

Modern Slavery Statement

This statement has been published in accordance with the *Modern Slavery Act 2018* (Cth). It sets out the steps taken by Adams Group Aus Holdings Pty Limited ACN 637 089 162 (**Adams**) and other relevant Adams group companies during the year ended 30 June 2021 to identify and reduce the risks of modern slavery and human trafficking in its business and supply chains.

Reporting entity covered by this statement

This statement covers:

- Adams; and
- Maven Dental Group Pty Ltd ACN 131 333 492 (**Maven Dental**)

In addition, the following capitalised term used throughout this statement are defined as follows:

- Adams Group means the Adams consolidated group which comprises Adams and its subsidiaries.

Structure and Operations

Adams Group is a leading trans-Tasman healthcare group and provides facilities and administrative services to independent dental practitioners in Australia and New Zealand, enabling them to deliver patient care in our facilities with support from our dental assistants and support staff. Adams is a private company and is headquartered in Melbourne, Victoria.

Adams Group operates through Maven Dental in Australia and Lumino Dental Limited in New Zealand.

Maven Dental is Australia's second largest provider of facilities and administrative services to dental practitioners. It operates approximately 100 dental practices in all Australian states and also the ACT. Approximately 67 per cent of these clinics operate under the "Maven Dental" brand with the balance being operated under legacy brands.

Lumino Dental is New Zealand's largest operator of dental practices. It operates more than 100 dental practices throughout New Zealand, primarily under the "Lumino The Dentists" brand.

Adams Group's operations are split roughly evenly between Australia and New Zealand and include salaried staff, employees under collective bargaining arrangements and modern pay awards, and temporary contractors. As at the date of this statement, there are approximately 1,100 employees working in the Australian business and approximately 1,000 employees working in the New Zealand business. These do not include the independent dental practitioners who receive services from Maven Dental and Lumino.

Approximately 95% of staff (excluding temporary contractors) in Australia are covered by an industrial instrument such as a modern award. The nature of these government instruments significantly mitigates the risk of modern slavery within our operations.

Adams Group operates a number of programmes to support professional development and the health and safety of our employees, including operating an Employee Assistance Program to support staff in dealing with personal, family and/or work-related concerns. Adams Group aims for continuous improvement in its treatment of employees and is frequently reviewing the efficacy of our programmes in rewarding and supporting our people.

In addition to our staff, Adams Group provides facilities and administrative services to approximately 600 independent dental practitioners at its practices in Australia and New Zealand.

Supply chains

Adams Group's major supply chain areas include:

- The lease of commercial real estate
- Dental equipment and consumables
- Laboratory services and dental devices
- IT hardware and associated software subscriptions and licensing
- Utility services
- Marketing services including advertisements on global social media platforms
- Cleaning services.

Risks of modern slavery practices in the operations and supply chains

Adams employs people and provides services to dental practitioners in accordance with all applicable laws. As a service provider in the heavily regulated allied health industry, we believe risks of modern slavery in our operations are minimal and are primarily limited to potential downstream supply chain activity, such as where and how equipment may be produced or how services may be provided.

Adams recognises that the extensive nature of our global supply chains may expose us to modern slavery risks. Adams may be exposed to modern slavery risks due to the diversity of products and services sourced by us and the associated geographic locations, industries and regulatory systems further down those supply chains. Exploitation in the production of consumable and equipment such as gloves, instruments, garments and electronics is well documented.

Our measures to address modern slavery risks

We have moved to mitigate these risks through the use of reputable suppliers in Australia and New Zealand. Our largest supplier of dental equipment and consumables comprises approximately 50% of spending in that area and is a reporting entity under the Modern Slavery Act.

Adams acknowledges that modern slavery has been found in cleaning companies in Australia. Adams Group uses small local suppliers for most of its cleaning services and is considering how it can mitigate risk in this area.

Further, as part of a review of our systems and controls, Adams is working to further improve the way we identify and manage Modern Slavery risks. Up to the date of this report, our key action points and effectiveness have been as follows:

Consultation

Consultation with our largest supplier to understand its approach to modern slavery and actions it is taking to mitigate modern slavery risk going forward.

Policies

Adams Group regularly reviews its key policies to ensure compliance with all applicable legislation, including employment and modern slavery laws. Adams Group has developed a Supplier Code of Conduct for incorporation into its supplier contracts where this is deemed appropriate. This specifically references our requirements regarding our suppliers' treatment of their workers, including that they will not engage in modern slavery.

Contracting

Adams Group mitigates modern slavery risk by the inclusion of appropriate clauses in key contracts, including those with offshore suppliers, requiring them (amongst other things) to take reasonable steps to identify, assess and address risks of modern slavery practices in their operations and supply chains.

Training

Adams Group requires all senior staff and those members of staff who are involved in procurement to undertake modern slavery training. This helps them to understand what modern slavery is, where the risks might lie in the operations and supply chain, and what can be done to mitigate those risks. All relevant staff have completed this training and will be required to complete this training on a regular basis.

Whistleblowing

Adams Group offers multiple ways to report potential compliance concerns, including anonymously through an external provider under the Adams Group's Whistleblower Policy. This policy applies to all current and former directors, officers, employees and suppliers of the Adams Group.

Consultation Process and Approval

This statement has been prepared by Adams in consultation with Maven Dental. It was approved by the board of directors of Adams Group Aus Holdings Pty Limited (being the principal governing body for the reporting entity) on 30 September 2021.

The process of consultation involved engagement with Adams Group's senior leadership team who represent relevant internal stakeholder groups including Procurement, Human Resources, Legal and Finance.

This statement is signed by Simon Harle in his role as a director of Adams Group Aus Holdings Pty Limited ACN 637 089 162 on 14 December 2021.

Signed:



Simon Harle

Director of Adams Group Aus Holdings Pty Limited

14 December 2021