

---

# **MODERN SLAVERY STATEMENT 2021**



# Introduction

---

**THIS IS THE FIRST MODERN SLAVERY STATEMENT (“STATEMENT”) FOR THE PACIFIC SMILES GROUP (“PACIFIC SMILES”), AS REQUIRED BY THE MODERN SLAVERY ACT 2018.**

The purpose of this statement is to outline Pacific Smiles approach to ensuring robust processes and frameworks are in place to manage the risk of modern slavery in our business supply chain and operations.

Pacific Smiles’ absolute commitment to outstanding patient care and customer service drives our true purpose to improve the oral health of ALL Australians to world’s best. This philosophy also drives our commitment to operating responsibly and establishing and adhering to the highest ethical standards in all areas of the business.

***Pacific Smiles will not tolerate any forms of slavery or human trafficking in our business.***

At Pacific Smiles, we understand that human trafficking and slavery can take many forms.

These forms include:

- › Child labour
- › Slavery
- › Human trafficking
- › Servitude
- › Forced labour
- › Forced marriage
- › Debt bondage
- › Deceptive recruiting for labour or services

# Our Business

## WHY WE EXIST

### OUR WHY

*Our True Purpose*

To improve the oral health of ALL Australians to world's best.

### OUR WAY



### OUR HOW

Our Patients TRUST us

Our Dentists are RESPECTED by us

Our Employees MATTER to us

Pacific Smiles is Australia’s leading dental services organisation, owning and operating in excess of 100 dental centres in Australia.

Pacific Smiles Group Limited is a listed public company limited by shares, domiciled and incorporated in Australia. The group has over 1,400 employees in centres across Queensland, New South Wales, the Australian Capital Territory and Victoria, as well as engaging over 600 practitioners under contractual arrangements to provide dental services to our patients in our centres.

Pacific Smiles is proud of our great people and the wonderful workplace culture we have. We understand the importance of respecting and improving human rights is key to how we deliver for our patients, our employees and our practitioners, as well as the broader community.

For more information regarding Pacific Smiles structure and strategy, please refer to our 2020 Annual Report.

# Our Business Operations and Supply Chain

**PACIFIC SMILES KEY ACTIVITIES AND OPERATIONS, AND THE ASSOCIATED SUPPLY CHAINS ARE AS FOLLOWS:**

## Key activities and operations

Delivering a full range of patient dental services, including:

- › Diagnostic services
- › Preventative, prophylactic and bleaching services
- › Periodontics
- › Oral surgery
- › Endodontics
- › Restorative services
- › Prosthodontics
- › Orthodontics
- › General services
- › Marketing
- › Finance and procurement
- › Information technology
- › Property leasing
- › People leadership and Culture

## Supply chain

- › Dental equipment and consumables including personal protective equipment
- › Uniforms and work attire
- › Office equipment and consumables
- › Marketing merchandise, promotional products and print collateral.
- › Property services (e.g. building trade services, cleaning services, security services, utilities, grounds and equipment maintenance)
- › Technology (hardware, software and cloud services)
- › Professional service consultants

# Our Policies and Procedures

**PACIFIC SMILES HAS A RANGE OF FORMAL POLICIES AND PROCEDURES IN PLACE SPECIFICALLY INTENDED TO PROVIDE ETHICAL BUSINESS PRACTICES.**

These policies contribute to our commitment to prevent human rights violations, and include our Code of Conduct and our Whistleblower Protection Policy. We have also implemented awareness training on human rights and modern slavery to ensure members of our team are aware and have an understanding of our responsibilities.

Our procurement team have implemented a robust procurement framework, which is also designed to prevent violations of human rights. The Pacific Smiles supplier on-boarding process now includes an assessment of human rights compliance of all new suppliers, with existing suppliers being assessed on renewal.

Pacific Smiles policies and procedures will be further reviewed to ensure we have the most robust processes possible in order to minimise the risk of modern slavery in our supply chain and our business operations.

# Potential Risks in our Business Operations and Supply Chain

**WE HAVE FOCUSED MORE ON THE POTENTIAL RISKS TO PEOPLE RATHER THAN ON POTENTIAL RISKS TO OUR BUSINESS.**

In assessing our business operations and supply chains for risks to human rights, we have focused more on the potential risks to people rather than on potential risks to our business. This assessment was undertaken in accordance with the principles of the Pacific Smiles Risk Management Framework.

During the assessment process, we considered risks that may possibly cause, contribute and/or be linked directly to modern slavery practices, in accordance with the Australian Government's Department of Home Affairs draft guidance document (2018).

In assessing our potential risks, we considered various factors, including the types of products and services being provided, geographical locations, as well as the industry and sector the products and services are being provided from.

The assessment we have completed identified both no and low risk areas, as well as some potential areas of greater risk for our business. Potential risk areas include where a local supplier is engaged to source a product from an overseas source. Further supplier on-boarding refinement over the next financial year will be focused on these identified potential risk areas.

Pacific Smiles will also continue to refine and improve our training for human rights and modern slavery during the next financial year.

## Future Commitments

---

### **DURING THE NEXT FINANCIAL YEAR, OUR KEY FOCUS AREAS WILL BE:**

- › Reviewing and updating our risk-related policies and governance measures.
- › Increase stakeholder engagement on human rights issues, including the ongoing delivery of appropriate awareness training sessions to all relevant Pacific Smiles staff and key suppliers; and
- › Incorporating requirements into existing processes.

*Zita Peach*

Chairperson