



**VISION EYE INSTITUTE LIMITED**  
(A.C.N. 098 890 816)  
**AND ITS WHOLLY OWNED SUBSIDIARIES**

**MODERN SLAVERY STATEMENT**  
**2023 CALENDAR YEAR**

## MODERN SLAVERY STATEMENT 2023

Pursuant to the Modern Slavery Act 2018 (Cth), significant companies operating within Australia are mandated to report on initiatives to identify and mitigate modern slavery risks within their operations and supply chains. Vision Eye Institute Limited (ABN 21 098 890 816) and its wholly owned subsidiaries, collectively referred to as “VEI,” hereby submit this Modern Slavery Statement for the year ending December 31, 2023.

## MANDATORY CRITERIA 1 AND 2 – IDENTIFYING THE REPORTING ENTITY, OPERATIONS AND SUPPLY CHAIN

### About Us

As Australia’s leading private provider of ophthalmic services, VEI owns and operates 18 consulting clinics and 11 day hospitals throughout Victoria, New South Wales, Queensland, and South Australia. With a workforce exceeding 500 employees and supported by a distinguished team of partner and associate doctors and visiting medical officers, VEI is at the forefront of introducing innovative surgical techniques and technologies in Australia.

### **Our Values**

**Medical sovereignty** – We will ensure company policies and procedures facilitate medical sovereignty.

**Accountability** – We will be accountable to our patients, our colleagues and Vision Eye Institute for the provision of quality patient care, our personal efforts and the culture we create.

**Excellence** – We will set the highest standards in everything we do.

**Operational excellence** – We will grow our business through operational excellence, while delivering sustainable levels of shareholder value.

**Integrity** – We will be open and honest in our clinical and business practices to protect the integrity of Vision Eye Institute and each employee.

**Teamwork** – We believe success depends on teamwork.

### Reporting Group

The VEI reporting group includes VEI and the following entities (wholly owned by VEI):

<b>Name</b>	<b>ACN</b>
Icon Laser (Aust) Pty Ltd	094 059 220
Lee Lenton Medical Pty Ltd	010 616 038
Macquarie Eye Centre Pty Ltd	103 788 129
P H Hughes Pty Ltd	002 678 284
Swordfish Nominees Pty Ltd	088 487 432
The Eye Centre Pty Ltd	082 489 165
The Eye Institute Pty Ltd	073 751 756
VEI Pharmacy SLA Pty Ltd	606 982 165
VEI Properties Pty Limited	106 763 562
VEI Services Pty Ltd	097 821 906
VEI Wholesale Pty Ltd	606 188 185
Vision Group Gold Coast Pty Ltd	104 778 805
Vision Group North Qld Pty Limited	107 339 444

VEI has an extensive supply chain. In 2023, VEI procured goods and services from over 800 suppliers with an estimated value of \$71 million. VEI procures items from a range of industries including:

- Hospital-specific medical supplies and equipment
- Office and corporate supplies
- Building and construction
- Recruitment and labour hire
- Facilities management (cleaning and maintenance)
- Textiles (linen and uniforms)
- Professional services (legal, consulting and audit)
- Utilities (telecommunications, electricity, gas and water)
- Catering (food and beverages), and
- Information technology (including hardware and software services).

The majority of goods and services are either procured from suppliers and distributors located within Australia or large multinational companies with robust policies and procedures in place in relation to modern slavery.

### **MANDATORY CRITERIA 3 – RISKS OF MODERN SLAVERY WITHIN OPERATIONS AND THE SUPPLY CHAIN**

#### **Our stance against modern slavery**

VEI is committed to conducting business responsibly and ethically and to ensuring all aspects of our business practices, including our supply chains, are free from any form of slavery. We reject all forms of modern slavery which can take the form of unpaid or underpaid servitude, human trafficking and forced labour. We are committed to implementing effective systems and controls to ensure that it does not take place within our own business or through any of our supply chains.

#### **Governance and Risk Framework**

The VEI Board and the VEI Risk Management Committee oversees governance and risk for the VEI group. A Risk Management Framework has been approved by the VEI Board which clearly outlines the governance structures in place to ensure an effective risk management infrastructure and culture is in place to promote robust systematic risk management processes into all VEI's activities, functions and operations, including compliance with modern slavery legislation. VEI is committed to maintaining the highest ethical standards and undertaking business with integrity, which is one of VEI's core values. As a healthcare provider, VEI's operations are highly regulated and subject to a range of State and Commonwealth legislation and accreditation requirements.

#### **Supply Chains**

Due to the nature of our business, VEI does not make use of high-risk supply chains, which are more susceptible to modern slavery risks. VEI's key suppliers are generally large multinational corporations. In addition, the majority of VEI's suppliers are located in Australia and other low risk countries. VEI has implemented the following actions to eliminate the risk of modern slavery in its supply chain:

- Adopted a Supplier Code of Conduct which details VEI's expectations of suppliers with respect to compliance with modern slavery legislation;
- Purchasing, where possible, fair trade certified consumables;
- Conducting due diligence on significant service providers; and
- Partnering with suppliers who share VEI's stance on modern slavery.

Relationships with significant suppliers and supplier contracts are closely managed by the Executive Leadership Team. Significant consideration is given to the reputation and quality of suppliers prior to entering into any commercial agreements with them. VEI is committed to operating its business lawfully and ethically and only working with suppliers that are aligned to its values. All suppliers are expected to operate in accordance with all applicable modern slavery laws. VEI values and observes all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity. VEI has an externally managed whistleblower service in place for staff and suppliers, through which any concerns in relation to modern slavery can be reported.

#### **MANDATORY CRITERIA 4 – ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES**

##### **Our risk assessment & due diligence**

We are committed to assessing the risk of modern slavery taking place in our operations by identifying and managing any areas of concern within our business and any external suppliers to VEI. As a health services organisation operating only in Australia, there is no material risk of modern slavery occurring within our direct business operations. However, we recognise we could be indirectly exposed to the risk of modern slavery and human trafficking through our supply chains.

To support its operations, VEI employs over 500 staff, and its supply chain consists of numerous suppliers and wholesalers in the healthcare industry (including prosthesis, consumables and medical equipment) as well as support services (including cleaning, IT support and food services). Given the level of control VEI exercises over day-to-day operations and the robustness of VEI's internal policies and procedures, we consider that our internal risk of modern slavery is low. The majority of VEI staff are engaged directly by VEI, which reduces the risk of modern slavery within our workforce. As such, our focus remains on identifying and addressing any material risks of modern slavery which may exist in our external supply chains.

VEI has implemented a policy requiring all material new suppliers and any suppliers operating in high-risk industries (from a modern slavery perspective) to complete a questionnaire outlining the policies and/or practices they have in place in relation to ensure compliance with the Modern Slavery Act. Questionnaires are reviewed by the Company Secretary (prior to appointment). In addition, annual assessments are undertaken of all key suppliers including reviews of any modern slavery statements lodged with the Australian Border Force and relevant policies on the supplier's websites. The Company Secretary provides feedback to the VEI Risk Management Committee on any concerns regarding a supplier's potential risk of modern slavery.

As a result of the processes in place and the investigations undertaken, the VEI Board and the VEI Risk Management Committee have formed a view all VEI's key suppliers have robust policies and processes in place to prevent modern slavery from occurring in their workplaces or supply chains.

##### **Our commitment to training**

We are committed to ensuring our employees have a strong understanding and respect for how their choices can have far-reaching impacts upon basic human rights across the globe. We have made the resources provided by Anti-Slavery Australia available to our employees through our intranet.

All VEI employees are provided with appropriate employee contracts and referred to VEI's Employee Handbook, which outlines key employee policies including those related to discrimination, harassment and work health and safety. VEI's healthcare workers are either employed under Modern Awards or Enterprise Bargaining Agreements and salaries of staff are regularly reviewed to ensure they are in line with market conditions. A high proportion of VEI's workforce are qualified clinical professionals

and are accustomed to complying with professional conduct reflecting the highest ethical standards. Operations at VEI's various sites are overseen by these professionals.

As part of VEI's employee onboarding processes, all new employees are provided with training on modern slavery to ensure they understand the importance of this issue and know where to access further information or assistance on this matter if required.

#### **MANDATORY CRITERIA 5 – HOW THE ENTITY ASSESSES THE EFFECTIVENESS OF ITS ACTIONS**

The VEI Risk Management Committee will continue to review VEI's supply chain and undertaking a risk assessment of suppliers, particularly those located in countries commonly known to be at higher risk for modern slavery or in high-risk industries or sectors. If any modern slavery issues are identified, action will be taken to resolve the issue with the supplier or if necessary, determine if an alternative supplier is required.

During the 2022 reporting period, the VEI Risk Management Committee identified the alleged use of forced labour at a Malaysian based third party supplier associated with the manufacturer of some of the disposable rubber gloves used by VEI (and sourced through a local distributor). This issue has been monitored and it was noted the manufacturer has implemented strong measures to ensure there is low risk of such an incident occurring in future.

#### **MANDATORY CRITERIA 6 – PROCESS OF CONSULTATION WITH ENTITIES OWNED AND/OR CONTROLLED BY THE ENTITY**

The VEI Board and VEI Risk Management Committee is responsible for all wholly owned entities in the VEI Group, and the processes and policies referred to in this Statement covers all VEI entities listed under the title "Reporting Entity".

#### **MANDATORY CRITERIA 7 – ADDITIONAL INFORMATION**

VEI will continue to identify and evaluate risks relating to human rights and where necessary, develop our policies, procedures, and training to help combat modern slavery. VEI also continues to monitor its key suppliers (through review of their annual Modern Slavery Statements and general monitoring in the media) to ensure they continue to adhere to modern slavery requirements.

#### **STATEMENT**

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) for Vision Eye Institute Limited (A.C.N. 098 890 816) and relates to the financial year ended 31 December 2023. The Statement incorporates each of the entities set out in the Reporting Group.

This statement was approved by the VEI Board on 14 June 2024.



Karen Lopreiato  
Company Secretary  
Vision Eye Institute Limited