



Modern Slavery Statement 2024

Contents

1	Reporting entity	2
2	Message from our CEO	3
3	About Estia Health	4
4	Modern slavery risks in our operations and supply chains	7
5	Actions taken to assess and address modern slavery risks	9
6	Effectiveness of actions taken to assess modern slavery risks	13
7	Consultation and approval	14
	Appendix	15

Ownership of Estia Health formally transferred to Bain Capital – 15 December 2023

Estia Health Ltd (ACN 160 986 201), the Ultimate Holding Company and reporting entity for the past four Modern Slavery Statements, which was a publicly listed entity, ceased trading on the ASX on 6 December 2023 and became a proprietary company (Pty Ltd) under the ownership of Bain Capital Private Equity, LP (BCPE). The Ultimate Holding Company is now Estia Health TopCo Pty Ltd (ACN 669 884 244) and is the reporting entity for this Modern Slavery Statement.

The ownership change did not affect Estia Health’s operations, with the entity Estia Investments Pty Ltd (ACN 164 350 387) continuing to operate all 75 aged care homes and employ all Estia Health employees with the same Executive Management team, led by Sean Bilton, Chief Executive Officer and Managing Director.

1 Reporting entity

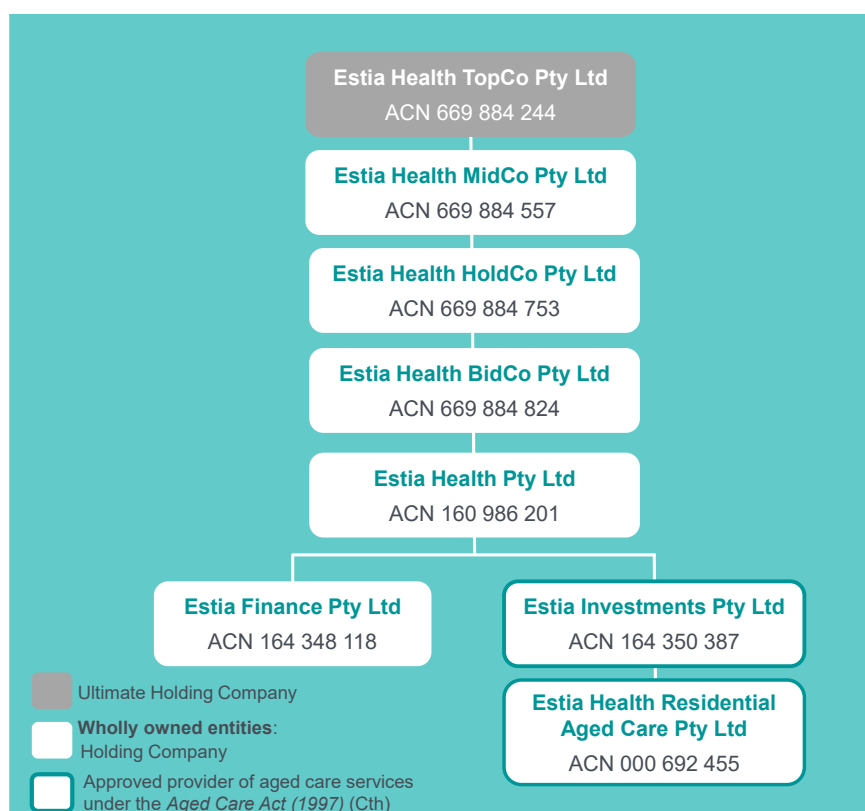
This Modern Slavery Statement ('Statement') has been prepared and published in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)* ('the Act') and uses the Act's definition of modern slavery. It identifies the steps that the Ultimate Holding Company, Estia Health TopCo Pty Ltd (ACN 669 884 244) and each of the entities that it owns and controls (collectively referred to as 'Estia Health', 'the Group', the Company or 'we', 'us' or 'our') took to identify, assess, mitigate and remediate modern slavery risks in the Group's operations and supply chain. It covers the period 1 July 2023 to 30 June 2024 ('FY24') representing Estia Health's FY24 financial year.

Ultimate Holding Company:

- Estia Health TopCo Pty Ltd (ACN 669 884 244)

Wholly Owned Entities:

- Estia Health MidCo Pty Ltd (ACN 669 884 557)
- Estia Health HoldCo Pty Ltd (ACN 669 884 753)
- Estia Health BidCo Pty Ltd (ACN 669 884 824)
- Estia Health Pty Ltd (ACN 160 986 201)
- Estia Finance Pty Ltd (ACN 164 348 118)
- Estia Investments Pty Ltd (ACN 164 350 387)¹
- Estia Health Residential Aged Care Pty Ltd (ACN 000 692 455)²



¹ Estia Investments Pty Ltd is the approved provider of aged care services under the *Aged Care Act (1997) (Cth)* operating all 75 aged care homes and employing all Estia Health employees.

² Estia Health Residential Aged Care Pty Ltd is an approved provider under the *Aged Care Act (1997) (Cth)* but is dormant with no operations

2 Message from our CEO

At Estia Health, we exist to enrich and celebrate life together, creating residential aged care homes where everyone is welcome and which reflect the residents who choose us, the local communities around us and the people that support and work with us.

As one of Australia's leading residential aged care providers, we are reliant on services and products from a wide range of suppliers to care for our residents and are committed to conducting our operations in a way that respects the human rights of our employees, the people we work with, and the communities in which we operate and this extends to supporting and protecting any vulnerable people within our supply chains.

Our key focus at all times is the care, wellbeing, and safety of our residents and that of our employees who support them. People are at the core of Estia Health and our aim is to ensure that their fundamental human rights are respected in our own business, as well as by our business partners and suppliers.

Our FY24 Modern Slavery Statement details our progress and activities to improve our transparency and understanding of risks within our complex supply chains. I want to thank our valued suppliers for their support, transparency and collaboration as we look to address modern slavery risk and achieve genuine, measurable and long-lasting improvements for workers across our supply chains.



Sean Bilton
CEO and Managing Director

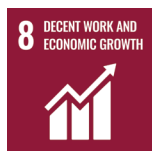
A handwritten signature in black ink, appearing to read 'S Bilton', written in a cursive style.

Sean Bilton

Chief Executive Officer and Managing Director
Estia Health

Acknowledgement of Country

Estia Health acknowledges all Aboriginal and Torres Strait Islander Traditional Owners of Country throughout Australia and recognises their connection to land, sea, culture and community. We pay our respect to Elders past, present and emerging and extend that respect to all Aboriginal and Torres Strait Islander Peoples.



Estia Health supports the [United Nation Sustainable Development Goals](#). This includes Goal 8 and Target 8.7: *take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.*

3 About Estia Health

Our purpose

At Estia Health, our purpose is to enrich and celebrate life together. To enrich a life means every small action we take can make a difference and as aged care professionals, we look after people at an important time of their lives. We want to celebrate this time with our residents, their families and our employees.

Principles and values

Our residents, their families and our employees often say they feel as if they're part of the Estia Health family, which is why our organisation's purpose is built on the foundations of our family code: a family where everyone belongs. This is brought to life through a set of five principles, guided by values, which our employees demonstrate daily in their varied and valued roles within each of our aged care homes and across the organisation.



Sustainability strategy

We know that for our organisation to have a sustainable future, it is dependent on the wellbeing of our people, supporting and integrating within our local communities and the continued health of the natural environment. Our 2020 – 2024 Sustainability Strategy has key focus areas and associated targets, which includes addressing modern slavery risks within our supply chains. In FY25 we will develop a revised Sustainability Strategy, with a continued focus on sustainable procurement, evolving our framework for assessing the effectiveness of our actions in identifying and addressing modern slavery risks within our organisation and supply chain.

Structure and governance

Estia Health is a group of proprietary companies (Pty Ltd), with the Ultimate Holding Company, Estia Health TopCo Pty Ltd and seven proprietary companies (entities) that it owns and controls, with the Registered Office for the Company: Level 9, 227 Elizabeth Street, Sydney 2000, NSW.

This includes Estia Investments Pty Ltd, the approved provider of aged care services under the *Aged Care Act (1997)* (Cth) which operates all 75 aged care homes and employs all Estia Health employees, and is as such, the main operating company of the Group. Estia Health Residential Aged Care Pty Ltd is also registered as an approved provider under the *Aged Care Act (1997)* (Cth) but is dormant with no operations.



This includes oversight of our approach to human rights, including the approval of the Group's annual Modern Slavery Statement. The Board is assisted by the Audit & Risk Committee supported by the Sustainability Committee and a Modern Slavery Working Group. Material business risks, including modern slavery related risks, are identified and reported via the Audit & Risk Committee in line with Estia Health's Risk Management Framework and the Board approved Risk Appetite Statement.

Estia Health has a diverse portfolio of 75 aged care homes that provide residential aged care services on a permanent or short-term respite basis, as well as providing dementia care and palliative care, delivered by our team of nurses, carers, lifestyle and hospitality employees.

Central services teams: provide policy, process, training, support and reporting across:

- Clinical services and quality of care
- Finance
- Health, safety and wellbeing
- Marketing and communications
- Human resources
- Property services
- Recruitment and talent acquisition
- Legal, risk and internal audit
- Rostering and workforce management
- Centralised procurement and supplier selection
- Information technology

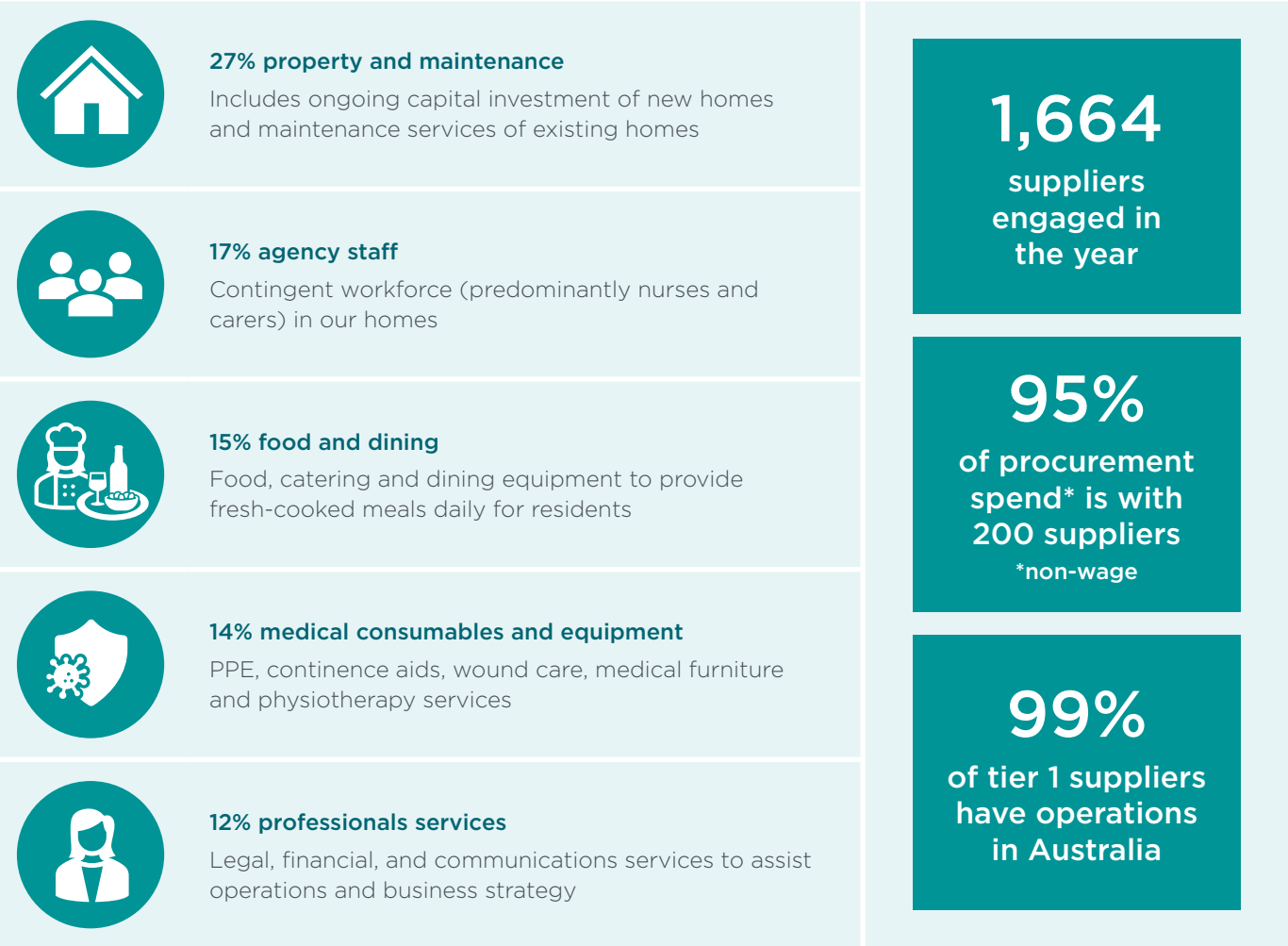
Supply chains

The majority of Estia Health’s suppliers are engaged on a long-term basis, managed by our centralised procurement team, responsible for overseeing the purchasing process, including tendering and sourcing, contractual terms and ongoing relationship management and performance. By maintaining a stable and preferred supplier network, we aim to enhance operational efficiency and uphold the principles of accountability and transparency within our supply chain operations.

Estia Health’s supply chain has not materially changed from FY23 and includes the provision of goods and services from companies in the key categories of:

- 1. **Corporate and operational procurement:** includes procured products and services required to provide care to residents living at one of our 75 aged care homes. This includes catering and hospitality, medical equipment, personal protective equipment (PPE) and consumables, allied health services, labour hire, uniforms and clothing, information technology and electrical equipment and office supplies;
- 2. **Capital and property work:** includes the products and services required for refurbishment and upkeep of existing residential aged care homes, and properties and the development and construction of new aged care homes, and;
- 3. **Professional services:** includes services such as accounting and auditing services, consultants, recruitment services and legal services.

Top 5 categories of procurement spend in FY24



4 Modern slavery risks in our operations and supply chains

Assessing salient and material modern slavery risks

Estia Health’s approach to assessing modern slavery risks includes a ‘risk to people’ approach, identifying the level of exposure to modern slavery that may exist via products or services, defined under the United Nation’s (UN’s) Guiding Principles as ‘the human rights at risk of the most severe negative impact through the company’s activities and business relationships’³. This is alongside our assessment of material risk to Estia Health, which is aligned with Estia Health’s Risk Management Framework adopting a continuous improvement approach ensuring supporting processes and practices continually evolve and this includes identifying, assessing and managing potential modern slavery risks within the organisation’s operations and supply chains.

The UN’s Guiding Principles outline three ways in which an organisation can negatively impact human rights by causing, contributing to or being directly linked to adverse human rights impacts. We have assessed Estia Health’s risk in alignment with these definitions as:

<p>Caused</p> <p>A business could cause modern slavery when its actions or omissions within its operations directly result in modern slavery occurring.</p> <p>Our assessment is that this is the least probable way for modern slavery to be linked to Estia Health due to the level of control and oversight we have over our own operations, effective governance and risk management practices, a workplace culture of safety and care and national modern slavery, human rights and labour laws in place.</p> <p>Estia Health therefore believes our risk to directly cause modern slavery remains low, however, as the business grows, we continue to embed systems, controls and processes to have better oversight and control over potential risks across our network of homes. This includes centralised rostering and recruitment as well as updated health, safety and wellbeing policies, including fatigue management.</p>	<p>Contributed</p> <p>A business could contribute to modern slavery where its actions or omissions (such as engagement with suppliers) significantly incentivise, enable or facilitate modern slavery occurring.</p> <p>While Estia Health would never knowingly contribute to modern slavery, we could inadvertently contribute via requests for costs reduction, or urgent delivery times for high demand products, which could result in exploitation of workers somewhere in the supply chain.</p> <p>As an example, during the height of the COVID-19 pandemic, the high demand for PPE and a global shortage meant Estia Health was required to source PPE from a multitude of additional suppliers under tight timeframes. Following this specific period, Estia Health now sources PPE from an established supplier using standard timeframes, yet we are aware the risk future disruption to global supply chains (from conflicts, climate events, pandemics) could cause and plan accordingly within the centralised procurement function.</p>	<p>Directly linked</p> <p>A business could be directly-linked to modern slavery if its operations, products or services are connected to modern slavery through the actions of another entity it has a business relationship with, such as a sub-supplier.</p> <p>This likely poses the greatest risk to how Estia Health could be connected to modern slavery by being ‘directly linked’ to exploitative practices of migrant labour, deceiving recruitment practices and underpayment or poor working conditions.</p> <p>Like all aged care providers, Estia Health does hire a contingent workforce to meet required care ratios and rosters to ensure we can continue to deliver a high level of care to our residents. This requires engaging with third-party labour organisations and although all are required to meet stringent Australian laws, the inclusion of third-party labour hire reduces Estia Health’s visibility of potential exploitation of workers, particularly a migrant workforce.</p>
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Operating risk

All of Estia Health’s residential aged care homes and direct operations are based in Australia and operate in a highly regulated labour market, with a low likelihood of modern slavery cases occurring within direct operations and direct workforce. The Group adheres and reports against regulatory requirements and has a number of internal policies and governance processes to promote a workplace culture of safety and care and upholds protections relating to workplace rights, freedom of association and workplace discrimination.

³ UN Guiding Principles Reporting Framework, [Salient Human Rights Issues](#) [accessed 4 October 2024]

In total, 82.2 percent⁴ of the Group's costs are remuneration to Australian-based employees, contractors and agencies protected by stringent Australian workplace regulations and monitoring by unions and government agencies, with 95.7 percent of Estia Health employees engaged under union negotiated, state-based enterprise agreements (EAs) which cover a wide range of terms and conditions in addition to pay levels.

Estia Health has enhanced recruitment and onboarding systems, embedding all relevant regulatory checks required to work in residential aged care, overseen by a central talent and recruitment team that also supports home-based leadership teams in the instance where local recruitment is required.

Our assessment of operational risk of modern slavery and exploitative practices to our direct workforce remains low, however, we continue to assess potential risk associated with third party labour hire, with further detail on management and mitigation of these risks as addressed in Section 5 of this Statement.

Supply chain risk

We believe the greatest inherent risk factors to contributing or being directly linked to modern slavery is through our supply chains, with healthcare having some of the most complex, multi-tiered supply chains.

Estia Health is a downstream company with the majority of engagement and collaboration with our tier 1 suppliers, providing and distributing finished goods to our aged care homes and offices. As a result, there are many tiers of suppliers in the chain between Estia Health and the companies that mine, grow, extract and process the raw materials we use, and although the salient risk may be high, our visibility of the risk and ability to enact change can be limited.

In FY24 the Group engaged Fair Supply, a modern slavery and ESG data provider, to complete an independent risk screening of all our suppliers for modern slavery risk. Fair Supply's proprietary technology aggregates world leading datasets from the Global Slavery Index, International Labor Organisation amongst other verified data sources, to enable reporting of the theoretical risk of modern slavery occurring for each supplier, termed inherent risk (the detailed methodology is included in the Appendix).

This expands Estia Health's previous methodology to identify risk hotspots by procurement category, supporting transparency of where within the supply chain (up to tier ten), the greatest potential risks could exist, providing further information to support engagement with suppliers. With a large proportion of forced labour occurring in the lowest tiers of global supply chains, we wanted to better understand the potential salient risks deeper within our supply chains, while utilising an online platform for improved supplier engagement and documentation capture and review.

We utilised Fair Supply's 'slavery intensity' metric which quantifies the number of full-time equivalent (FTE) workers estimated to be in slavery across Estia Health's supply chain per million dollars invested. This method helped identify potential risk hotspots not dependent on annual spend, improving our understanding of potential salient risk within the products and services we buy and use.

The below table shows a consolidated rating for all assessed companies and each company can be assessed individually on a selection of metrics (including by geography) to assist engagement and collaboration with our suppliers during our due diligence approach to help prioritise any further due engagement that may be required.

Estia Health's supplier risk profile – based on Fair Supply risk screening

Category of risk	Summary of results
Summary of inherent risk ratings following first pass screening	1,629 screened: <ul style="list-style-type: none"> • 1,321 companies determined at low for potential modern slavery risk • 307 companies determined moderate low • 1 company determined moderate risk • No companies profiled in the two remaining categories of moderate high or high
Highest inherent risk by sector	<ul style="list-style-type: none"> • Food, beverage, hospitality and agriculture sector • Third party labour hire for contingency workforce • Apparel and textiles • Construction and maintenance in property sector • Medical consumables and equipment
Risk by geography and tier	<ul style="list-style-type: none"> • Australia – tier 1 • China – tier 3-5 • India – tier 3-5

⁴ Excluding non-recurring business acquisition related costs, depreciation, interest and tax















5 Actions taken to assess and address modern slavery risks

Estia Health's FY20 – FY23 modern slavery roadmap formed a consistent, foundational approach to assessing and addressing potential modern slavery risks within our operations and supply chain. In FY24, we have focused on key areas of the roadmap, which includes improving our due diligence approach to better understand potential risks within our multi-tiered supply chains. This enables us to prioritise resources to assess and manage modern slavery risks to people within our supply chains as well as risks to our organisation.

Roadmap areas	Roadmap actions	FY24 progress update
1. Governance and due diligence	<ul style="list-style-type: none"> Expand existing policies and Code of Conduct Continue due diligence process Incorporation of modern slavery process into contracts 	<ul style="list-style-type: none"> Issued 34 supplier contracts which included modern slavery clauses and Supplier Code of Conduct, with \$26 million spend covered Embedded new system to assess inherent modern slavery risk of all suppliers to assist with further due diligence
2. Engagement and training	<ul style="list-style-type: none"> Open communication channels with suppliers and employees Implement an internal modern slavery training program for key teams (e.g. procurement, property) 	<ul style="list-style-type: none"> Implemented whistleblower training with 7,781 completions by Estia Health employees
3. Remediation and reporting	<ul style="list-style-type: none"> Design and implement a remediation process Develop and implement a reporting and evaluation framework 	<ul style="list-style-type: none"> Expanded KPIs No calls received by the 'Say Something' Whistleblower Hotline in relation to Modern Slavery allegations No supplier contracts were terminated as a result of the identification of Modern Slavery concerns
4. Collaboration⁵	<ul style="list-style-type: none"> Investigate and pursue collaboration with relevant networks and organisations 	<ul style="list-style-type: none"> Head of Sustainability, lead for delivery of Modern Slavery roadmap, attended multiple modern slavery roundtables, including Sustainability Professionals Association (SPA) event, with the Attorney General's Department, organised by Fair Supply.

⁵ In July 2024 the ACCC released its draft Guide, [Sustainability collaborations and Australian competition law: A guide for business](#), which includes guidance for businesses collaborating on sustainability issues. Although not directed specifically to modern slavery, Estia Health will continue to monitor the development of the Guide following the consultation process, to ensure continued lawful collaboration within future reporting periods.

Risk summary by sector

Sector & product	Inherent risk factors	Relative risk within Estia Health top ten procurement categories	Status of previously completed actions* with current suppliers	Future focused actions
Food, beverage, hospitality and agriculture sectors		<ul style="list-style-type: none"> Food and dining is Estia Health's top five procurement spend. All meals are cooked fresh at our homes by Estia Health's Chefs and hospitality teams, apart from some contingency staff. As a result, operational risk is assessed as low Fair Supply's assessment determines this sector as having inherent modern slavery risk due to the nature of work required in the production, processing, packaging and transport of food and beverage goods in Australia, which attracts seasonal, base-skilled workers Estia Health sources a large proportion of food from a distributor (tier one) of food products, supplied by a large food provider (tier two). Both are required to report under the Australian Modern Slavery Act 	<p>Governance: yes</p> <p>Due diligence: yes</p> <p>Engagement & training: yes</p> <p>Supplier relationship: long-term</p>	<p>Complete Fair Supply Self-Assessment Questionnaire (SAQ) and based on risk rating, assess ongoing engagement for risk management</p> <p>Complete scope for supply chain mapping assessment in collaboration with suppliers</p>
Third party labour hire for contingency workforce	 	<ul style="list-style-type: none"> Estia Health utilises third-party Australian labour organisations to hire contingent workforce within homes, increasing risk within our tier one/two supply chain The majority of workforce is selected from a preferred panel of Australian third-party labour organisations, centrally managed, with a proportion engaged in Estia Health's modern slavery due diligence process 	<p>Governance: partial</p> <p>Due diligence: yes</p> <p>Training: no</p> <p>Engagement & training: no</p> <p>Supplier relationship: mixed</p>	<p>Engage suppliers in planned training and education</p>
Apparel and textiles	  	<ul style="list-style-type: none"> Fair Supply's assessment rates the sector moderate risk based on documented cases of labour exploitation in raw material sourcing and the production of garments in factories in Asia Estia Health's tier one uniform and linen suppliers have been engaged on a long-term basis and participated in Estia Health's modern slavery roadmap due to risk category 	<p>Governance: yes</p> <p>Due diligence: yes</p> <p>Engagement & training: yes</p> <p>Supplier relationship: long-term</p>	<p>Define sector specific modern slavery KPIs with supplier</p>
Construction and maintenance in property sector	 	<ul style="list-style-type: none"> Estia Health's largest procurement spend category for the construction of new homes and the ongoing refurbishment and maintenance of existing homes Typically requires low-skilled, migrant workforce, combined with high-risk business models, working under tight budgets and timings, reliant on outsourcing and sub-contracting of labour within Australia and the global supply chain Estia Health has long-standing construction partners, responsible for the build and fit out of our two newest homes, opened in FY24, with both partners previously engaged in Estia Health's modern slavery roadmap 	<p>Governance: partial</p> <p>Due diligence: yes</p> <p>Engagement & training: yes</p> <p>Supplier relationship: long-term</p>	
Medical consumables and equipment	 	<ul style="list-style-type: none"> Medical consumables, particularly in the manufacture of disposable gloves and face masks in certain Asian regions is associated with high modern slavery, well documented during the height of the Covid-19 pandemic when high global demand resulted in exploitive labour practices Estia Health has a longstanding relationship with the tier one supplier, providing wholesale and distribution of medical consumables from a centralised platform, overseen by Estia Health's procurement team and has been previously engaged in Estia Health's modern slavery roadmap 	<p>Governance: yes</p> <p>Due diligence: yes</p> <p>Engagement & training: yes</p> <p>Supplier type: long-term</p>	
<div> <div>  Vulnerable population </div> <div>  High-risk business model </div> <div>  High-risk geographies </div> <div>  High-risk product </div> </div>				

The above is a summary only and is not an exhaustive list of all the Group's activities in managing modern slavery risk.

*Completed actions refer to those completed since the inception of Estia Health's FY20 modern slavery roadmap, as well as actions completed within FY24. The risk assessment and summary was completed in FY24.

Due diligence approach

- 1. Inherent risk assessment:** utilising Fair Supply's forced labour risk assessment tool in FY24 enabled Estia Health to apply an initial inherent risk rating to all suppliers, to better understand salient risks and hotspot areas within our supply chain. This includes assessing risk down to tier 10 of the supply chain, as well as by sector, industry and geography. This initial assessment was also completed for potential suppliers prior to a tender process, to inform specific questions within the due diligence process.
- 2. Self-assessment questionnaire to apply revised risk rating:** depending on the level of inherent risk and other relative metrics, including spend, we then applied the next step of our due diligence process, engaging suppliers via an SAQ using the Fair Supply platform, which applies a revised risk rating based on the supplier answers, in relation to their mitigation plans in alignment with the Act's criteria. In FY24 this process was completed for one third-party labour organisation.
- 3. Supplier engagement:** following the survey, we engage with suppliers, which usually involves a call or meeting with a key contact to discuss SAQ findings and ratings. Further analysis of information is completed, and action plans established.

Grievance mechanism

Estia Health has a structured process for escalating concerns, addressing and resolving complaints through established grievance procedures, providing well-communicated mechanisms for employees, suppliers and other external parties to report concerns, including modern slavery. Methods for communication of the relevant policies and programs (table on page 12) occur at multiple stages of the employee and supplier lifecycle, including references in contractual engagement, induction training, annual training and engagement programs, to make it available, accessible and understood by as many people as possible.

Remediation process

The Group has established standards, policy, procedures, and controls as part of a broader remediation process, including the Reporting and Resolving a Grievance Policy. This policy applies to all employees, other workers and contractors of Estia Health, and provides guidance for dealing with a grievance and the process for escalation, without fear of retribution. In FY24, no calls were received by the 'Say Something' Whistleblower Hotline in relation to modern slavery allegations and no supplier contracts were terminated as a result of the identification of modern slavery concerns. We do, however, understand, that these results are not the single determining factor in assessing whether modern slavery risks exist within our operations and supply chain, and we will reassess our remediation approach in line with a best practice approach should an incident of modern slavery be identified.

Relevant policies and programs

Policy/Program	
<u>Code of Conduct</u>	Underpins and supports our organisational purpose, principles and values. It is designed to provide consistent expectations about our behaviour and conduct in the workplace as representatives of Estia Health.
<u>Supplier Code of Conduct</u>	Sets out the minimum standards expected of Estia Health suppliers, contractors, consultants, agents and other providers of goods and services. By entering a contract with Estia Health, suppliers are also requested to view and agree to make all reasonable endeavours to comply with the Supplier Code of Conduct and ensure their employees, subcontractors, and agents also adhere to its principles.
<u>Whistleblower Policy</u>	<p>Provides whistleblower protection under Australia's whistleblowing laws, with specific protections against harassment, vilification, or employment consequences to anyone who makes a report. Whistleblowing information is reported monthly to the Estia Health Board, which includes the Chair of Estia Health's Audit and Risk Committee.</p> <p>Whistleblower training continued, with 7,781 completions across the Group at the end of FY24.</p>
<u>Whistleblower Hotline</u>	The 'Say Something Hotline' is independently operated and allows for anonymous disclosures of alleged incidents of suspected misconduct, including modern slavery concerns. Suppliers, contractors, and sub-contractors can utilise Estia Health's Whistleblower Policy and services to report modern slavery concerns. In FY24, the hotline received no modern slavery calls.
<u>Health, Safety, and Wellbeing Policy</u>	<p>Commits to providing and maintaining a working environment that is safe and eliminates or minimises work-related hazards and risks. Complies with Work Health and Safety Acts and Regulations for the jurisdictions in which we operate, as well as codes of practice and the process allows for the reporting of safety concerns and risks to managers and SolvSafety, an online safety management system.</p> <p>At the commencement of employment and annually thereafter, all Estia Health employees complete mandatory 'staying safe at work' training, with 8,934 completions across the Group at the end of FY24 as well as bullying, discrimination & harassment training, with 8,688 completions at the end of FY24.</p>
<u>Employee Assistance Program (EAP)</u>	The employee support service <u>REACH</u> is an independent Employee Assistance Program (EAP) offering a range of free and confidential services to Estia Health employees and their families including 24/7 counselling and coaching, financial support and legal advice.

6 Effectiveness of actions taken to assess modern slavery risks

The Group continues to mature our methodology in identifying and mitigating modern slavery risk as well as measuring the effectiveness of our mitigating actions. In FY24 we have disclosed measurement metrics to assess the effectiveness of our actions, and we will continue to assess these, governed by Estia Health’s Sustainability Committee and supported by Estia Health’s Modern Slavery Working Group, responsible for the development of Estia Health’s modern slavery roadmap.

Key Performance Indicator	FY24 results
Risk screening: percentage of suppliers assessed via Fair Supply tool for indicative and inherent risk screening	100%*
Policy/contracts: percentage of key suppliers** that have Sustainability and Modern Slavery commitments incorporated into new or renewed contracts	80.5%
Grievance mechanism: Total number of modern slavery allegations received and resolved by Estia Health’s grievance mechanism, See Something, Say Something hotline	0 allegations received
Supplier engagement: number of actions taken to work with suppliers to improve capacity to manage potential modern slavery risks	1

*Included all Estia Health suppliers in the procurement spend report as at April 2024, minus the categories of rent, tax and wages.
**Key suppliers defined as long-term suppliers under procurement team management. Excludes development, entertainers and IT suppliers.

7 Consultation and approval

Estia Health's TopCo Board holds the responsibility for approving and supervising the Group's modern slavery risk management approach and the disclosures in this Statement. A groupwide consultation of this Statement and its contents was conducted with the Board Directors of each entity within the Group and discussed at a joint Board meeting. This was overseen by the Head of Sustainability and Chief Financial Officer, and reviewed by the Groups' executive level Sustainability Committee.

Principal Governing Body Approval

This Modern Slavery Statement was approved by the *principal governing body*⁶ of Estia Health as defined by the *Modern Slavery Act 2018* (Cth) (the Act) on 17 December 2024.

Signature of Responsible Member

This Modern Slavery Statement is signed by a responsible member(s)⁷ of Estia Health as defined by the Act.



Mike Murphy

Chairman, Estia Health TopCo Pty Ltd



Sean Bilton

Chief Executive Officer and Managing Director

Mandatory criteria

The following page number(s) of the Statement address each of the mandatory criteria in Section 16 of the Act.

Mandatory criteria	Page number(s)
a) Identify the reporting entity	<u>2</u>
b) Describe the reporting entity's structure, operations and supply chains	<u>4, 5, 6</u>
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns and controls	<u>7, 8</u>
d) 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	<u>9, 10, 11, 12</u>
e) Describe how the reporting entity assesses the effectiveness of these actions	<u>13</u>
f) Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	<u>14</u>
g) Provide any other relevant information	<u>Appendix - 15</u>

⁶ *Principal governing body*: means the body or group of members of the entity that are responsible for the governance of the entity.

⁷ *Responsible member*: means a decision-making member of the entity. Where an entity has a principal governing body, the responsible member will be a member of that body.

Appendix

Fair Supply Initial Risk Assessment Methodology Summary

1. As detailed in section 3 of this Statement, we applied the initial risk assessment methodology to 100 percent of Estia Health's suppliers in FY24. This baseline exercise provides the basis for our subsequent focus for ongoing due diligence and remediation activities across not only the present reporting period but for upcoming years.
2. Incorporating company spend data throughout global markets, we have utilised external consultants with proprietary technology to trace the economic inputs required to produce products and services sourced from Tier 1 suppliers to Tier 2 suppliers, Tier 2 suppliers to Tier 3 suppliers, and so on, all the way to Tier 10 suppliers of the supply chain of Estia Health's top suppliers by spend.
3. This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using the following sources:
 - a) The United Nations' (UN) System of National Accounts;
 - b) UN COMTRADE databases;
 - c) Eurostat databases;
 - d) The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
 - e) Numerous National Agencies including the Australian Bureau of Statistics.
4. The MRIO is then examined against the following international standards:
 - a) The UN Guiding Principles on Business and Human Rights;
 - b) The Global Slavery Index;
 - c) International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
 - d) The United States' Reports on International Child Labour and Forced Labour.
5. A proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier.
6. This analysis was performed for the purposes of risk identification under the Act. It does not purport to confirm the actual existence (or non-existence) of slavery in Estia Health's supply chains and operations. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.
7. The multi-faceted approach to modern slavery risk assessment that we have undertaken has included examination and analysis of the following:
 - a) The individual suppliers and industries with the most elevated risk of modern slavery;
 - b) Supply chain plots to provide a visual representation of the supply chains for Estia Health's top 3 first tier industries;
 - c) Plotting the relative slavery risk in the supply chain by tier, up to tier 10;
 - d) Geographical depiction of the cumulative risk of modern slavery across the supply chain around the world; and
 - e) An overview of the classification of the first tier of our supply chain by country and industry, including relative modern slavery risk.
 - f) Suppliers in our supply chains and operations that posed any calculated risks in relation to modern slavery were identified.