



Aspen Medical

Disclosure Report

Date Submitted: November 18th, 2023



Disclosure Materials

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire that B Lab deems relevant for public stakeholders, then, as a condition of their certification, the company must:

- 1) Be transparent about details of the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue
- 3) Demonstrate that management practices are in place to avoid similar issues from arising in the future, when necessary.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit and integrity of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to a background check by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company



Disclosure Questionnaire

Industries and Products

	Yes	No
Please indicate if the company is involved in production of or trade in any of the following. Select Yes for all options that apply.		
Animal Products or Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Biodiversity Impacts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chemicals	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Firearms Weapons	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Mining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Pornography	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Tobacco	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Energy and Emissions Intensive Industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Fossil fuels Gambling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Genetically Modified Organisms	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Illegal Products or Subject to Phase Out	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Industries at Risk of Human Rights Violations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Monoculture Agriculture	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Nuclear Power or Hazardous Materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payday, Short Term, or High Interest Lending	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Water Intensive Industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Advisory Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Outcomes & Penalties

	Yes	No
Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply.		
Anti-Competitive Behavior	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Breaches of Confidential Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bribery, Fraud, or Corruption	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company has filed for bankruptcy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consumer Protection	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Financial Reporting, Taxes, Investments, or Loans	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Labor Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Large Scale Land Conversion, Acquisition, or Relocation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Litigation or Arbitration	<input type="checkbox"/>	<input checked="" type="checkbox"/>
On-Site Fatality	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Penalties Assessed For Environmental Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Political Contributions or International Affairs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Recalls	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Significant Layoffs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Violation of Indigenous Peoples Rights	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Practices

	Yes	No
Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No."		
Animal Testing	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company prohibits freedom of association/collective bargaining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company workers are prisoners	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Conduct Business in Conflict Zones	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Confirmation of Right to Work	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does not transparently report corporate financials to government	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employs Individuals on Zero-Hour Contracts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Facilities located in sensitive ecosystems	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ID Cards Withheld or Penalties for Resignation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No formal Registration Under Domestic Regulations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No signed employment contracts for all workers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Overtime For Hourly Workers Is Compulsory	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payslips not provided to show wage calculation and deductions	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Yes	No
Sale of Data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Reduction Through Corporate Shells	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers cannot leave site during non-working hours	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers not Provided Clean Drinking Water or Toilets	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers paid below minimum wage	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers Under Bond	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other - Clients in COntroversial Industries	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other Disclosures	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Supply Chain Disclosures

	Yes	No
Please indicate if any of the following statements are true regarding your company's significant suppliers.		
Business in Conflict Zones	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Child or Forced Labor	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Environmental Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Social Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Operations in Conflict Zones

Topic	The company worked in Yemen and Iraq, which are considered conflict zones.
Summary of Issue	<p>Aspen Medical provided medical services in regions classified by the World Bank's FY24 List of Fragile and Conflict-affected Situations as conflict zones. Aspen Medical's role is to provide medical support to UN personnel working in those zones.</p> <p>In 2017, Aspen Medical was contracted by the World Health Organization (WHO) to provide three humanitarian field trauma and maternity hospitals in Mosul, Iraq. WHO further contracted Aspen Medical in 2018 to assess and prioritize the infrastructure rebuild requirements and clinical capacity needs of the Yemen Public Hospital in Aden, Yemen.</p> <p>Aspen Medical no longer operates in those regions.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<p>Aspen Medical employed between 50 and 60 clinicians and support workers for the trauma and medical hospitals in Mosul, Iraq, and up to 3 employees in Yemen to assess and prioritize Yemen Public Hospital requirements.</p> <p>7.8% of the company's revenue came from the WHO contract for three hospitals in Iraq and less than 0.01% came from the WHO contract for Yemen.</p>
Impact on Stakeholders	<p>Conflict zones are often characterized by widespread human rights abuses and violations of national or international law. The security of company workers who work in such areas could also be at risk.</p>
Implemented Management Practices	<ul style="list-style-type: none">• At the company's core is a philosophy that everyone should have access to health care, especially non-combatants,• Aspen Medical stated that it values its contributions to humanitarian assistance to global organizations like the WHO and UNDP. Since 2018, the company has been listed as a WHO Emergency Medical Team (EMT) for Specialized Care (Surgical and Outbreak).• To address the inherent risks in conflict zones, Aspen Medical has committed to the UN Global Compact with

	<p>its ten universal principles on human rights, labor, environment, and anti-corruption. The company takes actions to advance societal goals — including the Sustainable Development Goals. The company's policies reflect this commitment,</p> <ul style="list-style-type: none"> • In these environments, Aspen Medical treated a total of 48,000 patients and delivered over 3000 babies in Iraq, and provided healthcare assessments to the WHO and UNDP for the provision of tertiary-level hospitals in Aden and Sana'a. • The company was not participating in the conflict but providing healthcare to the civilians injured in the conflicts, • All employees working on these conflict zones signed a code of conduct as part of their employment agreement, • Aspen's managers and those responsible for engaging third-party contractors (i.e. cleaners and catering) were contracted and monitored to meet the company's anti-corruption policies and anti-slavery policies (available at the Report section of this disclosure documentation).
Report	Company's Business Ethics Policy

Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other - Clients in Controversial Industries

Topic	Company has clients in the mining industry and has worked in one contract with the prison industry.
Summary of Issue	<ul style="list-style-type: none"> Aspen Medical has been engaged in the provision of healthcare to workers in the mining sector, in mainly Australia, since 2009. The company provides onsite medical support to several mining companies within Australia. The support is centered around Primary Healthcare (nurse and paramedic) and occupational health for the employees. Aspen Medical also provides a fixed-wing AeroMedical Evacuation Service in Western Australia for mining companies employees (as well as the general population) which assists in transporting critical patients from remote areas to tertiary hospitals in Perth. Additionally, over the life of the company Aspen Medical has participated in one contract providing health to Prison Services. This contract was completed in 2018.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<p>The company has over 500 employees working in the mining sector. In 2022, approximately 25% of the company's revenue came from mining companies.</p> <p>Approximately 100 employees have worked in the prison sector up until 2018, which equated to less than 1% of Aspen Medical's revenue that came from this contract.</p>
Impact on Stakeholders	<p>Companies that work with clients in controversial industries can indirectly increase the harmful impact to stakeholders by enabling business growth. Therefore, companies that work with clients in these industries should have practices in place to ensure that their impact is aimed at decreasing the negative impacts of the industry.</p> <p>B Lab has flagged the involvement of companies with clients in controversial industries as a material issue and new standards will be created to address possible risks related to this matter.</p>
Implemented	<ul style="list-style-type: none"> Aspen Medical exercises due diligence on all clients

Management Practices	<p>before committing to contracts. It considers the industry as well as the services it provides in that industry, in this case, health services to workers and prisoners. These decisions are held at the highest levels in the company,</p> <ul style="list-style-type: none">• The company has moved away from providing these services in the prison sector in the future.

Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other disclosures

Topic	<p>The media published allegations of government affairs and lobbying issues, corruption, service quality issues and humanitarian crisis:</p> <ul style="list-style-type: none"> • Profiting from the pandemic (2022) • How Aspen Medical got 'paid access' to politicians before it made more than \$1 billion in the pandemic (2022) • WA inquest into Cally Graham's death criticizes prison healthcare, praises 'heroic' cellmate (2023) • Inquest into the Death of Cally GRAHAM (2023) • Newmarch House death toll rises to 16 as worker stood down amid alleged infection control breach (2020) <p>Aspen Medical has formally responded to the accusations vehiculated by Four Corners</p>
Summary of Issue	<p>The article news flagged mentions the following allegations:</p> <p>Government affairs and lobbying practices</p> <ul style="list-style-type: none"> • There are allegations that Aspen Medical was selected to provide services to the Australian Government, especially related to COVID-19, without the proper public tenders. • Claims that a former member of the company's board of directors lobbied in favor of Aspen Medical. • There are claims that the company's services were priced higher than other companies. <p>Service quality issues</p> <ul style="list-style-type: none"> • It was alleged that a single staff member did not deliver quality service during the COVID-19 outbreak in aged care facilities, • A worker hired by the company allegedly failed to help a patient and allegedly did not follow proper protocols to restock the emergency kit. <p>Responses to humanitarian crises</p> <ul style="list-style-type: none"> • Article news questioning the ethics behind for-profits providing services in humanitarian crises (e.g. Ebola, COVID-19 outbreaks)

Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<p>Until the date of this document, Aspen Medical had won 51 public tenders to serve the Australian Government. Around 19% (10 public tenders) of this total was focused on COVID-related health services. Those 10 contracts represented a total value of AUD 408,731,611.60.</p> <p><i>For more information, check the "Guidelines of the Australian Electoral Commission" available in the "Report" section of this disclosure statement.</i></p>
Impact on Stakeholders	<p>Although healthcare providers are intended to have a positive impact on human beings' health, if the services are not ethically provided and/or managed, there is an inherent potential risk of negatively impacting people's health and safety.</p>
Implemented Management Practices	<p>The company reported not having closed or ongoing litigations, penalties, or investigations related to all claims mentioned.</p> <p>All company's policies and processes mentioned in this document are regularly reviewed with CEO's awareness</p> <p>Aspen Medical reported the following responses related to the allegations:</p> <p>(1) Government Affairs and Lobbying Practices:</p> <ul style="list-style-type: none"> • The company stated that all Public Tenders related to services provided to the Australian Government are available on the Australian Government website (link available at the "Report" section of this document), • The company has a formal Political Engagement Policy (available in the "Report" section of this disclosure statement) that signalizes its purpose in engaging with political stakeholders and highlights which compliance requirements the company abides by. In this policy, the company reports that is committed to engaging with all political parties but will not make political contributions to any of them, • Aspen Medical has a Business Ethics Policy in place (available in the "Report" section of this disclosure statement) that is applicable to all of its subsidiaries, staff, and business partners. This policy promotes a "zero tolerance" approach to all forms of corruption, ensuring continuing compliance with the Criminal Code Act 1995 and any relevant national legislation governing

	<p>the operations and actions of companies\ s/ individuals where it works. Additionally, Aspen Medical is committed to conducting appropriate due diligence on all potential partners and refuses to associate with any company or employ any individual suspected of corrupt behavior/ practice. The Company's Code of Conduct is signed by all employees and encourages staff to report all incidents of suspected corruption (including fraud), misconduct, serious mismanagement, or substantial waste of resources,</p> <ul style="list-style-type: none">• The company reported that Dr. Michael Wooldridge has been involved with Aspen Medical in various capacities since 2007. He has been a director and board advisor, and through his work with the registered firm, Strategic Counsel, has provided registered advice and services to Aspen Medical. Dr. Wooldridge ceased being a director on 23 October 2019. The company stated that currently, Dr. Woolridge is a director on the Aspen Medical/ Docta Pty Ltd board, where Aspen Medical is a part shareholder. As per the company's public website statement, Aspen Medical attends political events, including fundraising events for all political parties, including both major parties and several minor parties to support good health, industry, national security, and exporting policy, irrespective of which political persuasion has the balance of power. Dr Woolridge, in his capacity at Strategic Counsel, has provided advice and supported Aspen Medical in transparent engagement with the government.• Aspen Medical reported that prior to the pandemic, Aspen Medical was not involved with The Hon Greg Hunt, the Australian Health Minister. Throughout the pandemic response, ongoing discussions were held by Aspen Medical with the Australian government and the Australian departments with respect to specific operational matters, such as volumes of deliveries, delivery schedules, and locations, volumes required, and increasing requests on various contracts. During this period a reporting process was established to inform the Department of Health and Minister Hunt's office on operational issues critical to the contract. No

	<p>discussions were held by Aspen Medical with the Minister of Health before the signing of any contracts with the Department of Health.</p> <ul style="list-style-type: none">Aspen stated that it applies for work in a competitive tender process with other organizations for private contracts. For Australian Government contracts Aspen Medical follows the Australian Government Tendering Guidelines which is also a competitive tender process and as such, sometimes Aspen Medical is successful and sometimes not.
	<p>(2) Service quality issues</p> <ul style="list-style-type: none">Regarding allegations of malpractice in aged care facilities during the COVID-19 outbreak, a report named "Independent Review of COVID-19 outbreaks at St Basil's Home for the Aged in Fawkner and Heritage Care Epping Gardens in Epping" was developed by Professor Lyn Gilbert AO and Adjunct Professor Alan Lily and publish on the Australian Health. The report stated that Aspen Medical was contracted by the Commonwealth to provide a key role in Australia's COVID-19 outbreak response, including the provision of surge workforces for Residential aged care facility whose own staff numbers were depleted by illness, quarantine or absenteeism for other reasons. This report made no adverse findings against Aspen Medical regarding the service provided for this specific facility. The Independent Review is available at the "Report Section".Aspen Medical reported that is not subject to a lawsuit or claim in relation to the Melaleuca Prison or Ms. Cally Graham. The Melaleuca Prison matter before the Western Australia Coroner has concluded, and there were no adverse findings against Aspen Medical. The Coroner found that Ms Graham's cause of death was not caused by the lack of a functioning oxygen tank, but was instead due to other medical issues described in the report. Nevertheless, Aspen Medical considers this a tragic and unfortunate event and has used this incident to improve its clinical processes.

	<p>(3) Disaster capitalism</p> <p>In its response to Four Corners, the company shared the following:</p> <ul style="list-style-type: none"> • "This is a complex, evolving and developing area of discussion in the humanitarian space. There are many organizations that support humanitarian work that are also commercial companies. These include the providers of logistics, vehicles aircraft and communications. Humanitarian health services have traditionally been delivered by charity-based organisations such as MSF and Red Cross [...]. As the global environment changes, we are seeing an increase in the need for deployed healthcare into humanitarian zones, and challenges for those extant charity providers to deliver those services. This is due to both the increased demand and the fact that combatant actors are not complying with those global rules of safety for health providers. The international NGOs, such as the UN and WHO, have been utilising commercial providers to complement charity health providers as this demand grows. This does not mean that the few specialised healthcare providers working in the humanitarian space will supplant the charity or NFP healthcare providers. In fact, we (NGOs, Governments, Charity, NFPs and commercial organizations) are all needed to address the growing demand for healthcare in the humanitarian fields around the world" • Aspen Medical is WHO accredited which means it can be classified as a Emergency Medical Team for Specialized Care (Surgical and Outbreak). Aspen and another company are the only in the world listed as such. Minimum standards for be listed as emergency medical teams: clinical care and operational support technical standards, • Aspen Medical has had experience in providing health care services during Cholera and Ebola and Outbreaks.
<p>Report</p>	<ul style="list-style-type: none"> • Guidelines of the Australian Electoral Commission • Political Engagement Policy • Business Ethics Policy • More about the company's WHO accreditation • Independent Inquiry into St Basils Epping Gardens

	<ul style="list-style-type: none"> • Royal Commission into Aged Care Quality and Safety (Newmarch House) • Coroner's Court of Western Australia - Inquest into the Death of Cally GRAHAM • Senate Estimates on Ebola
Other Management Comments	<ul style="list-style-type: none"> • "At Aspen Medical's core is the philosophy that everyone should have access to health care. Allegations made in the media have been thoroughly investigated by numerous national and international government bodies with no findings against Aspen Medical Pty Limited." • "Aspen Medical continues to implement improvements in line industry best practice generally, including ongoing training and adopting ISO standards across the business." • "We take our contribution to national and international policy health, defence, trade, security seriously, and as such contribute to papers when open to do so by Governments and think tanks, and attend meetings, forums, events etc. Aspen Medical always follows government protocols, including the Australian Attorney General's Code of Conduct." • "Our financial records are a matter of public record consistent with the requirements of Australian Securities and Investment Committee (ASIC) under the Corporations Act. As with any corporation, Aspen Medical experiences good financial years and lean financial years, and like any corporation it manages these years consistent with Board oversight, responsive management, and reporting to the regulator, ASIC."