


Oneview Healthcare PLC (ASX: ONE)  
ABRN: 610 611 768

**MODERN SLAVERY POLICY**  
28<sup>TH</sup> February 2025

Oneview Healthcare PLC and its subsidiaries  
(the Company)



Oneview Healthcare PLC is an Irish company registered under the Companies Act 2014 as a public limited company (513842). It is registered under the Corporations Act 2001 (Cth), Australian Registered Body Number 610 611 768.

# Introduction

This modern slavery policy is designed to assist Oneview to comply with the Modern Slavery Act 2018 (NSW) and the Modern Slavery Act 2018 (Cth). The policy sets out Oneview's expectations for its workers, contractors, suppliers, distributors and other business partners regarding modern slavery. It also sets out measures taken by Oneview to address modern slavery in its business and supply chains.

## Policy Statement

- 1.1 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. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains (to the best of our ability).
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under Australian modern slavery legislation. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude or debt bondage, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

## Responsibility for the policy

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The board of directors is also responsible for approving our annual modern slavery statement and ensuring that it complies with our disclosure obligations under

Australian modern slavery legislation.

- 2.2 The implementation of this policy extends to:
- (a) monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in our operations under Australian modern slavery legislation, including in our subsidiary organisations;
  - (b) monitoring and consulting with our suppliers, contractors and business partners to identify risks of modern slavery practices in our supply chains;
  - (c) developing measures to assess and address any risks of modern slavery practices, including through due diligence in our contractual relations;
  - (d) monitoring the effectiveness of those measures;
  - (e) developing appropriate training materials and programs for our employees to comply with this policy; and
  - (f) preparing our annual modern slavery statement in accordance with our disclosure obligations under Australian modern slavery legislation.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains, including any areas of our business and supply chains which are identified as at risk of modern slavery practices.
- 2.4 Queries on this policy should be addressed to the Company Secretary.

## **Compliance with the policy**

- 3.1 All employees, which includes any full and part time and casual employees, consultants, secondees and contractors must read and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working in Oneview or under its control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.3 If an employee believes or suspects a breach of this policy has occurred or that it may occur, they must notify their manager or HR, or report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.4 If an employee is unsure about whether a particular act, the treatment of workers more generally or the working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, you must raise it with the Company Secretary.

- 3.5 We aim 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. We are 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 our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Company Secretary immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our reporting procedure which can be found in your Employee Handbook, on our internal intranet or on our website.

## **Communication and awareness of this policy**

- 4.1 Awareness of this policy is brought to the attention of every new joiner during onboarding. It is published on our website and also accessible on our internal intranet.
- 4.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **Breaches of this policy**

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or serious misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## **Adoption of this policy**

- 6.1 This policy was adopted by the Board on 23<sup>rd</sup> June 2021. The Board reviews this Charter periodically. The Company Secretary will communicate any amendments to employees as appropriate. The last review of this Charter took place on 28<sup>th</sup> February 2025 and replaces any previous policy in this regard.