

Modern Slavery Statement

Our structure, operations and supply chains

NorthWest Healthcare Australian Property Limited ACN 083 065 034, a public company, is incorporated in Australia (the **Company**). The registered office of the Company is Level 45, Rialto South Tower, 525 Collins Street, Melbourne, Victoria, Australia.

The Company is ultimately majority owned by NorthWest Healthcare Properties REIT which is a publicly traded REIT listed on the Toronto Stock Exchange (TSX:NWH.UN). The Company is the trustee of two property-owning trusts which own healthcare real estate in Australia. The Company also operates in New Zealand, including through its wholly-owned New Zealand subsidiaries.

The Company makes this statement under the Modern Slavery Act 2018 (Cth) (**Act**) which commenced on 1 January 2019. The Act requires reporting entities subject to the Act to produce an annual modern slavery statement. This modern slavery statement has been approved by the principal governing body of the Company, namely the Board of Directors of the Company on 30 November 2020.

This is the Company's first annual statement and is for the Australian Financial Year ended 30 June 2020.

The business, which is conducted in New Zealand and Australia, involves acquiring, managing, maintaining and developing high quality healthcare real estate. We have 41 members of staff in Australasia and have offices in Auckland, Melbourne and Sydney.

We consider our main supply chains can be categorised into two main functions, **asset management supply chain** and **construction and development supply chain**.

We also recognise the role of our **operational supply chain** which supports our business operations.

Asset management supply chain

Our asset management supply chain involves providers of services and equipment; facility maintenance providers; professional service firms, including lawyers and valuers; cleaners and landscapers and providers of security services.

Construction and development supply chain

The construction and development aspect of our business involves providers of project management, design and construction services; equipment and construction materials; professional service firms, including lawyers and valuers.

When our role is that of principal, development manager or financier of construction and development projects, we seek to address any supply chain risk by obliging our contractual counterparties to comply with all laws relating to Modern Slavery and to notify us promptly on becoming aware of any actual or suspected Modern Slavery in a supply chain connected with those contractual arrangements.

Operational supply chain

This supply chain includes professional service firms, including lawyers, accountants and auditors; the landlords of our premises; and suppliers of office equipment and supplies.

NorthWest Healthcare Australian Property Limited

Level 45, Rialto South Tower, 525 Collins Street, Melbourne Victoria 3000 Australia

ACN 083 065 034 Australian Financial Services Licence 452719

Our commitment

Our relationship with stakeholders, tenants, counterparties and suppliers is key to our success and our relationship-focused business model enables us to select premium grade and reputable suppliers, whose values align with ours.

We recognise the significant impact human slavery, people trafficking and forced labour have on society and are committed to ensuring our operations are conducted to the highest ethical standards and in compliance with all applicable laws.

We are deeply committed to being responsible corporate citizens and providing a workplace which is free from discrimination and in which our staff is treated with dignity and respect. This commitment is evidenced by the many corporate policies we have in place, for example, we have a well-developed whistleblower policy and an employee assistance programme which provides emotional and psychological assistance to staff.

We also have policies which support our day-to-day operations and provide guidance to staff in their interactions with others to ensure our core values are maintained. Our team must comply with a comprehensive code of conduct which spells out best practice in interactions with third parties.

Compliance and effectiveness measures

We endeavour to conduct appropriate due diligence and risk assessments when we onboard new suppliers and are committed to having processes in place to identify and address any risks of modern slavery practices in our supply chains.

We are developing a training programme for our staff for 2021 which will include providing them practical tools to identify and mitigate modern slavery in our supply chain.

In preparing for our first annual modern slavery statement, we have consulted with senior executives to establish the key areas of focus in the ensuing period. The Regional General Counsel ANZ will take ownership and responsibility for compliance with the Act across the Australian and New Zealand business together with the Operational Risk Committee (**ORC**) which comprises several senior executives across the acquisition, management, development and treasury teams. The ORC meets monthly to consider and evaluate the risks which our business faces and to implement steps to mitigate or remediate those risks. The agenda for each ORC meeting has been updated to include a line item on modern slavery to ensure this is considered at each meeting.

Particular steps which we will undertake, include:

1. assessing the potential modern slavery risks in our operation with an emphasis on high risk areas;
2. developing and reviewing company policies on the possible impacts of modern slavery on our operations;
3. developing training for staff in modern slavery requirements;
4. preparing to conduct further and ongoing due diligence on potential and current suppliers;
5. reviewing supplier contracts to ensure they contain terms consistent with the Act; and

6. taking steps to address any potential modern slavery risks identified and to implement effective mitigation and, if necessary, remediation steps throughout our business in addition to those which are already in place.

A handwritten signature in blue ink, appearing to read 'Craig Mitchell', written in a cursive style.

Craig Mitchell

Director of NorthWest Healthcare Australian Property Limited ACN 083 065 034