

Zenitas Healthcare

Modern Slavery Statement

FY25

This statement has been published in accordance with Part 2 of the Modern Slavery Act (Cth) 2018 (**Act**).

It sets out the steps taken by the Zenitas Healthcare group of companies during the financial year ending 30 June 2025 to prevent caused, contributed or directly linked modern slavery practices in its business and supply chain.

This statement has been approved by the Board of Guardian Alphabet Holdco Pty Ltd on the date below in their capacity as principal governing body of the Zenitas Healthcare group of companies.

Signed:

A handwritten signature in blue ink, appearing to read 'Robert Koczkar', is written over a light blue horizontal line.

Robert Koczkar, Director of Guardian Alphabet Holdco Pty Ltd

Date signed: 16 December 2025

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1. Statement from our CEO

I am pleased to share Zenitas Healthcare's sixth Modern Slavery statement.

We remain wholly opposed to any abuses of a person's freedoms in our direct operations, indirect operations and our supply chains. We also expect our people, partners and suppliers to share our commitment to eradicating modern slavery practices.

Over the past 12 months, despite significant business transformation, we continued to further develop our processes and implement controls within our operations as we continue to better understand our modern slavery risk.

Corporate divestiture and simplification in late FY25/ early FY26 will greatly reduce our risk footprint and exposure moving forward.

Nonetheless, we recognise that continued effort is required to further progress towards our commitment of eliminating modern slavery risks across our business.



Mark Mulder

CEO | Zenitas Corporate and Claro Disability Services

2. Structure, Business and Supply Chains

Modern Slavery Reporting Criteria One and Two: Identify the reporting entity and describe its structure, operations and supply chains.

2.1 About Zenitas Healthcare

For completeness and compliance with the Modern Slavery Act, where our structure, operations and supply chains have remained the same since the last reporting period, we have re-stated the same information in this Statement.

Zenitas Healthcare was incorporated in 2016 and forms part of a group of private companies that provide a wide range of healthcare services across Australia. For the reporting period, it operated two customer focused healthcare businesses that deliver aged and disability care, accommodation and allied health care services, namely Plena Healthcare and Claro Aged Care and Disability Services.

The ultimate holding company of the Zenitas Healthcare group of companies is Guardian Alphabet Holdco Pty Ltd. This statement is made jointly by Guardian Alphabet Holdco Pty Ltd and the other entities within the Zenitas Healthcare group of companies that are reporting entities for the purposes of the Act (identified in **Annexure 1**). In preparing this statement, we have considered the operations of the wholly owned subsidiaries of the Zenitas Healthcare group of companies.

Preventing and addressing involvement in modern slavery is central to our values and our commitment to running a safe, responsible, and sustainable business.

2.2 Our Operating Model

Plena Healthcare

Plena Healthcare provides allied health services to elderly people and people living with disability in their homes and residential aged care facilities across Australia.

Plena offer a full suite of allied health services including physiotherapy, occupational therapy, podiatry, speech therapy, and dietetic services.

Claro Aged Care and Disability Services

Claro Aged Care and Disability Services provides quality support services to people living with disability and elderly people to live more independent lives.

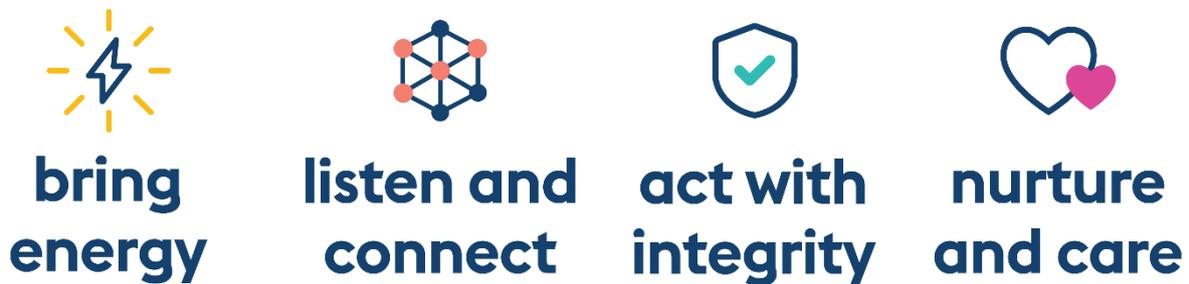
Support services are delivered in specialist disability accommodation and community settings across Australia.

2.3 Our People

Zenitas contracts and employs approximately 1,700 support workers and 800 allied health professionals. Our large workforce means we have a diversity of skills and experience to draw upon, reflecting the needs of the customers that we serve.

As our organisation serves the community, we have the highest standards when it comes to our safety and conduct. We ensure that all staff and contractors who have or are likely to have access to our customers, undergo rigorous safety screening and training.

Respecting human rights, including the right to be free from slavery, is inherent in our recently refreshed values of:



3. Operations and Supply Chain Risk

Modern Slavery Reporting Criteria Three: Describe the risks of modern slavery practices in the operations and supply chain in the reporting entity and any entities it owns or controls.

3.1 Our Operations (low risk)

Our operation includes a workforce of circa 2,500 directly employed workers, with a small number of contracted workers in Australia and in the Philippines. Most of our workforce are support workers and allied health professionals who deliver healthcare and support services to customers in their homes and the community. Our enabling and corporate functions such as human resources, finance and IT are run from our offices in Melbourne and Adelaide.

Our staff are either salaried or employed under a modern Award instrument. We enforce rigorous compliance to Award requirements and comply with all requirements of the National Employment Standards, so operational risk is low.

3.2 Our Supply Chain (medium risk)

Zenitas' supply chain is centred around providing healthcare staff to aged and disability care and community settings. Goods and services are sourced from tier one suppliers based in Australia and can be broadly grouped as follows:

- health and administration services including medical consumables such as personal protective equipment.
- information technology hardware and software
- cleaning services
- local construction of specialised dwellings
- stationery and printing supplies

The largest spend areas in Zenitas' supply chain are IT hardware and software, medical consumables and phone and internet. Other consumables within our supply chain include recruitment, marketing, professional services and cleaning.

Areas of highest risk, requiring constant monitoring relate to medical supplies, offshore workforce, and domestic cleaning staff.

3.3 Modern Slavery Risks Identified

We applied the Modern Slavery Act's definition of modern slavery to our operations and supply chain risk assessment which is a situation of exploitation that a person cannot refuse or leave because of threat, violence, deception, abuse of power or other forms of coercion. Modern slavery practices include human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

Also relevant to identifying modern slavery risks for FY25 is the risk assessment conducted in FY23. Our supply chains and operational activities have remained relatively unchanged to date, therefore conclusions were drawn based on the FY20 review and FY22 refresh, along with an evaluation against our June 2023 assessment, as reliable and applicable sources of our current modern slavery risk management position.

We continue to apply the UN Global Compact principles-based framework to our approach to managing modern slavery risks. Within the "caused, contributed, linked" framework that is designed to guide organisations in relation to their level of responsibility in identifying and addressing human rights impacts, we continue to consider that our level of responsibility remains as "linked" as expanded below.

Operations

Previous reviews and assessments (including June 2023) considered Zenitas and its controlled entities operations and supply chains activities to decipher any risk caused, contributed, or directly linked to modern slavery practices.

We discovered that the use of outsourced cleaning and labour hire services, procurement of medical supplies were our main exposure areas to modern slavery risks. The modern slavery practices that could be linked here include servitude, deceptive recruitment for labour or services, debt bondage and forced labour.

Supply Chain

Factors considered when ascertaining modern slavery risks in our supply chains were geographical location, sourced products and services, our business model and vulnerable populations involved. Within

these four domains, we found that our supply chain could potentially be linked to deceptive recruitment for labour or service practices, forced labour, debt bondage and servitude.

Geography

Our operational activities primarily occur in Australia with the exception of a small number of outsourced contractors based in the Philippines.

Australia is considered a low-risk country where human rights violations are concerned because its laws are centred around respecting human and workers' rights. The Philippines presents greater risk for potential human rights and worker right violations due to more instances of poorly enforced national laws and corruption therefore offshore workers may be exposed to forced labour, deceptive recruitment, and labour practice for instance.

Product and services

Services involve placing staff into aged and disability homes and the community. As a provider of healthcare services there is low risk in operations.

Zenitas engages cleaning companies to service its offices. The cleaning services industry in Australia is considered high risk due to high number of past violations and large number of migrant contract-based workers in this industry. Further, there is a lack of transparency about hiring practices which can lead to violation of worker's rights/entitlements.

Business Model

Considering our operations are focused on healthcare delivery, we understand that the highest modern slavery risk sits within the procurement of medical goods. Zenitas procures medical goods to support its customers but also procures electronic hardware and PPE (Personal Protective Equipment) to facilitate business operations. The manufacture of medical goods is a known high-risk area for potential exploitation and human rights violations, however with changes to Zenitas' future business model beyond the financial year it is viewed as less of an ongoing risk within its business model.

Vulnerable Populations

Zenitas employs many low skilled and migrant/and or non-English as a first language speaking workers as aged and disability carers. Such workers are susceptible to exploitation because they may not be fully aware of their legal rights and entitlements. Because we directly hire workers and have established labour policies and practices consistent with Australian laws however, the risk of such exploitations occurring are considered low risk.

Risks associated with the four domains identified above have been considered and responses included in our management operating plan.

4. Modern Slavery Response Strategies

Modern Slavery Reporting Criteria Four: Describe the actions taken by the reporting entity (and any entities it owns or controls) to assess and address these risks, including due diligence and remediation processes.

Response to Modern Slavery Risks

As a business operating in the healthcare industry, we are conscious that modern slavery risks can arise in certain areas of the sector, particularly in areas such as disability and aged care provision, as well as in the manufacturing of healthcare equipment and IT.

Our modern slavery and corporate responsibility frameworks have underlying policies and procedures such as:

- Whistle Blower Policy,
- Protected Disclosure Policy and Procedure,
- Feedback Management Procedure,
- Zenitas Code of Conduct and,
- Supplier Code of Practice (Supplier Code).

Over FY25, we have made some progress in implementing these policies and actions to minimise our modern slavery impact.

- **Supplier processes:** Our due diligence process involves actively negotiating for the use of modern slavery and supplier code provisions in supplier contracts where feasible. Where negotiating such a clause in standard contracts for instance is unachievable, suppliers receive a copy of our supplier code outlining our approach to corporate social responsibility and the standards expected of our suppliers and tier two supply chains.
- **Whistle-blower hotline:** Claro has continued to receive disclosures via the Whistle Blower Hotline managed via an external provider. For the reporting period (to 30 June 2025), Claro received 18 disclosures spanning categories of bullying and harassment, discrimination, fraud, unethical conduct, behaviour, welfare concerns and breaches of policy.
- **Employee education:** Claro continues to include Speak Up and whistleblower information in its employee, marketing and informational materials to actively encourage reporting and disclosure of potential concerns, reinforcing our commitment to transparency and supporting robust due diligence in addressing modern slavery risks.
- **Executive training:** Our executive leadership group have previously participated in Modern Slavery training to increase their awareness of modern slavery risks and the importance of responsible procurement.

5. Assessment and Reporting

Modern Slavery Reporting Criteria Five: Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address Modern Slavery risks.

5.1 Assessment of effectiveness of actions being taken.

Zenitas is committed to remediation if we identify case or contribution to human rights harm such as modern slavery. Where there is a direct link to harm in our operations and supply chain, we recognise that we may choose to play a role in remediating these incidents.

For this reporting period, we measured how effective our modern slavery risks were identified and mitigated by cross-referencing response activities to the actions detailed in section 4 above.

These actions produced some evidence of responsiveness and progress in further reducing exposure and risk., against the broader context of significant organisational transformation, outlined in Section 7 below.

Given these changes and simplification, in FY26 we will focus on potential high-risk areas of our business:

Compliance and Action Plan

Summary	Detailed Actions
Award Compliance	Strengthen procedures and controls for Award compliance.
	Procure and plan for new Award Interpretation and Payroll systems.
Offshore Staffing	Assess practices and procedures of offshore providers.
	Review hiring practices, wage comparisons, and working conditions.
Supplier Consolidation	Further consolidate the supplier network.
	Rely on the Modern Slavery compliance of these Australian-based businesses.
Modern Slavery Training	Arrange refresher training for the executive team.
	Train key personnel, such as recruitment and human resources staff.

We will continue to re-evaluate how effective our modern slavery response strategies and actions are over subsequent reporting periods for continuous improvement.

6. Consultation

Modern Slavery Reporting Criteria Six: Describe the process of consultation with any entities the reporting entity owns.

The FY25 modern slavery statement was prepared with input from across the business. Consultation involved reviewing the FY24 statement, plan and previous risk assessments. Key leadership positions were also consulted on aspects of Zenitas' supply chain and operations for data verification and input.

Support in development of both the action plan and this statement has been provided by resources from our equity partner businesses.

7. Other Relevant Information

Modern Slavery Reporting Criteria Seven: Describe any other information that the reporting entity, or the entity giving the statement, considers relevant.

Change in business structure and composition

On 1 September 2025 we divested the entities and operations of Plena Healthcare. We continue to operate Claro, a specialist disability services provider, as a standalone national business.

This has greatly simplified our operating structure and will further decrease our modern slavery exposure, both in terms of geographic footprint as well as the size and composition of the workforce.

Risks associated with acquisition of medical equipment are greatly reduced with the exit of our allied health and medical businesses.

These changes will be reflected in our FY26 statement.

Annexure 1

The following entities within the Zenitas Healthcare group of companies are reporting entities for the purposes of the Act:

- Guardian Alphabet Holdco Pty Ltd
- Guardian Alphabet Midco Pty Ltd
- Guardian Alphabet Pty Ltd
- Zenitas Healthcare Pty Ltd

The wholly owned subsidiaries of Zenitas Healthcare Pty Ltd comprise:

- Claro Administration Services Pty Ltd
- Claro Employee Services Pty Ltd (formerly known as Zenitas Medical Trusco Pty Ltd)
- Modern Medical Administration Unit Trust
- Zenitas Medical (WA) Unit Trust
- Comrec Australia Pty Ltd
- Claro Care Holdings Pty Ltd (formerly known as Zenitas Home Care Pty Ltd)
- Claro Disability Services Pty Ltd (formerly known as Australian Home Care Services Pty Ltd)
- Healthcare at Home Australia Pty Ltd
- Claro Aged Care Pty Ltd (formerly known as AHC Care Services Pty Ltd)
- Accommodation & Care Solutions Holdings Pty Ltd
- Accommodation & Care Solutions Pty Ltd
- Rehabilitation Care Solutions Pty Ltd
- Zenitas Caring Choice Pty Ltd
- Rehabilitation Care Solutions Pty Ltd
- Plena Healthcare Holdings Pty Ltd (formerly known as Dimple Group Holdings Pty Ltd)
- Dimple Podiatry Pty Ltd
- Dimple Dietetics Pty Ltd
- Dimple Consulting Pty Ltd
- Dimple Physiotherapy Pty Ltd
- Transform Wellbeing Pty Ltd
- Transform Care Pty Ltd
- Loqui Pty Ltd
- Murto Pty Ltd
- Grantley No. 10 Pty Ltd