



APM Group's Modern Slavery Statement

Reporting period 1 July 2023 to 30 June 2024



The reporting entity

This Modern Slavery Statement is a joint statement made on behalf of APM Human Services International Limited (ACN 639 621 766) ("**APMHSI**") and all its controlled subsidiaries around the world ("**APM**" or "**APM Group**"). APMHSI is a company incorporated in Australia and was an ASX listed company for the reporting period.

Please note APMHSI delisted and became a subsidiary of Ancora TopCo Ltd (ACN 677 564 662) after the reporting period.

APM Contact

Communications regarding this document can be forwarded to:

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Photography

Photographs used in this document are for illustration only and should not be interpreted to mean that any person or organisation whose assets are shown in them endorses this document.

APM Group’s structure, operations and supply chains

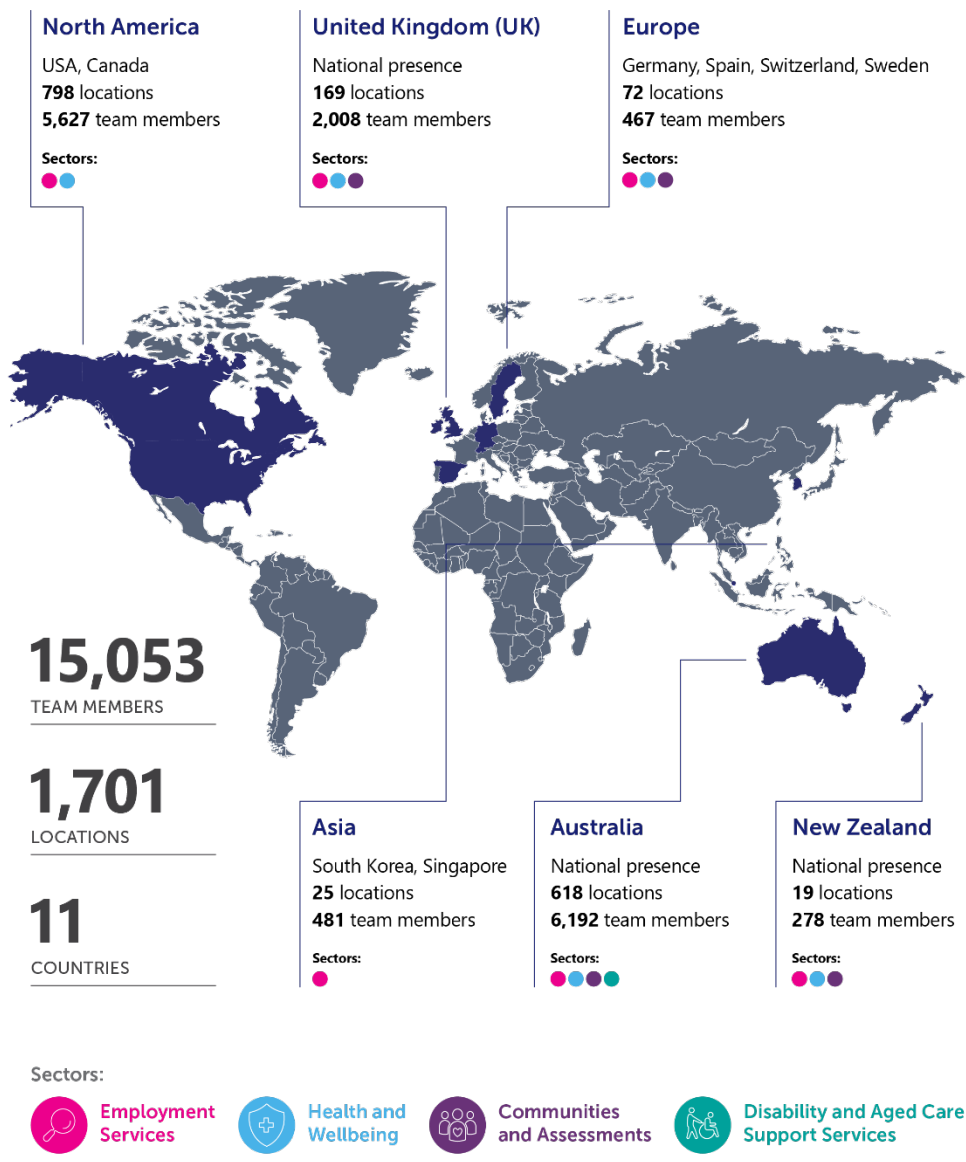
APM Group’s head office is at 58 Ord Street, West Perth, Western Australia, 6005.

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, the UK and the USA. APM Group has a company incorporated in Saudi Arabia, but by the end of reporting period it had not commenced operations.

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

Global presence

APM is a global leader in health and human services



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, UK, Canada, USA, South Korea, Singapore, Germany, Switzerland, Sweden and Spain.

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 Assessment 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 the 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 supply chain

During the reporting period we obtained goods and services from more than 8,000 suppliers in Australia and New Zealand associated with property, insurance, motor vehicle leasing, accommodation and facilities, recruitment, communications, consumables, training, health providers, contractors and consultants. Globally, there are significantly more suppliers. Most of our services are delivered either face to face, or via digital

platforms by staff located in the same country as our Service Users. We have also undertaken an extensive review of our supply chain in Canada and the UK.

Our supply chain comprises of the following main categories: sole traders, entities such as partnerships, companies and non-government organisations and other supplies of products and services. Almost universally we acquire products and services locally in country, although our suppliers for IT equipment or office supplies (in particular) may acquire those products internationally.

In delivery of large programs we may use complex supply chain partner arrangements, including through not for profits, community organisations, and other private sector providers. These supply chain arrangements often last for the length of the program, which can be more than 10 years in some cases. We also form part of other government providers' supply chains, where they require our expertise, or where it is more efficient or cost effective to deliver through our existing operations rather than through their own.

APM has several consortia or joint ventures around the world which can arise depending on the nature of the programs we are tendering for or delivering services under. The two principal joint ventures we have are with D'Aleph in Ingeus Spain, and our Veterans Services Contract where we partner with Lifemark in Canada. In our Australian health businesses, at times senior health professionals may retain an ownership stake in the practice which was acquired by the APM Group.

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

The APM Group has considered its operations and supply chains, and considers that the risk that APM has caused, contributed to, or is directly linked to modern slavery practices is very low.

Sector Risk

Given that we are delivering human services, and generally to large government customers, there is little sector risk associated with delivery of our services.

Geographical Risk

Other than Singapore, APM's programs were all delivered in OECD countries where the risk of modern slavery is low in our operations. In Singapore, there is potential risk associated with low skilled migrant workforce who may provide services such as site cleaning. We have considered modern slavery risk when establishing our Saudi Arabian subsidiary.

Product and Services Risk

We are a service delivery organisation and do not supply products (other than non-complex health products in our physiotherapy clinics and ErgoEquip business. We do not manufacture any products we supply. Services conducted on site such as cleaning or safety services are a direct risk. As our services are mostly delivered face to face by white collar workers, the chance of product and services risk is low. There may be some indirect risk of working with suppliers of branded merchandise, IT equipment or facilities management services, if our suppliers have not put in place adequate controls or other measures.

Entity Risks

Most of our supply chain is directly procured by APM and in almost all cases is procured in the country where we operate. We have in place procurement controls to ensure we deal with reputable suppliers, and therefore this risk is low.

Actions taken by APM Group to assess and address modern slavery risks

APM Group has carried out a risk assessment to assess the risk of modern slavery either caused by APM Group or linked to APM Group.

Due diligence

APM Group’s Risk Management Framework provides the methodology for identification and assessment of any modern slavery risks. The Framework is aligned with ISO 31000:2018 Risk Management Principles and Guidelines.

Following the principles in our Framework, the highest exposures potentially arise in the following areas:

Direct facilities management services to sites	Services such as facilities management consultants, cleaners, fire equipment testing and electrical test and tag. This class of entities is often procured locally and may be of lower value and therefore subject to less governance or scrutiny. The labour is often lower paid and may be vulnerable to exploitation.
Indirect services	Such as utility providers (power, telecommunications), software suppliers and web-based services. These services are often procured generically with little understanding of how the service is generated or where certain elements of it are located (such as call centres etc).
Plant and equipment	Information technology, laptops or mobile phones. This class of entities may have very complex supply chains, operate offshore and source materials and labour from entities with fewer controls to mitigate modern slavery risks.
Products	Stationery supplies, branded merchandise, physiotherapy aids and office furniture. These products are acquired from local suppliers but may be manufactured or sourced from third parties without adequate checks or controls by the vendor.

Similarly in Canada our supply chain risks have been identified as subcontractors, indirect services, specialised services, direct services on site and IT Services and other goods suppliers. In the UK we have assessed our risks around employment practices, participants to our services, supply chain partners and other suppliers of goods and services i.e., gas/electricity utility suppliers, IT service providers, stationers, landlords and facility management services.

The risk review identified robust controls and treatments including:

- International Board Governance

- Third Party services, Legal, Financial, Quality, IT system compliance audits, which are often made available to government customers for further review and checks
- Complex and targeted human resource management processes
- Finance and Payroll expertise and systems
- Checks on licences and certifications of service providers
- Binding contracts with service providers requiring compliance with laws
- Statutory audit
- Complaints and whistleblowing procedures advertised externally.

Remediation processes

The remediation and prevention processes that the APM Group has established include:

- Developed a global Modern Slavery Policy, a Supplier Questionnaire and reporting procedures
- Inclusion of standard modern slavery clauses in our standard form contractor agreements and seeking to negotiate them into all our supply contracts
- Liaised with all APM jurisdictions to ensure processes for supplier contracts are implemented.
- Our Procurement Policy contains a modern slavery provision
- Added modern slavery as a consideration in our tender processes and supply chain awards
- Published a global Code of Conduct, which specifically incorporates modern slavery with communications to all geographies on implementation, adoption of and commitment to the Code
- Communicated our commitment to eradicate modern slavery across our supply chain
- Published a Sustainability Report, which specifically incorporates supply chain management and modern slavery and human rights
- Reviewed the modern slavery policy and compliance of our merchandise providers in Australia
- In Canada, we conduct annual supplier management process audits and have implemented other risk mitigating processes, including training for all staff in light of the new Canadian modern slavery legislation
- Due diligence processes introduced in the UK
- Distributed APM Global Compliance Questionnaire again which requires completion by every business unit across the APM Group, evidencing compliance with APM processes, including modern slavery.

How we have assessed the effectiveness of such actions

APM Group's control environment is regularly reviewed by our Quality & Compliance and Finance teams. Regular internal audits and reviews are carried out in terms of quality issues and other relevant factors. We have sought and received feedback from each APM Group country as to their implementation of our modern slavery avoidance program.

Consultation with APM Group Members

We require feedback from all our global CEOs and any new businesses we acquire on the risks and mitigation steps relating to modern slavery and feedback those responses into this statement. There has been consultation with respect to this statement with Quality and Compliance, Marketing, Legal and group corporate representatives.

Other relevant information

This is the fifth year of reporting for APM Group on modern slavery in Australia. We are also reporting in the 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 APM Human Services International Limited on 11 December 2024.

A handwritten signature in black ink, appearing to read 'Peter Torre', with a long horizontal flourish extending to the right.

Peter Torre

Chief Risk Officer and Company Secretary APM Human Services International Limited