



MODERN SLAVERY STATEMENT

JULY 2024 - JUNE 2025

Approved by:

Heath Priestly,
Chief Executive Officer

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I.0 INTRODUCTION

The Australian Government's Modern Slavery Act 2018 (**the Act**) came into force on 1 January 2019 and requires certain entities to produce a statement on modern slavery risks across their operations and supply chain.

Similarly, the UK Modern Slavery Act (2015), requires certain commercial organisations publish an annual statement setting out the steps they take to prevent modern slavery in their business and supply chains. Actions to address modern slavery risks and their effectiveness must be disclosed.

This Modern Slavery Statement is made by **Device Technologies Group** (TA Device Technologies Australia Pty Ltd - ABN 40 058 091 973), 1 Garigal Road, Belrose, NSW 2085 and is prepared for the financial year period 1 July 2024 to 30 June 2025.

At **Device Technologies Group** (TA Device Technologies Australia Pty Ltd), we believe in the importance of fundamental human rights and promoting an end to modern slavery.

We are strongly committed to ensuring that the products we provide to our customers are sourced and delivered in a way that respects the global standards of human rights.

In addition to our obligation to comply with the Act, we acknowledge our responsibility towards ensuring that our operations and supply chains comply with accepted local and international standards, which are derived from the Act and the principles of the United Nations (UN) Global Compact.

Both as an employer and as a business acquiring products and services, Device Technologies Group does not tolerate any form of exploitation through slavery, servitude, any type of forced or compulsory labour or human trafficking.

OUR COMMITMENT

'At Device Technologies Group we believe in the importance of fundamental human rights and promoting an end to modern slavery.'

'We are strongly committed to ensuring that the products we provide to our customers are sourced and delivered in a way that respects the global standards of human rights.'



Heath Priestly

Chief Executive Officer
Device Technologies Group



2.0 BUSINESS STRUCTURE, OPERATIONS AND SUPPLY CHAIN

WHO WE ARE

Device Technologies Group is one of the largest independent healthcare enterprises within the Asia-Pacific Region, developing and supplying leading medical technologies and solutions.

OUR VISION

To transform healthcare by delivering leading-edge technology, services and solutions that improve outcomes and change lives.

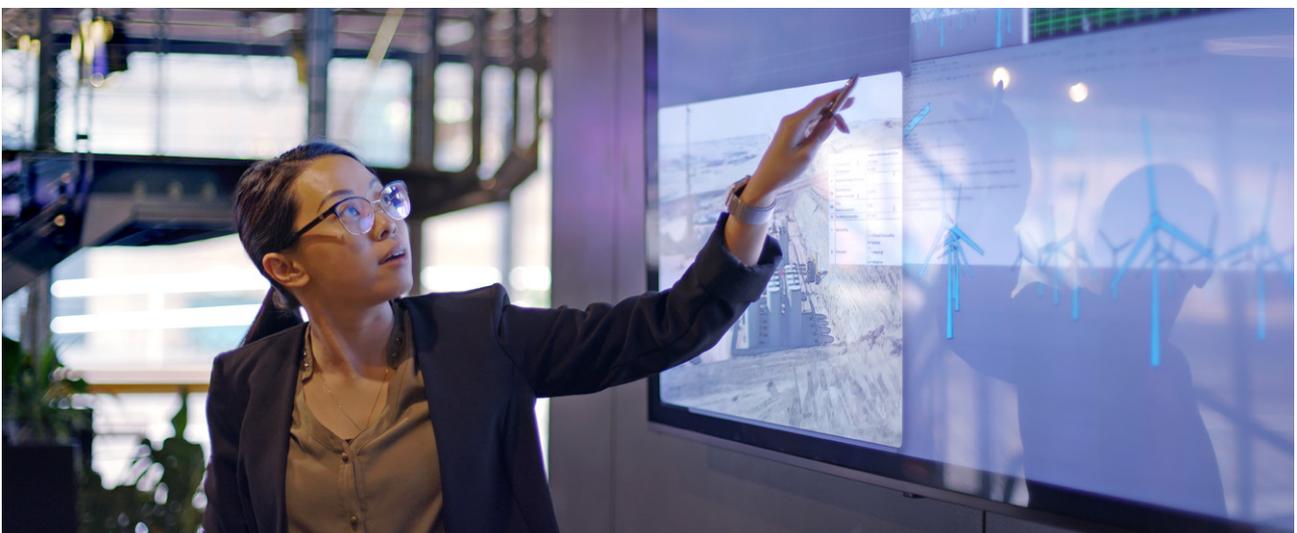
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– this is at the heart of what we do.

WHAT WE DO

We are in the business of improving and enhancing quality of life across the healthcare continuum.

We do this by providing the best medical and healthcare solutions available, contributing to the overall well-being of individuals and communities we serve.





OUR VALUES

Here at Device Technologies Group our values are linked to five key areas of our business: Innovation, Collaboration, Ownership, Good Business and Championing the Customer.

Foremost, we support innovation and ingenuity. We believe that by collaborating with the best in the business we can deliver the finest technologies and results. Good business relies on intuition and precision and we back every decision with 100% ownership and support.

By placing customers at the heart of decision-making and operations, we enhance experiences, foster loyalty, and drive sustainable growth.



***Delivering* INNOVATION**



***Taking* OWNERSHIP**



***Seeking* COLLABORATION**



***Practising* GOOD BUSINESS**



***Championing* THE CUSTOMER**

NAVIS

Navis Capital partners secured ownership of Device Technologies Group in January 2019.

Navis Capital Partners was founded in 1998, with their founders sharing a belief that there was an untapped opportunity to create a distinctive investment firm in Southeast Asia.

The founders' extensive consulting and professional experience around the region is at the core of Navis' approach.

To date, the Navis Asia Funds have completed more than 90 controlling private equity investments, predominantly in Southeast Asia.

In addition to these primary investments, Navis has made more than 45 follow-on investments. Navis' 27 years of investing experience, focused on transforming and growing organisations with a distinctive competitive advantage, has delivered top-quartile returns.

Under Navis' ownership and direction, Device Technologies Group maintains a strong focus on achieving strong Environment, Social and Governance outcomes.

BUSINESS STRUCTURE

Device Technologies Group employs approximately 1,200 employees across Australia, New Zealand and Asia.

Offices are located in Sydney (Head Office), Melbourne, Brisbane, Adelaide, Perth, Auckland, Singapore, Thailand, Vietnam, Philippines, Indonesia and Malaysia.

Device Technologies Group (TA Device Technologies Australia Pty Ltd) owns and controls the following notable trading entities:

- Advanced Skin Technology NZ Limited (New Zealand)
- Advanced Skin Technology Pty Ltd
- Aresis Medical Sdn Bhd (Malaysia)
- Atris Pty Ltd
- BirthBeat Pty Ltd
- Bits Medical Sdn Bhd (Malaysia)
- CK Surgitech Pty Ltd
- Denyers Pty Ltd
- Denyers (NZ) Limited (New Zealand)
- Device Technologies New Zealand Ltd (New Zealand)
- Device Technologies Private Limited (Singapore)
- Device Technologies (Thai) Company Limited (Thailand)
- DLC Vet Pty Ltd
- DTect Innovation Pty Ltd
- DTG Medical Company Limited (Vietnam)
- DTG Medical Incorporated (Philippines)
- DTG Medical Sen Bhd (Malaysia)
- DTG Medical Pte Ltd (Singapore)
- Fusion Scientific Sdn Bhd (Malaysia)
- Haines Medical Australia Pty Ltd
- Healthcorp Pty Ltd
- HospEquip Pty Ltd
- Infinity Medical Sdn Bhd (Malaysia)
- Lucid Group Pty Ltd
- Lyka Smith Pty Ltd
- Makar Consulting Pty Ltd
- Medical Design Innovations Pty Ltd
- Medical Sales and Service Pty Ltd
- PT Device Technologies Indonesia (Indonesia)
- Reynard Health Supplies Pty Ltd
- Reynard Health Supplies Ltd (United Kingdom)
- Reynard Health Supplies Ltd (New Zealand)
- Venbio Nutraceutical Sdn Bhd (Malaysia)
- Venusys Medical Sdn Bhd (Malaysia)
- Venusys Medical Pte Ltd (Singapore)
- Vlm Medical Sdn Bhd (Malaysia)

Group Companies underneath the Device Technologies banner are not required to provide individual Modern Slavery Statements.

However, Device Technologies has taken the view that providing clarity of individual businesses and their respective risks and actions is appropriate.

The trading entities above are Group Companies of Device Technologies and have been consulted in the development of this Modern Slavery Statement.

Consultation consisted of individual discussions with the most senior business representative of each business and covered the identification of specific modern slavery risks and the development of appropriate actions.

Where Group Companies have discrete modern slavery risks, these have been identified within this statement.

Most Group Companies have significantly integrated into Device Technologies Group and are bound by the same overarching policies and systems which provides comfort that modern slavery risks are being managed appropriately.

OPERATIONS

(staff, contracted sales teams, agents, cleaners, security etc)



Device Technologies Group's primary business involves the importation, manufacture, distribution and provision of clinical support for medical devices in the markets in which we operate

- The majority of Device Technologies' Group's workforce is employed within Australia/NZ.
- Device Technologies operates small offices across Thailand, Vietnam, the Philippines, Malaysia, Indonesia, and Singapore. In addition to employing local staff, we also partner with sales agents in Vietnam, Malaysia, the Philippines, Hong Kong, and Thailand to support product distribution.
- Device Technologies maintains its chief sales and marketing and support functions in Belrose, NSW. A small number of sales agents represent Device Technologies in the Australian market.
- Warehouse locations in Australia and New Zealand are staffed by Device Technologies employees – with the exception of our new warehouse facility at Marsden Park, which is staffed by an experienced third party. Logistics and warehouse services in Singapore, Thailand, Malaysia, Vietnam, Philippines and Hong Kong are provided by third parties. Freight forwarders are predominantly utilised for the importation of goods into Australia and New Zealand markets.

SUPPLY CHAIN

(Suppliers (incl sub contractors) and their supply chain)



The products Device Technologies distributes are sourced from over 500 active suppliers.

Due to the diversity of the products we supply our first tier supply chain is effectively worldwide across the Americas, Europe and Asia.

In addition to the supply of medical device technology, Device Technologies acquires not for resale goods and services to enable its core business functions.

These are mainly in the category of:

- IT - laptops, printers, peripherals, software
- Uniforms/promotional attire - limited
- Facilities management - cleaning services, security, maintenance (contracted)
- Utilities - telecommunications, electricity, gas, water
- Dedicated service providers - eg insurance, governance
- Office and warehousing supplies
- Inbound and outbound transport services - local and international
- Professional services - legal, accounting, consulting

OUR TOUCHPOINTS

In today's healthcare industry, delivering cutting-edge technology is just the tip of the iceberg.

Every product and service we bring to market must be amongst the best of its kind.

It must contribute to better patient outcomes and provide support for healthcare staff to deliver enhanced patient care.

Our offerings cover a broad spectrum of specialties, faculties of medicine and surgery from highest-quality consumables to technological advances, such as the da Vinci Surgical System and fully-digital operating theatre.



OUR TOUCHPOINTS

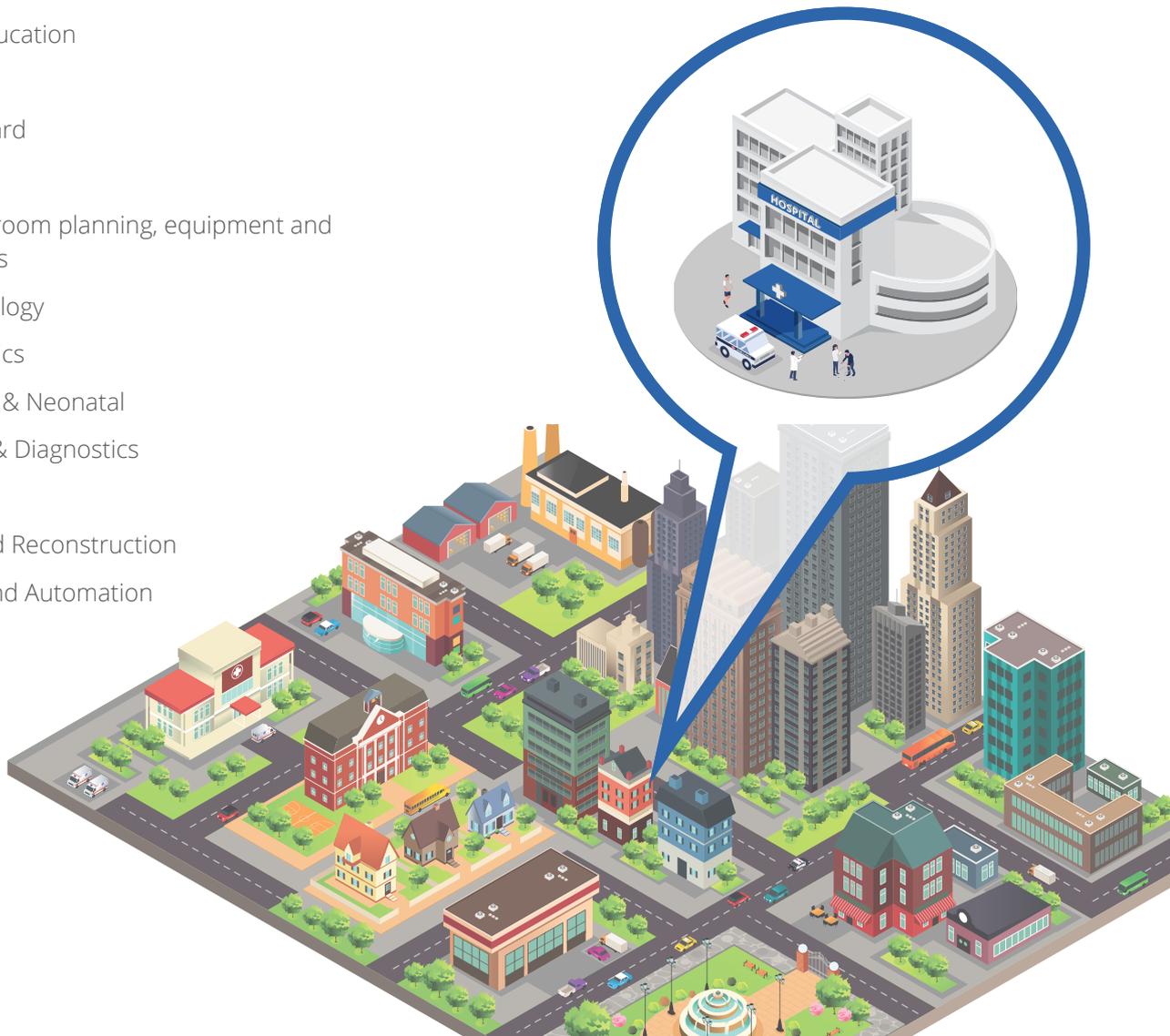
Device Technologies extensive portfolio of products and services reaches virtually every department of the hospital and healthcare sector.

We supply medical professionals and healthcare facilities with the technologies and support they require to achieve the best possible outcome for their patients.

- Anaesthesia
- Cardiology
- Emergency Department and Ambulance
- Endoscopy
- Infection Prevention & Sterilisation
- Information Technology
- Intensive Care
- Interventional Neuroradiology
- Interventional Radiology
- Managed Services
- Medical Education
- Neurology
- Nursing Ward
- Oncology
- Operating room planning, equipment and instruments
- Ophthalmology
- Orthopaedics
- Paediatrics & Neonatal
- Pathology & Diagnostics
- Pharmacy
- Plastics and Reconstruction
- Robotics and Automation
- Spine

HEALTHCARE CONTINUUM

- Aged Care
- Corporates
- Day Surgery
- Digital
- First Aid and Safety Training
- Mining and Resources Sector
- Primary Healthcare
- Skin Care
- Veterinary



3.0 RISK OF MODERN SLAVERY PRACTICES

Device Technologies Group has assessed the overall risk of modern slavery in its own operations and tier one supply chain as low.

As a distributor of medical devices

The suppliers of products that are distributed by Device Technologies and Group Companies are predominantly ISO 9001 accredited organisations that have policies and practices in place to manage modern slavery risk in their supply chain.

Device Technologies Group's operations in Asia is largely sales distribution. As a specialised professional service, the risk of modern slavery is comparatively low against other industries. Aside from sales agents in some jurisdictions, Device Technologies Group employs its own staff.

Device Technologies Group recognises that suppliers of medical device technologies have complex, multi-tiered supply chains which may present a higher risk of modern slavery.

As an employer

Device Technologies Group takes a no-tolerance approach to modern slavery in all its forms. Device Technologies Group meets modern slavery and employment law requirements in all jurisdictions in which we operate.

As a manufacturer

Lyka Smith

Lyka Smith are at the frontier of 3D printing technologies and provide medical industry professionals with fully customised parts, devices and implants. Based in Melbourne, Australia, Lyka Smith produce bespoke, patient-specific solutions for a variety of surgical options ranging from orthognathic and trauma, to mandibular cancer reconstruction and guided dental surgery. Lyka Smith's first tier supply chain is predominately based in Australia.

Medical Design Innovations (MDI)

MDI have a manufacturing plant based in Brisbane, Australia and consists of a full fabrication department and assembly line. MDI also has a dedicated team of design engineers, draftsman, installers and service technicians. Components are sourced locally in Australia and imported, predominantly from Asia.

Denyers

Established in 1889, Denyers is one of Australia's longest-standing medical companies. Throughout its proud history, Denyers has evolved into a market leader in the design and manufacture of premium Surgical Operating Tables and Surgical Table Accessories. Denyers operates direct sales, service, and support operations across Australia and New Zealand. The Denyers manufacturing facility, located in Melbourne, Australia, is staffed with a skilled team of design engineers, machinists, and assemblers. Components are sourced both locally in Australia and internationally, primarily from Europe and Asia.

As a contract manufacturer

Device Technologies Group sources its products both locally and from overseas factories or manufacturers who do not have an established presence in Australia. This approach, referred to as the contract manufacturing model, is utilised by several companies within the Device Technologies Group. Furthermore, Device Technologies Group applies this model to its own limited range of private label products, ensuring a consistent and efficient supply of goods. Group Companies of note (where this practice is more prominent in their product offering), are described below:

Advanced Skin Technology (AST)

AST is an entity within Device Technologies Group which supplies skincare products. AST's first tier supply chain is primarily located within the USA and Australia. This includes the supply of component products and end-phase manufacturing. Raw material suppliers (tier two and below) are likely to occur outside of the USA and Australia. Vessel packaging primarily comes from China, through a tier one Australian supplier.

Haines Medical

Haines is a medical manufacturing and supply company based in South Australia with offices in major cities across Australia. Haines is focused on improving healthcare for staff and patients through better disposable and patient single use products. Haines offers over 200 products and are involved in manufacturing (through third parties, largely based in Asia), warehouse, and distribution activities.

DLC Vet

DLC Vet is one of the largest and longest serving veterinarian equipment and consumables distributors in Australia and New Zealand. DLC source product from established specialist manufacturers across many countries including: US, India, Pakistan, China, New Zealand, England, Ireland, France, Germany, South Korea, and Japan. DLC acts as a distributor for major brands as well as procuring discrete product as part of their range.

Atris

Atris has supported Australia's medical and healthcare industry with innovative, high-quality, effective, and affordable solutions for many years. Acquired by Device Technologies Group during the reporting period, Atris works closely with customers to source products that meet their financial needs, ensuring high clinical standards and compliance with Australian regulations where required. Strong relationships with independent manufacturers allow Atris to deliver specialty care and end-to-end efficiencies across various medical fields. Products are sourced from manufacturers in Europe, China, Australia, Israel, USA and Pakistan.

Venusys

Since its inception in 2005, Venusys Medical, which has presence in both Malaysia and Singapore as noted above, has been dedicated to advancing the aesthetic and surgical markets through innovative solutions. Venusys was acquired by Device Technologies in the reporting period and the business comprises three key divisions: aesthetic equipment, injectables, and skincare/ supplements. These divisions are built on a foundation of growth and excellence, catering to the evolving needs of aesthetic dermatology and plastic surgery professionals. Products for these divisions are predominantly sourced from Korea and Europe.

Aresis Medical

Aresis Medical, which was acquired by Device Technologies in the reporting period, focuses on delivering state-of-the-art aesthetic equipment designed to meet the needs of professionals across Malaysia and Singapore. With advanced laser technology, their non-invasive treatments enhance beauty and well-being, offering clients effective and reliable solutions that redefine industry standards. Aresis Medical's suppliers are predominantly based in China.



Infinity Medical

Infinity Medical delivers high-performance medical imaging technologies, including ultrasound and X-ray systems, and innovative neonatal care designed to protect, support, and nurture newborns. Infinity Medical was acquired by Device Technologies in the reporting period and its suppliers are predominantly based in China.

Bits Medical

Bits Medical is dedicated to providing high-quality imaging systems and equipment for medical and veterinary clinics in Malaysia. Offering advanced solutions such as General X-ray, C-arm X-ray, Flat Panel Detectors, CT Scans and MRI, the company partners with renowned brands including Mindray, Browiner, iRay Technology, SinoVision and GSMED. Bits Medical was acquired by Device Technologies in the reporting period and their expertise and innovative approach ensure that clinics can access reliable, cutting-edge technology. The suppliers to Bits Medical are predominantly based in China.

Device Technologies - Olie

Device Technologies has a small number of products under the private label Olie brand. These products are manufactured by contracted third parties to Device Technologies in Australia, Europe, and Asia.

CK Surgitech

CK Surgitech supply gastroenterology devices and accessories to Australian Hospitals and Day Hospitals. Acquired by Device Technologies Group during the reporting period, CK Surgitech has an expansive endoscopy product range through strong specialist collaboration and partnership with skilled global manufacturers. Products are predominately sourced from manufacturers in China, with suppliers also located in Germany and Canada.

As a consumer of not for re-sale goods and services

The vast majority of goods and services that Device Technologies Group acquires are from established multi-national businesses with strong positions on modern slavery and/or businesses based in Australia/NZ with a low risk of modern slavery.

RISK ASSESSMENT SUMMARY

| Risk Description | Finding | Our Risk Exposure |
|--|--|-------------------|
| Casual or contract workers engaged directly by Device Technologies | Device Technologies Group's workforce is almost all permanent, with only a small percentage (less than 1%), of casual or contracted labour. | Low |
| Casual workers under the age of 18 | Device Technologies Group employs very few casual employees under the age of 18. | Low |
| Migrant workers | Device Technologies Group has very few employees on temporary visa working arrangements. | Low |
| Seasonal workforce fluctuation | Device Technologies Group's operations are not seasonal. There is consistent workforce turnover during the reporting period. | Low |
| Freedom of association | Device Technologies Group employees operate under an Enterprise Bargaining Agreement or contracted salary above award rates. | Low |
| External auditing | Device Technologies Group holds current ISO9001 certification and is audited to financial accounting standards. Device Technologies participates in an annual EcoVadis assessment. No independent responsible sourcing audit has been undertaken. | Low |
| Sector Risk | <p>Device Technologies Group operates in high-risk sectors including:</p> <ul style="list-style-type: none"> • Manufacturing • Wholesale and Trade <p>As primarily a distributor, direct tier one manufacturing risk presents as a lower likelihood for Device Technologies Group. A tier one supply chain map has been developed against the Global Slavery Index. Less than 5% of Device Technologies Group sales come from high risk countries.</p> | Medium |
| Services engaged by Device Technologies Group | Device Technologies Group relies on services including recruitment, legal, cleaning services, construction, property maintenance waste disposal and equipment maintenance. Whilst recruitment, construction and cleaning services are considered high risk, Device Technologies Group generally has long term relationships with small family businesses or recognised service providers with strong human rights policies. | Low |



4.0 RISK MANAGEMENT ACTIONS AND EFFECTIVENESS

The actions described below have been implemented across Device Technologies Group businesses and an assessment of their effectiveness provided:

Supplier Code of Conduct

Device Technologies Group has implemented a Supplier Code of Conduct which requires suppliers to actively certify their compliance with governance requirements including modern slavery and human rights. The Supplier Code of Conduct enables Device Technologies Group to obtain further confidence that suppliers have adequate procedures in place to manage modern slavery risk. Alongside contractual controls, the Supplier Code of Conduct also permits Device Technologies Group to assess the effectiveness of a supplier's approach to managing modern slavery risk by allowing for desktop and/or onsite audits. The Supplier Code of Conduct has been effectively implemented for all new supplier relationships and is being applied to circumstances where Device Technologies Group refreshes its position with existing suppliers as supply contracts are renewed. Very few third parties have raised concerns about being bound by the Device Technologies Group Supplier Code of Conduct, and none have raised concerns regarding requirements obliging them to comply with the modern slavery obligations.

Modern Slavery and Human Rights Policy

In conjunction with the Supplier Code of Conduct, the Modern Slavery and Human Rights Policy establishes Device Technologies Group's expectations of both our business and our suppliers and acts to provide confidence that modern slavery risk is being managed effectively within our supply chain. The Modern Slavery and Human Rights Policy is available for all third parties on our external facing Policy Library (<http://www.device.com.au>). The Modern Slavery and Human Rights Policy is embedded within the Supplier Code of Conduct and is effectively communicated as part of all new supply relationships. Existing suppliers reference the Modern Slavery and Human Rights Policy from the Policy Library and will be formally bound as the Supplier Code of Conduct is progressively implemented.

Contractual Controls

Device Technologies Group's Contract Execution Policy drives consistency of baseline contractual protections and requirements for all customer and supplier relationships. This Policy applies across all supplier interactions and includes Group Companies business engagements. Where Device Technologies contracts are used with suppliers, contractual provisions are more specific in relation to management and notification of modern slavery risks identified within the supplier's business and/or supply chain. Where a third party contract is executed, reciprocal clauses are included to ensure the Device Technologies Group must be made aware of modern slavery risk.



Additionally, specific clauses allowing for audit rights have been included as appropriate within contracts to allow for comfort that the supplier has appropriate and effective controls in place. As current contracts expire or are renewed, the updated versions of these contracts with the included modern slavery drafting are being implemented.

Device Technologies Group has yet to be notified of any modern slavery risk through its supply chain relationships. Whilst audit clauses have been included in contracts, few site visits have been conducted over the period.

Risk Steering Committee

Device Technologies Group recognises that modern slavery risk cannot be assessed or addressed adequately by one functional area. As such, the Device Technologies Group Risk Steering Committee (RSC), comprised of representatives from: Legal, Commercial & Facilities, Finance, IT, Sales and Marketing, Regulatory & Quality, People & Culture and Supply Chain continues to have ownership of this risk.

The RSC meets on a monthly basis and, amongst other topics, set the direction to manage modern slavery risk and has oversight of the effectiveness of the control framework.

Enhanced Due Diligence

As a part of our approach to acquisitions and/or business partnering in Asia, Device Technologies Group selectively undertakes enhanced due diligence – which includes an assessment on modern slavery risk. The results of this enhanced due diligence (conducted by a discrete third party with considerable expertise), are used to inform our approach to managing risk and ultimate decision regarding business engagement with the parties the subject of the enhanced due diligence.

Typically, enhanced due diligence is conducted on third party sales agents in Asia, an area where Device has limited on-the-ground visibility. These reports provide for in-market intelligence and allow for greater insight into modern slavery risks. There were no modern slavery or human rights concerns raised by the enhanced due diligence activities conducted during the period.

Navis Oversight

Navis have clear expectations of Device Technologies Group and how risks such as modern slavery are identified, treated and escalated. Device Technologies Group provides frequent reports to Navis to demonstrate ongoing compliance with relevant requirements and management of risk. The Ethics and Compliance Committee of the Board meets quarterly and discusses third party risk, including modern slavery.

Escalation Mechanisms

Device Technologies Group has longstanding escalation mechanisms in place, whereby through commercial avenues (or through the formal Whistleblower channel), employees or suppliers can escalate concerns regarding wrongdoing – including but not limited to any modern slavery risk. The whistleblower program is made available to all third parties and is accessible via the Device Technologies public facing website.

No claims as to modern slavery risk have been received. An assessment of whistleblower usage was conducted and whilst not narrowed to modern slavery matters, the assessment indicated that the usage of the whistleblower program is below average. During the period, posters promoting the Whistleblower Program were installed in all sites and in-view of external site visitors.

Employee Training

All Device Technologies Group employees are provided with mandatory awareness training on modern slavery. The online learning module requires completion during induction for new employees. Dedicated refresher training is scheduled for all employees on a two-year cycle.

Third Party Due Diligence Screening and Third Party Questionnaires

Device Technologies Group has implemented a system to issue third party questionnaires and conduct due diligence screening on all new suppliers prior to formalising a business relationship. Amongst various other topics, the questionnaire requires the supplier to respond to a number of questions designed to assess the risk of modern slavery and the maturity of their current practices. In conjunction with the due diligence screening (against both the entity and name key individuals), this process allows Device Technologies Group to make an informed judgement on modern slavery risk with that supplier and, where necessary, implement appropriate mitigations. The Device Technologies Third Party Oversight Policy articulates these requirements. Suppliers are asked to provide high level visibility on their tier one supply chain, which allows Device Technologies Group to obtain some oversight on our tier two supply chain.

Employee Code of Conduct

Device Technologies Group retrained all staff on the Employee Code of Conduct during the period. Modern slavery awareness content is included and all staff were required to complete an online module supporting the Code of Conduct document. This content supplements the discrete learning module on modern slavery also delivered to all staff upon commencement and which was also refreshed for all other staff during the period.

Private Label Manufacturer Assessment

Under the direction of the Head of Strategic Sourcing, a vendor evaluation form featuring a modern slavery assessment and discrete Slavery and Human Trafficking Declaration has been implemented for all new private label suppliers.

Tier One Supply Chain Map

A 'live' map of Device Technologies' purchase order value is available which contrasts against the Global Slavery Index. Results show that approximately 5% of Device Technologies purchase order value is made through high risk countries. This reflects contract manufacturing activity being undertaken largely in China. The tier one supply chain map is an effective tool to understand risk, however, the limitation is a lack of information from certain Group Companies where they have not yet been integrated into relevant systems.



Ethical Audits

Device Technologies Group held discussions with a leading industry ethical sourcing audit body to understand whether their product was utilised broadly across the medical device manufacturing industry and as such, might prove a useful mechanism to identify and manage modern slavery risk. A very low rate of industry take-up was identified and is not an effective option at this time. Further work is required to determine an effective approach for our business and industry.

UN Global Compact

Device Technologies Group joined the UN Global Compact in the reporting period and, as such, have committed to upholding its Ten Principles, including those related to human rights and labour standards. This commitment strengthens our risk management framework by embedding internationally recognised standards into our governance and operational practices. It supports proactive identification and mitigation of modern slavery risks across our operations and supply chains and reinforces our accountability through transparent reporting and continuous improvement.

5.0 NEXT STEPS

The Device Technologies Group RSC anticipates the following (additional) actions to be progressed and/or completed during the next reporting period to drive further risk reduction for modern slavery.

Third Party Questionnaires and Due Diligence Screening

Device Technologies Group will continue to embed the application of the Third Party Oversight Policy, requiring all new third parties and third parties whom are due for contract renegotiation to respond to a questionnaire containing modern slavery questions. Upon receipt of this information, Device Technologies Group will continue to assess and take actions as appropriate to address modern slavery risk. Further steps will be taken to ensure that new Group Company businesses are encompassed under the broader Device Technologies Group modern slavery control framework.

Employee Code of Conduct

The Device Technologies Group Employee Code of Conduct, will be re-issued during the next period and issued to all employees, via e-learning. The availability of escalation mechanisms (such as the Whistleblower Policy), will also be promoted.

Supplier Code of Conduct

Device Technologies Group will continue to roll-out the Supplier Code of Conduct for new third parties and capture existing third parties where the contractual relationship is due for renewal. Further steps will be taken to ensure that new Group Company businesses are encompassed under the broader Device Technologies Group modern slavery control framework.

Approach to Ethical Audits

Device Technologies Group will continue to assess and mature our approach to managing ethical audits in our supply chain. Work to assess the suitability of industry ethical audit bodies (such as SEDEX), will be further explored.

Third-Party ESG Assessments

Device Technologies Group's modern slavery control framework will continue to be reviewed by EcoVadis as part of an overall ESG annual re-assessment. This complements the various on-going assessments that our customers perform on our approach to managing modern slavery risk. Improvements will be considered and implemented following from on-going assessments

Group Company Integration

Further work will be conducted to ensure that Group Companies embed key policy controls to manage modern slavery risks. Of particular focus will be the Third Party Oversight Policy (due diligence procedures) and contractual protections (Contracts Execution Policy).

Third Party Supplier Audit Expertise

Work will commence to select a provider capable of providing supplier audit capability. This will meet ad hoc requirements to conduct supplier audits which address modern slavery and other ethical and quality outcomes.

For further information please contact our Compliance & Risk Manager at compliance@device.com.au



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