

MODERN SLAVERY STATEMENT 2025

3 November 2025



Introduction

The St John WA Group's Modern Slavery Statement (**Statement**) is prepared in accordance with the Australian *Modern Slavery Act 2018* (Cth) (**Act**). It outlines the steps the Group has taken for the period 1 July 2024 to 30 June 2025 (**Reporting Period**) to identify, assess and manage the specific risks of modern slavery in the Group's operations and supply chain.

Business and supply chains

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

St John WA Group

The St John WA Group (**Group**) comprises of two operating entities:

- St John Ambulance Western Australia Ltd ABN 55 028 468 715 (**SJWA**); and
- Apollo Health Ltd ABN 79 159 660 036 (**Apollo Health**).

SJWA is established as a public company limited by guarantee. SJWA trades under the registered business names St John WA and St John Giving. SJWA is registered with the Australian Charities and Not-for-profits Commission as a public benevolent institution. SJWA is a charitable, not-for-profit, humanitarian organisation teaching first aid to the community, delivering the State's ambulance service while also shaping and leading the sector nationally. SJWA has been servicing and operating as an integral part of the Western Australian community for more than 130 years. SJWA is a reporting entity for the purposes of the Act, having met the reporting threshold in the Reporting Period.

Apollo Health is established as a public company limited by shares and is a wholly owned subsidiary of SJWA. In the provision of primary health care services, Apollo Health trades under various business names, including, St John General Practice, St John Dental and St John Urgent Care. Apollo Health is registered with the Australian Charities and Not-for-profits Commission as a health promotion charity. Apollo Health is not in itself a reporting entity for the purposes of the Act. However, this Statement is provided on behalf of both entities within the Group, given that both

entities operate in the same sector, share many suppliers and prepare consolidated financial statements. Further, SJWA sets the broader policies and processes on behalf of the Group, with both entities being responsible for enacting these policies and processes within their operations, sourcing and procurement practices.

To the extent that this Statement outlines activities conducted by SJWA, those activities have been conducted by SJWA on its own behalf and on behalf of Apollo Health, unless expressly stated otherwise.

Operating Model

The Group operates across three customer-focused operating divisions, supported by two Corporate Services divisions.

Service Stream 1: Preventative

SJWA offers a range of nationally accredited first aid courses and shorter non-accredited training options across Perth Metropolitan and Regional WA. The preventative training programs are designed to enhance the overall health of the WA community. Primary school programs offer age-appropriate first aid classes for students in Kindergarten to year 6. SJWA courses also encompass tailored programs for industry and support for aging well. The Group offers a range of first aid supplies and equipment through physical shop locations, field servicing operations and online webstores ensuring people and businesses have access to the right first aid equipment when they need it. During FY25 the St John Academy was introduced, a youth program that builds first aid skills, fosters community engagement, and creates health sector pathways.

Service Stream 2: Community

Apollo Health Ltd (trading as St John General Practice, St John Urgent Care and St John Dental) operates six health centres in the metro area and one rural medical



centre: Armadale, Cannington, Cockburn, Joondalup, Kambalda (rural medical centre), Midland, and Osborne Park. In addition to the GP services common to each of these clinics, the six health centres also offer dental services and walk-in urgent care. A range of allied health, specialist and pathology services (operated by external providers) are co-located at these centres to help provide an integrated service to patients. The St John Urgent Care service provide an alternative to the emergency department for urgent but non-life-threatening injuries and illnesses.

Event Health Services provides first aid cover and medical services at WA events and attended 3149¹ events during the Reporting Period.

Industry Medical Services provides a range of services to corporate customers, including qualified and experienced medical teams for short or long-term projects; medical facility on-site resources; first aid training and supplies; and medical and safety services.

Service Stream 3: Emergency

SJWA provides emergency ambulance and patient transport services in metropolitan Perth and several regional centres. Volunteer teams provide these services in other regional areas allowing SJWA to meet the diverse needs of the communities in which team members serve, spread over 2.5 million square kilometres.

SJWA also runs the State Control Centre, which fields Triple Zero calls. The State Control Centre received 317,979² Triple Zero calls during the Reporting Period.

Patient Transport Services caters to non-emergency or 'booked' patient transport needs and is resourced by low or medium acuity crews, depending on the patient's need. Community Transport Services provides a door-to-door service to people who need to travel to community centres and medical appointments. For those requiring additional support, the service also includes a companion option in which the SJWA driver attends before, during and after the appointment to provide further peace of mind.

Corporate: People

The People stream supports all departments in the 'human' element of the Group's business.

Corporate: Enterprise Performance

The Enterprise Performance stream supports Service Streams 1, 2 and 3 and the People stream in securing

and maintaining the Group's position from the perspective of finance, IT, business intelligence/program management, property, procurement, project management, legal, risk and governance.

Office of the Group CEO

Each of the above five streams report directly to the Group CEO. The Office of the Group CEO includes the Corporate Affairs team.

People

The Group's people are integral to its purpose of serving humanity and building resilient communities in which it operates. Due to operating in complex, and at times challenging environments, the health and wellbeing of all team members is paramount throughout operations and is underpinned by the Group's values. SJWA's people have multiple avenues to access specialist external support services which are frequently promoted and easily accessible. In addition, SJWA's team members have 24/7 access to an internal wellbeing and support program who assist by providing cost free counselling and guidance.

The Group engages approximately 8,400 team members throughout the State of Western Australia (3800 paid and 4600 volunteers) and is committed to providing services with the highest standards of personal and corporate integrity.

With a dedicated People department made up of suitably qualified and experienced personnel based out of the State Office, the Group is confident that the risk of modern slavery within operations is low. The Group has established and embedded policies, procedures, and governance practices that include, but are not limited to, recruitment and selection, onboarding, visa management, grievance resolution, fitness for work, and wellbeing and support.

The Group is bound by Australian labour laws regulating wages, benefits and working conditions of paid employees and utilises Modern Awards and Enterprise Agreements where appropriate.

Supply Chain

Given the range of inputs into the operations of SJWA's divisions, the Group has a sizeable supply chain that

¹ St John WA FY25 Annual Report

² St John WA FY25 Annual Report



includes the purchase of products and services required for the delivery of operations.

The Group also procures goods and services related to a range of support business functions including office and corporate administration, building and construction, large scale inventories, contracting services, security, cleaning, catering, information technology infrastructure and uniforms. The Group's highest risk exposure to Modern Slavery is in the procurement of goods and services and the Group has improved processes, procedures, education of team members and auditing in these areas, as outlined elsewhere in this Statement.

Whilst the majority of purchasing is through suppliers based in Australia; it is acknowledged that many of the products and services the Group procures have complex global supply chains. It is also acknowledged that various procured goods are purchased through multi-tier supply sources which creates complexities in reviewing Modern Slavery risks and obtaining required information. The Group uses a risk assessment tool to identify the level of Modern Slavery risk for procurements and recommend appropriate due diligence in the selection of suppliers and terms to govern the contractual relationship. Ongoing monitoring has focussed on supplier surveys.

Operations and supply chains risk

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

On analysis of the supply chains and operations to identify modern slavery related risks, some key risk areas were noted:

Sector and industry risks

Textile production remains a high risk industry globally, with growing risks within agriculture, construction, cleaning/hospitality and some areas of manufacturing. The sectors and countries from which some key suppliers source have a high risk of modern-day slavery.

For example, SJWA procures the following:

- Fast moving consumer goods
- Electronic equipment
- Uniforms
- Cleaning services
- Construction and labour hire services

Products and services risks

Paper and medical goods are recognised as high-risk products globally and cleaning services have inherent modern slavery risks.

- A significant amount of SJWA's supply chain products are fast-moving consumer goods, that are predominantly single-use medical products. It is acknowledged that the complex global supply chains for these items are often obscured, lack transparency and have exploitative practices/conditions within them.
- Outsourced cleaning services are utilised by SJWA for each office and for operational sites. Cleaning services often have lower wages, involve manual labour, are outsourced and are frequently on a casual basis. Workers are often from migrant, low socio-economic, or culturally diverse backgrounds.

Geographic risks

Some countries have higher prevalence of modern slavery. The Global Slavery Index of 2023 of the Minderoo Foundation ranks countries based on government response to modern slavery. SJWA procures goods from countries which may present a high risk of modern slavery:

- **China:** SJWA procures medical consumables and branded items such as first aid kits, pens and promotional items.
- **India:** SJWA procures uniforms and electronics which may be manufactured in India.
- **Bangladesh:** SJWA procures uniform products that are manufactured in Bangladesh.

Risk mitigation and remediation

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

The Group Board agreed to a series of high level Environmental, Social, People and Governance (ESPG) targets which outline SJWA's commitment to, among other aims, ensuring that SJWA manages its social licence to operate by improving processes around how the organisation deals with "vulnerable people".



Our corporate strategy continued to be embedded with monthly executive meetings solely focused on measuring progress.

In addition, a monthly executive meeting focused exclusively on our Environmental, Social, People and Governance (ESPG) initiatives, including, specifically a metric on modern slavery compliance – “*Delivering on Modern Slavery Statement (MSS) commitments including all procurements to have Modern Day Slavery (MDS) stipulations in pre-qualification phases by Q4 FY 2025/26 and a 30% increase (on FY 2023/24) in the number of MDS risk-based assessments by Q4 FY 2025/26*”.

To minimise modern slavery risk in the supply chain, SJWA commenced a comprehensive “Procurement with Confidence & Agility” program, supported by the Group Chief Executive Officer. Among the initiatives were - better use of data analytics; progressing category management in procurement (a cross functional approach to managing similar areas of spend); and consolidation exercise working towards reducing the number of suppliers. The program of works will continually advance the controls and risk relating to modern slavery and form an ongoing requirement that will enable Supply Chain to allocate resources in a more timely and targeted manner in accordance with executive priorities, including encouraging suppliers to proactively address modern slavery risks. Other key focus areas for reducing risk are using more local suppliers and reducing the tiered level exposure through distributors are key focuses for reducing future risk.

During this Reporting Period, the Group focused on the following risk mitigation strategies described below and summarised in Table 1: Effectiveness Assessment.

External supplier assessment

The Group has established a modern slavery supplier survey as part of its pre-qualification in supplier tender responses, ensuring suppliers are compliant with the Act and providing risk rating levels before SJWA awards contracts.

Supplier monitoring

Whilst the supplier survey provides the initial risk assessment and actions, SJWA acknowledges that this is the first step. These surveys will form a baseline to be used for learning more about suppliers, industry and risks to enable the Group to move towards

proactive best practice in modern slavery (as reflected in the Group’s FY26 priorities below).

- Modern Slavery questionnaires are issued with every tender.
- Procurement identified and reviewed five (5) high-risk vendors within ‘Cleaning’ and ‘Construction’. All vendors were confirmed to meet our requirements.
- A total of sixteen (16) Modern Slavery questionnaires were completed and reviewed during the FY25 reporting period.

Governance and Policies

The Group’s Modern Slavery Policy provides the guiding principles on behaviours and actions required for all divisions, to ensure they are compliant with the Group’s commitment to mitigating risk of modern slavery within supply chain and operations.

More generally within the Group, the management of, and governance around, policies continued to improve during the reporting period. The Group completed a comprehensive review of the Code of Conduct and 11 directly supporting policies and group standards, as well as updates to other policies and standards. Management of policies by the Group is subject to an annual audit to ensure SJWA retain ISO9001 (Quality Management) accreditation of its ambulance operations (Perth metropolitan), first aid services and first aid training.

The Group is continuing to review and assess procurement policies and associated documentation to further refine the modern slavery framework and also business processes in respect to modern slavery, ethical procurement and upholding human rights principles in procurement. One example is in the updated Whistleblowing Policy. Enhancements include utilising an external expert agency to manage whistleblowing allegations and conduct investigations, and training of key staff.

Team Members may go into people’s homes and workplaces and have insight into patients living arrangements. The Group recognises that team members may be in a position to identify signs of modern slavery. Therefore, during the year, the Group published a Safeguarding Vulnerable People Policy which outlines measures that team members can take to protect vulnerable people from abuse, neglect, or



exploitation during their interactions with SJWA by recognising, responding to and reporting concerns.

Employment practices

The Group's robust policies and procedures for recruitment and remuneration of employees, ensure compliance with applicable employment laws and regulations. Validation of Working Rights occurs as a part of the onboarding process to eliminate risk of employees working under illegitimate circumstances.

There are regular reviews conducted of employment practices to ensure compliance with applicable Awards, Enterprise Agreements, and employment laws.

The Industrial Relations department conducts yearly audits of remuneration reviews of those employees excluded from coverage of an enterprise agreement to ensure their salaries remain in excess of any potentially applicable Award. Those employees covered by an Award or Agreement have automatic salary increases consistent with the applicable industrial instrument.

Volunteer Practices

Volunteer team members are a fundamental component of SJWA's operations. For this reason, volunteers are afforded maximum inclusivity to ensure they have working conditions (including access to uniforms, wellbeing support, training and education, corporate benefits, reward and recognition etc) which are comparable to paid team members whilst simultaneously recognising the gratuitous nature of their service.

At the time of commencement, volunteers are required to read and execute a Volunteer Expectation Agreement which makes clear their rights, roles and responsibilities as a volunteer. This agreement binds both the volunteer and SJWA. In addition, upon commencement, volunteers are required to undertake training which affirms their rights and responsibilities as a volunteer whilst also detailing their operational scope.

To ensure volunteers remain competent and confident in their scope, they receive ongoing education through SJWA's Continuing Education Program.

SJWA's priority is ensuring volunteers are supported and do not suffer any detriment from their service. For this reason, SJWA maintains a Volunteer Advocacy Team who advance any issues or concerns. In addition, the organisation pays volunteers an honorarium when they complete shifts of a certain

length and reimburses any out-of-pocket costs associated with volunteering.

Training and education of team members

Procurement education continues within the Group focusing on best practices, ethical sourcing and due diligence. A new learning module around "Accountable and Ethical Decision Making" (AEDM) was launched during the year with modules on Fraud and Corruption awareness, Gifts, Hospitality and Benefits (GHB), Conflict of Interest, Modern Slavery and Whistleblowing. This was supplemented by face-to-face training provided, on a risk assessed basis, to the finance, property and supply chain teams.

Remediation

During the Reporting Period, the Group did not receive any complaints associated with modern slavery and did not establish any remediation processes focused solely on modern slavery.

The Group has a Whistleblower Policy and has contracted with an external subject matter expert (SME) regarding whistleblowing. How to raise an incident via our whistleblowing channels is prominent in both our intranet and external website. We accommodate receiving incidents via our secure "microsite" (hosted by the external SME), telephone, email and regular mail. After the reporting period, our policy and processes were externally reviewed and reported (independently) to the Board. SJWA did not receive any disclosures of instances of modern slavery within the business.

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.

SJWA continues to recognise that knowledge sharing, including targeted training for team members, and acting, including mitigation measures where the organisation sees a risk of involvement, are vital to successfully preventing modern slavery.

The Group's actions in the reporting period have been encouraging in their effectiveness specifically in improving procurement processes and understanding Modern Slavery risk in the purchasing business units. In addition, the rollout of the AEDM training and system



(see above) demonstrated a continued commitment to, and maturity of, our practices around modern slavery.

Over the coming year, SJWA will continue to set clear expectations to support team members and suppliers to be alert to possible involvement in modern slavery and to reject it.

Key focuses for FY26 will include:

- Engage with a primary medical consumable supplier to ensure that we cover MDS requirements for St John Dental
- Enhance remediation protocols for instances where MDS statements are not evidenced for existing supply sources.
- A full review of governance documentation (including policies, procedures etc) around MDS, to ensure we remain aligned with best practice
- Incorporate a remediation guide that will assist SJWA determine the appropriate response when a report of modern slavery is made but always prioritising taking steps to correct the situation for the worker where this is possible (aligned to the United Nations Guideline Principles on Business Human Rights).
- Formalise processes by which supply chain counter parties are notified of non-compliance with MDS.
- Complete fifty (50) Modern Slavery questionnaires through procurement activities.

Legal, Risk and Governance will continue to work with Supply Chain and other business areas, to mature MDS within SJWA, including, but not limited to enhancements to Whistleblowing (including with external parties), ongoing training and education (particularly induction processes for new team members), and ensuring all elements of our MDS obligations remain best practice.

Table 1: Effectiveness assessment

Actions taken to satisfy FY25 priorities	Achieved
<p>Identify, assess and commence strategies to address the key risks for cleaning and construction arrangements, deemed to be at elevated risk of modern slavery</p> <p><i>by completing assessments of three major suppliers to SJWA in the cleaning industry and two in the building industry and all respondents satisfied the pre-requisites for supply to SJWA.</i></p>	✓
<p>Consistently apply the risk-based approach to new tenders and contracts</p> <p><i>by using SJWA contracts which incorporate modern slavery compliance or requesting that any non-compliant third party contracts are amended to include appropriate clauses where there is an assessed risk of modern slavery practices.</i></p> <p><i>Any tenderers for supply to SJWA need to satisfy prequalification criteria based on the type of goods and services they provide (SJWA will then use a risk matrix to spot red flags).</i></p>	✓
<p>Target the supplier survey to capture updates to modern slavery key risk indicators</p> <p><i>by building on the previous year and undertaking surveys of the next largest group of suppliers to SJWA so that 15 suppliers across construction, cleaning and FMCG industries were surveyed in total (a 50% increase on the number surveyed last financial year)</i></p>	✓
<p>Review and refresh the Ethical Sourcing and Modern Slavery Policy</p> <p><i>by increasing the focus on appropriate checks, due diligence, expectations on suppliers and focus on high-risk sectors</i></p>	✓
<p>Provide training for the Procurement team and Heads of Department in the Ethical Sourcing and Modern Slavery Policy</p> <p><i>by launching accountable and ethical decision-making training to team members in the higher risk areas of finance, procurement and supply chain (the training is available online to the whole organisation).</i></p>	✓
<p>Provide Accountable and Ethical Decision-Making training to key team members initially and progressively to all team members</p> <p><i>by launching accountable and ethical decision-making training to team members in the higher risk areas of finance, procurement and supply chain (the training is available online to the whole organisation).</i></p>	✓
<p>Rollout the updated Whistleblower Policy and the Safeguarding Vulnerable People Policy</p> <p><i>was achieved by publishing our Whistleblowing Policy in March 2025 and our Vulnerable People Policy in August 2024 (as part of our Code of Conduct)</i></p>	✓
<p>Roll out the internal review program for procurement and supply chain management in greater depth across the Group</p> <p><i>via a department led review based on the MDS delivery criteria outlined in this document and what has been established to date</i></p>	✓
<p>SJWA and Apollo Health Ltd to continue working together to integrate procurement and supply chain knowledge, experience and learnings to ensure continued consistency in procurement, modern slavery compliance and alignment with organisational values</p> <p><i>by UC centres being incorporated into supply chain / procurement and SJ Health purchases made through eBos online portal plus via dental providers who satisfy our requirements</i></p>	✓

Consultation

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

The majority of procurement and sourcing for the Group is conducted by SJWA. Some procurement is undertaken by Apollo Health Ltd for its St John Health Centres, primarily through a third-party supplier who source and supply healthcare, medical and pharmaceutical products.

The SJWA procurement team has worked with Apollo Health to identify and assess the level of Modern Slavery risk across the supply chain. The majority of consumables spend for Apollo Health is with EBOS Group Australia Pty Ltd (trading as EBOS Healthcare). Apollo Health successfully negotiated the inclusion of standard form Modern Slavery terms for that contract (which was finalised at the start of the FY 2025 reporting period).

Consultations have taken place with Apollo Health executive and senior managers to raise awareness and get commitment to implement more broadly the improved modern slavery processes established within SJWA for the primary health business operated by Apollo Health Ltd in the reporting period.

SJWA consulted with Apollo Health Ltd executives in the development of this Statement.

SJWA and its wholly owned subsidiary, Apollo Health Ltd, are managed and governed by the same Board of Directors, who have reviewed and approved this Modern Slavery Statement.

This Modern Slavery Statement is made in accordance with section 14 of the *Modern Slavery Act 2018* (Cth) and represents the St John WA Group Statement for the period 1 July 2024 to 30 June 2025.



Mr Monish Paul
Board Chair

27 November 2025