



MODERN
Dental Pacific



Modern Slavery Policy

1. Purpose

Modern Slavery is a crime and violation of human rights and is defined under the Australian Modern Slavery Act 2018 (the Act) as including seven types of serious exploitation:

- human trafficking
- slavery
- servitude
- forced marriage
- forced labour
- debt bondage
- the worst forms of child labour

The intention of this Policy is to:

- prevent, detect and respond with mitigating controls to the risk of Modern Slavery occurring within the Modern Dental Pacific group of companies (MDP), its supply chain or in any other business relationships
- demonstrate MDP's commitment to only doing business with those who fully comply with the Act; and
- ensure compliance with the Act (as may be amended from time to time).

2. Scope

This policy applies to all MDP team members including Directors, employees, contractors and temporary employees.

3. Policy Statement

- 3.1. MDP has a zero-tolerance approach to Modern Slavery.
- 3.2. MDP is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in its own business operations or supply chains.
- 3.3. MDP is also committed to ensuring there is transparency in its approach to tackling Modern Slavery throughout its business and supply chains, consistent with our disclosure obligations under the Act
- 3.4. The prevention, detection and reporting of Modern Slavery in any part of MDP's business and supply chains is the responsibility of all those working for it or under its control.
- 3.5. Employees who also include contractors, are encouraged to raise concerns with their manager or the CEO, about any likely Modern Slavery breaches in any parts of the MDP's supply chains or business, at the earliest possible stage.
- 3.6. MDP expects the same high standards from all of its contractors, suppliers and other business partners. Our contracting processes will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expect suppliers to hold their own suppliers to the same high standard.

4. Policy Program

The MDP Modern Slavery Program includes the following elements:

4.1. Policies

MDP operate a number of policies that support awareness of acceptable practice and behaviour, and the reporting mechanisms to raise concerns of inappropriate behaviour:

- Whistleblower Policy
- Code of Conduct

4.2. Procedures

MDP will meet its requirements under the Modern Slavery Act in these ways:

4.2.1. Procurement of goods and services (Procurement Policy MDPQMS-136293630-97 and Procedure MDPQMS-136293630-184)

The procurement framework is the key mechanism whereby suppliers are engaged by MDP. The procurement framework provides for due diligence on these suppliers and their compliance with the Act. Procuring goods and services will, as far as reasonable, be conducted in a way as to ensure that MDP sources goods and services from entities that comply with their obligations under the Act. The extent of the due diligence conducted in the procurement process will depend on the types of goods or services being sourced.

Depending on the level of supplier evaluation, controlled actions to be conducted include:

- Supplier Risk Evaluation (MDPQMS-136293630-240)
- Supplier Evaluation MDPQMS-136293630-238 (self-assessment/attestation that the supplier complies with various provisions in the Act);
 - a copy of the supplier's most recent Modern Slavery statement (if applicable);
 - details of structure and operations of their supply chain; and/or



- details of the actions taken by the supplier to manage and address modern slavery risks in their supply chain. If a proposed contract is included as part of the procurement, consideration must be given to a provision ensuring compliance with the Act

4.2.2. Contract management and monitoring key suppliers/offshore partners

The adoption of anti-slavery wording in contracts to cover compliance with the Act. The obligations in the clause to include:

- Obligation to comply with the Act;
- A requirement to take reasonable steps to ensure that there is no modern slavery in the contractors supply chains or any subcontractor’s supply chains; and
- A requirement to notify MDP if the supplier becomes aware of any actual or suspected breach of the Act.

MDP will work collaboratively with key suppliers/business partners to identify and manage modern slavery risks and develop commercial and actionable solutions.

4.2.3. Statement Preparation, Endorsement and Approval

The Act requires that an annual statement be prepared and approved for each financial year where the Company has a revenue of at least \$100 million. Where required, the annual statement will be approved by the Board and signed by a member of the Board.

5. Authority

5.1. Modern Dental Pacific may amend or vary the Code of Conduct, in its absolute discretion, from time to time.

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