



SONIC
HEALTHCARE
LIMITED

Our Commitment to Human Rights

Modern Slavery Statement | 2025

Contents

About this Statement

Sonic Healthcare Limited ACN 004 196 909 (Sonic) is an Australian public company listed on the Australian Securities Exchange (ASX: SHL). Sonic’s registered office is Level 22, Grosvenor Place, 225 George Street, Sydney NSW 2000, Australia. The 2025 Modern Slavery Statement (Statement) has been published in accordance with the *Australian Modern Slavery Act 2018* (Cth) (the ‘Act’) and the United Kingdom Modern Slavery Act 2015 (UK) (the ‘UK Act’).

This Statement describes the steps Sonic has taken during the year ended 30 June 2025 to assess and address risks related to modern slavery and human rights across our operations and supply chains, in Australia, the UK and our other global operations.

This Statement adopts the definition of modern slavery to include the trafficking of people, slavery, servitude, forced labour, debt bondage, deceptive recruiting for labour or service, and the worst forms of child labour (as defined in Article 3 of the ILO Convention).

This Statement was approved by the Sonic Healthcare Board on 13 November 2025 and is signed by the Chief Executive Officer of Sonic Healthcare Limited, who is also a member of the Board.

This Statement is published on our [website](#) and lodged with the Australian Government’s Modern Slavery Statements Register.

Entities covered by this Statement

Sonic makes this joint Statement on behalf of itself and each Australian reporting entity (listed below), as defined in Section 5 of the Act:

- | | |
|---|-----------------------------------|
| ■ Sonic Healthcare Services Pty Limited | ■ IPN Medical Centres Pty Limited |
| ■ Castlereagh Co Pty Limited | ■ Melbourne Pathology Pty Ltd |
| ■ Clinipath Pathology Pty Ltd | ■ Queensland X-Ray Pty Ltd |
| ■ Clinipath Laboratories Pty Limited | ■ SKG Radiology Pty Ltd |
| ■ Douglass Hanly Moir Pathology Pty Limited | ■ Sonic Clinical Services Pty Ltd |
| ■ Hunter Imaging Group Pty Limited | ■ Sonic HealthPlus Pty Ltd |
| | ■ Sullivan Nicolaides Pty Ltd |

This Statement also fulfils the requirements of Section 54 of the UK Act, and has been prepared and published on behalf of:

- The Doctors Laboratory Limited
- Health Services Laboratories LLP

In addition to the above reporting entities, this Statement also covers all other entities ultimately controlled by Sonic, a full list of which can be found in the Consolidated Entity Disclosure Statement on pages 144 to 156 of Sonic’s [Annual Report 2025](#).

For the avoidance of doubt, this Statement does not cover joint ventures in which Sonic does not have operational control.



Consultation

This Statement has been prepared by Sonic Healthcare in consultation with each Sonic division across all countries of operation. This consultation is based on input from the Sonic Global Human Rights Committee, which includes senior management representation from every country of operation and representation from procurement, human resources, legal, finance, communications and training. The Committee meets formally on a regular basis to discuss key topics relating to modern slavery in our global operations and supply chains, including:

- any new or emerging modern slavery risks across our operations or supply chains
- progress on any corrective actions undertaken by our suppliers
- updates to our employee and supplier education initiatives
- any feedback received from stakeholders
- opportunities identified to improve our internal processes
- any legislative changes within our jurisdictions of operation, and
- to agree on the content of our Statement.

The Sonic Board of Directors also contributes to the consultation process and is responsible for reviewing and approving the final content of this Statement.

Acknowledgement of Country

Sonic Healthcare acknowledges the Traditional Owners of Country throughout Australia.

We pay our respects to Elders past and present, and extend this recognition and respect to Indigenous peoples around the world.

CEO's Message

On behalf of the Board of Sonic Healthcare, I am pleased to present the Sonic Healthcare Modern Slavery Statement 2025.

As a global healthcare company with operations across seven countries, Sonic Healthcare is deeply committed to supporting our people, the communities we serve, and protecting the environments in which we operate. As part of this, we recognise our responsibility to ensure ethical, responsible and sustainable sourcing across our extensive supply chains.

In FY2025, we actively worked with suppliers, industry peers, shareholder groups, key staff and other stakeholders to identify potential risks of modern slavery in our operations and supply chains, using our modern slavery risk management framework. We also performed additional due diligence across a number of higher-risk suppliers. While we did not identify any instances of modern slavery, we did find opportunities for improvement and will encourage these suppliers to implement robust policies and processes to better mitigate against possible instances of modern slavery.

As I conclude my tenure as CEO, this will be my last Modern Slavery Statement message. I am proud of the actions we have taken to raise modern slavery awareness among employees and suppliers, including embedding modern slavery risk management into our daily operations. We will continue to evolve our systems and work with our suppliers to build their capabilities and to promote transparency and accountability.



Dr Colin Goldschmidt
CEO – Sonic Healthcare
13 November 2025



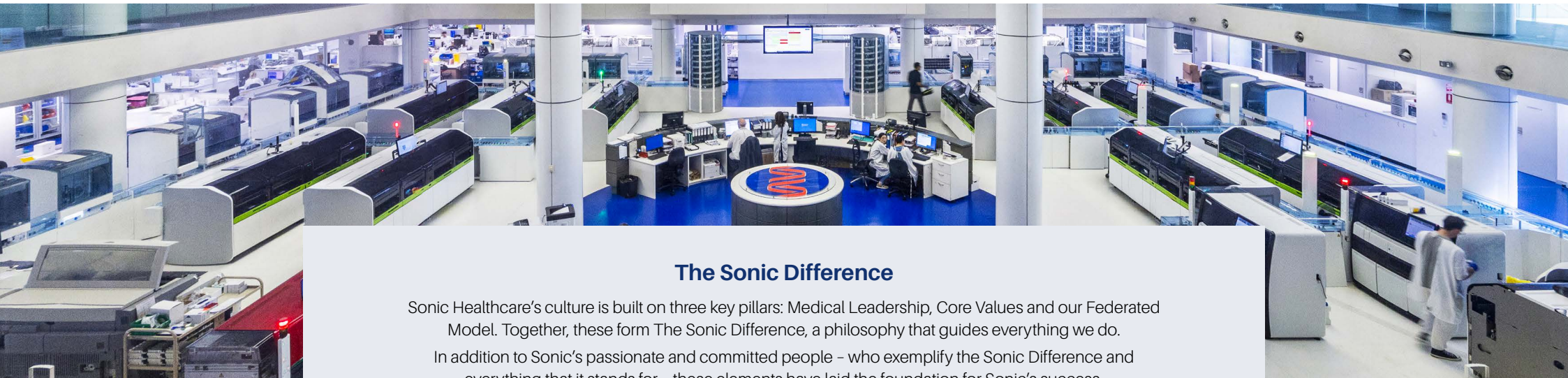
Introduction

Sonic Healthcare is a global leader in healthcare services, with a reputation for clinical and operational excellence in laboratory medicine/pathology, radiology and primary care medical services. Our purpose goes beyond diagnostics – we are deeply committed to supporting our people, the communities we serve, and protecting the environments in which we operate. This commitment is embedded in our culture and upheld through strong corporate governance across operations in Australasia, Europe and North America.

Our diagnostic and clinical services are provided by more than 2,200 pathologists, radiologists and other clinicians, and approximately 18,000 employees in science-based roles, including radiographers, sonographers, technicians and nurses. These professionals are guided by highly experienced medical leaders, from Board level through to management of our local practices.

Our staff are supported by ongoing investments in state-of-the-art medical technologies, modern facilities and information systems designed to meet the specific needs of our organisation and stakeholders. This is backed by a firm commitment to uncompromising ethical standards in business management and medical practice.





The Sonic Difference

Sonic Healthcare's culture is built on three key pillars: Medical Leadership, Core Values and our Federated Model. Together, these form The Sonic Difference, a philosophy that guides everything we do.

In addition to Sonic's passionate and committed people – who exemplify the Sonic Difference and everything that it stands for – these elements have laid the foundation for Sonic's success.

By always acting in the best interests of doctors and their patients, and by putting our people first, we've earned a reputation for medical excellence and built a workplace that attracts and retains top talent.

Two of our guiding principles – 'Company Conscience' and 'Respect for Our People' – are deeply aligned with efforts to uphold human rights and eradicate modern slavery, both locally and abroad.

Medical Leadership

Medical Leadership – leaders who truly understand and respect doctors and the medical profession – is the cornerstone of Sonic's success. It is woven into every part of our organisation and inspires our people to deliver superior healthcare for both doctors and patients.

Our leaders are medical doctors or experienced healthcare professionals who are deeply passionate about healthcare. They uphold an ethical, respectful and caring approach, always prioritising service, patient safety and quality.

They are empowered to act in the best interests of clinicians and patients, supported by strong clinical governance embedded across all our healthcare businesses.

Medical Leadership is enshrined in Sonic's corporate culture. It reflects our belief that medicine is a profession rather than a business. This ethos is embraced by everyone at Sonic, who understand the vital role they play in delivering our high-quality medical services.

Medical Leadership Principles

Medicine is a complex profession that demands insight, sensitivity and a commitment to lifelong learning to deliver the best possible care and outcomes for patients.

Our Medical Leadership Principles provide Sonic staff with clear guidelines on how to engage with external stakeholders, including doctors, patients, customers and our local and global communities.

The five key principles are a vital part of our Code of Conduct and Ethics, and have been embraced by Sonic teams around the world as shared guidelines for how we operate, uniting us in purpose and culture.



Core Values



- Commit to service excellence**
To willingly serve all those with whom we deal, with unsurpassed excellence.
- Treat each other with respect and honesty**
To grow a workplace where trust, team spirit and equity are an integral part of everything we do.
- Demonstrate responsibility and accountability**
To set an example, to take ownership of each situation to the best of our ability and to seek help when needed.
- Be enthusiastic about continuous improvement**
To never be complacent, to recognise limitations and opportunities for ourselves and processes and to learn through these.
- Maintain confidentiality**
To keep all information pertaining to patients, as well as professional and commercial issues, in strict confidence.

Our Core Values

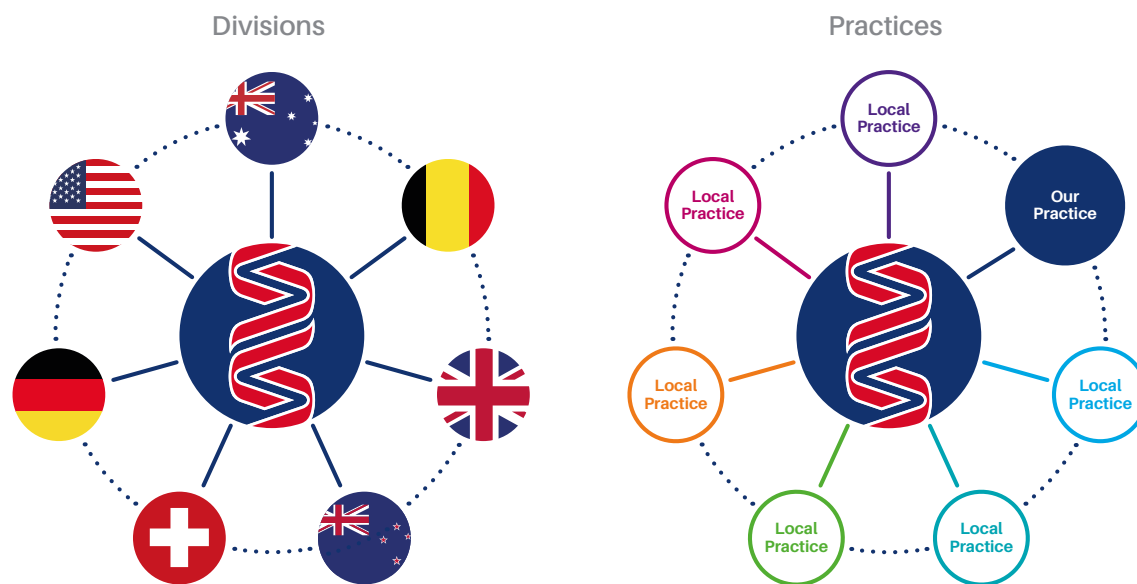
Sonic's Core Values are a unifying blueprint for the supportive and respectful way we interact with one another, and the professionalism we bring to our daily work. Individually, each value reflects our commitment to medical excellence. Collectively, they empower our people to deliver outstanding healthcare services to doctors and patients.

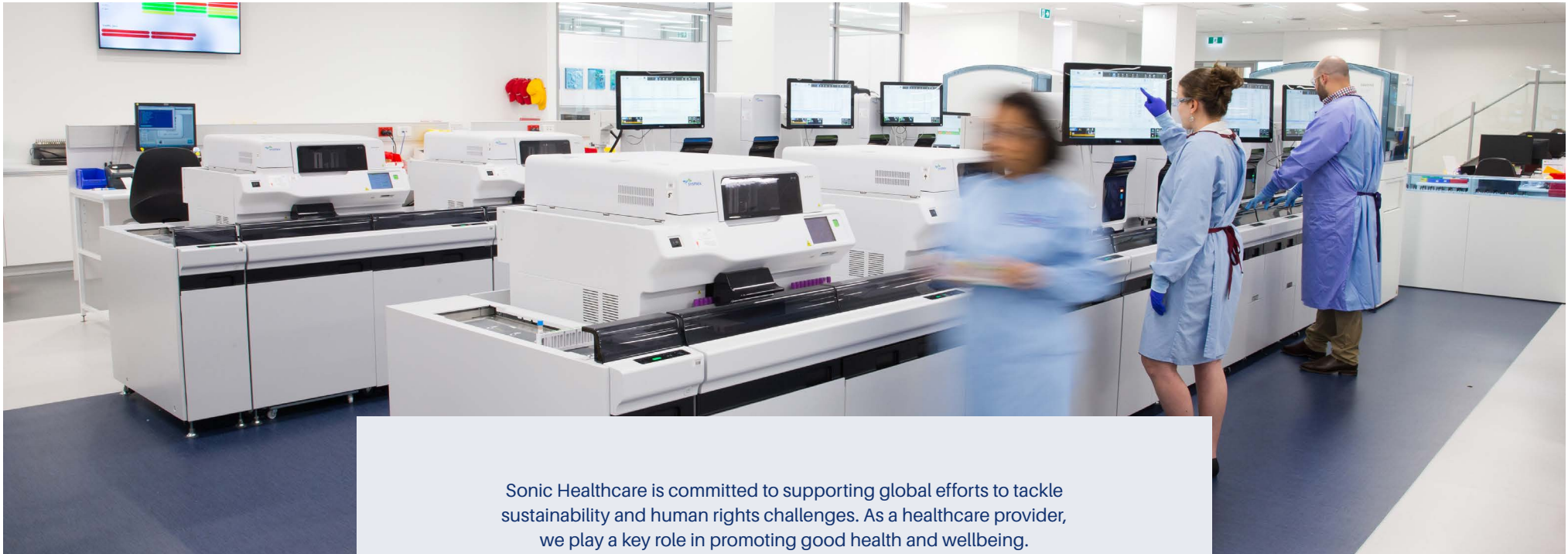
Our Federated Model

Sonic Healthcare's federated management structure unites our global businesses under the shared goal of Medical Leadership, and provides a framework that combines the strength of global resources with the agility of local expertise.

This model empowers our individual companies to operate with autonomy, retaining local management teams, branding and service delivery, while aligning with Sonic's shared vision and values. It allows each practice to respond effectively to the specific needs of its community, while benefiting from the support and scale of a global network.

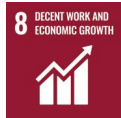
By preserving the identity and goodwill of our foundation brands, the Federated Model has been key to our long-term success. It also fosters collaboration across our global network, enabling the sharing of knowledge, the development of synergies and the adoption of best practices.





Sonic Healthcare is committed to supporting global efforts to tackle sustainability and human rights challenges. As a healthcare provider, we play a key role in promoting good health and wellbeing.

In line with the United Nations Sustainable Development Goals (UNSDGs), we've identified nine priority goals that align with our responsibilities as a global, federated healthcare organisation. Of these, five include efforts to eliminate modern slavery.



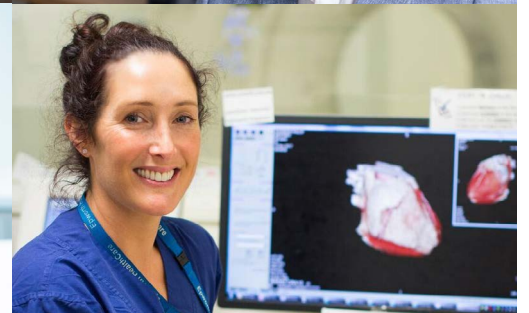
For more details on how we align with the UNSDGs, please refer to our [Sustainability Report 2025](#)



Our services

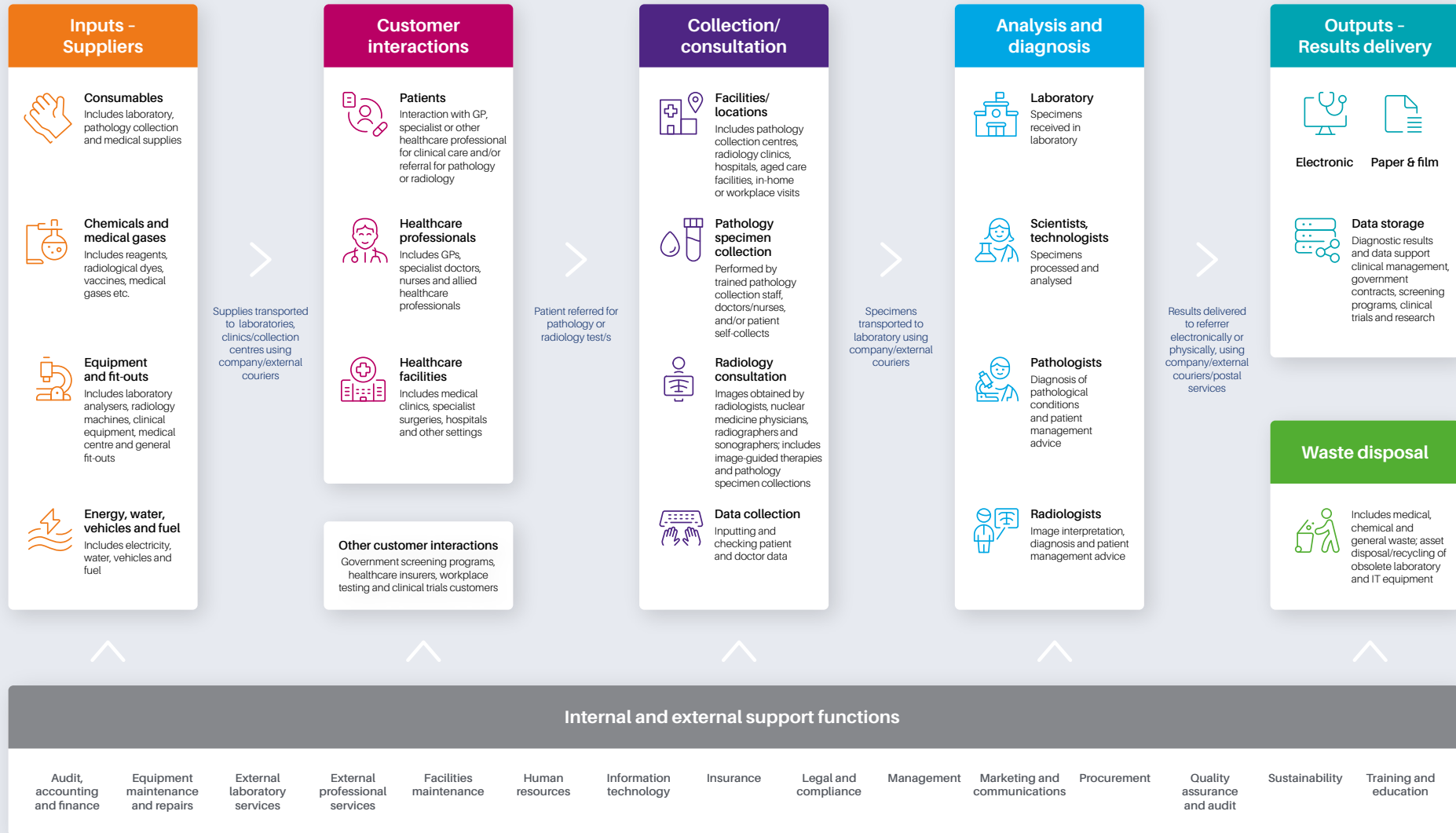
Sonic Healthcare delivers high-quality pathology/laboratory medicine, radiology, general practice and corporate medical services.

With 3,500 locations globally, we provide accessible and affordable healthcare to approximately 129 million patients each year. Our professional environments emphasise accuracy, reliability and safety.



Our value chain

The diagram below represents the key elements of our value chain.



Our structure and operations

Sonic Healthcare delivers high-quality services in pathology/laboratory medicine, radiology, general practice and corporate medical care in Australia and pathology/laboratory medicine in the USA, UK, Germany, Switzerland, Belgium and New Zealand.

We operate under a federated structure, meaning each local business retains its own identity and leadership. Every division has its own CEO and management team. When Sonic acquires a new business, we typically keep the existing brand, leadership and local 'flavour'. This approach helps preserve goodwill, supports local employment in the communities we serve, and resonates most strongly with local medical communities.

Our federated structure also fosters the opportunity to share knowledge and experience, allowing us to develop synergies and establish best practices, further strengthening the foundations for Sonic's continued growth and prosperity into the future.



Our operating segments

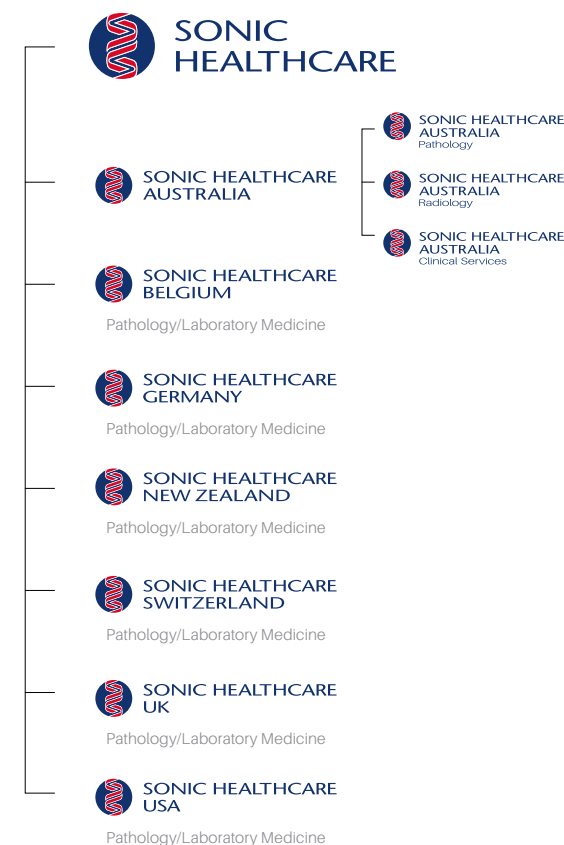
Sonic is divided into three operating segments:

Operational segment	Overview of services
 Pathology/ Laboratory Medicine Australia, USA, Germany, UK, Belgium, Switzerland and New Zealand	Pathology/laboratory medicine¹ is the branch of medicine that studies samples of blood, urine, tissue and bodily fluids to identify patients at risk of disease, to determine the cause and nature of disease, and to guide and monitor treatment and progress of disease management. Medical laboratory test results provide clinicians with the information they need to manage patients in a timely and appropriate way, enabling optimal health outcomes for the individual as well as the community.
 Radiology Australia	Radiology is the branch of medicine that uses non-invasive technologies to create images of bones, tissues and organs within the human body. These images are interpreted by a radiologist or nuclear medicine physician to identify or monitor disease or injuries. Diagnostic imaging technologies include X-rays, computed tomography (CT), magnetic resonance imaging (MRI), ultrasounds, nuclear medicine, positron emission tomography (PET) and more. Imaging methods are also used to help radiologists perform procedures, such as biopsies, fine needle aspirations and image-guided treatments, known as interventional radiology.
 Clinical Services Australia	General Practice is the medical discipline that delivers primary healthcare in the community. General Practice is usually the first port of call for patients, and deals with everything, from colds and flu through to acute and chronic illnesses. General Practitioners also provide preventative care and health education to patients. The holistic approach of General Practice aims to consider the biological, psychological and social factors relevant to the medical care of each patient. The discipline is not confined to specific organs of the body and involves treating people with multiple health issues. Sonic also operates dedicated skin cancer clinics, and provides occupational healthcare and general medical services to workplaces, including pre-employment medical checks, injury prevention management, general practice, vaccinations, disability medical assessments and allied health services.

¹ Diagnostic specialties include anatomical pathology, biochemistry, haematology, immunology, microbiology and genetics.

Structure of Sonic entities

Sonic's federated structure is supported by a strong culture of collaboration, communication and sharing of best practices. Executives at our Global Office in Sydney, Australia, provide leadership across the organisation, ensuring that key matters are managed consistently across the group, while optimising synergies and improving organisational performance. Sonic's divisional structure is outlined in the diagram below.



Our workforce

As a global organisation, Sonic Healthcare is committed to supporting the communities we serve, starting with our people. We strive to provide a work environment that is respectful, safe, equitable and rewarding.

At the end of FY2025, Sonic employed approximately 43,000 people who proudly delivered high-quality medical and diagnostic services to approximately 129 million people across numerous communities.

Most of our employees work on a full-time or part-time basis, with only a small number employed on casual or temporary contracts. Almost half our total workforce is employed in highly skilled technical and science-based roles, while 28% of all employees have worked for Sonic for 10 years or more.

Gender diversity is another core tenet of our operations. This includes 55.6% female representation at Board level and 38.9% in executive leadership positions.

For more details about our workforce composition, please refer to the 'Our people' section of the Sonic Healthcare [Sustainability Report 2025](#), pages 79 to 95.

Total workforce - employees by country and gender*				
	Female	Male	Total	% female
Australia	15,070	4,536	19,606	76.9%
Belgium	332	168	500	66.4%
Germany	6,098	2,758	8,856	68.9%
New Zealand	145	59	204	71.1%
Switzerland	1,944	847	2,791	69.7%
United Kingdom	2,165	1,365	3,530	61.3%
United States	5,381	2,408	7,789	69.1%
Total	31,135	12,141	43,276	71.9%

For further data on Sonic's workforce, please refer to Appendices in the [Sustainability Report 2025](#).

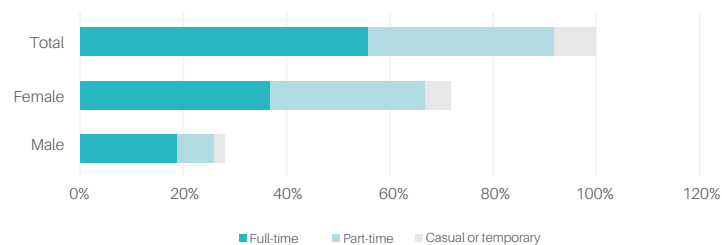
Gender diversity: female representation*		
	Total workforce	% female
Board of Directors	9	55.6%
Executive senior leadership ¹	496	38.9%
Total senior leadership ²	3,818	51.5%
Science-based roles ³	20,411	73.1%
Whole of workforce	43,276	71.9%

1 Includes CEO or head of each reporting unit and their executive management teams

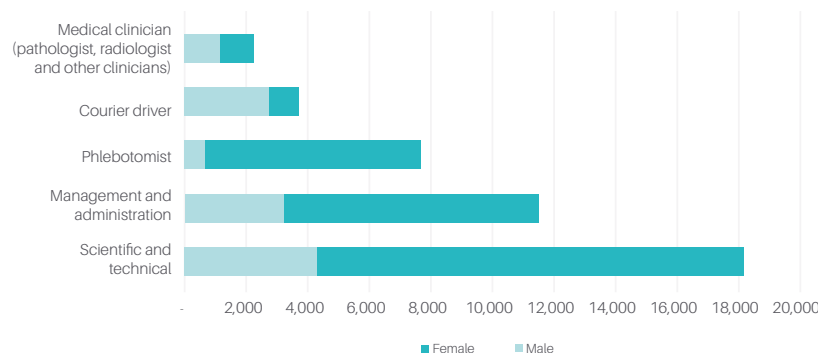
2 Includes executive senior leadership, other managers, pathologists, radiologists and other doctors

3 Includes doctors, scientists, technicians, radiographers, sonographers and nurses

Status of employment*



Workforce by role type and gender*



39%

Women in executive leadership positions



47%

Total science-based roles (as a proportion of all roles)



28%

Employees with more than 10 years of service

*As at 30 June 2025.

Our supply chains

Sonic has a large and diverse supply chain, with approximately 20,000 direct (Tier 1) suppliers providing goods and services across our operations in seven countries. Our largest spend category relates to specialised medical supplies and equipment that support high-quality diagnostic testing and medical procedures. The combined categories of specialised medical equipment, medical supplies and related maintenance and repair services constituted approximately 44% of our total supply chain spend.

Sonic Healthcare's procurement teams, located in each country of our operations, sourced goods and services from a wide range of supplier categories in FY2025. Overall, Sonic's category spends were proportionally similar to FY2024. The graph to the right shows how our spend profile is distributed across different product and service categories.

Although we work with many suppliers, a large portion of our spending is concentrated among approximately 20 reputable, multinational Tier 1 suppliers of medical consumables and equipment. This represents 25% of our supply chain spend. These companies are mainly based in low-risk countries for modern slavery, including the USA, UK, Italy, Switzerland and Japan. Sourcing from these suppliers is typically via long-term supply contracts with frequent meetings and site visit engagements.

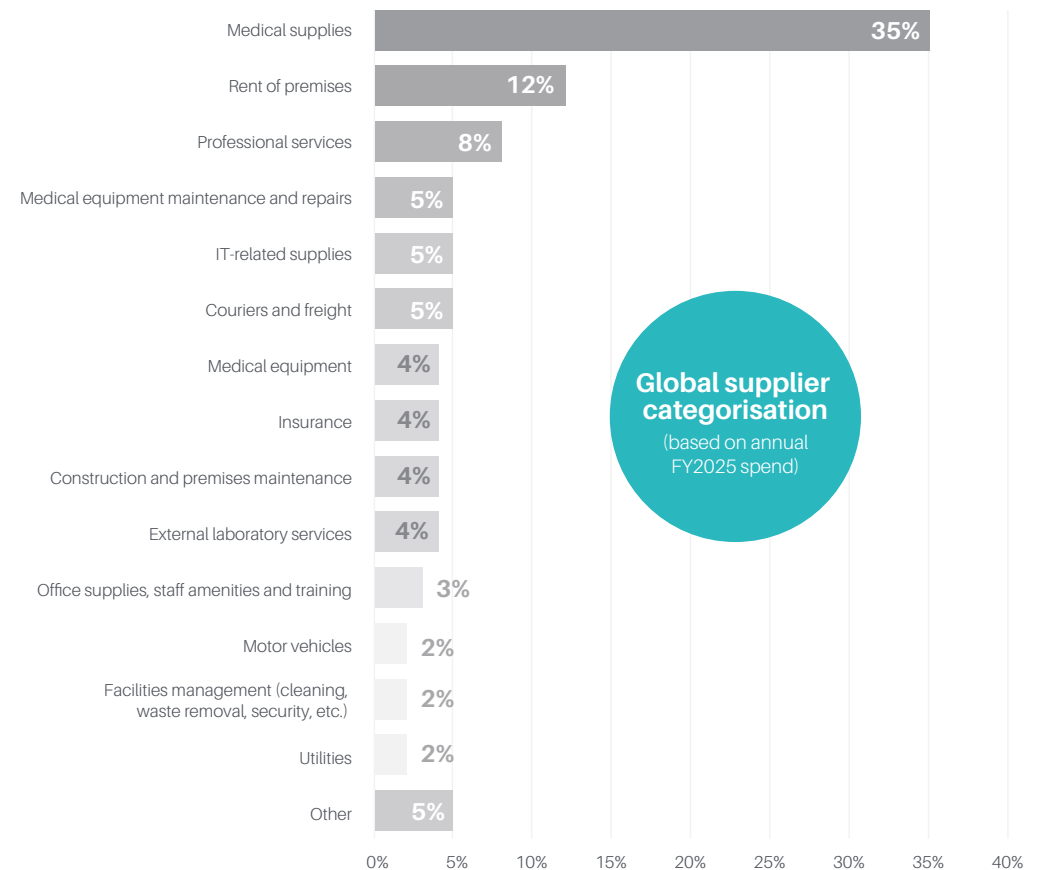
While these Tier 1 suppliers are located in low-risk regions, their Tier 2 suppliers may operate in countries with higher risks of modern slavery violations.

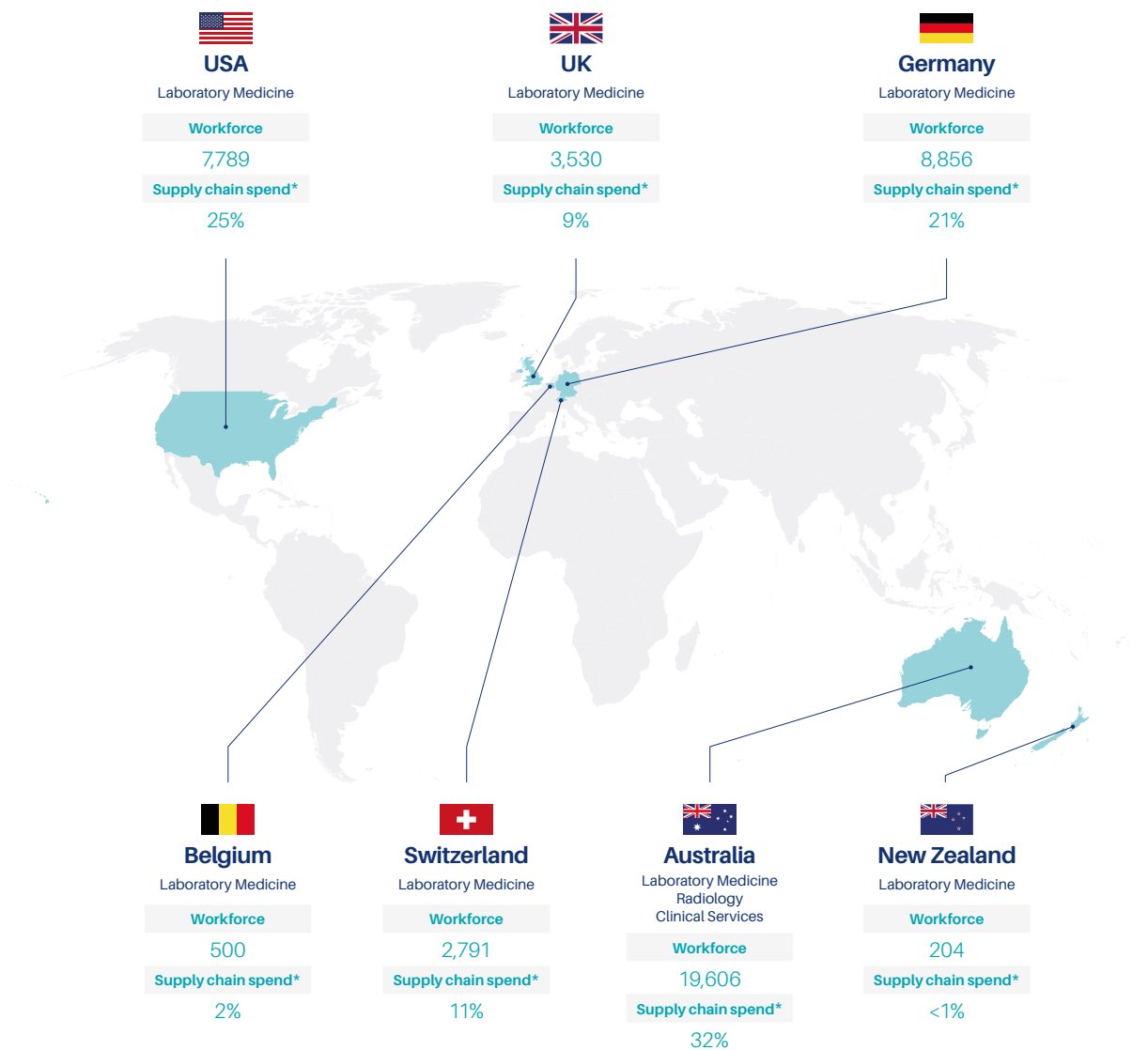
Some of the ancillary goods and services we source fall into categories with a higher risk of modern slavery, such as:

- disposable gloves
- IT-related supplies
- couriers and freight
- construction and premises maintenance
- facility management, including cleaning.

Although these categories represent a small portion of our overall spend, they are considered our higher risk areas and are subject to a more detailed modern slavery due diligence program.

Relative spend proportion by product/service category





*Represents the country's proportion of Sonic Healthcare's global supplier spend.

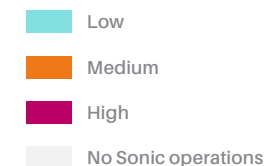
Sonic's countries of operation, workforce numbers and proportional supplier spend

The map on the left shows our Tier 1 supplier spend by our countries of operation.

It highlights that most of our goods and services are sourced locally within countries that have a low risk of modern slavery. However, it's important to note that the map reflects the location of the Tier 1 supplier we purchase from, not necessarily the country where the products are manufactured.

Risk profiling in our operations

All Sonic Healthcare companies operate in countries that have a low-risk rating for the prevalence of modern slavery*.



*Risk profiling in our operations based on Global Slavery Index 2023 Dataset, Walk Free

Risks of modern slavery in our operations and supply chains

Sonic is committed to identifying risks of modern slavery within our operations and supply chains. We use a risk management framework to identify and manage these risks, as well as the UN Guiding Principles on Business and Human Rights (UNGPs) to assist in the analysis of modern slavery risks.

1 Be proactive

Take a proactive approach to modern slavery risk management, which improves our chances of identifying potential modern slavery risks within our operations and supply chains.



2 Engage with stakeholders

Establish positive and open dialogue and engagement with employees, suppliers, investors, industry peers and other relevant stakeholders, to encourage the identification of potential modern slavery issues and actions.



3 Communicate

Provide education, training and ongoing communications for employees (especially those involved in human resources, recruitment, procurement and audit functions) and suppliers, to strengthen awareness and response capabilities.



4 Work together

Collaborate to drive meaningful change. We work with suppliers, industry peers, shareholder groups and other stakeholders, to tackle the root causes of modern slavery.



5 Respond accordingly

Implement a staged response where potential instances of modern slavery are identified. We act quickly and responsibly when concerns or reports of modern slavery arise. Our responses focus on protecting and supporting affected workers or individuals.



Principles used to guide Sonic's approach to modern slavery risks

The risk of modern slavery in our operations

Sonic has strengthened the monitoring and assessment of employment practices and operations to manage the risk of human rights violations and instances of modern slavery. In this reporting period, we have established a global Human Resources (HR) forum that brings together the Heads of HR in our Australian and overseas operations on a quarterly basis. This forum complements our existing Australian HR leaders' group, and includes regular discussions on employment practices and human rights.

We also conducted a global Modern Slavery audit survey in FY2025 through the country HR leads. Each lead was required to declare any potential human rights violations including those related to activities outsourced to overseas workers. Although no instances of modern slavery were identified during this audit, and while the risk of modern slavery within our operations is assessed as low, we will continue to monitor.

The terms and conditions of employment across Sonic are governed by:

- international human rights conventions and treaties
- country-specific statutory labour laws and regulations
- global Sonic codes and policies dealing with conduct and ethics, human rights, workplace health and safety, and modern slavery
- local employment policies and procedures, developed in consultation with employees.

Our internal audits cover employment terms and conditions, as well as training and education provided to staff about their local and international rights.

Our updated Global Whistleblower Policy encourages employees and external stakeholders to report incidents or concerns relating to sub-standard terms and conditions of employment, human rights violations or modern slavery practices. To date, we have not received reports of such matters within our operations.

The risk of modern slavery in our supply chains

Sonic Healthcare's biggest exposure to modern slavery risk comes from our large and complex supply chains. We work with approximately 20,000 Tier 1 suppliers across seven countries, and many more Tier 2 and lower-tier suppliers that we don't deal with directly.

Using the United Nations Guiding Principles on Business and Human Rights, we understand that our business relationships with our supply chain partners could be linked to human rights and modern slavery issues, through our multiple supply chain tiers.

To manage this risk, we use a multi-layered assessment framework, which includes:

- supplier human rights (modern slavery) due diligence questionnaires that ask nominated suppliers to provide information relating to their operations and supply chains
- periodic assessment of supplier compliance with Sonic's [Supplier Policy](#)
- media monitoring for emerging risks and incidents, including tracking government sanctions lists, such as the US Customs and Border Protection Withhold Release Orders
- reports from employees and other stakeholders about possible or actual modern slavery or human rights violations
- collaborations with various stakeholders, including industry peers, suppliers, shareholder groups and various rating agencies.

Because it's difficult to assess risks deeper in the supply chain, we focus and prioritise our efforts on the highest-risk categories, such as:

- certain medical consumables, including disposable gloves
- cleaning services
- transport and logistics.

The table on the following pages shows the categories of products and services Sonic purchased in FY2025, along with their risk ratings based on industry and location risk. Even though we buy from trusted Tier 1 suppliers in low-risk countries, there may still be risks further along the supply chain. We actively monitor these areas, even if we don't have direct control over them.

Using the United Nations Guiding Principles on Business and Human Rights, we understand that our business relationships could be linked to human rights and modern slavery issues, through our multiple supply chain tiers.

Supplier risk assessment

Main supply chain categories	Spend	Products and services	Risk rating based on industry and geography
Medical supplies	35%	- Reagents, contrast agents and other chemicals - Medicines and vaccines - Other medical consumables - Personal protective equipment (PPE)	Low risk Most of Sonic's largest Tier 1 suppliers are headquartered in the USA, western Europe, UK, Japan and Australia. These businesses account for a significant percentage of Sonic's procurement spend, and a high proportion have satisfactorily completed Sonic's modern slavery due diligence questionnaire. Medium-high risk (disposable gloves) Sonic Healthcare sources a large number of disposable gloves from reputable Tier 1 healthcare consumable suppliers across all regions where we operate. However, the manufacturing of disposable gloves is known to carry a high risk of human rights violations, especially labour violations. Workers in this industry may face exploitative conditions, such as: - poor living conditions, especially when housing is provided by employers - long working hours, which can increase during high-demand periods like pandemics - confiscation of identity documents, limiting workers' freedom of movement - debt bondage, where workers are charged recruitment fees by third-party labour firms, leaving them to work off the debt.
Rent of premises	12%	Premises rent and related costs paid to our landlords	Low risk Suppliers are based within our seven countries of operation. However, there may be Tier 2 risks if landlords include services such as cleaning in their charges. Cleaning and similar services are associated with higher modern slavery risks, as noted in our facilities management category below.
Professional services	8%	Legal and accounting firms, professional consultants and contractors, such as specialist medical locums, marketing, HR/recruitment firms and IT	Low risk Suppliers are based within our seven countries of operation and most engagements of temporary workforce and contractors relate to medical practitioners and other professionals.
External laboratory services	4%	Testing outsourced to third-party specialist medical providers	Low risk Suppliers are based within our seven countries of operation.
Couriers and freight	5%	Third-party couriers, freight, postage and mail services	Medium risk Freight and transport services, including shipping, distribution and storage. Groups include drivers, seafarers, port and other workers. Local postage and mail services are considered low risk.
IT-related supplies	5%	Computer hardware and consumables, software, including usage and maintenance, managed print and other IT services and supplies	Medium risk Raw materials and the manufacture of consumables may take place in higher-risk geographies.
Construction and premises maintenance	4%	Building contractors and professionals used for the construction and maintenance of premises	Medium risk Construction and maintenance only occurs in our seven countries of operation. However, third-party outsourcing of property maintenance may impose a risk of migrant labour exploitation.

Supplier risk assessment

Main supply chain categories	Spend	Products and services	Risk rating based on industry and geography
Medical equipment	4%	Medical equipment purchased	Low risk Suppliers are mostly headquartered in the USA, western Europe, UK, Japan and Australia. These businesses are predominantly large multinational organisations, most of whom have satisfactorily completed Sonic's modern slavery due diligence questionnaire.
Medical equipment maintenance and repairs	5%	Medical equipment repairs and maintenance	Low risk Suppliers and their employees are predominantly based within our seven countries of operation.
Insurance	4%	- Normal business and commercial insurances - Employment-related insurances	Low risk Suppliers are based within our seven countries of operation. However, increased risks may be associated with Tier 1 utility providers using call centres outside Sonic's low-risk countries of operations.
Office supplies, staff amenities and training	3%	- Stationery, office equipment and consumables, staff amenities, uniforms, cleaning products - Staff training	Predominantly low risk Tier 1 suppliers (mainly distributors) are deemed to be low risk.
Utilities	2%	Electricity, gas, water, telephone and data services	Low risk Suppliers are based within our seven countries of operation. However, increased risks may be associated with Tier 1 utility providers using call centres outside Sonic's low-risk countries of operations.
Facilities management	2%	- Cleaning - Security - Waste removal	Medium risk These industries often rely heavily on the use of subcontractors, which may allow exploitative practices to go undetected. Medium-high risk (cleaning) Sonic relies on external suppliers for the provision of cleaning services for its facilities. Sonic uses reputable Tier 1 suppliers in each country of operation for this purpose. This category presents a higher risk of modern slavery for various reasons, including the industry's reliance on migrant labour, international students, visa holders and subcontractors. These workers are potentially vulnerable to exploitation and may be less likely to report such incidents. Note that some smaller cleaning contracts are considered to have low risk of modern slavery due to the self-employed nature of the service (that is, the cleaner is a sole trader and provides the services themselves). In our previous Statements we had assessed the cleaning sub-category as medium risk but upon stakeholder feedback and collaboration, we have increased our risk rating to medium-high. Not only do we focus on modern slavery issues during the onboarding of new cleaning suppliers but continue to monitor, assess and support throughout the term of the contract.
Motor vehicles	2%	Fleet vehicles, including repairs, maintenance and fuel	Low-medium risk Certain vehicle parts, such as rubber, steel and cobalt for electric vehicles batteries, may be sourced from regions where modern slavery is more prevalent.
Other	5%	All other suppliers	Low risk Includes items such as memberships, donations, advertising, marketing, hire equipment, licence fees and other general expenses.

Actions taken to assess and address modern slavery risks

Sonic Healthcare is continuously improving its processes to help eliminate any risk of modern slavery. Our efforts are guided by our Core Values and Medical Leadership, which shape how our employees around the world act to protect human rights and reduce modern slavery risks.

In the next few pages is a summary of the key actions we've taken to assess and address modern slavery risks across our operations and supply chains.



ACTION 1

Supplier due diligence program

Sonic Healthcare continues to strengthen our supplier due diligence process, starting with our online human rights (modern slavery) questionnaire for prospective and existing suppliers to Sonic. This questionnaire helps us assess both Tier 1 suppliers (those we work with directly) and selected higher-risk Tier 2 suppliers or indirect suppliers, such as manufacturers.

The questionnaire initiates engagement with the supplier on modern slavery awareness and risks and helps to inform us about:

- the product/service category supplied to Sonic
- the country of origin of key products and services supplied
- whether the supplier has become aware of any actual or potential modern slavery risks in their supply chains and the nature of those risks

- the presence and nature of policies aimed at identifying and mitigating modern slavery and human rights violations within the supplier's domestic and global operations and supply chains
- whether the supplier's contracts with their own suppliers contain clauses to ensure compliance with relevant policies and/or legislation on modern slavery, labour standards and human rights
- whether the supplier has procedures to monitor compliance with documented policies and any relevant modern slavery legislation
- whether the supplier has protected whistleblower mechanisms in place that are accessible to employees, suppliers, consultants and subcontractors, to anonymously raise concerns related to labour conditions or workplace grievances
- whether education and training in relation to modern slavery and human rights is provided to employees and other stakeholders.

In addition, the questionnaire seeks confirmation of the following:

- compliance with Sonic's [Supplier Policy](#)
- that all employees and subcontractors of the supplier are engaged on the basis that they have freely chosen employment and that the conditions of work are not in violation of modern slavery or human rights legislation.

Each supplier's response is collated, assessed and assigned a risk score. This risk score then informs the type of follow-up required. Some suppliers choose to submit their own Modern Slavery Statement instead of completing Sonic's online human rights questionnaire. When this happens, we ask them to provide a statement that is relevant to their local jurisdiction.

Approximately 400 Tier 1 and selected higher-risk Tier 2 suppliers have provided documentation describing and supporting their efforts to assess and address modern slavery risks. Together, these suppliers represent approximately 40% of Sonic's global spend.

ACTION 2

Additional assessments

For higher-risk suppliers, we conduct deeper reviews, which may include onsite visits.

In 2024 we focused on disposable glove manufacturers. Refer to our [2024 Modern Slavery Statement](#) for this background and related case study.

In FY2025, we focused on:

- selected cleaning service providers across our global operations (see [Case Study 1](#))
- Tier 2 suppliers in China, assessed in person by a Tier 1 packaging supplier (see [Case Study 2](#)).



CASE STUDY 1

Cleaning

The cleaning industry presents a higher risk of modern slavery due to its reliance on vulnerable workers, such as migrants, international students, visa holders and people with limited English (or limited knowledge of the primary language in their new country of residence).

As part of our focus on higher risk industries, Sonic recently surveyed a number of cleaning service suppliers across all operating regions, representing both large and small suppliers. The survey assessed whether suppliers had knowledge of the risks of modern slavery and, if not, introduced them to those risks. Further, the survey explored whether the suppliers had appropriate policies and controls in place to reduce modern slavery risks.

High-level findings from the survey confirm that all suppliers who have responded attest to complying with the Sonic Healthcare Supplier Policy. All suppliers also confirmed that their employees and subcontractors are engaged under freely chosen employment, with no human rights violations reported.

Cleaning supplier improvement opportunities identified

Responses to the survey gave us insight into the following:

- the opportunity for some suppliers to develop and/or monitor compliance to policies or statements regarding labour standards/human rights
- the opportunity for some suppliers to establish anonymous grievance mechanisms, which we are actively encouraging them to implement
- the need for some suppliers to provide modern slavery/human rights training for employees and/or subcontractors.

The opportunities identified (above) were evident amongst a small proportion of smaller supplier organisations. Sonic will continue to work with suppliers to support the implementation of these initiatives.

CASE STUDY 2

Supplier capability building, Tier 1 and 2

Sonic's extensive supply chain includes approximately 20,000 Tier 1 suppliers and many more in the Tier 2 classification. To strengthen our approach to managing modern slavery risks, we are actively working with key suppliers to develop their own capability to identify and address modern slavery risks. This complements our internal risk management program.

In FY2025, we worked closely with a long-term Tier 1 supplier of high-volume packaging products that are mainly sourced from China, where there is potentially a higher risk of modern slavery. Our Tier 1 supplier visited five Tier 2 supplier sites in China and, in collaboration with Sonic, used our modern slavery site assessment work program as the basis for their onsite reviews.

The Tier 1 supplier interviewed employees at each of the Tier 2 supplier sites to verify information that had been provided by their organisation. After completing the site visits, the Tier 1 supplier provided Sonic with assessment reports, including scores and evidence of each supplier's operational procedures and controls.

Findings

No modern slavery indicators were detected during the visits, and the Tier 2 suppliers were assessed as lower risk for modern slavery. The Tier 2 suppliers all confirmed that they have grievance mechanisms in place for employees and subcontractors.

Several relatively minor improvement opportunities were identified during the visits. This included suggestions around improving organisation and housekeeping, making standard operating procedures more visible to employees, and improving equipment maintenance record-keeping.

Benefits

This collaborative approach delivered many benefits. The Tier 1 supplier improved their ability to recognise key risk indicators in manufacturing facilities, while also gaining a clear understanding of the standards we expect Tier 2 suppliers to meet.

Next steps

The Tier 1 supplier has communicated their findings to the Tier 2 suppliers and is tracking corrective actions. They will follow up to ensure improvements are implemented and will periodically reassess.



ACTION 3

Building employee awareness about modern slavery

Sonic supports employee awareness of modern slavery risk detection and mitigation through an interactive online training module that aims to empower employees to recognise potential risks and report them using Sonic's established channels. The online module includes knowledge check questions to reinforce understanding.

This online training has been completed by more than 11,000 staff across the Sonic group. The completion rates for staff in roles that may have higher exposure for potential instances of modern slavery, such as management, procurement, finance, recruitment and human resources, are more than 95%.

ACTION 4

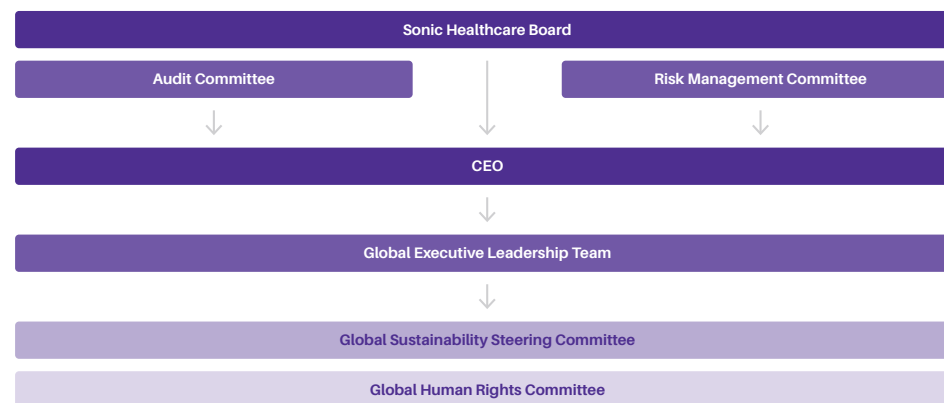
Provision of sound governance and oversight

Sonic has a clear governance structure to manage modern slavery risks, where Sonic's Board has ultimate responsibility for overseeing modern slavery risks. In addition, the Board reviews the Modern Slavery Statement each year and approves its release. This ensures our leadership remains informed and engaged in our efforts to protect human rights.

The Global Human Rights Committee supports Sonic's divisions' and local entities' day-to-day modern slavery risk activities, under the guidance of the Sonic Board and the Sonic Sustainability Steering Committee.

The Global Human Rights Committee is responsible for

- **Risk assessment:** identifying and evaluating modern slavery risks across Sonic's operations and supply chains.
- **Policy oversight:** reviewing and recommending policies, including due diligence and grievance procedures.
- **Monitoring and reporting:** tracking implementation and progress, and ensuring transparency through regular updates, including Sonic's annual modern slavery statement.
- **Awareness and training:** educating employees and stakeholders about warning signs of modern slavery and how to respond to potential human rights issues.
- **Stakeholder engagement:** facilitating conversations with internal and external stakeholders to address concerns.
- **Remediation:** implementing and monitoring actions to resolve any identified potential or real issues.



The Global Human Rights Committee includes head office senior executives from key areas, including operations, procurement, people and culture, communications, finance and legal. The Committee also includes senior managers from all countries where Sonic operates. A sub-committee meets monthly to review the effectiveness of current initiatives and track how modern slavery risk data is received, evaluated and acted upon.

Each year, representatives from Sonic's Global Human Rights Committee present to the Board on:

- the risks of modern slavery in our operations and supply chains
- the steps we're taking to reduce those risks
- any actions taken to address potential instances of modern slavery
- updates on modern slavery legislation and emerging areas of relevance.

ACTION 5

Policy framework

The previously mentioned governance framework is supported by a range of policies and charters that require internal and external stakeholders to operate in an ethical, safe and legally compliant manner. Some of these policies contain sections specific to modern slavery, while others relate more generally to human rights matters.

Policy	Overview
Board Charter	Outlines the Board's responsibilities and delegated management roles.
Code of Conduct and Ethics	Outlines our core values and defines the standards of behaviour expected of everyone who represents Sonic and acts on its behalf.
Labour Standards and Human Rights Policy	Describes our commitment to respecting human rights and upholding labour standards, and is aligned with the principles established within the Universal Declaration of Human Rights, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.
Supplier Policy	Outlines the expectations of suppliers regarding ethical conduct, the adoption of environmentally sustainable business practices (where feasible), and the integration of social responsibility, among other areas. It also provides contact details for individuals or organisations seeking to raise concerns.
Global Whistleblower Policy	Supports the reporting of misconduct, illegal acts or any improper actions relating to Sonic's businesses and protects whistleblowers.

As outlined in our [Code of Conduct and Ethics](#) and our [Labour Standards and Human Rights Policy](#), Sonic does not accept any form of slavery and prohibits the use of all forms of forced labour, including bonded labour and forced labour.

Sonic performs regular reviews of our key policies to ensure compliance with Australian and UK modern slavery legislation and other human rights laws, in addition to satisfying our own standards and expectations.

These policies, charters and codes conform to the following Acts and best-practice guidelines:

- [ILO Declaration on Fundamental Principles and Rights at Work](#), produced by the International Labour Organization
- [Guiding Principles on Business and Human Rights](#), produced by the United Nations Human Rights Office of the High Commissioner
- [Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities](#), produced by the Department of Home Affairs, Australian Government
- [Ethical Procurement for Health: Workbook](#), developed as a partnership between the Sustainable Development Unit for the Health and Social Care Sector, British Medical Association, Ethical Trading Initiative, and the Department of Health
- [Beyond compliance: Effective reporting under the Modern Slavery Act – A civil society guide for commercial organisations on the transparency in supply chains clause](#), produced by CORE (Corporate Responsibility) Coalition, 2016
- [Transparency in Supply Chains etc. A practical guide](#), produced by the Home Office of the UK Government
- [The FTSE 100 Modern Slavery Statement benchmark methodology](#), published by the Business and Human Rights Resource Centre, UK

All policies are available at: www.sonichealthcare.com/policies

ACTION 6

Supplier compliance and selection process

Sonic promotes mutually beneficial partnerships built on trust, transparency and a sense of shared commitment. We frequently engage with key suppliers about challenges they may face in the management of their modern slavery risks.

Sonic's [Supplier Policy](#) ensures procurement of high-quality, innovative products and services that demonstrate whole-of-life value for money. Supplier selection includes reviews of environmental impacts of products and services, commitment to sustainability principles and practices and compliance with global human rights legislation. This is also included in our periodic review of key supplier compliance, and a project is progressing to implement a more automated system to manage supplier due diligence responses, assess risk and supplier compliance.

Contracts include clauses on human rights (modern slavery) and sustainability to align with Sonic's [Supplier Policy](#). These clauses are being progressively included in supplier contracts.



ACTION 7

Monitoring for new and emerging risks

Sonic uses media monitoring and scans relevant sanctions lists, to be alert to emerging risks and to detect suspected or actual incidents of modern slavery within our operations or supply chains. Relevant concerns are reported to the Sonic Global Human Rights Committee to determine if further action is required. All decisions are contextualised according to Sonic's level of involvement, as defined by the UN Guiding Principles continuum of involvement.

This approach has helped us to identify risks with disposable glove and solar panel manufacturing, resulting in extended due diligence on suppliers of those products.



ACTION 8

Grievance mechanisms and remediation

Sonic has whistleblower policies in place to support the reporting of misconduct, illegal conduct or any improper actions relating to Sonic's businesses.

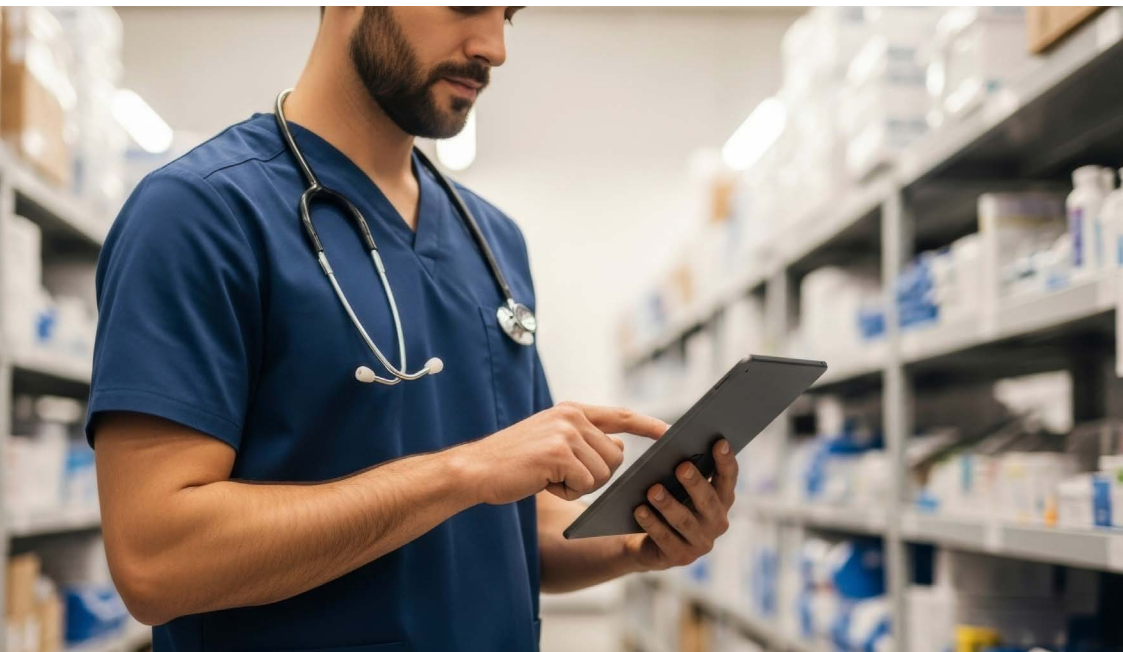
An overarching [Global Whistleblower Policy](#) is supported by local policies relevant to the legislation in that country. Reports can be anonymous and whistleblowers are protected from victimisation, harassment or discriminatory treatment. Confidentiality is extended to anyone who discloses their identity while making a relevant disclosure.

Stakeholders who can make a report under the whistleblower policy include;

- Sonic officers and employees (whether permanent, part-time, fixed-term or temporary)
- Sonic suppliers (or their employees), including contractors, consultants and secondees
- relatives, spouses or dependants of the above.

Sonic reviews each disclosure and determines the appropriate action/s. If reports relate to potential human rights abuses in our supply chains, Sonic works with the supplier to help achieve a positive outcome for affected workers. If this doesn't resolve the situation, Sonic may end the business relationship.





ACTION 9

External stakeholder collaboration

Sonic engages with external stakeholders, including suppliers, shareholders, relevant agencies, industry peers and others. This engagement helps inform us and our stakeholders of new and emerging risks and actions adopted to mitigate those risks.

Our engagement with our suppliers (particularly our smaller suppliers) helps build awareness of the modern slavery issues and risks that may arise in their operations and supply chains.

Our collaboration with industry peers allows the sharing of knowledge and experience about modern slavery and environmental issues in our supply chains.

Independent assessment

Sonic's standing as a socially responsible company is evidenced by the ratings we receive in various independent assessments of environmental, social and governance practices. These include:



Prime (B-)



Leader (AA)



Awareness (C)



FTSE4Good All World
Index and FTSE4Good
Developed Index

Assessing the effectiveness of our actions

As part of our commitment to eliminating all forms of modern slavery within our operations and supply chains, we regularly review the effectiveness of our actions to assess and address actual or potential human rights or modern slavery risks and violations.



FY2025 initiative	Status
1 Progress our supplier management processes.	Ongoing – continuing to refine our internal processes and systems, including the development of a global contract management system.
2 Continue to perform additional due diligence on suppliers from higher risk industries and/or geographies.	Ongoing – focused on performing additional due diligence on cleaning service providers in all countries of operation, due to the higher risk of modern slavery across this industry.
3 Continue to verify compliance of suppliers’ obligations to Sonic’s key policies and modern slavery legislation more generally.	Ongoing – Approximately 40% of our Tier 1 suppliers (by spend value) have undertaken due diligence by completing Sonic’s Human Rights/Modern Slavery Supplier Questionnaire or providing their own Modern Slavery Statement.
4 Expand our program of site inspections for selected Tier 1 and 2 suppliers.	Ongoing – in FY2025, we focused on medical consumable and equipment suppliers in Australia, Germany, France, Japan and the USA.
5 Continue to build awareness and capability among our smaller suppliers who may lack formal policies and procedures for the management of modern slavery risks.	Ongoing – See Case study 2 , page 25.
6 Expand the rollout of the modern slavery training module to additional employees.	Ongoing – more than 11,000 employees have undertaken Sonic’s online training module. Completion rates of >95% in management, procurement, finance, recruitment and human resources employee groups.

In addition, Sonic regularly reviews and improves our risk management framework to help us identify and remediate actual or potential human rights or modern slavery risks and violations. This includes:

- reviewing and updating our online human rights and modern slavery training module on an ongoing basis to ensure it is relevant and accessible. This helps build our employee knowledge base and improve detection of risks.
- actively seeking feedback from external stakeholders and using it to improve our approach
- benchmarking our actions against best practice to find areas for improvement
- incorporating feedback from external stakeholders, such as investor groups and rating agencies, to enhance our approach
- monitoring our progress against our stated actions
- using our digital Human Rights/Modern Slavery Supplier Questionnaire to gather information from suppliers about their operations and supply chains, and working with suppliers to ensure the questionnaire remains effective
- monitoring suppliers to ensure they follow through on their commitments to Sonic and other stakeholders
- regularly reviewing and updating our policies to reflect new (including updates to) modern slavery regulations and laws.

No cases of modern slavery were identified through our due diligence during this reporting period, though we acknowledge this does not guarantee its absence. We did, however, identify opportunities for improvement with several Tier 1 and Tier 2 suppliers and are actively addressing these. We remain committed to ongoing monitoring and continuous enhancement of our systems, processes and knowledge.



Future initiatives

In line with the ongoing evolution of our modern slavery risk management framework, future initiatives will focus on the following key areas.

Our future initiatives



Improving systems for onboarding and evaluating new suppliers.



Building supplier awareness, particularly amongst smaller suppliers, to help them build their capability to manage modern slavery risks.



Expanding education and training for employees, to boost risk awareness.



Actively seeking feedback from external stakeholders.



Using stakeholder feedback and published data to benchmark our practices against best practice. This includes NGOs, research organisations and organisations representing worker-voice.



Regularly updating our corporate policies and Code of Conduct and Ethics to remain aligned to our modern slavery risk framework, as well as relevant legislation and stakeholder expectations.

Appendix

Addressing the Australian MSA and UK MSA reporting criteria

Modern Slavery Act mandatory reporting criterion - Australia	Modern Slavery Act mandatory reporting criterion - UK	Reference in this Statement
Identify the reporting entity.	Not required.	Page 2
Describe the reporting entity's structure, operations and supply chain.	Organisation's structure, its business and its supply chains.	Section 2, pages 12-16
Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities it owns or controls.	Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	Section 3, pages 17-21
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls, to assess and address risks, including due diligence and remediation processes.	- The steps the organisation has taken during the financial year to ensure that slavery and human trafficking are not taking place in any of its supply chains, and in any part of its own business. - Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff. - Organisation's effectiveness in ensuring that slavery and human trafficking are not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate. - The training about slavery and human trafficking available to its staff.	Section 4, pages 22-30
Describe how the reporting entity assesses the effectiveness of such actions.	Not required.	Section 5, pages 31-33
Describe the process of consultation with any entities the reporting entity owns or controls and, for a reporting entity covered by a joint statement, the entity giving the statement.	Not required.	Page 3
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Not required.	Section 6, page 34

