

# Environmental, Social & Governance (ESG) Statement



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# Introduction

Australian Clinical Labs Limited (ACL)<sup>1</sup> is an industry leader committed to providing positive social impact and contributing meaningfully to the communities in which the Company operates. ACL was formed through the integration of Healthscope's Australian pathology business in 2015, St John of God Health Care's pathology business in 2016, Perth Pathology in 2016 and SunDoctors in 2021. ACL currently provides pathology and other related services to communities in Victoria, New South Wales, Queensland, the Northern Territory, Western Australia, South Australia and the Australian Capital Territory.

ACL operates 86 National Association of Testing Authorities (NATA) accredited laboratories and 995 Accredited Collection Centres (ACC), 30 specialist skin cancer clinics and services over 90 hospitals including public and private. There are approximately 3,850 people under the employ of ACL who assist with performing millions of episodes each year, for a range of clients, including doctors, specialists, patients, hospitals and corporate clients.

This is our first ESG Statement outlining relevant policies and practices, as of August 2021, that align with ACL's values of continuous improvement. Our Environmental, Social and Governance (ESG) strategy and activities are integrated into business practice, with effort across a range of foci and an additional program focusing on particular areas.

Striving for and achieving continuous improvement is in our DNA and through the collective mind, we aim to empower decision-making that saves and improves lives. We acknowledge the vital role ACL's contribution can play in helping to address global sustainability challenges and have considered our ESG position accordingly.

As a company, we have considered our sustainability commitment and contribution in the context of Australia's global commitment to the Sustainable Development Goals (SDGs). These Global Goals were adopted by all United Nations Member States in 2015 as a universal call to action to end poverty, protect the planet and ensure that all people enjoy peace and prosperity by 2030.



We have appropriately identified particular regard for SDG 3 (good health and well-being), SDG 4 (quality education), SDG 5 (gender equality), SDG 8 (decent work and economic growth), SDG 9 (industry, innovation and infrastructure), SDG 10 (reduced inequalities), SDG 11 (sustainable cities and communities), SDG 12 (responsible consumption and production) and SDG 13 (climate action).

## Scope

This Statement relates to all staff under the employ of ACL, ACL suppliers, contractors and the Board; all activities undertaken by or on behalf of ACL; and all facilities operated and/or managed under the direct control of ACL employing entities.

All business operations are in scope regardless of their function, unless stated otherwise.

## Sustainability Reporting

Collectively with the Board, the Chief Executive Officer (CEO) oversees the development and delivery of our sustainability strategy. The Chief Operating Officer (COO) has accountability for the delivery of sustainability goals and has the authority within the organisation to influence goals, activities, systems and behaviours at all levels.

Reporting to the CEO (and COO) the State Executive Officers (SEOs) and Company Secretary are responsible for the management and performance of ESG-related risks and opportunities.

The CEO, COO and SEOs meet regularly to manage and measure the performance of the Company. ESG is part of the Executive agenda and sustainability risk and opportunities are regularly reported to the Board, through the reporting channels of the CEO and COO respectively.



<sup>1</sup> The expressions “we”, “us”, “our”, “ACL” and “the Company” refer to Australian Clinical Labs Limited and/or its subsidiaries as the context is appropriate.

# ACL's Mission & Values

ACL's mission and values were developed at the formation of the organisation, at the time of integration with Healthscope, St John of God and Perth Pathology. With many staff having previously worked in hospital pathology laboratories, for-profit and not-for-profit, with very different stated values, a process in which staff at all levels were engaged allowed the establishment of a shared purpose and newly shared values for the new organisation.

Our staff are highly engaged by the sheer purpose of our mission. Our values, also developed with staff engagement, are key to how we behave and expect others to behave as we act and interact to fulfil our mission.

## Company Mission

Our mission is to combine medical and scientific leadership and talented people with innovative thinking and technologies to empower decision-making that saves and improves patients' lives. We strive to achieve excellence through improving efficiency, encouraging innovation and engagement. Fundamental to our mission is having a positive impact on the environment and society, fostered by leading governance practice.

## Company Values

Our values and behaviours serve to shape the culture within the workplace; set and manage expectations for staff, patients and community; and strengthen and further define business' culture. As a company, we have formal methods of promulgating our values to ensure they are felt and seen in the way we behave. The fundamental strength of our values is that they are driven by us at all levels, due to staff engagement, passion and commitment to our mission.



### Patient Focus and Medical Excellence

We serve to protect the best interests of our patients by aiming to achieve excellence in our daily actions.

We are committed to:

- Applying evidence-based practice to our diagnostic practice and medical care.
- Utilising best practice science to deliver accurate and timely results.
- Continuously developing our skills and expertise through education and training.
- Investing in leading technologies.
- Being professional in conduct towards customers, patients and colleagues and garnering an appropriate sense of respect and empathy.
- Continuously improving service performance and setting standards within the industry.



### Efficiency and Effectiveness

We apply innovative thinking to science and business. We endeavour to be agile in responding to the needs of customers and stakeholders. We aim to be proactive and not reactive to problems, meeting challenges with a "can do" attitude.

This is demonstrated by:

- Anticipating potential problems and creating solutions to problems.
- Applying innovative thinking to our diagnostic practice and our business.
- Listening, sharing, promoting and embracing new ideas, applying innovative ideas from other industries to our practice, where appropriate.
- Being flexible and agile in the course of business.



### Entrepreneurship and Agility

We seek to deliver the Company's mission to as many people as possible by being vigilant of delivery costs.

We are committed to:

- Continuously improving Company operations by being accountable and responsible for its diligent use of resources.
- Striving to improve efficiency and effectiveness in everything we do.
- Recognising and ceasing activities that do not positively impact our goals where we are able.
- Encouraging collaboration as part of the Company's pursuit in ensuring timely information for resilient business decision-making.
- Setting challenging but achievable goals and meeting them.



### Passion and Enthusiasm

We are passionate about pathology and enthusiastic about living out its mission.

ACL and its staff demonstrate passion and enthusiasm by:

- Recognising and taking pride in good performance and rewarding achievements.
- Encouraging participation and collaboration to achieve team, organisation and social goals
- Taking a genuine interest in patients, customers, colleagues and community.
- Actively promoting pathology and ACL.



### Respect and Integrity

We are committed to ensuring the Company and its representatives act with the highest integrity and respect

We aim to contribute to preserving human dignity by:

- Maintaining confidentiality and privacy, respecting the customer and in compliance with governing laws and internal protocols.
- Being honest, consistent and fair in interactions.
- Recognising individual needs, behaviours and conduct and understanding potential impacts adverse behaviour and/or conduct may have.
- Treating patients, customers and colleagues with respect and integrity.

# Sustainability Disclosures

As a company, we aim to develop our disclosures in line with changing sustainability priorities relevant to the industry, investors, the Company and other stakeholders.

Together with the SDG's, this report has utilised the Sustainability Accounting Standards Board (SASB) standards as a guiding framework to identify, measure and align our disclosure topics and practice, where possible. ACL's sustainability activities include a range of programs and projects aimed at improving its ESG impact, as outlined in the following pages.

For future sustainability disclosures, we will continue to develop our sustainability program to provide, where possible, quantitative data relating to our Company's practice. ACL intends to be guided by the Task Force on Climate-related Financial Disclosures (TCFD) reporting requirements and those of other relevant sustainability bodies, to ensure decision-useful, forward-looking information, on the material impacts of climate-related risks and opportunities is readily available, to the greatest extent possible.

In the 2022 financial year, ACL will assess scope 1 and 2 greenhouse gas (GHG) emissions and our carbon footprint, in line with international standards such as the GHG Protocol, which supplies the world's most widely used GHG accounting standards and the ISO 14064-1 Standard for reporting of GHG emissions and removals.

Once our carbon footprint is assessed, appropriate measures, together with existing measures and potential measures, will become identifiable. This information aims to give greater insight into the management of waste, bio-diversity risks and water. Delivering our mission to combine talented people and innovative thinking, ACL's Board, management and other relevant stakeholders have identified particular ESG activities in which we wish to drive additional impact.

As part of the Board's delegation, it has requested management determine and focus on particular issues, setting appropriate and achievable measures. The table below outlines these key foci. Collectively, ACL management identified its 9 key focus issues that the company intends to focus on as projects over the next 12-24 months, as set out below.

We have identified different approaches to take as a means to guide the company in its pursuit to improve sustainability practices.



By 2023			
	Focus Issue	Target	Measurement
Environmental	1. Minimise GHG Emissions in logistics	<ul style="list-style-type: none"> <li>Scope 1 and 2 emissions to be measured, published in 2022.</li> <li>Digitisation, GPS tracking, optimised courier routes, flexible working practices</li> </ul>	Scope 1 and 2 results, total kms and fuel per episode, number of cars
	2. Energy Reduction at Facilities	<ul style="list-style-type: none"> <li>Collaborate with landlords to have solar panels and LED lighting installed at laboratories</li> </ul>	Total electricity usage Renewable energy %
	3. Innovation/Digitisation	<ul style="list-style-type: none"> <li>Reduce carbon footprint via increased digitisation of ordering and reporting processes</li> </ul>	Reduced postage and paper usage Total electronic orders as % of total
Social	4. Workplace Health & Safety (WHS) for staff and patients	<ul style="list-style-type: none"> <li>WHS managers comprehensive audit and improvement of practice</li> <li>Continuous Improvement framework</li> </ul>	Number of incidents, lost time injury frequency rates, monthly WHS reports
	5. Training & Education	<ul style="list-style-type: none"> <li>Training future generations of pathologists</li> </ul>	Registrars under training, fellowships awarded
	6. Customer Care	<ul style="list-style-type: none"> <li>Increase engagement with customers, patients and staff and ensure care quality is measured and continuously improved</li> </ul>	Patient feedback via automated SMS scores
Governance	7. Board Governance	<ul style="list-style-type: none"> <li>Align Board governance structure(s) and practices to ASX</li> <li>Corporate Governance where appropriate</li> </ul>	CGS, Board structure review and performance evaluation
	8. Cyber Security & Privacy	<ul style="list-style-type: none"> <li>NIST evaluation and targets set, plan implemented</li> </ul>	Penetration testing and action
	9. Diversity	<ul style="list-style-type: none"> <li>Number of women at Board and senior management</li> <li>Salaries to align</li> </ul>	Target 40% women, 40% men, 20% any at Board and senior management level, salary audits - equity

# COVID-19 Response

## Our People

Our people are our biggest asset.

ACL recognises the dynamic industry in which we operate and the subsequent impact it may have on individuals, particularly given our acute role in the pandemic. Accordingly, the management team have focused on developing particular support and strategies for self-care.

Our Employee Assistance Program (EAP) has been updated to give extra support throughout COVID-19 to assist in dealing with and developing strategies to overcome new challenges presented by COVID-19. Our EAP extends to all employees, with the aim to equip vulnerable members with the necessary skills to assist with human flourishing and cultivate a safe working environment. Our program provides opportunities for employees to speak confidentially with experienced counsellors, who are qualified to assist with a range of issues. We offer support through EAP on general life challenges including relationship issues, grievance and loss, financial affairs, and general mental health and wellbeing.

## Helping our communities through COVID

ACL prides itself on maintaining its strong values, which not only reflect the culture of the company, but also principles of ethics and honesty. Accordingly, during our COVID-19 response, we maintained our focus on treating our patients with the same values, respect and dignity.

ACL's effective early response to the pandemic focused on delivering its mission to save and improve lives. COVID-19 highlighted the business' resilience and the agility and flexibility of staff, in being able to respond quickly and effectively to the necessities of the pandemic. We are proud of our staff for remaining committed to embodying our values and their efforts made toward exercising medical excellence to patients. Our communities have shown appreciation through sending cards, notes, emails, gifts and formal acknowledgements, extending their gratuities for the excellence that was displayed by ACL staff.

As part of our response, we established a National COVID-19 Advisory Group, including the medical specialist leadership and representatives of key functions. Our National COVID-19 Advisory Group met daily at the peak of COVID-19 and communicated regularly with staff to ensure their safety in practice. Examining literature and implementing best practice to respond to the continually changing conditions formed part of the Advisory Group's duties. Findings were communicated to staff and communities at large to assist with the impacts of COVID-19 and to ensure that ACL was well placed to help the community in their response.

COVID-19 testing, facilitated by our phlebotomists, courier drivers, laboratory scientists, pathologists and many others, provided the diagnostic data our communities needed to protect themselves.

Irrespective of geographical location or environmental influence from the changing seasons, our teams in the drive-through clinics through to testing laboratories have remained motivated and inspired by the work we do. In the call centres, teams have remained compassionate and efficient, answering millions of phone calls.

ACL was also able to provide vital assistance to our doctor referrer-base. As the nation began moving to a telehealth model of care, ACL supported our referrers with the transition by enabling the use of electronic referral forms, as well as integrating automated telehealth referrals into our eOrders platform. Innovation and digitisation have made it easier for doctors to continue with their practice, whilst ensuring patient safety.

## Supporting Government & Industry

All ACL state businesses have been instrumental in supporting state governments with their rigorous testing programs. Each of our state businesses has played a significant role in assisting respective State Health Departments to conduct their large-scale COVID-19 response. What started as a series of informal agreements has now expanded to include a number of successful tenders, contracts and retainers – resulting in ACL standing up a number of new testing locations to assist in the effort. ACL staff have applied their skill, diligence and care to patients and our labs have driven excellence in regard to testing volumes and turnaround times.

During FY21, ACL forged important new relationships with both government and industry in the fight against COVID-19. Clinical Labs partnered with Mining Companies and universities to provide COVID-19 testing for FIFO ('Fly-In, Fly-Out') workers. The testing not only assists the mining sector in being able to continue to provide jobs and revenue for the economy but also provides valuable community data for the WA Health Department from a research standpoint.



## Setting up Testing Capacity

As part of our COVID-19 response, we opened an additional 50 ACCs and employed over 400 new staff to service the increased demand for pathology services, from COVID-19 and other work. Under the guidance and medical leadership of our pathologists, our phlebotomists, courier drivers, laboratory scientists and staff group at large have assisted with facilitating over 1.7 million COVID-19 tests. From our laboratory teams who have provided time-critical diagnostic data, to our procurement and logistics teams ensuring requisite equipment is available; support across different functions has contributed to our effective response.

Demonstrating the Company's resilience and agility, as new COVID-19 ACCs were set up, our business development and collection teams acted quickly and made necessary arrangements to ensure sites were adequately staffed during times of increased demand. We readied drive-through clinics and pop-up testing sites over weekends and at the extreme, within 24 hours, meeting the challenges of COVID-19 with a "can do" attitude. Our mission underpinned our operations at this time, with our aim to be proactive and not reactive to problems but also mindful to balance care for our staff and community equally.

As unprecedented numbers of samples arrived in our laboratories, ACL's ability to leverage from a single unified Laboratory Information System (LIS) became crucial to our response. Operating an additional five COVID-19 laboratories and four different testing platforms, our laboratory teams across the country have been adaptable and responsive to differing levels of volume. Digitisation enabled samples and data to be moved nationally in ACL's network to laboratories with spare capacity. Our LIS assisted in our ability to process additional volumes and efficiently provide results to patients and/or other relevant stakeholders including doctors and hospitals.

## PPE and Consumables

In addition to supporting our communities, ACL is committed to protecting our people, many of whom perform their duties on the frontline. During FY21, many essential items of personal protective equipment (PPE) and testing consumables were at critical levels globally. ACL was able to maintain a steady supply, ensuring adequate supplies and consumables were available so frontline staff were safe and our role in testing could be continued seamlessly. This was implemented concurrently with our Modern Slavery Policy. Sustainable sourcing and enhancing supply chain engagement are part of our ESG activities.



## Furthering Education



In pursuit of providing clinical excellence through continuous improvement, we recognise the importance of providing ongoing education and training to our staff and referral networks. By fostering a collaborative, knowledge-based culture, we are able to attract and retain our talented staff. We are also able to utilise our expertise and teachings with the greater medical community by sharing our knowledge.

Reflecting the Company's commitment to continually improving lives and public health, we recognise the significant impact our talented clinicians can have on saving and improving patients' lives. Accordingly, we are committed to continuing professional education for our staff, including training the next generation of pathologists and scientists.

### Our Pathologists & Scientists

At ACL, we have over 590 pathologists and scientists from a variety of backgrounds, who practice across multiple disciplines. We understand the importance of protecting the integrity of services provided, by applying evidence-based practice and the need to be responsive to the emerging needs of our referrers and patients.

Accordingly, all pathologists are Fellows of the Royal College of Pathologists Australia (RCPA) and participate in the RCPA's Continuing Professional Development Program. We also support our diagnostics team as they participate in multi-disciplinary meetings, medical student teachings and clinical collaboration across all specialties, where possible.

Many of our pathologists are training supervisors, accredited by the RCPA. As part of our commitment to training future generations, our expert pathologists are actively involved in the training of future medical practitioners. ACL hosts up to 20 pathology registrars annually, as they undergo supervised training for their admission to Fellow of the RCPA.

Many of our pathologists also act as college examiners and participate in peak body advocacy, as members on Boards, Advisory Committees and scientific and professional symposia.

ACL launched 'Focus Haematology', a first-of-its-kind annual training course for Haematology Registrars around Australia. This involves Haematology experts from across the country attending and presenting materials to assist registrars in preparing for their Royal College of Pathologists Haematology examinations.

ACL has formal arrangements with universities and institutions across Australia. Our partnerships focus on providing teaching and supervised on-the-job training to the next generation of biomedical scientists and clinicians.

### Our Health Partners

ACL recognises the value of extending our clinical expertise and education to all our health partners. We collaborate with a variety of different health professionals including large public and private hospitals and sole doctor referrers.

We share our expertise through mentoring medical officers, junior medical officers, nursing staff and undergraduates. Through digitisation, we are able to provide up-to-date and ongoing training, at any time, through our online eLearning System. We provide education on a range of topics including infection control, advanced equipment training, ordering patterns, test appropriateness, and other necessary general skills and training on an ongoing basis.

Health partners are provided access to our eLearning Module database (ELMO) that hosts over 500 different modules. ACL's eLearning Platform (ELMO) is a dedicated online learning resource that offers a broad range of flexible and practical solutions. ELMO can be accessed online from any location to accommodate and facilitate training nationally, including remote areas.

Our popular Skin Excision Evaluation Program and Diabetes Clinical Evaluation Programs have thousands of participants every year. We are proud to offer training and contribute to educating doctors and other professionals as our overarching objectives remains to improve patients' wellbeing. Our programs also aim to provide valuable data insights and online tools, reduce administrative costs and help referrers meet their ongoing education requirements.

As part of our contribution to improving lives, ACL publishes 4-5 clinical newsletters per year. Our newsletters feature topical evidence-based clinical articles written by our pathologists to assist with referrers' everyday practice. We regularly invite General Practitioners and Specialists from our communities to contribute, to promote participation whilst fostering advocacy.

Although primarily aimed at providing information to our General Practitioners and specialist referrers, we understand our reach may extend beyond our General Practitioners and referrers. Accordingly, we provide information on a broad range of topics to accommodate varying stakeholders. Topics range from clinical updates regarding new reference ranges and trends in the emergence of disease, to showing the impact of COVID-19 on cancer and diabetes positive diagnoses.

## Our People

We are committed to training and developing all of our employees, whether they are at the clinical end of our business or the non-clinical. A large range of scientific and technical learning modules for pathology laboratory operations and continuing professional education are incorporated into ELMO, which is a resource available to all ACL staff. ELMO supports our risk management, business and staff development objectives.

ACL has designed a leadership development program for our employees to enhance their skills in decision-making, change management, project management and performance management, with a view to develop future leaders and expand the capabilities of our employees.

In Financial Year 2021 (FY21), we introduced a new program that focuses on empowering and educating female managerial scientists and other female staff. We developed our program with the aim of equipping future leaders with the requisite skills and confidence to be successful in executive management roles within the corporate arena.

Nominated participants in the program received tailored and individual mentorship and education from our CEO, who is female, and other executive members who are female. Participants were encouraged to draw on their respective unique experiences, diversity and skills and harness the different exposures women can accordingly bring to the executive management level. It is through programs such as this we hope encourage more female leaders to seek higher management roles or special projects to enhance their careers.



## Clinical Research & Medical Excellence

ACL works with hospitals, referring doctors and in-house scientific leads as part of its focus, in accordance with its mission, to save and improve lives. We are committed to providing value to our referral network and communities at large. We do this by being at the fore of any scientific developments or technological change, where possible.

Our research philosophy is that all aspects of medicine start as hypotheses and require interrogation and validation via research and clinical-based evidence. We believe structured research leads to a higher-quality evidence-based practice, which will ultimately benefit patients and improve treatments and medical outcomes.

ACL provides services to corporate organisations to comply with occupational health and safety regulations. These include drug testing and commercial COVID-19 testing.

We also invest in the ongoing analysis of drug and treatment responses in clinical trials, to improve patient safety and provide analysis to assess the effectiveness of an intervention. Our research has been vital to drug discovery and development and is central to monitoring the treatment efficacy of cell and gene therapy.

ACL provides functional testing to investigate the functional, biochemical, nutritional, metabolic and hormonal status of patients. Our work in this space aims to assist private health professionals, naturopaths and wellness clinics with scientifically based pathology tests. We also provide pathology testing for veterinary clinics, production animals and zoos.

### Partnering with Hospitals

ACL has a well-established relationship with several hospitals and other institutions that includes collaboration with clinical trials and research programs. We endeavour to support hospitals and other research bodies in their research, as we appreciate the positive impacts research can have on improving lives. We honour our commitment to improving lives by lending our clinical and scientific expertise and interpretive services, where possible. Our commitment to research seeks to enhance medical understanding, encourage and support the development, validation, accreditation and introduction of new tests, to the extent possible.

Previous and current examples of clinical trials and research projects include but are not limited to:

- Baker IDI – A nationwide 2-year diabetes study involving sample collection, testing and reporting
- Pleomorphic Lobular Carcinoma of the Breast – a collaborative study with Strathfield Breast Clinic
- Prosper study for breast cancer (EndoPredict) - DHMP
- CMAX, pharmacogenetic genotyping study (MyDNA interpretation), SA
- ctDNA in colorectal cancer (Aspect Liquid Biopsy), Yarra oncology Vic (Prasad Cooray)

### Clinical Trials

ACL has strong a strong presence in the clinical trials arena, providing our advanced pathology services to help ensure new drugs are safely brought to market for patients. We recognise that our pathology services are also critical to clinical trials and research such as in the pharmaceutical and biotechnology industries.

In 2018, we set up a purpose-built clinical trials laboratory in Port Melbourne, Victoria and in 2021, we set up a laboratory in Murarrie, Queensland. Our laboratory in Port Melbourne was the first of its kind within Australia and our laboratory in Queensland is our first in the state, as new entrants to Queensland.

For our clinical trials service, we have invested in specialised digital technology that supports end-to-end paperless ordering and reporting. Our specialised reporting tool integrates seamlessly into the clinical trials workflow, utilising customised iPads that interface with study and patient requirements. We also have a Clinical Trials App that allows for workflow optimisation across clinical trials.



## Leaders in Science and Precision Medicine

ACL is proud to be an innovator in advanced new-to-market testing. We are proud of our involvement with scientific innovations and subsequent contributions to improving decision-making.

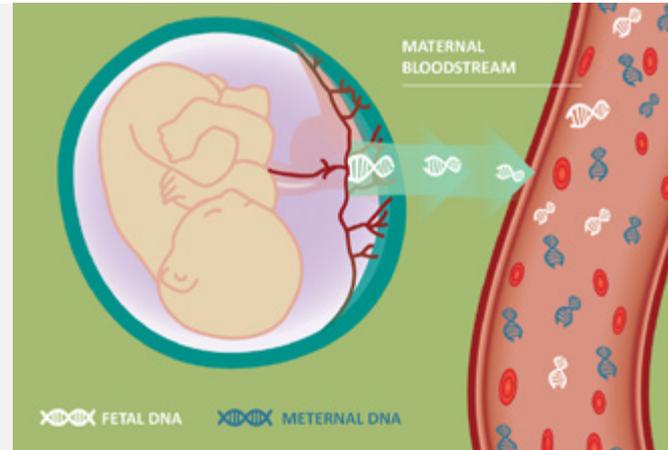
In 2016, ACL became an early adopter of the Harmony Prenatal test within Australia. This test is a non-invasive prenatal DNA-based blood test, which analyses a blood sample during pregnancy for chromosomal abnormalities. ACL was also at the fore of providing the Genetic Carrier Screening test in 2018. Aimed at individuals or couples either planning or in the first stage of pregnancy, this test can assist with identifying a range of genetic conditions and the respective probability a child may have.

NIPT involves testing millions of short fragments of DNA in maternal plasma. Some of these fragments will have come from the placenta and most will be from the mother.

Using state-of-the-art, cell-free DNA (cfDNA) technology, the Harmony® NIPT test can be performed as early as 10 weeks' gestation and carries a >99% accuracy rate for Down syndrome with a low false-positive rate of 0.1%<sup>3</sup>. NIPT reduces the need for invasive diagnostic testing and thus the risk of procedure-related miscarriage. Compared to conventional screening tests, NIPT is the most accurate and specific test with higher detection rates of chromosomal aneuploidies including Trisomy 21, 18 and 13<sup>1,2,3</sup>.

#### References:

1. Stokowski et al. Prenat Diagn. 2015 Dec; 35(12): 1243-1246.
2. Demonstrated by 59 peer-reviewed published studies using the Harmony prenatal test as of Jan 2019.
3. Norton et al. N Engl J Med. 2015 Apr 23; 372 (17): 1589-97.



In 2018, ACL was the first major pathology provider to introduce Aspect Liquid Biopsy to the market – a revolutionary cancer screening tool using a simple blood test. This non-invasive, safe and ultrasensitive cancer screening option identifies genomic alterations from a simple blood test using the circulating tumour DNA (ctDNA). Aspect Liquid Biopsy allows oncologists to choose a targeted therapy, monitor treatment resistance and detect minimal residual disease, without patients undergoing an invasive procedure.

In FY22, in collaboration with Geneseq, ACL will introduce Melaseq – a first-of-its-kind screening test designed to diagnosing melanoma early. Melaseq™ is an innovative approach to detecting and more precisely diagnosing melanoma. The test is being developed as a genomic blood and skin biopsy test which will assist doctors to diagnose and monitor melanoma more accurately and objectively. The test measures a panel of 38 microRNAs, which are a recently discovered class of genes that have key functionality both inside and outside of cells. The ability to detect microRNAs in disease-specific combinations makes them ideal candidates for differentiating between healthy and cancerous states.

ACL has been the leader in traditional molecular analysis. With ground-breaking core laboratories, our genetic test centres offer an innovative platform where our pathologists focus their expertise on a comprehensive testing selection dedicated to Haematology, Oncology & Antenatal. We look forward to continuing our focussed medical research that enables superior decision-making that can save and enable patients' lives.

	Category	General Issue	SASB Metric / Performance Measure	ACL's Contribution	Related Policies and Procedures
Environmental	Greenhouse Gas (GHG) Emissions	Mobile Sources	Description of efforts to reduce the environmental impact of logistics	<p>ACL operates a courier network that picks up samples from sites, as often as three times a day, and transfers them to the appropriate central laboratories. ACL is committed to minimising its emissions from mobile sources and is consciously investing in environmentally friendly resources to increase sustainability, including the digitisation of key parts of its systems.</p> <p>ACL is successfully limiting GHG emissions through investing and installing GPS tracking systems in its fleet vehicles, aimed at minimising emissions, reducing fleet operation costs and optimising its courier routes further.</p> <p>ACL is seeking further alternative investments, including low carbon hybrid vehicles and trials of electric vehicles, to make mobile sources more efficient and reduce emissions further.</p> <p>ACL acknowledges the work-related environmental impacts commuting can have. ACL seeks to minimise operating and commuting travel emissions by offering flexible working practices to employees, where practicably possible.</p> <p>Due to the increased use of online meetings and employees working remotely throughout the COVID-19 pandemic, businesses have been able to minimise workplace-related emissions.</p> <p>Whilst ACL facilitates remote working, the Company notes the potential impact of additional domestic emissions, from increased working at home and the difficulty of tracking these individual impacts.</p>	Fleet Vehicles Procedure, Fleet Management Maintenance Program Protocol.
			Payload fuel economy, # vehicles in the fleet, motor engine type and # of kilometres travelled.	ACL currently has 332 motor vehicles in its courier fleet, all of which have a four-cylinder or less engine. Implementing GPS tracking in courier fleet vehicles has increased fleet sustainability, optimised courier routes and sample collection efficiency, as anticipated.	
		Stationary Sources	Description of efforts to reduce the environmental impact at facilities, countries of operations.	<p>ACL currently operates in two countries; Australia and Malaysia. As part of the Company's response to the requirements for Australia to meet the Paris Climate Agreement goal, ACL proactively engages with landlords on renewable energy projects, with a view to materially reduce GHG emissions and carbon footprint.</p> <p>ACL has joined with its landlord at Clayton (ACL's registered office and principal place of business) in green energy initiatives whereby it is working with the landlord to have solar photovoltaic panels (Solar Panels) installed to increase business resilience by reducing energy usage, overall emissions and energy bills.</p> <p>ACL's back office in Malaysia efficiently manages non-client-facing functions including data entry, accounts receivable, payables management and some information technology services from its 4 star NABERs shared services centre site.</p>	
	Regulatory Risk Management and Environmental Compliance	Description of efforts to manage non-compliance and reduce overall environmental impact	ACL's suite of Environmental Policies (including Environmental Protection Agency Changes to Vehicle Procedure and Environmental Audit Checklist) aims to keep ACL accountable for sustainable practice and is committed to increasing efficiency to minimise our environmental footprint.		
	Air Quality (Upstream suppliers and downstream product use not included)	Energy Management	Total energy consumed: % grid electricity vs % renewable	<p>ACL is committed to transitioning facilities, to be more environmentally viable, energy efficient and sustainable, to the extent possible.</p> <p>ACL has installed light sensors and LED lighting at the majority of its main and larger hospital laboratories, as part of the Company's commitment to invest in long-term sustainable business alternatives.</p> <p>ACL's main laboratory located in Adelaide was specifically designed with a focus on optimising efficiencies, including workflow efficiency and energy efficiency. Accordingly, ACL's main laboratory in Adelaide has been fitted with LED lighting and Solar Panels as a means to minimise energy consumption.</p> <p>ACL limits operational emissions at its main laboratory in Clayton, by electrical monitoring, which optimises power management. Through monitoring consumption, ACL is able to achieve continual improvement in its environmental performance and prevent unnecessary pollution.</p>	
	Water & Wastewater Management	Water Usage	<p>Description of policies and procedures</p> <p>Wastewater treatment and discharge</p> <p>Total amount of: rain (if any) vs local water</p>	<p>ACL has implemented an accountability framework including a range of internal reporting requirements, best practice procedures and policies, across various states to support Company initiatives, focused on managing water and wastewater management.</p> <p>ACL operates a water testing service in various states and has appropriate documentation to guide how to efficiently manage the collection and operation of water samples. Relevant policies and procedures employed incorporate climate change strategy into water management to support the Company in its pursuit of minimising water use, managing water discharge and protecting local water sources.</p>	Lab Environmental Water Testing and Samples Procedure, Environmental Water Testing Quality Control.

	Category	General Issue	SASB Metric / Performance Measure	ACL's Contribution	Related Policies and Procedures
Environmental	Waste & Waste Management	Waste Disposal	Treatment, handling, storage, disposal and regulatory compliance	<p>ACL has adopted a risk management approach consistent with ISO 31000: Risk Management, ISO 1400:2004 Environmental Management Systems and AS4801:2001 WHS Management Systems for managing the exposure to health, safety &amp; environmental risks that can arise from workplace hazards. ACL's 'Waste Management Plan' has been developed including Emergency Contingency planning.</p> <p>ACL has current agreements with relevant waste businesses to undertake appropriate waste management activities including collection, transportation, treatment and appropriate disposal of recyclable, general, putrescible, medical, sanitary, hazardous, liquid, sharps, prescribed and other waste.</p> <p>ACL has also implemented waste disposal procedures as site-specific documents. ACL's main laboratory in Adelaide has an EPA approved waste trap catchment system.</p> <p>All laboratories have a documented waste management program that includes procedures on how to dispose of and manage the disposal of biological and non-biological waste, quarantine waste, sharps and broken glass, "uncontaminated" waste and exotic material waste.</p>	Waste Management Plan For ACL
			% of incinerated vs recycled vs landfill; % of hazardous vs non-hazardous	ACL will commission a waste audit in FY 2022, which will assist the company in assessing our waste disposal. Waste classification and appropriate reduction strategies will become available at the relevant time.	
	Ecological	Environment	Description of efforts to reduce the environmental impact	<p>ACL understands the importance of sustainability considerations including pollution prevention, biodiversity and resource conservation in its business activities. ACL is committed to having its material dependencies and subsequent consumption impacts on nature assessed, with a view to reporting on its assessment and sustainability measures implemented, as required.</p> <p>ACL encourages employees to minimise the use of paper in the office, as the Company remains committed to minimising emissions with a view to achieving net-zero carbon emissions in the long-term future, or as soon as practicably possible. ACL has programmed print-release on its printers that requires staff to login before documents are printed to minimise unnecessary paper usage.</p> <p>ACL's recent digital investments, aimed at reducing unnecessary printing and paper usage include: e-Orders and e-Results, optimised sample collection, digitisation of slides, and a Clinical Trials App.</p> <p>e-Orders and e-Results allow doctors to order and receive results online, cutting down on paper usage. ACL has also implemented electronic signature capabilities in Clinical Trials operations and invested in technology that supports electronic ordering and downloads to reduce its carbon footprint and subsequent paper usage.</p> <p>ACL strongly encourages clients and doctors to access their pathology results and reports and communications electronically, to the extent possible, to further reduce the energy and water resources associated with paper and print production.</p>	
				Innovation	

		Category	General Issue	SASB Metric / Performance Measure	ACL's Contribution	Related Policies and Procedures
Social Capital	Human Rights & Community Relations	Safety of Clinical Trial Participants	Management process for ensuring quality and patient safety during clinical trials	<p>ACL has positively contributed to the dignity of the person through its innovation and investment in research. We are proud of our contribution in being able to provide a non-invasive cancer screening test, that can detect cancer biomarkers in blood. This test allows oncologists to choose a targeted therapy, monitor treatment resistance and detect low residual disease, without patients undergoing more invasive procedures.</p> <p>All clinical staff are required to regularly complete Clinical Trials Training and Competency Assessment Modules, to ensure patients are treated with the best care and in the most up-to-date way.</p> <p>ACL also has comprehensive procedures in place that govern the process of reporting clinical incidents, to effectively manage and mitigate adverse events from reoccurring. Information and changed practices are recorded and made available in relevant internal policies and procedures, including Transfusion Testing Procedures and Transfer of Blood between ACL Labs.</p> <p>Our work in the clinical trials arena aims to purport more evidence-based testing, as we recognise the environmental impact unnecessary testing may have. We invest in this space with the aim to protect and promote the health of the population at large. By reducing rates of preventable diseases and contributing to the prevention of other illness, injury and disability, we intend to simultaneously improve patients' lives and reduce emissions in the health and pathology industry.</p>	Clinical Governance Policy, Clinical Governance Process for Transfusion Testing, Reporting Of Clinical Incidents To ACL & Hospital Boards, Health, Safety & Environment Policy.	
		Community Relations	Advocacy	<p>ACL consciously contributes to the common good of society by maintaining a community focus and encouraging the participation of its staff and stakeholders. As part of the 'May 50K' Multiple Sclerosis (MS) initiative, ACL and staff made a combined contribution of over \$25,000.00 to MS Research, being the 4th largest contribution nationally.</p> <p>In January 2020, ACL made a combined contribution of \$50,000 from various donations and fundraising events held by staff to Australian Red Cross (\$20,000) and (\$30,000) to national and statewide disaster relief and recovery charities, including the Salvation Army, the NSW Rural Fire Service, the Victorian Bushfire Appeal, The Wildlife Emergency Fund (WIRES) and Warriors4Wildlife.</p> <p>ACL staff positively view philanthropic contributions to communities and engage within the workplace to foster a socially positive culture, encouraging participation where possible.</p> <p>Flexible working arrangements are made available to employees including for those who volunteer with the Government and other agencies including Country Fire Authority. Offering a system of support throughout COVID19 and at times of hardship, the company has created welfare packs for those in isolation or a trying time with respect to work-related reasons.</p>		
		Training & Education of future Pathologists	Description of efforts towards training and educating future generations	<p>ACL strives for diagnostic excellence and is committed to continuing professional education of staff and referring medical practitioners, including training the next generation of pathologists and scientists.</p> <p>ACL's focus on clinical excellence through commitment to continuing professional education for staff, including training the next generation of pathologists and scientists, helps to attract and retain a professional workforce.</p> <p>ACL actively maintains a focus on research, innovation and advocacy to contribute to shared scientific effort and to enable leadership in scientific developments and technological change.</p> <p>ACL works with hospitals, referring doctors and in-house scientific leads to enhance medical understanding and invests in research for the development, validation, accreditation and introduction of new tests to market.</p> <p>Aimed at improving scientific understanding and knowledge in our communities, ACL's professional staff also participate in peak body advocacy, as members on Boards, Advisory Committees and scientific and professional symposia.</p>		
	Access & Affordability	Access for Low-Income Patients	% of revenue derived from Medicare	<p>ACL aims to provide an inclusive and accessible pathology service. This is facilitated through bulk-billing the vast majority of services and receiving reimbursements through the Australian Government's Medicare Benefits Schedule (MBS).</p> <p>Promoting universal access to pathology and limited price differentiation between pathology providers, over 70% of ACL's revenue is derived from the MBS with almost all community pathology being directly paid for under the MBS and some hospital contracts linked to services and pricing in the MBS.</p>		

		Category	General Issue	SASB Metric / Performance Measure	ACL's Contribution	Related Policies and Procedures
Social Social Capital	Privacy & Data Security	Customer Privacy & Use of Personal Information (PI) and other data for secondary purposes (legal proceedings, clinical trials, marketing)	<p>Approach to collecting data</p> <p>Obtaining consent</p> <p>Managing user and customer expectations</p> <p>Managing evolving regulations</p> <p>Description of policies and practices to secure customers' Protected Health Information (PHI) records and PI</p>	<p>ACL is committed to upholding the right to privacy, the protection of personal and health information in accordance with privacy laws and actively seeks to prevent and reduce information security risks.</p> <p>ACL's information security policy and standards framework was established in accordance with the international standard Information Security Management (ISO 27001). ACL has also employed procedures for archiving patient results and performing system data backup on testing instruments at relevant laboratories.</p> <p>ACL recognises the benefits of implementing effective consultation mechanisms, which encourage cooperation and engagement of workers, management and or/other applicable stakeholders (contractors/medical practitioners). Accordingly, ACL's privacy and data policies support and outline the management of personal relations and personal, health and business information.</p> <p>ACL takes reasonable steps to ensure that personal and health information collected, used and disclosed is accurate, complete and up to date. ACL's internal and external policies aim to protect restricted, confidential or sensitive data from loss and limit exposure to accidental loss. Accordingly, ACL has no risk appetite for the intentional, deliberate or negligent use of information including personal, health and other confidential information.</p> <p>ACL implements and operates IT security in-house, with the assistance of partners and common IT security technologies to challenge, protect, detect and respond to security concerns. ACL is consciously using eWaste recycling firms, that securely transport and appropriately destroy the Company's legacy IT assets to manage IT waste disposal.</p> <p>ACL's Cyber Security Policy establishes and communicates the expectations for cyber security protocols within ACL, including the conduct of routine testing and collaboration with third-party security specialists to support the ongoing, secure, protection of information and to assist with implementing the Company's security roadmap.</p> <p>ACL's Ethics, Confidentiality and Customer Service procedure sets out the protocols associated with managing privacy and confidentiality of patient's information that may be released, in accordance with privacy laws.</p>	Archiving Patient Results and System Data Backup Procedure, Malware And Vulnerability / Patch, Management Standard Policy, Privacy Policy, Privacy, Complaints, Confidentiality & Duty Of Care Procedure, Ethics, Confidentiality & Customer Service Policy, Cyber Security Policy, Information Security Policy, Security Incident Management Policy, External Supplier Security Standard Policy,	
	Customer Welfare	Services provided that may create health or safety risks to patients	Description of policies and practices to manage expectations of service provided	<p>ACL endeavours to be agile in responding to the needs of customers and is continually looking for new ways of providing a quality service to customers.</p> <p>ACL's established procedures (which are consistent across the business), focus on best practice, clinical excellence and continuous service improvements, which serves to improve patient care and treatment, promoting the common good and preserving the dignity of people in our society.</p> <p>ACL's Ethics, Confidentiality and Customer Service procedure benchmarks a minimum standard expected of staff in their conduct whilst representing the Company. This standard requires staff to use ethical behaviour and maintain a customer-centric attitude as customer service remains a Company priority.</p> <p>ACL collaborates with the National Association of Testing Authority (NATA) to ensure service standards and quality, risk management and process improvement in scientific practice.</p> <p>ACL is committed to ensuring the accreditation of its laboratories, as a public good for the community and quality assurance that adds value to ACL and its customers, by hosting regular audit assessments by NATA.</p> <p>All pathologists in the employ of ACL are fellows of the Royal College of Pathologists Australasia (RCPA) and participate in the RCPA's Continuing Professional Development Program, to protect the integrity of the services provided and be responsive to the emerging needs of customers.</p>	Guideline for Good Clinical Practice, National Model Clinical Governance Framework Regulations for Supervision, Clinical Governance of Medical Pathology Laboratories, Good Clinical Laboratory Practice (GCLP), Incident Management Policy.	
	Selling Practice & Product Labelling	Pricing & Billing Transparency	Description of policies or initiatives to ensure that stakeholders are adequately informed about price	<p>ACL acknowledges its industry is sensitive to pricing fluctuations; accordingly, ACL endeavours to manage such changes proactively and with transparency.</p> <p>ACL has appropriate procedures in place for collection centre billing codes that set out the commonly used billing codes at relevant facilities.</p> <p>ACL makes its best endeavours to inform and discuss costs and any potential changes to costs that may result in the patient being charged an out-of-pocket expense.</p>	Pricing Changes Affecting PIRSA, Collection Centre And Billing Codes, Initial Assessment: Billing Code Procedure.	

	Category	General Issue	SASB Metric / Performance Measure	ACL's Contribution	Related Policies and Procedures	
Social	Social Capital	Product/Service Quality & Safety	Materials Sourcing & Management	<p>Process involved when engaging a supplier (screening, selection, monitoring and engagement with suppliers), including supplier's commitment to and/or alignment with ACL's ESG Position (where applicable).</p> <p>Product / Service Quality</p> <p>Quality of Care &amp; Patient Satisfaction</p> <p>Number of Serious Reportable Events</p>	<p>ACL is committed to ensuring the safety and quality of goods and services throughout the value chain and recognises the ethical significance of where and how materials and services are sourced. ACL actively promotes transparency in its supply chains and consciously engages with suppliers to understand their commitment to ethical and other compliance standards. ACL has engagement initiatives, including conducting supplier audits and reviews, to support and manage suppliers, where possible.</p> <p>ACL's Corporate Quality Manual was established in accordance with the international standard Quality Management System (ISO 9001) and sets out the Company's quality framework and Quality Management System that supports the organisation, including the controls to be exercised on process functions.</p> <p>Where appropriate, and applicable, statutory regulations and accreditation requirements including compliance with AS/NZS ISO 9001, AS ISO 15189, and AS ISO/IEC 17025 are met. We aim to return value to our customers, commit to appropriate staff training and develop mutually beneficial relationships with our suppliers and stakeholders.</p> <p>ACL avoids contributing to breaches of human rights, including in the supply chain and other business relationships and has employed a due diligence procedure as part of its supplier engagement practice. Accordingly, ACL expects suppliers to comply with certain requirements and minimums such as wages, benefit policies, working hours, no forced labour, no discrimination, health and safety and business integrity that are provided for in supporting internal documentation.</p> <p>ACL provides suppliers (including potential suppliers) an opportunity to complete supply chain assessments through the MSA360 supply chain sustainability-rating platform. Based on responses, ACL categorises supplier's respective risk, if any, and appropriately determines whether to engage them further.</p>	
				Packaging and delivery of materials/services	<p>ACL actively reviews current packaging and delivery of materials and consumables used to deliver services and considers alternative options with sustainability benefits, where possible.</p> <p>ACL understands its operational footprint and the impact (including potential impact) business decisions can have on the industry and recognises that collaboration across the value chain creates a powerful force to tackle a common challenge. Accordingly, ACL intends to seek out collaboration intra-industry and with relevant government agencies to consider less carbon-intensive packaging and delivery options.</p>	
Human Capital	Labour Practices	Human Resource Management	<p>Employee turnover</p> <p>Employee satisfaction</p> <p>% of employees on EBA's vs modern award vs salary, gender equity</p>	<p>We are dedicated to providing and advocating for equal opportunity in the working environment. Accordingly, ACL complies and reports in accordance with the Workplace Gender Equity Act 2012 (Cth). ACL aims to foster equality in the workplace by conducting audits of salaried staff including medical officer's salaries to ensure gender and market equity.</p> <p>ACL's Australian staff currently operate under various Enterprise Bargaining Agreements (EBAs) and modern awards. ACL is a party to six EBAs and one national Modern Award which collectively cover approximately 80% and 20% of its Australian workforce respectively. This ensures that all employees are covered by minimum employee entitlements.</p> <p>ACL is proud to offer meaningful employment and offer promotions internally, where possible. 97% of employees who took primary carers leave in FY21 returned to work after their period of leave.</p> <p>ACL recognises and awards employees for their acts and length of service on a monthly and yearly basis. ACL launched its length-of-service awards in FY20 with approximately 400 employees to receive service milestones in FY21.</p>		
			<p>No. of incidents (and outcome)</p> <p>Description of policies and practices in place to support</p>	<p>ACL has dedicated Workplace Health &amp; Safety (WHS) managers who implement and audit policy and practice and produce state-based, monthly WHS reports that are presented to the Board with a national overview on a quarterly basis.</p> <p>Our WHS strategy includes programs to mitigate and manage incidents and Lost Time Injury (LTI) nationally. By improving investigative processes and promoting a positive safety culture through employee engagement and communication, LTI Frequency Rates (LTIFRs) decreased by 0.52 between FY19 and FY21.</p> <p>ACL's continuous improvement framework that is aligned to ISO 9001 (Quality Management Systems) supports the Company in meeting its health and safety objectives and obligations. Human Capital Management and people risks are also integrated into ACL's risk management processes and are reported regularly to ACL's Board Risk Committee.</p> <p>Employees are provided with frequent training and education via an online staff portal, utilised to communicate up-to-date best practice in proactively mitigating and managing incidents.</p>	<p>Workplace Health And Safety Standards, Occupational Violence And Aggression Management Policy, Injury Management Policy, Health, Safety and Environment Statement.</p>	

		Category	General Issue	SASB Metric / Performance Measure	ACL's Contribution	Related Policies and Procedures
Social Human Capital	Labour Practices	Training & Education	Clinical Training and Education of future Pathologists	<p>ACL's pathologists are actively involved in the education of future medical practitioners' training as the Company recognises the importance of medical leadership and stewardship. Accordingly, ACL consistently has pathology registrars undergoing supervised training for their admission to Fellow of the Royal College of Pathologists Australia (RCPA), with many of its experienced pathologists acting as supervisors and college examiners.</p> <p>ACL also has formal arrangements with universities across Australia to provide supervised on-the-job training to the next generation of biomedical scientists.</p> <p>ACL invests in the medical education of its professional network. ACL designs and runs professional development programs accredited by the Royal Australian College of General Practitioners for its referring medical practitioners, enabling them to continue to upskill their practice in the use and interpretation of laboratory tests.</p> <p>ACL staff undergo comprehensive induction training and regular competency-based education, which are part of a standardised process to manage training needs.</p> <p>ACL has an online education platform that involves a series of updated national training and competency assessment modules and guidelines for all non-clinical staff. There are 20 Training and Competency Assessment Module guideline documents that are developed for all departments and for certain job functions that need to be performed by staff members.</p>		
			Other Training and Education	<p>As part of its succession planning framework, ACL has established a mentoring program that focuses on empowering and educating female managers and scientists to equip them with capabilities required in executive management roles.</p> <p>ACL also delivers a leadership development program in two phases, designed for its employees to enhance skills in decision-making, change management, project management and performance management, with a view to develop future leaders.</p> <p>In FY21 ACL internally promoted 1,004 employees, with females representing 74% of internal promotions.</p>		
	Employee Engagement, Diversity & Inclusion	Employee Engagement	Description of policies or initiatives to ensure that stakeholders are adequately informed	<p>ACL's overarching Code of Conduct governs representative activities and behaviours.</p> <p>As detailed in this sustainability report, ACL has appropriate policies, procedures, standards and protocols including relating to code of conduct, equality and diversity, corporate social responsibility, supplier relationship management, anti-bribery and anti-corruption, work health and safety standards, leave entitlements (including parental leave), working from home, bullying, harassment and discrimination and work experience, in order to: attract and retain talent and maintain and improve employee morale, engagement and productivity.</p> <p>ACL's Communication and Consultation procedure serves to support, guide and provide a clear framework for both workplace consultation and communication including inter- and intra- communication.</p> <p>ACL is committed to protecting Indigenous rights and has implemented an Aboriginal and Torres Strait Islander hiring program setup to specifically address this within the organisation. Accordingly, ACL has collaborated with TAFE NSW to establish the first Aboriginal health employment program in NSW.</p> <p>As part of the Aboriginal Pathology Collections program, ACL's collections staff provide guidance and support to assist Aboriginal students with work placement. ACL has successfully employed collections staff from the program.</p> <p>ACL aims to support employee's wellbeing by regularly communicating programs that the company offers. ACL provides an independent Employee Assistance Program (EAP) that offers a confidential counselling service to support all its employees. We also provide independent finance and career services as part of EAP. Further information is available to employees on the staff intranet as relevant external bodies publish such information.</p> <p>We also offer employees an employee benefits program that includes offers for discounted services and items, from time to time. We are proud of our ability to align and collaborate with national companies.</p> <p>As part of ACL's Initial Public Offering, ACL offered employees an opportunity to acquire a shareholding in the Company or receive a payment for hard work and continued efforts. ACL is proud to have been able to support more than 730 staff in becoming shareholders.</p>	Code of Conduct, Communication and Consultation procedure.	

		Category	General Issue	SASB Metric / Performance Measure	ACL's Contribution	Related Policies and Procedures
Social	Human Capital	Employee Engagement, Diversity & Inclusion	Diversity & Inclusion	Description of policies and procedures  % diversity including race, gender, ethnicity, religion, sexual orientation and remuneration variance (as appropriate).	ACL recognises the fundamental obligation to respect human rights and actively manages and encourages equal opportunity, gender equality, inclusion and diversity across the company through the implementation of an accountable and transparent framework.	Equality and Diversity Policy Bullying, Harassment and Discrimination Policy.
					ACL's workforce includes individuals with diverse skills, backgrounds, perspectives and experiences, and this diversity is recognised, valued and respected. ACL's Diversity Policy aims to align ACL's business operations with the positive outcomes that can be achieved through a diverse workforce that recognises and utilises the contribution of diverse skills and talents amongst its Board, management and employees.	
					Consistent with the principles of justice, integrity, equity and the pursuit of medical excellence upon which the profession is founded, ACL is committed to equality and diversity in the workplace. Together with the support of ACL staff, the Diversity and Equality and Diversity Policies promote the right to diversity, equality, respect, inclusion and substantive equality in the workplace and medical / healthcare profession.	
					As part of ACL's "Staff Fun Days" ACL celebrates 'Cultural Diversity Day'. On this day, employees of all different backgrounds are encouraged to proudly wear their national costumes and share food and traditions from all over the world.	
					ACL recognises that globally, women and girls are less likely to participate in science. Accordingly, ACL annually celebrates the 'United Nations International Day of Women and Girls in Science' in February, to engage and inspire women to take up roles and careers in all fields of science.	
					ACL's workplace gender ratio is above 80%, female to male. Whilst this is favourable for females, ACL recognises the imbalance and employs appropriate ethical decision-making when recruiting.	

Category	General Issue	SASB Metric / Performance Measure	ACL's Contribution	Related Policies and Procedures
Governance  Board & Corporate Governance	Business Ethics/ Model Resilience	Description of policies and/or practices geared towards transitioning to a low carbon and climate constrained environment.	<p>ACL's ESG commitment is primarily captured within the Corporate Social Responsibility Policy (that includes both Environment and Social commitments); and Governance Policy. ACL is committed to identifying and reducing waste and consumption of resources, by providing education and training to staff on environmental matters and disaster mitigation, through emergency planning to reduce adverse environmental outcomes.</p> <p>ACL's management understands its responsibility with regard to protecting our environment and works to enable employee commitment and involvement that increases environmental awareness.</p> <p>ACL Whistleblower Policy encourages its employees, suppliers, contractors, customers, tenderers and other persons who have business dealings with ACL to raise any concerns and report instances of unethical, illegal, socially irresponsible or fraudulent conduct, where there are reasonable grounds to suspect such conduct, without fear of intimidation, disadvantage or reprisal.</p> <p>The Whistleblower Policy sets out ACL's commitment to investigating all matters reported in an objective and fair manner as soon as possible after the matter has been reported. ACL has engaged a third party that provides a platform for matters to be anonymously raised and appropriately investigated.</p> <p>ACL acknowledges the vital role it plays in helping to address our global sustainability challenges.</p> <p>As a Company, ACL is well positioned to be an adaptable and resilient company. Due to this, ACL was able to quickly respond the COVID-19 crisis in an extremely agile way; examples being, rapidly setting up COVID laboratories and validating tests, setting up drive-through COVID-19 Collection Centres across the nation, or helping referrers transition to a telehealth model of care.</p>	Risk Management Framework, Whistleblower Policy, Whistleblower Protection Policy, Remuneration and Nomination Committee, Charter Disclosure Policy, Audit Committee Charter, Corporate Governance Statement, Anti-Bribery and Corruption Policy.
	Board Diversity	Board Diversity	<p>ACL is committed to ensuring that its Board is diverse in all its forms, including in its range of technical and human skills, expertise, lived experience, backgrounds, gender, race and age.</p> <p>ACL acknowledges that a diverse Board will result in better decision making and more sustainable value creation. ACL has committed to achieving a gender diversity target on its Board of 40:40:20 (male:female:any) as is actively engaging with female potential candidates.</p>	Corporate Governance Statement, Board Charter.
	Ethical Business Practice	Description of efforts to reduce the environmental impact	<p>ACL is committed to operating in a manner consistent with the laws and regulations of the jurisdictions in which its businesses operate, including those relating to bribery and corruption.</p> <p>Accordingly, the Board has adopted an anti-bribery and corruption policy which sets out the responsibilities of ACL and its employees, or other personnel or representatives in:</p> <ul style="list-style-type: none"> <li>observing and upholding the prohibition on bribery and related improper conduct, and</li> <li>providing information and guidance on how to recognise and deal with instances of bribery and corruption.</li> </ul> <p>As part of minimising conflicts of interest and/or unethical business practice, under the Whistleblower Policy, the Board is to be informed of any material concerns that call into question the culture of ACL.</p> <p>ACL has ongoing engagement initiatives, including conducting supplier audits and reviews, to monitor and manage ethical business practices in the supply chain, where possible. All suppliers (including potential suppliers) are required to complete assessments on the MSA360 supply chain sustainability rating online platform prior to engagement. Based on responses, ACL's Quality and Risk department determines whether to engage with the supplier or if the Company needs to correctively engage with the relevant supplier.</p>	Anti-Bribery & Anti-Corruption Policy, Shareholder Communication Policy, Securities Trading Policy, Whistleblower Protection Policy, Modern Slavery Statement.
	Reputational Risk	Risk Management & Opportunities	<p>As part of ACL's risk management framework, ACL has developed a Risk Appetite Statement that includes no appetite for intentional non-compliance with legal, statutory and policy requirements.</p> <p>ACL is committed to meeting all relevant regulatory and legislative environmental requirements, to achieve continual improvement in environmental performance and to prevent pollution</p> <p>ACL operates in a highly regulated industry and is subject to laws, government policies and regulations. ACL monitors legislative and regulatory developments and engages proactively with key stakeholders to manage this risk.</p> <p>ACL maintains high quality standards and audit processes to ensure it continually meets licencing and accreditation standards across its business. Each laboratory has been accredited to AS ISO 15189 and the Clayton and Adelaide laboratories also have ISO 9001:2015 certification, Quality Management System frameworks in place.</p>	Risk Committee Charter.

Category	General Issue	SASB Metric / Performance Measure	ACL's Contribution	Related Policies and Procedures
Governance  Other Governance	Management of the Legal & Regulatory Environment	Description of corporate positions related to government regulations and/or policies to address.	<p>ACL's Board has created a framework for managing the Company, including adopting relevant internal controls, risk management processes and corporate governance policies and practices which it believes are appropriate for the Company's business and designed to promote the responsible management and conduct of the Company.</p> <p>ACL's Code of Conduct (<b>Code</b>), that has been endorsed by the Board and made available to Employees, seeks to guide the behaviour of everyone in ACL (including all employees, contractors, consultants, managers and the Board, including temporary employees, contractors and directors of ACL) by clearly stating ACL's firm commitment to behaving honestly and fairly.</p> <p>The Code requires ethical and responsible conduct of Employees that includes acting in accordance with ACL's values and best interests, acting with integrity (including being honest, ethical, fair and trustworthy in all business dealings and relationships) and reporting any breaches to the Code.</p> <p>As part of ACL's governance and risk management framework, the Board has delegated responsibility for the oversight of legal and regulatory risk to its Risk Committee, more information about the role and function of the Risk Committee can be found in ACL's Corporate Governance Statement.</p>	Code of Conduct, Board Charter, Governance Policy, Corporate Governance Statement, Risk Committee Charter, Modern Slavery Statement, Workplace Health and Safety Policy, Securities Trading Policy, Disclosure Policy.
	Taxation	Description of efforts to manage	ACL recognises a fair tax system is essential to the proper functioning of society and the economy. ACL observes relevant tax law.	
	Competitive Behaviour	Description of efforts to manage	<p>ACL is committed to operating in a manner consistent with the laws and regulations of the jurisdictions in which its businesses operate, including those relating to bribery and corruption.</p> <p>Accordingly, the Board has adopted an anti-bribery and corruption policy which sets out the responsibilities of ACL and its employees, or other personnel or representatives in:</p> <ul style="list-style-type: none"> <li>observing and upholding the prohibition on bribery and related improper conduct, and</li> <li>providing information and guidance on how to recognise and deal with instances of bribery and corruption.</li> </ul> <p>As part of minimising conflicts of interest and/or unethical business practice, under the Whistleblower Policy, the Board is to be informed of any material concerns that call into question the culture of ACL.</p> <p>ACL has ongoing engagement initiatives, including conducting supplier audits and reviews, to monitor and manage ethical business practices in the supply chain, where possible. All suppliers (including potential suppliers) are required to complete assessments on the MSA360 supply chain sustainability rating online platform prior to engagement. Based on responses, ACL's Quality and Risk department determines whether to engage with the supplier or if the Company needs to correctively engage with the relevant supplier.</p>	Anti-Bribery & Anti-Corruption Policy, Shareholder Communication Policy, Securities Trading Policy, Whistleblower Protection Policy, Modern Slavery Statement.
	Critical Incident Risk Management	<p>Description of efforts to manage</p> <p>Total amount of Critical Incidents /remediation</p>	<p>ACL recognises that risk management is a cornerstone of good clinical and corporate governance and organisational success.</p> <p>Being able to manage risk well is fundamental for ACL, as it seeks to meet patient and organisational objectives, excellence in patient care and promote efficient, effective and ethical decision making, to align with the Company's mission, to empower decision-making that saves and improves patients' lives. In pursuit of this mission, ACL has consciously invested in effective risk management strategies that allow for the continual monitoring of performance; identification and prioritisation of risks relating to performance; and identification and implementation of appropriate actions to manage and/or mitigate each identified risk, as appropriate.</p> <p>ACL has adopted the Australian and International Standard on Risk Management (AS ISO 31000:2018) as a benchmark for its risk management framework. ACL's risk management framework includes a Risk Committee, Risk Management Policy and Risk Appetite Statement to mitigate and manage risk.</p>	Risk Committee Charter, Risk Management Policy, Incident Management Policy, Incident Management, Business Continuity Plans.



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