

# aspenmedical



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needed

UN Global  
Compact  
Communication  
on Progress (COP)

From 28 April 2022  
to 28 April 2023



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> **1. Statement of continued support  
by the Chief Executive Officer**

28 March 2022

H.E. Antonio Guterres  
Secretary-General, United Nations  
New York, NY 1001 , USA

Dear Mr. Secretary-General,

I am pleased to reaffirm our continuing support for - and commitment to – the Ten Principles of the United Nations Global Compact on human rights, labour, environment, and anti-corruption.

With this communication, we express our intent to implement those principles. We are committed to making the UN Global Compact and its principles part of the strategy, culture, and day-to-day operations of our company, and to engage in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.

Aspen Medical will make a clear statement of this commitment to our stakeholders and the general public. We recognize that a key requirement for participation in the UN Global Compact is the annual submission of a Communication on Progress (COP) that describes our company's efforts to implement the Ten Principles.

We support public accountability and transparency, and therefore commit to report on progress annually according to the UN Global Compact COP policy.

This includes:

- A statement signed by our Executive Chairman and Co-Founder expressing continued support for the UN Global Compact and renewing our ongoing commitment to the initiative and its principles. This is separate from our initial letter of commitment to join the UN Global Compact.
- A description of practical actions (i.e., disclosure of any relevant policies, procedures, activities) that the company has taken (or plans to undertake) to implement the UN Global Compact principles in each of the four issue areas (human rights, labour, environment, anti-corruption).
- A measurement of outcomes (i.e., the degree to which targets/performance indicators were met, or other qualitative or quantitative measurements of results).



**Mr. Glenn Keys AO**

Executive Chairman and Co-Founder  
Aspen Medical Pty Ltd

A photograph of two healthcare workers in an operating room. They are wearing light blue scrubs, white hairnets, and glasses. One worker is wearing blue gloves and is holding a blue tube connected to a patient lying on an operating table. The patient is covered with a white blanket. The room has white cabinets, a large surgical light fixture, and various medical equipment. A white text box is overlaid in the top left corner.

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## 2. Description of actions

# Human Rights



**Principle 1** Businesses should support and respect the protection of internationally proclaimed human rights

**Principle 2** Make sure that they are not complicit in human rights abuses

## Our Policy Commitment

- We have policies to define our approach to Human Rights in Our Team. Vulnerable People and Child Protection Policy which is included in all Humanitarian Contracts prior to deployment.
- Aspen Medical is the only private company in the world that has been accredited as an Emergency Management Team under the World Health Organisation (WHO) for international Humanitarian work and as such our policies and procedures relating to Human Rights and Labour has been rigorously audited by the WHO prior to accreditation being awarded.
- We are a certified B Corps (Benefit Corporation). Certified B Corps are businesses that meet the highest standards of verified social and environmental performance, public transparency, and legal accountability to balance profit and purpose.
- In accordance with our commitments under the Modern Slavery Act 2018 (Commonwealth), we publish an annual statement summarising the steps that we have taken to ensure that slavery and human trafficking are not taking place either within our business or in our supply chains.

- Aspen Medical's business operations are conducted in accordance with accreditation of the International Standards Organisation (ISO) Quality Management System 9001:2015, Occupational Health and Safety and Management System 45001:2018, and Environmental Management System 14001:2015. These include all the elements of an integrated Management System which is audited by a third party annually.

## People and processes

- We have policies to protect our staff such as our Code of Conduct, Respectful Workplace Behaviour, Prevention and Management of Aggression in the provision of Health Services which are included in induction training and accessible at any time in our online training portal.
- Our Risk Management Policy requires all new contracts to undergo mandatory rigorous Risk Assessments and establish dedicated contract Risk Management Plans which includes assessment of any human rights risks.
- We maintain country-level Risk Management Plans as an established part of our broader risk management processes especially for Humanitarian operations.



- We provide tailored face-to-face training on human rights to our international employees at the outset of their deployment, and issue regular reminders of our human rights commitments.

### External engagement

- We liaise with our clients in addressing the conditions of tenders to demonstrate our commitment to prevent any human rights abuses. We share our Risk Management Plans so clients are aware of the risks we have identified and how we will mitigate the risks.
- In 2021 we established a Modern Slavery Awareness online training program for our recruitment, logistics and procurement teams as a high priority for overseas deployments and have now made it available for all staff.

### Plans for 2022 – 2023

- Develop our human rights training, particularly with regard to high-risk environments.
- Review and revise our risk assessment procedures in relation to the human rights impacts of our international deployments with regard to labour rights and modern slavery risks.
- Establish a supplier risk assessment rating register mapped against our suppliers.
- Develop a process to conduct spot audits as part of the Supply Chain Assurance Program.

# Labour



**Principle 3** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

**Principle 4** The elimination of all forms of forced and compulsory labour

**Principle 5** The effective abolition of child labour

**Principle 6** The elimination of discrimination in respect of employment and occupation

## Our Policy Commitment

- We have a Business Ethics Policy that outlines its approach to business integrity in two parts: a Code of Ethics and a Code of Conduct. This policy applies to Aspen Medical and all of its subsidiaries and affiliates. Our Code of Ethics outlines the ethical principles of Aspen Medical and its staff, representing the aspirations of the company at the business level. Our Code of Conduct translates these principles into practical guidance that empowers Aspen Medical, its staff, its business partners and their employees to realise these aspirations. Our Business Ethics Policy – the combination of these two codes – has been developed to reinforce our commitment to honest and truthfulness and for the practical purpose of protecting Aspen Medical, its staff and business partners from acts of corruption, modern slavery (slavery, servitude, forced or compulsory labour, bonded labour) or human trafficking and the potential criminal liabilities.
- Underpinning this framework are the Aspen Medical Group’s suite of policies and procedures, several of which are relevant to Labour and Modern Slavery. These include our Code of Conduct, Recruitment and Selection Policy, Our Team, Vulnerable People and Child Protection Policy, and Whistle Blower Policy.
- We have provided our annual Statement on Modern Slavery for 2022 under the Modern Slavery Act 2015.
- As Aspen Medical is an international Company, we have completed a Global Indigenous Peoples Risk Management Plan in 2021 identifying Indigenous Peoples risks wherever we work.
- We have established a Community Engagement Policy where it is formally stated that Aspen Medical will undertake open communication with the Community and Primary Stakeholders to gain understanding of interest, capabilities, any concerns and explore opportunities through its Community Engagement.

- We have established an Indigenous Engagement and Participation Policy where it is formally stated that Aspen Medical is committed to actively providing strategies for ensuring Indigenous engagement and participation are demonstrable in each of its workplaces.
- Aspen Medical implemented its Diversity and Inclusion Strategy in 2021 covering three main areas of attention:
  - Gender Equality
  - Social Inclusion
  - Indigenous Engagement.

## People and processes

- Our Team, Vulnerable People and Child Protection Policy aims to ensure the prevention of exploitation and abuse of vulnerable people. Aspen Medical recognises vulnerable people are at particular risk of being subjected to exploitation and abuse.
- Aspen Medical prepares an annual Statement on Modern Slavery to the government under the Modern Slavery Act 2018. Associated with the Statement on Modern Slavery we have established a Supplier Code of Conduct with a Self-Assessed Supplier Questionnaire.
- To assist in mitigating modern slavery risks, all personnel on overseas humanitarian deployments are required to undergo Red Cross Mandatory modular training in International Humanitarian Law Fundamentals, Enforcement and for Medical Personnel.

## External engagement

- Aspen Medical provided an annual Statement on Modern Slavery in 2022 to the government under the Modern Slavery Act 2018 which is in the public domain and accessible.

## Plans for 2022 – 2023

- A new Diversity and Inclusion online training course was completed in 2021, which is now part of our induction training.
- New Workload and Fatigue Management Strategy under development to mitigate burnout and fatigue.







# Environment



**Principle 7** Businesses should support a precautionary approach to environmental challenges

**Principle 8** Undertake initiatives to promote greater environmental responsibility


**Principle 9** Encourage the development and diffusion of environmentally friendly technologies

## Our Policy Commitment

- Aspen Medical has an accredited Environmental Management System (EMS) to ISO 14001: 2015 
- We publicly demonstrate our commitment to Health, Safety and Environmental Sustainability (HSES) in our HSES Policy Statement which is included in our induction programs for people joining the company and by displaying the policy statement in all our offices and medical clinic 
- We publish our environmental commitment, performance, and future targets in our Environmental Sustainability Development Plan annually.
- Our Waste Management Policy aids in reducing consumption and increasing recycling of waste materials.
- Our Risk Management Processes include Environmental Risks as part of our ten areas of business risk.
- Our EMS undergoes monthly Site Hazard inspections and six-monthly audits as part of our accreditation.

- Environmental hazards and incidents are required to be reported and investigated as per our HSE Incident Reporting and Investigation SOP. Tracking is conducted in our RiskMan Incident Reporting system.
- Aspen Medical does not emit any pollutants from our work processes other than procuring utility supply, use of vehicles and third-party commercial aircraft.
- Aspen Medical has an Emergency Management Policy to prevent and address incidents affecting the environment and human health impact 
- We strive to minimize the use and safe handling and storage of chemical and other dangerous substances as per our procedure Hazardous Substances and Dangerous Goods SOP. 

## People and processes

- All new staff are required to undergo mandatory induction training which includes an online Environmental Sustainability Recycling training course.
- Waste facilities and suitable waste/recycling containers are provided on all our sites to ensure the right waste is disposed of properly with minimal harm to the environment and other items re-cycle 



- The Board, Senior Management Team and all managers receive reports on our Environmental Sustainability KPIs with an intent to target areas for improvement.
- The COVID-19 Pandemic introduced an extreme risk for many organisations in their Supply Chain with border closures and ban on international and domestic flights. A new COVID-19 Pandemic Business Continuity Plan was established to assist in addressing those risks.
- During the COVID-19 Pandemic Aspen Medical's business was in demand to provide advice and services to wide range of government and private enterprises domestically and internationally.
- We developed several online training courses for the Australia Department of Health which have now had over 5.8 million completions not only in Australia but also internationally

#### Plans for 2022 – 2023

- Aspen Medical will establish an Environment, Social and Governance Reporting Framework for regular consistent reporting to the Board.



#### External engagement

- We are a certified B Corp (Benefit Corporation). Certified B Corps are businesses that meet the highest standards of verified social and environmental performance, public transparency, and legal accountability to balance profit and purpose. The B Corp Impact Assessment audits five areas of business:
  - Governance
  - Workers
  - Environment
  - Community
  - Customers



# Anti-Corruption

## Principle 10 Businesses should work against corruption in all its forms, including extortion and bribery

### Our Policy Commitment

- Aspen Medical has a policy that outlines its approach to business integrity in two parts: a Code of Ethics and a Code of Conduct. This policy applies to Aspen Medical and its subsidiaries and affiliates. Our Code of Ethics outlines the ethical principles of Aspen Medical and its staff, representing the aspirations of the company at the business level. Our Code of Conduct translates these principles into practical guidance that empowers Aspen Medical, its staff, its business partners and their employees to realise these aspirations.
- Our Business Ethics Policy – the combination of these two codes – has been developed to reinforce our commitment to honesty and truthfulness and for the practical purpose of protecting Aspen Medical, its staff and business partners from acts of corruption, modern slavery (slavery, servitude, forced or compulsory labour, bonded labour) or human trafficking and the potential criminal liabilities.
- Australia is a signatory to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions Countries (the Convention). In accordance with our Anti-Bribery Policy, despite the availability of a facilitation payment defence in Australia, it is the policy of Aspen Medical that facilitation payments will not be made to Foreign Public Officials. Aspen Medical states further, that Aspen Medical will not pay bribes in any circumstances.
- Aspen Medical's Risk Management Policy is aligned and is conducted in conformance with the ISO 31000: 2018 methodology. Accordingly, Aspen Medical's Risk Management Plans cover ten areas of business risks which includes Financial Risk that incorporates Anti-bribery and Corruption.
- We have a Fraud Control Plan in which states Aspen Medical does not tolerate or condone fraudulent conduct.
- Aspen Medical has established an Investment Committee that reports to the Board.

### People and processes

- Our Finance Team undergo annual financial audits to ensure that we are managing our financial performance appropriately. In keeping with our Code of Conduct all staff need to be aware of their responsibility to foster and develop the highest standards of integrity and promote an ethical workplace culture.
- Aspen Medical's Fraud Control Plan is aligned with the Commonwealth's Fraud Control Guidelines and Australian Standard AS 8001-2008 Fraud and Corruption Control.

### External engagement

- Our Finance Team undergo annual external financial audits to ensure that checks and balances are applied across our finance function

### Plans for 2022 – 2023

- Aspen Medical will establish an Environment, Social and Governance Reporting Framework which will incorporate more frequent financial reporting.

# Measurement of outcomes



- The Corporate Sustainability Team creates and implements strategies that promote Governance, Social Purpose and Environmental stewardship within Aspen Medical and our community. We encourage our team members to support external programs in our community through our
  - Matching and giving program
  - Volunteering program
  - Benefit Corporation (B Corp) initiative which include 5 measurement elements:
    - Governance
    - Workers
    - Environment
    - Customers
    - Community
  - Aboriginal and Torres Strait Islander Peoples Reconciliation Action Plan
- We have been compliant with the Workers Gender Equality Report by the WGEA:
  - Worker Profile
  - Gender composition of workforce
  - Gender composition of governing bodies
  - Equal remuneration for women and men
  - Consultation with employees on gender equality issues
  - Sex-based harassment and discrimination
- Aspen Medical has a very high level of Health, Safety and Environmental (HSE) Performance, which is reported monthly to our senior management team, quarterly and annually to all managers including the Senior Management Team, the Corporate HSE Committee and the Board. The report includes:
  - Fatalities
  - Fines and Sanctions
  - Lost time injuries
  - Medical treatments
  - Days lost
  - Lost Time Injury Frequency Rate (LTIFR)
  - Medical Injury Treatment Frequency Rate (MTIFR)
  - New Workers Compensation Claims
  - Environmental Incidents
  - Security Incidents
- Environmental Key Performance Indicators are reported annually in our Environmental Sustainability Development Plan 2021–22 and reported to the Senior Management Team, the Corporate HSE Committee and the Board comprising:
  - Water
  - Paper
  - Electricity
  - Fuel
  - Vehicles
  - Domestic and International Air Travel

## CONTACT

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## DISCOVER

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