

FY25 Modern Slavery Statement



Hearing Australia

MODERN SLAVERY STATEMENT



Overview

Hearing Australia is a leading hearing services provider. We provide expert hearing care to Australians and are the nation's largest provider of government-funded hearing services for children, young adults up to the age of 26, eligible Aboriginal and Torres Strait Islander people, and people with complex hearing needs.

Introduction

This statement sets out the steps Hearing Australia took to address Modern Slavery risks in our organisation and supply chain for the financial year ending 30 June 2025, pursuant to the Modern Slavery Act 2018 (Cth).

This statement is submitted by Hearing Australia in response to the Act and builds upon the initiatives contained in prior statements. Hearing Australia remains committed to operating with the highest levels of compliance, ethics, and governance. This includes a commitment to human rights and the elimination of modern slavery across our supply chain.

Structure and Operations

Hearing Australia operates under the Australian Hearing Services Act 1991 and the Public Governance, Performance and Accountability Act 2013 (PGPA Act). Under the PGPA Act, Hearing Australia is defined as a corporate Commonwealth entity.

The Board of Hearing Australia is our accountable authority, and it is responsible for determining the objectives, strategies and policies to be followed and to ensure Hearing Australia performs its functions in a proper, efficient and economical manner.

Hearing Australia reports to, and is accountable to, the Minister for Health and Ageing and Minister for Disability and the NDIS, who also appoints Directors to Hearing Australia's Board. The Department of Health, Disability and Ageing works closely with Hearing Australia, providing advice to the Minister in relation to the Minister's responsibilities regarding Hearing Australia.

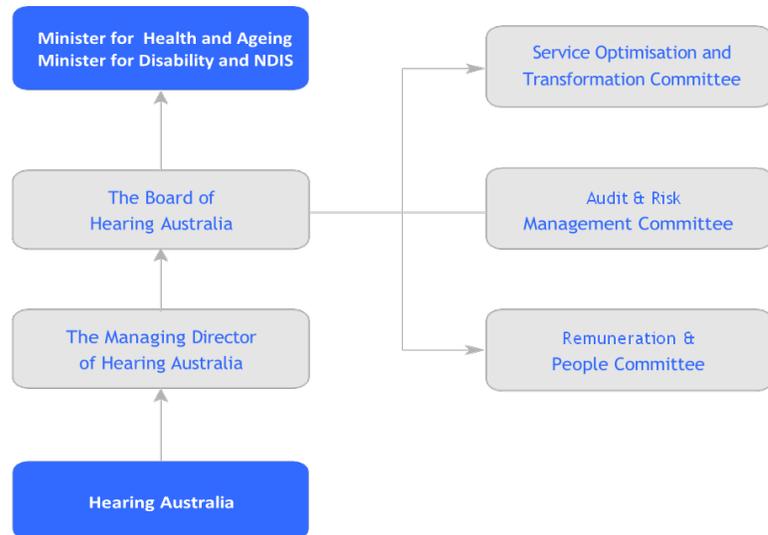
Hearing Australia is a Corporate Commonwealth Entity ("CCE") and does not own or operate any other subsidiaries.

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Board and Governance Structure

Hearing Australia's Board of Directors (Board) consists of highly credentialed Directors who have significant expertise, experience and industry knowledge.

The Board oversees our performance, effectiveness and strategic direction including Hearing Australia's governance policies and practices and accountable for ensuring that Hearing Australia performs its functions in an ethical and economical manner.



The [Modern Slavery Act 2018 \(Act\)](#) requires our business to disclose the efforts we have employed to ensure that our supply chain is free of slavery and human trafficking.

Victims of modern slavery experience some of the most severe breaches of human rights in the world today which is irreconcilable with Hearing Australia's values.

We take this opportunity to state that we acknowledge our obligations under the Act, and we believe that our policies and procedures reflect our commitment and corporate responsibility in identifying potential human rights breaches across our supply chain.

We take a zero-tolerance position on human rights breaches and commit to eradicating all forms of slavery, servitude, forced labour and human trafficking across our network and undertake to perform our corporate responsibilities purposefully and with integrity.

As a leader in our field, Hearing Australia fully understand that we must play our part in combatting modern slavery and this requires traceability, transparency, and collaboration with our suppliers and supply chain partners.

Supply Chain

Hearing Health and Care Products

In the financial year ending 2025, Hearing Australia's supply chain comprised approximately 1,350 suppliers. The supply base remains relatively stable, with a strong representation of local Small and Medium Enterprises (SMEs) that we actively engage and partner with. The complexity in our product supply chain resides across the manufacture and distribution of products, which includes:

- Hearing Aids & Moulds
- Listening Devices
- Consumables & Batteries, and
- Clinical Equipment.

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Our suppliers operate in the following sectors:

- Accommodation and Food Service Activities
- Administration and Support Services
- Agriculture, Forestry, and Fishing
- Arts, Entertainment and Recreation
- Building services contractor
- Cleaning
- Construction
- Education
- Electricity, Gas, Steam and A/C supply
- Finance and Insurance
- Government administration, Defence and Social Security
- Health and Social Work
- Information and Communication
- Labour hire
- Maintenance and Repair of motor vehicles
- Manufacturing
- Mining and Quarrying
- Personal services
- Professional and Scientific Services
- Real estate
- Retail
- Security services
- Transportation and Storage
- Water supply, Sewerage and Waste Management
- Wholesale

Our suppliers operate in many locations across the world, including:

Australia	Columbia	India
Austria	Denmark	Ireland
Belgium	Fiji	Israel
Brazil	France	Italy
Canada	Germany	Japan
China	Hong Kong	Malaysia
Mexico	Portugal	Sri Lanka
Netherlands	South Korea	Sweden
New Zealand	Saudi Arabia	Switzerland
Norway	Singapore	Thailand
Philippines	South Africa	Turkey
Poland	Spain	UK
USA	Vietnam	



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Our suppliers operate, produce, and source across several/ different sectors. Some of these sectors can be described as high-risk. [High-risk sectors](#) are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).

The below graphics show the high-risk sectors of operation, production, and sourcing for our suppliers.

Hearing Australia Suppliers Operate in the following High-risk Sectors¹

 Building services contractor 1	 Cleaning 1
 Construction 1	 Manufacturing 4
 Personal services 1	 Retail 2
 Security services 1	 Transportation and Storage 3
 Wholesale 1	

¹ Numbers in graphics describe how many suppliers are in the corresponding sector.

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Hearing Australia Suppliers Provide Goods and Provide Services in the following High-risk Sectors²

 Accommodation and Food Service Activities 1	 Agriculture, Forestry, and Fishing 1
 Cleaning 2	 Construction 3
 Maintenance and Repair of motor vehicles 2	 Manufacturing 3
 Mining and Quarrying 1	 Personal services 2
 Retail 2	 Security services 1
 Transportation and Storage 1	 Wholesale 2

Hearing Australia Suppliers Source Goods and Services from the following High-risk Sectors³

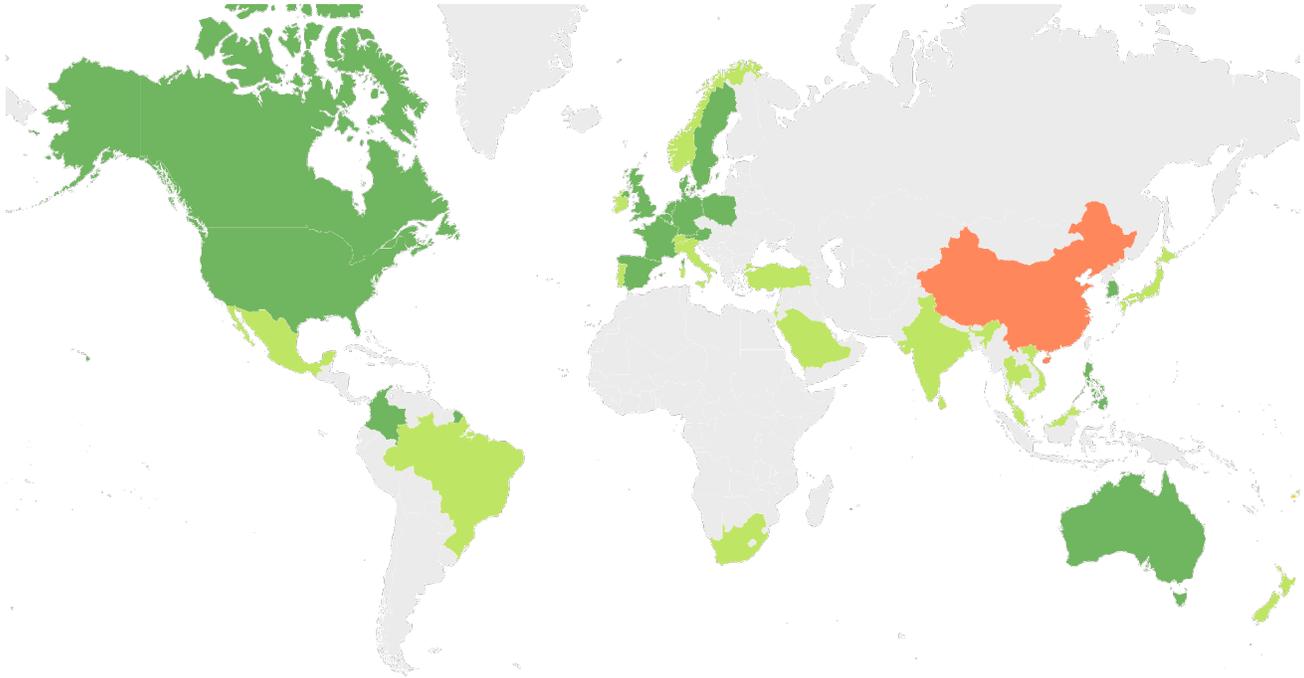
 Cleaning 2	 Labour hire 1
 Maintenance and Repair of motor vehicles 1	 Manufacturing 7
 Retail 2	 Security services 1
 Transportation and Storage 1	

² Numbers in graphics describe how many suppliers are in the corresponding sector

³ Numbers in graphics describe how many suppliers are in the corresponding sector

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Some countries and regions within our supply chain network are classified as higher risk owing to potential associations with human trafficking activities. The map below depicts the locations of our supply chain partners, overlaid with the tiered risk classifications from the [Trafficking in Persons Report](#).⁴



Some goods and services produced and sourced by our suppliers can be described as high-risk due to the possibility of a link to modern slavery practices such as [forced labour and child labour](#). The adjacent maps highlight regions where our supply chain partners operate in areas identified as having elevated risk. Specific categories where modern slavery risks have been assessed include:

- Australia - Cleaning⁵
- China - Electronics



⁴ US Department of State Trafficking in person report

⁵ Hearing Australia Assessment of supplier for cleaning services indicated no modern slavery risk

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Assessment of Modern Slavery risk

Hearing Australia uses a third-party tool, the [iPRO Modern Slavery Assessment Tool](#) to assess modern slavery risks in our supply chain. The risks identified in the previous section were all identified utilising this assessment tool. We engaged iPRO during the reporting period to conduct a bulk assessment of 40 of our suppliers with an annual expenditure of > \$250k which represents ~ 80% of spend (Government agencies and property lease companies were excluded).

We intend to carry this process forward as an annual assessment of our supply chain.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned one of the following risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

Additionally, we conduct due diligence relating to modern slavery risks by utilising the [iPRO Modern Slavery Assessment Tool](#) as part of our new supplier procurement process. As part of a new suppliers onboarding, they complete the modern slavery assessment in addition to our other quality and compliance checks.

As an additional due diligence step, the tool allows us to ask suppliers to upload documentation to support their assessment responses.

Modern Slavery Awareness Training

Supplier Training and Information

Our suppliers range from Small to Medium Enterprises (SME's) to Multi-Nationals. Each is required to effectively manage their supply chain risks as a requirement of remaining a Hearing Australia supplier.

In the event a supplier is unaware of their Modern Slavery obligations, we offer and provide information and educational materials within our Supplier Modern Slavery Pack.

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Employee Awareness Training

Hearing Australia has an online training program as well as dedicated learning and development officers to help employees develop their knowledge and professional development.

We have developed dedicated Modern Slavery training modules to raise our employee's awareness of the risks and our obligations under the Act. In FY25, 419 employees completed these modules.

Training modules will be distributed annually. They will also be provided to all new employees as part of Hearing Australia's onboarding process. Topics covered include:

- Reporting concerns
- Information & resources
- Modern Slavery in Procurement
- Managing Modern Slavery Risks
- Identifying and Assessing Modern Slavery Risks

Supplier Management

Supplier Contracts

Hearing Australia's preferred suppliers are under formal contracts agreements with terms ranging from 3 -10 years and include Modern Slavery provisions.

Each supplier must comply with our Supplier Code of Conduct and submit annual Modern Slavery Questionnaires as part of their ongoing compliance requirements.

Supplier Code of Conduct

Hearing Australia regularly reviews our internal policies and undertakes formal reviews of our suppliers. We also take the opportunity to educate our suppliers through the review process via a two layer 'supplier's supplier' model to review and interrogate the modern slavery risks and transparency across their own supply network.

Hearing Australia's supply chain network supports our supply of products and clinical equipment.

To ensure that the third-party supply of goods and services remains compliant with applicable laws and regulations, Hearing Australia has established – and continues to strengthen – appropriate governance and assurance processes.

Reporting Violations

Employees and Suppliers are able to report potential or known Modern Slavery risks, violations or concerns to Hearing Australia's Procurement, Risk and Compliance or Legal functions.

Reported incidents are investigated and if deemed a serious breach, are referred to one of the following federal agencies based on the supplier's headquarters location:

- Australian Federal Police (AFP)
- Australian Border Force (ABF).
- In financial year 2025, no incidents on modern slavery risk or violation was reported.

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Continuous Improvement and Assurance

- We will implement a structured supplier audit program that verifies questionnaire accuracy, reviews supporting documentation, conducts targeted on-site or virtual checks for high-risk suppliers, and work with suppliers on corrective actions with follow-up monitoring.
- This will include both risk-based and random sampling of suppliers in audits to ensure comprehensive oversight and fairness.
- All new critical suppliers are already required to complete the Modern Slavery Questionnaire as part of the onboarding process.

Financial Year 2025's KPI's

We utilise the benchmarking and KPI's in the iPRO Modern Slavery Assessment Tool to assess the effectiveness of our actions.

Financial year 2025 is the first year we have used the iPRO platform to conduct our assessments and due diligence. We will be able to objectively measure the improvements when the assessments are completed during the next reporting period.

The main KPI's we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process.

Each organisation who completed the assessment questionnaire was assessed and given 2 risk scores.

- Inherent Risk Score
- Unmitigated Risk Score - this represents the residual risk

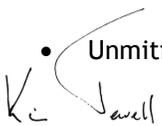
The [Inherent Risk Score](#) measures modern slavery risks that are intrinsic/built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The remaining [Unmitigated Risk Score](#) measures the organisations risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.

Hearing Australia was provided an aggregated risk score of all the assessed suppliers by the iPRO platform, that was then used to measure the risk on an overall supply chain level. The result below shows Hearing Australia has both low inherent and unmitigated risk score and, we aim to continuously improve on these KPI's.

Aggregated Supply Chain Risk Scores⁶

- | | |
|--|-------------|
| • Inherent Risk Score | 32.88 / 100 |
| • Unmitigated Risk Score (residual risk) | 15.66 / 100 |


Mr Kim Terrell

Managing Director
5 November 2025

This statement is made pursuant to Section 13 of the Modern Slavery Act 2018 and was endorsed by the Hearing Australia Board on 6th of November 2025.

⁶ Lower score on a scale of 100 implies less risk and emphasis is on continuous improvement