused on the areas that are most 'at risk'.
  - b) Where appropriate, as informed by the risk assessment, the Company will engage directly with suppliers in respect of the Modern Slavery Policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own business.
  - c) Our contractual documentation will incorporate specific prohibition against slavery and servitude, the use of forced, compulsory and trafficked labour, and the use of child labour in line with this policy.

- d) Also, where appropriate, we will make provision for our contracted suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is a breach of this policy.
- e) The Company may set reporting timeframes and deadlines, for example, every six months the Board may receive a report to monitor the implementation of the measures and to be informed whether there were any incidents, and if so, what sort of measures will be taken to mitigate, remediate or eliminate the risk or exposure to the slavery practices.
- f) The Company may allocate the modern slavery reporting responsibilities within the Company, e.g. establishing a dedicated team and/or involving existing teams within management, legal, risk, compliance, corporate social responsibility, procurement, sourcing, human resources, and finance.
- g) The Company will take steps to address any risks or potential modern slavery risks identified and produce risk categorisation of the operations, investments, and supply chains (e.g. by sector, geography, etc).
- h) Implementation of a modern slavery incident reporting and monitoring process (including mechanics to foster whistleblowing and reporting within the business).
- i) Creating a remediation framework to address the management of suppliers who perpetrate, or are at high risk of perpetrating, modern slavery offences.
- j) Implementing regular monitoring of the Company's modern slavery compliance measures.
- k) Establishing Key Performance Indicators to monitor the effectiveness of the Company's modern slavery and broader human rights strategy.
- l) The Company will provide specific training to the staff in modern slavery requirements.

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## **6. Responsibility for this Policy**

- 6.1. The Board has overall responsibility for this Policy and in ensuring that the Company complies with all its legal and ethical obligations.
- 6.2. The Chief Executive Officer (CEO) will have the primary day-to-day responsibility for the implementation of this Policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

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## **7. Communication and employee awareness training**

- 7.1. General Managers will ensure that relevant colleagues receive adequate training on this Policy and any supporting processes applicable to their role.

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## **8. Breach of this policy**

- 8.1. The breach of this Policy by an employee, director or officer of the Company may lead to disciplinary action being taken in accordance with the Company's Code of Conduct. Serious breaches may be regarded as a gross misconduct and can lead to immediate dismissal.
- 8.2. All colleagues will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this Policy or any related processes or procedures.
- 8.3. If any part of this Policy is unclear, clarification should be sought from the CEO or Company Secretary.

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**9. Review**

- 9.1. This Modern Slavery Policy will be reviewed by the Board on a regular basis. This Policy reflects the Company's current practice and will be updated from time to time to ensure that it remains effective and meets the best practice standards and the Company's needs.
- 9.2. The Policy cannot be amended without approval from the Board.

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**10. Further assistance**

- 10.1. Any questions regarding this Policy should be directed to the Company Secretary.

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**11. Approved and Adopted**

- 11.1. This Policy was reviewed, approved, and adopted by the Board on 26 October 2022.