



Holstep
Health

Community care.
For life.

Modern slavery statement

Reporting period for financial year ending 30 June 2025

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Introduction and commitment

Holstep Health is committed to preventing modern slavery and human trafficking in all aspects of our operations and supply chains. We recognise that modern slavery is a serious violation of human rights and are committed to acting ethically, transparently and responsibly in the way we operate and engage with suppliers and partners.

This statement describes our approach to identifying, assessing and addressing modern slavery risks and reflects our commitment to continuous improvement.

Our commitment

Modern slavery refers to situations where individuals are exploited and cannot refuse or leave work due to threats, violence, coercion, deception or abuse of power. Under the Modern Slavery Act 2018 (Cth), modern slavery includes practices such as slavery, servitude, forced labour, debt bondage, human trafficking, forced marriage and the worst forms of child labour.

Holstep Health acknowledges that modern slavery can occur across many industries and supply chains, including those that support health and community services. While the risk of modern slavery within our direct operations is considered low, we recognise that risks may exist within complex or global supply chains.

Holstep Health is firmly committed to the abolition of modern slavery wherever possible within our supply chains. We will not knowingly support or engage in practices that contribute to modern slavery and will take a risk-based, proportionate and practical approach to identifying, preventing and addressing modern slavery risks. This commitment is grounded in our organisational values and our responsibility to act ethically and in the best interests of the consumers and communities we serve.

1. Identity of the Reporting Entity

Holstep Health (ACN: 135 261 988, Merri Community Health Services Ltd trading as Holstep Health) is a not-for-profit community health organisation operating in Victoria, Australia.

The 2024 merger of Banyule Community Health and Merri Health brought together over a century of shared expertise in the delivery of community-based health and wellbeing services.

Holstep Health's vision is to create healthier, more inclusive communities where everyone has equitable access to high-quality care and support. Our purpose is to provide holistic, person-centred services that enhance the physical, mental, social and economic wellbeing of the communities we serve. We achieve this through innovative service delivery, strong partnerships, and by prioritising those most vulnerable or experiencing disadvantage.

Our organisational values underpin every aspect of our work and guide how we engage with clients, communities, staff, partners and suppliers. They are:



Compassion

Providing care, support and understanding for all individuals, particularly those facing disadvantage or vulnerability.



Empowerment

Enabling clients, staff and communities to make informed choices and take control of their health and wellbeing.



Excellence

Striving for high-quality, ethical and evidence-based service delivery, and continuous improvement in all that we do.

2. Structure, Operations and Supply Chains

Structure and Operations

Holstep Health delivers holistic, person-centred care across the north, north-west and north-east regions of metropolitan Melbourne, as well as selected statewide programs.

Our services include clinical care, allied health, dental services, mental health, community and social support programs, and legal and financial assistance. Our work is underpinned by a strong focus on equity, access and support for people experiencing vulnerability and/or disadvantage.

Services are delivered across multiple fixed sites, outreach locations and via telehealth, supported by a workforce of employees, contractors and volunteers engaged predominantly under Australian workplace laws and industrial instruments.

Supply Chains

Holstep Health's supply chains support both service delivery and organisational operations and include clinical and medical supplies and equipment; information and communications technology hardware and software; facilities management, cleaning and maintenance services; office supplies and equipment; and professional and consulting services.

While the majority of suppliers operate within Australia, some goods and services involve global supply chains, particularly in relation to manufactured products and technology.

3. Modern Slavery Risks in Operations and Supply Chains

Holstep Health considers the risk of modern slavery within its direct operations to be low, due to our Australian workforce and the regulatory frameworks governing employment. However, we recognise that modern slavery risks may exist within supply chains, particularly where:

- Goods are manufactured offshore;
- Services involve subcontracting or outsourced labour;
- Industries have known higher modern slavery risk profiles, such as cleaning, manufacturing or technology supply chains.

We acknowledge that modern slavery risks can be indirect and difficult to detect, requiring ongoing attention and improvement.

4. Actions Taken to Assess and Address Risks

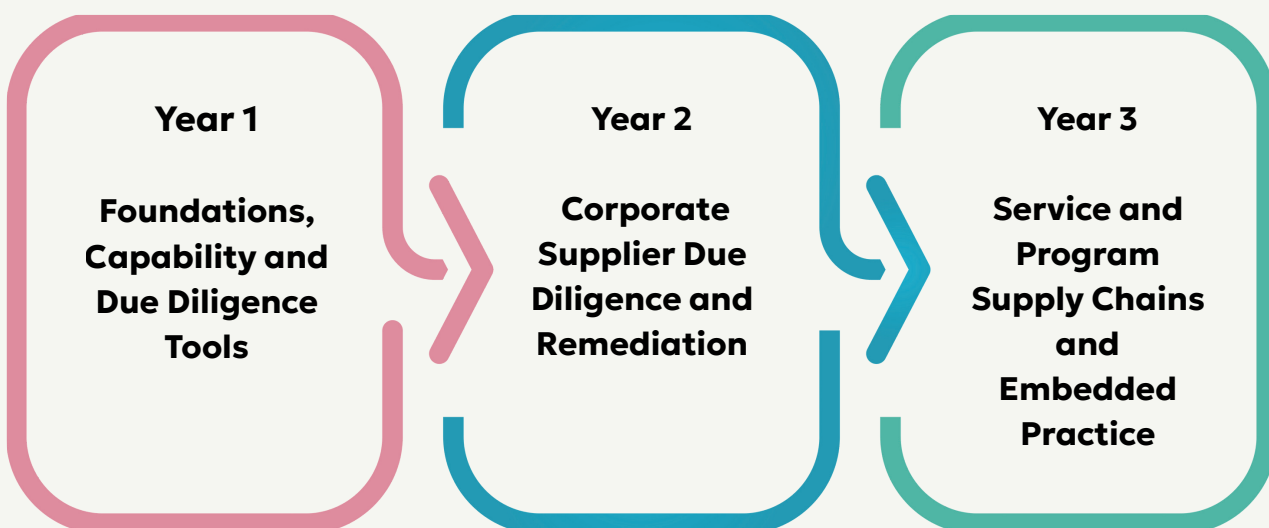
Holstep Health has adopted a proportionate, risk-based approach to addressing modern slavery risks, including maintaining organisational policies and codes of conduct that promote ethical behaviour and compliance with labour laws, including clearly documented expectations that suppliers comply with applicable laws and fair labour practices. Modern slavery risks are considered within procurement and contract management processes, and staff involved in procurement and supplier management are supported with awareness and guidance. Suppliers are also encouraged to raise concerns related to labour practices.

5. Assessing the Effectiveness of Our Actions

Holstep Health assesses the effectiveness of its actions through periodic review of procurement practices and supplier arrangements, monitoring supplier performance where risks are identified, reviewing progress against planned actions and governance documentation, and conducting an annual review of this Modern Slavery Statement.

6. Future Actions and Continuous Improvement

Holstep Health recognises that addressing modern slavery risks requires ongoing effort and continuous improvement. To strengthen our approach in a structured, proportionate and practical way, we have established a three-year plan that builds organisational capability, prioritises higher-risk areas and embeds modern slavery considerations into business-as-usual practices.



Modern Slavery Statement

Reporting period ending 30 June 2025

Year 1 – Foundations, Capability and Due Diligence Tools

In the first year, Holstep Health will establish and implement policies, procedures and guidance documents that define our commitment to abolishing modern slavery and embed modern slavery considerations at all stages of the procurement cycle. This includes establishing a supplier code of conduct, identifying higher-risk spend categories and suppliers, and building internal capability through targeted awareness and training for staff involved in procurement and contract management.

To support consistent and risk-based due diligence, Holstep Health will develop a supplier modern slavery risk assessment framework to help identify and prioritise higher-risk suppliers and categories. The organisation will also implement a supplier self-assessment questionnaire to engage with suppliers and improve visibility of their labour practices and controls.

Year 2 – Corporate Supplier Due Diligence and Remediation

In the second year, Holstep Health will assess and evaluate its top 20 corporate suppliers using the risk assessment framework and supplier self-assessment questionnaire.

This will prioritise suppliers and categories with a higher inherent risk of modern slavery and include engagement with suppliers to better understand their labour practices and risk controls.

Where modern slavery risks or indicators are identified, Holstep Health will take appropriate, proportionate remediation actions. This may include working with suppliers to address identified issues, requiring corrective action plans, adjusting contract management arrangements, or reconsidering supplier relationships where risks cannot be adequately mitigated.

Year 3 – Service and Program Supply Chains and Embedded Practice

In the third year, Holstep Health will assess and evaluate the top 20 suppliers that support service and program delivery, recognising their critical role in enabling ethical, safe and high-quality services for the consumers and communities we serve.

This phase will focus on embedding modern slavery considerations into ongoing supplier performance and contract management processes, strengthening grievance and escalation pathways where relevant, and applying remediation actions where modern slavery risks or practices are identified.

Insights from Years 1–3 will be used to refine policies, procedures and future actions to support continuous improvement. This staged approach supports capability building, focuses effort where risk is greatest, and enables sustainable implementation over time.

7. Consultation

As a single reporting entity, Holstep Health undertakes consultation through internal governance and executive leadership processes. This statement has been informed by consultation with relevant internal stakeholders, including procurement, finance and executive leadership teams.

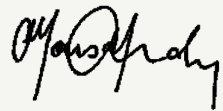
Modern Slavery Statement

Reporting period ending 30 June 2025

Approval

This Modern Slavery Statement was approved by the Board of Holstep Health on Thursday 29th January 2026.

Signed:



Tass Mousaferiadis
Board Chair
On behalf of the Board of Holstep Health

For the financial year ending 30 June 2025.

This statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) and outlines how Holstep Health has assessed and addressed modern slavery risks during the reporting period.