



APM Group's Modern Slavery Statement

Reporting period 1 July 2024 to 30 June 2025



The reporting entity

This Modern Slavery Statement is a joint statement made on behalf of Ancora TopCo Limited (ACN 677 564 662) all its controlled subsidiaries around the world (“**APM**” or “**APM Group**”).

Acknowledgement of Country

APM acknowledges indigenous peoples as the traditional custodians of the lands and waters in which we operate, and we pay our respects to their past and present elders.

APM Contact

Communications regarding this document can be forwarded to:

legal@apm.net.au

A message from our Group CEO

At APM, our purpose is to enable better lives. This is reflected not only in the services we deliver but also in the way we operate. As a human services organisation we are committed to ethical, inclusive and responsible practices.

Over the past five years, we have strengthened our governance frameworks and introduced policies and tools to identify and mitigate risk across our operations and supply chains. These actions reflect our commitment to compliance with national and international Modern Slavery legislation, and our alignment with international human rights frameworks.

We recognise that ethical sourcing, human rights protections, and the prevention of modern slavery are interconnected responsibilities. It is our belief that preventing modern slavery is a shared responsibility—and one we are committed to leading with purpose and resolve.

For more on our broader environmental, social and governance (ESG) commitments, please refer to APM's 2025 Sustainability Report.

Michael Anghie
Group Chief Executive Officer

APM Group’s structure, operations and supply chains

APM Group’s head office is at 58 Ord Street, West Perth, Western Australia, 6005.

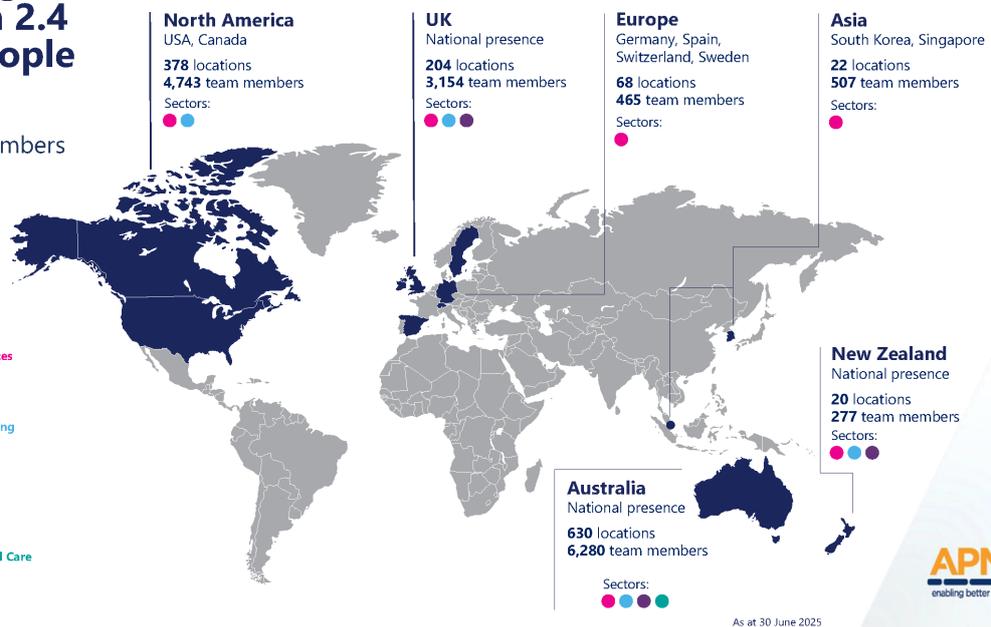
APM Group is a human services organisation delivering a wide range of services and programs to enable better lives. We operate in 11 countries: Australia, New Zealand, the United Kingdom (“UK”), Spain, Germany, Switzerland, Sweden, South Korea, Singapore, Canada and the United States of America (“USA”). Our most significant operations are in Australia, UK and USA.

APM Group locations, supporting more than 2.2 million people each year

Supporting more than 2.4 million people

11 Countries
16,307 Team members
1,502 locations

- Employment Services
- Health and Wellbeing
- Communities and Assessments
- Disability and Aged Care Support Services



Classification: Confidential

During the reporting period, our services globally were delivered around the following key service lines:

Employment Services

APM Employment Services supports job seekers to find decent, sustainable employment and local employers to find unique talent to meet their business needs. Working with governments, we deliver services to individuals who require support to find work, including those with injury, illness or disability, sole parents, youth, aged workers, ex-offenders, and people from culturally or linguistically diverse backgrounds. The services we deliver put the client at the centre, allowing them to develop individual agency, confidence, and skills to engage in their local labour market. We deliver Employment Services in Australia, New Zealand, Canada, USA, South Korea, Singapore, Germany, Switzerland, Sweden, Spain and the United Kingdom.

Health and Wellbeing Services

APM’s Health and Wellbeing businesses offer multi-disciplinary Allied Health services across the prevention, early intervention, rehabilitation, maintenance and treatment dimensions of health and wellbeing to government agencies, employers, insurers and directly to members of the public. We deliver Health and

Wellbeing Services in Australia, New Zealand, UK and Canada with additional psychology services delivered by supply chain partners globally.

Communities and Assessment Services

Our Communities and Assessments businesses develop support plans for funded and non-funded support. This includes providing assessments for individuals or families to facilitate access to government support schemes and supporting citizens to engage more fully with their communities by building capacity and societal engagement across socio-economic classes. We also operate community-based programs including youth, justice, and veterans’ services in Australia and UK.

Disability and Aged Care Support Services

APM Disability and Aged Care provides a range of in home and community-based support services for people with disability and older people, empowering them to meaningfully participate in daily life and help build more inclusive communities. Our support services catering to the disability and aged care sectors include plan management, support coordination, and an on-demand home care services marketplace. These services are delivered across Australia.

Our brands

APM trades under multiple brands, which are aligned either by country or by specific type of service delivery. During the reporting period, these included APM (Australia, New Zealand and UK), Ingeus (UK, South Korea, Spain, Germany, Switzerland, Singapore), CiC (UK), Clustera (Sweden) Assure (Australia and New Zealand), Konekt, Communicorp, FBG Group, MCI, Lifecare, Peninsular Sports Medicine Group, Ontrac, Early Start Australia, MyIntegra, Mobility, Acumen Health, Interact Injury Management, Biosymm, Springday, Ergoworks (including ErgoAssess and ErgoEquip), Everyday Independence, Human Psychology, FutureThinc (all Australia) and Dynamic Workforce Solutions, Dynamic Education Systems, Ross Innovative Employment Solutions, Grant Associates, Equus, Equitable Social Solutions (all USA) and WCG and Agilec (both Canada).

Our Assure and CiC health and wellbeing businesses also offer employee assistance programme services to staff of multinational corporations in many locations through a network of associates, who are trained psychologists and social workers.

Our People

APM employs a diverse workforce across 11 countries, including health professionals, employment consultants, support staff, and subcontractors. As at 30 June 2025, APM employed approximately 16,000 team members.

We do not engage in practices that constitute modern slavery in any form within our operations. Our workforce structure and subcontractor engagement are subject to governance mechanisms designed to uphold ethical employment practices and reduce the risk of exploitation.

To support this, we have implemented controls including:

- Right-to-work verification and pre-employment screening
- Fair remuneration and employment conditions
- Confidential reporting channels for concerns or misconduct
- Oversight of subcontractor arrangements.

Our supply chain

Overview of our Global Supply Chain

In FY25, APM procured goods and services from over 20,000 suppliers across our global operations. The majority of these suppliers are located in Australia, USA, UK, Europe and Canada. Our supply chain supports both internal operations and client-facing programs and includes sole traders, partnerships, companies, non-government organisations, and community-based providers.

We operate in a predominantly localised sourcing model, particularly for services delivered in-country. However, certain spend categories (such as information technology, office supplies, uniforms, and branded merchandise) may involve international manufacturing or distribution, which can introduce elevated ethical risks.

APM also participates in joint ventures and consortia, including with D'aleph (Spain) and Lifemark (Canada), which extend our supply chain reach.

Procurement Governance and Ethical Sourcing

APM operates a decentralised procurement model, guided by our Group Procurement Framework, Group Risk Framework, and Global Code of Conduct. These frameworks support ethical sourcing and compliance with modern slavery legislation.

We apply a range of protocols to manage ethical risks, including:

- Supplier onboarding processes
- Ethical sourcing expectations
- Modern slavery due diligence questionnaires
- Contractual clauses addressing labour rights and transparency.

Our procurement activities span five major categories:

- Property and Fleet: *Leases, facilities management, cleaning, utilities, vehicle leasing*
- Digital and Technology Services: *IT services, software, hardware, hosting, call centres*
- Corporate and Professional Services: *HR, finance, legal, audit, consultancy, travel, office supplies*
- Operational and Service Delivery: *Employment programs, labour hire, vocational education, allied health, subcontracted services*
- Product Supply: *Ergonomic equipment, assistive technologies, participant support items.*

Product Supply Considerations

While APM is primarily a service-based organisation, we also procure and supply products that support service delivery and client outcomes. These include:

- Commercial products (e.g. ergonomic equipment)
- Participant support items (e.g. workwear, assistive devices)
- Digital platforms and tools (e.g. assessment systems).

Although APM does not manufacture these products, we acknowledge our dual role in both upstream (as a purchaser) and downstream (as a provider) supply chains. This reinforces our obligation to ensure that products are ethically sourced and do not contribute to exploitation.

The risks of modern slavery practices in APM Group’s operations and supply chains

Overall Risk Assessment

Based on our service profile, operating jurisdictions, and existing controls, we assess our overall risk of causing, contributing to, or being directly linked to modern slavery as “low”.

This reflects our position as a human services organisation operating primarily in regulated sectors and OECD countries. However, we acknowledge that risk is dynamic and commit to ongoing assessment and mitigation through our governance, procurement, and operational practices.

Identifying Risk and Exposure

We use APM’s Risk Management Framework (aligned with ISO 31000:2018) to assess modern slavery risks across geography, sector, workforce composition, and procurement categories.

Geographical Risk	<ul style="list-style-type: none"> Localised assessment identified some elevated risks with tailored safeguards implemented in Canada, UK and Singapore.
Sector and Operational Risk	<ul style="list-style-type: none"> While our services are delivered in regulated sectors by qualified professionals, we engage with vulnerable populations who may face indirect risks. We apply safeguarding protocols, ethical recruitment standards, and compliance frameworks to mitigate these risks.
Product Risk	<ul style="list-style-type: none"> We procure and distribute physical and digital products that support service delivery. These include ergonomic equipment, assistive devices, and digital platforms. We apply ethical sourcing protocols to manage risks associated with upstream and downstream supply chains.
Supply Chain Risk	<ul style="list-style-type: none"> APM’s decentralised procurement model supports local responsiveness but presents challenges in maintaining consistent oversight. We conducted a supplier spend analysis and identified elevated risk categories including facilities management, indirect services, IT hardware, and merchandise. We recognise that high supplier volumes and decentralised practices can lead to variability in engagement and due diligence. We continue to strengthen governance and oversight to address these risks.
Entity Level Risk	<ul style="list-style-type: none"> Each APM entity complies with local legislation and publishes its own modern slavery statement where required. These statements are reviewed through Group governance processes to ensure alignment and continuous improvement.

Elevated risk profile and strategic response

APM recognises that modern slavery risks can be complex and embedded within indirect relationships or multi-tier supply chains. During this reporting period, APM undertook a reassessment of its modern slavery risk profile. While our overall risk remains low, we identified an elevation in risk exposure, particularly in relation to our decentralised procurement model, which can lead to variability in supplier engagement and oversight. This does not indicate direct exposure to modern slavery but highlights the need for enhanced governance, consistency, and proactive mitigation across our global operations.

Strategic Actions in FY25

To strengthen our governance and build capability in modern slavery prevention, APM implemented the following initiatives:

Procurement Leadership

Governance and Enhancements

- Appointed dedicated procurement professionals across Australia, New Zealand, USA and Canada, supported by a Group Procurement leadership role. This structure enhances local accountability and ensures consistent application of ethical sourcing practices.
- Strengthened procurement frameworks and controls to improve visibility, consistency, and accountability across our supply chain.

Actions taken to assess and address modern slavery risks

Since publishing our first Modern Slavery Statement in FY2020, APM has progressively strengthened its governance, awareness, and operational controls to reduce the risk of modern slavery across our global operations and supply chains. Key initiatives have included:

- Development of a Global Modern Slavery Policy
- Integration of modern slavery provisions into our Procurement Policy and tender processes
- Use of standard contract clauses and negotiation protocols to uphold ethical sourcing expectations
- Implementation of supplier due diligence questionnaires and reporting procedures
- Annual Global Compliance Questionnaire completed by all business units
- Mandatory Code of Conduct training incorporating modern slavery awareness
- Publication of our Global Code of Conduct and Sustainability Report
- Communication of our commitment to eradicating modern slavery across our supply chain.

Country-Specific Actions

- Australia – Reviewed merchandise provider policies and compliance
- Canada – Conducted annual supplier audits and delivered staff training aligned with new legislation
- UK – Introduced due diligence processes and supplier assessments.

These actions demonstrate our commitment to ethical sourcing and human rights protection, and our belief that preventing modern slavery is a shared responsibility across our global operations.

How we have assessed the effectiveness of such actions

We assess the effectiveness of our actions through:

- Structured governance processes
- Control environment that is reviewed by our Quality & Compliance and Finance teams, supported by internal audits, supplier assessments, and feedback loops across jurisdictions
- Annual engagement process with all APM Group entities, including global CEOs and newly acquired businesses, to identify risks.
- Identification of planned improvements to include key actions and performance indicators.

Effectiveness Assessment Table

Action Area	Key Measures Implemented	Effectiveness Indicators	Planned Improvements
Risk Identification	ISO 31000-aligned Risk Framework; country-specific assessments	Annual risk reviews; country-level insights inform mitigation; risk register maintained	Expand risk mapping; integrate spend data and supplier profiling
Policy & Governance	Global Modern Slavery Policy, Procurement Policy provisions, Code of Conduct	Questionnaire completion rates; contract reviews; supplier audit outcomes	ESG Committee oversight; policy refresh; industry engagement; roadmap integration
Supplier Engagement	Contract clauses; due diligence protocols	Questionnaire completion rates; contract reviews; supplier audit outcomes	Refresh questionnaire; identify high-risk contracts; enhance monitoring; supplier risk rating
Training and Awareness	Mandatory Code of Conduct training; ESG role established	Training embedded; increasing awareness; ESG role in place	Develop targeted training by function; integrate lived experience
Procurement System & Controls	Procurement decentralisation review; regional roles recruited	Improved visibility; governance strengthening underway; taxonomy design initiated	Global procurement governance review; taxonomy rollout; operating model roadmap
Remediation & Monitoring	Whistleblower channels; supplier audits; compliance questionnaires	Active reporting channels; consistent audit and questionnaire completion	Expand audit scope; link findings to remediation actions
Country Specific Actions	Tailored actions in Australia, Canada, and UK	Responsive to local risks; strong regional engagement	Formalise local reporting; align regional actions with global roadmap
Governance & Oversight	ESG role recruited; roadmap development initiated	Governance structure in place; cross-functional engagement	Establish ESG Committee; define metrics; monitor roadmap delivery.

Consultation with APM Group Members

This statement has been developed in consultation with representatives from Risk, Marketing, Legal and other corporate functions. Their insights and collaboration ensure this Statement reflects our shared commitment to ethical sourcing, human rights protections, and the prevention of modern slavery.

Other relevant information

This is the sixth year of reporting for APM Group on modern slavery in Australia. We are also reporting in UK and a copy of Ingeus' Modern Slavery Statement can be found here [Modern Slavery Statement | Ingeus](#).

This statement was approved by the board of Ancora Topco Limited on 4 December 2025.



Peter Torre

Company Secretary Ancora Topco Limited