



Report Submission Under the  
Fighting Against Forced Labour and Child Labour in Supply Chains Act

### **Application:**

This report has been prepared pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “Act”) specifically for Change Healthcare Canada Company (“CHC”), an entity operating within the Optum unit of UnitedHealth Group. This report will provide the Minister of Public Safety and Emergency Preparedness on the steps taken during their previous financial year ended December 31, 2023 to prevent and reduce the risk of engaging in forced labour and child labour in its delivery of goods and services in Canada as well as in all jurisdictions served.

### **Structure, Activities and Supply Chain**

The Change Healthcare organization was acquired by the Optum unit of UnitedHealth Group in October 2022. Change Healthcare Canada Company was formed under the Canada Business Corporations Act and operates in the medical device segment of healthcare as a manufacturer of radiology and cardiology Picture Archiving and Communications Systems (“PACS”) sold to hospitals and health systems in the United States, Canada, United Kingdom, Ireland, France, Germany and Australia. UnitedHealth Group is the parent company of Optum, and both are headquartered in Minnesota, USA. As of our acquisition, all Change Healthcare entities follow the foundational policies of UnitedHealth Group.

Change Healthcare Canada Company utilizes third party suppliers as part of their supply chain. These third party suppliers provide hardware, software and other components used to manufacture the PACS systems sold to its customers. Additionally, there are third party organizations we contract with for the testing and calibration of these PACS systems.

Due to the nature of the highly skilled roles required to perform the functions and the due diligence performed during our hiring process, the risk that forced labour or child labour may be involved is very low. The use of third-party suppliers may be the area where there can be increased risk as we do not have direct control over their internal policies and business practices.

### **Policies and Due Diligence Activity**

UnitedHealth Group believes supporting human rights is core to our business and the health of communities in which we work. We operate guided by our six values, including integrity, compassion and inclusion so we can continue to advance our mission to help people live healthier lives and help make the health system work better for everyone. The basic principles of human rights are reflected in our values and our commitment to the highest standards of business practices and performance.

As a global company, we recognize our role in upholding human rights for others. We are committed to treating our employees, members, customers, clients, partners and stakeholders with dignity and respect, and we expect those with whom we interact to do the same. UnitedHealth Group does not condone racism, violence, terrorism, bullying,

labour violations or discrimination with respect to sex, gender identity, sexual orientation, religion, color, ancestry, national/regional or ethnic origin, pregnancy, age, veteran status, or disability.

UnitedHealth Group is committed to upholding the highest ethical standards in the ways we operate internally and externally. Our conduct, values and principles are rooted in the spirit of the following:

- United Nations (UN) Guiding Principles on Business and Human Rights
- International Labor Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work

UnitedHealth Group's commitment extends to respecting the human rights of all those with whom we engage and employ.

UnitedHealth Group follows all laws and regulations in the markets where we operate, including those addressing forced labour/modern slavery, minimum age for employment, minimum wage thresholds, work hours, pay equality, nondiscrimination, anti-harassment and freedom of association. We abide by all national laws, respecting international standards whenever feasible, and implement company requirements, if necessary.

We are committed to equal employment opportunities without discrimination and are steadfast in our efforts to cultivate an optimally inclusive and diverse work environment for all. In support of our commitments, employees are required to attest to and abide by a [Code of Conduct](#) as well as our internal employee handbook, outlining expectations around nondiscrimination, nonretaliation and sexual and other harassment. Globally, we adhere to similar protections consistent with applicable local and national laws. Our commitments are supported by robust resources and training on a variety of inclusion and diversity themes.

UnitedHealth Group expects those we engage with to adhere to policies and practices regarding human rights consistent with our own as outlined in our [Supplier Code of Conduct](#) included in standard vendor/supplier contracts and available publicly on our corporate website.

In 2022, UnitedHealth Group conducted an enterprise-wide Human Rights Impact Assessment in consultation with a third-party. The assessment identified and assessed potential human rights impacts in our operations, value chain and business relations, including subsidiaries and joint ventures. We cataloged existing due diligence processes in place to manage these issues. We plan to review the risk mapping periodically and will continue to integrate risk identification and due diligence into our internal business functions. United Health Group's Human Rights Impact Assessment considered potential human rights issues such as access to healthcare and affordable healthcare, health outcomes, freedom of association, right to collective bargaining, equal remuneration, discrimination and workplace health and safety as well as understanding the due diligence processes in place to prevent issues from arising and to ensure proper resolution of any issues identified.

Reporting human rights violations is not only the right thing to do, but it is also required by Company policy. As indicated in our Code of Conduct, the Compliance & Ethics HelpCenter, which is available in multiple languages, 24 hours a day, 7 days a week, allows all employees and external parties globally to report human rights issues without fear of retaliation. All parties can report issues confidentially and anonymously, where permitted by law. The Compliance and Ethics team reviews all reports and, if necessary, takes action or remediates. Examples of remediation include offering specific trainings to individuals or groups as needed, updating policies and procedures, and following up directly with the parties involved to find resolution. Reporting human rights concerns and asking questions helps the Company address issues quickly and thoroughly and is critical to supporting the Company's core values.

## Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Change Healthcare Canada Company. In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to sign on behalf of Change Healthcare Canada Company.

*Roger Connor*

[Roger Connor \(May 30, 2024 15:41 CDT\)](#)

Roger G. Connor  
President and Chief Executive Officer  
Director of Change Healthcare Canada Company

Date: