

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 2023 (**reporting period**) 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
- Abano Healthcare Australia Pty Ltd ACN 131 333 492 (**Abano**)

In addition, the following capitalised terms 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 manages dental centres in Australia and New Zealand and provides facilities and services to the dentists and other dental practitioners who operate from them. We provide the administrative and non-dental services that those dental practitioners need to provide patients with dental services. Normally, those dental practitioners are not our employees and, in providing dental services and doing other things, operate their own independent dental businesses.

Adams is a private company and is headquartered in Melbourne, Victoria. In addition to its headquarters, Adams Group operates support offices in Auckland and Brisbane. Adams Group operates centralised management functions from its support offices including IT and finance.

Adams Group now operates through Abano and 1300 Smiles Pty Ltd in Australia and through Lumino Dental Limited and Abano NZ Limited in New Zealand.

Adams Group is Australasia's largest provider of facilities and services to dental practitioners. In Australia it operates 118 dental clinics through Abano and 1300 Smiles, with clinics in all Australian states and also the ACT. Approximately 65 per cent of these clinics operate under the "Maven Dental" or "1300 Smiles" brands with the balance being operated under legacy brands.

Adams Group operates a further 131 dental clinics in New Zealand through its subsidiaries Lumino Dental Limited and Abano NZ Limited. 87 per cent of these clinics operate under the "Lumino The Dentists" brand.

Staff

Adams Group's operations are split roughly evenly between Australia and New Zealand and include salaried employees, employees under modern pay awards and temporary contractors. As at the end of the reporting period, there were 1,238 employees working in the Australian business and a further 938 employees working in the New Zealand business. These do not include the independent dental practitioners who receive services from Adams Group.

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 frequently reviews the efficacy of our programmes in rewarding and supporting our people.

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

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.

90% of staff in Australia are covered by modern awards and approximately 10% are paid annualised salaries in full satisfaction of the award. The nature of these government instruments significantly mitigates the risk of modern slavery within our operations. Additionally, Adams has several policies, procedures, codes of conduct, and standards that reflect our ethics and values. They guide the way we treat our employees and demonstrate our commitment to conducting business with integrity, probity, and accountability. These policies include:

- Anti-Discrimination and Equal Employment Opportunity (EEO) Policy
- Bullying Policy
- Employee Code of Conduct
- Grievance Policy
- Overtime Policy
- Work Health & Safety Systems Manual

Abano makes limited direct use of administrative support in the Philippines through an Australian outsourcing company. Abano has a formal contract with the outsourcing company and has regular and direct contact with its Philippines-based team member.

Our measures to address modern slavery risks

Our focus to date has been on our relationships with suppliers with whom we have a direct contractual relationship (i.e. "tier 1" suppliers). Due to the broad range of products that are used in our business we believe that these tier 1 suppliers are best placed to undertake detailed due diligence on their suppliers.

More than 50% of our spending on dental equipment and consumables is with companies that are reporting entities under the Modern Slavery Act. We note that our key suppliers are taking active steps to mitigate slavery risk in their supply chains.

Our other suppliers show a greater variability in their awareness of, and steps to mitigate, slavery risk within their supply chains. This is particularly evident with smaller suppliers and with New Zealand domiciled suppliers who have less regulatory impetus to improve in this area. Adams Group is considering its existing suppliers' responses to its enquiries and considering how it can work with suppliers to improve their processes and address its risk here. This may include discontinuing relationships with suppliers.

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:

Procurement

Adams Group undertakes due diligence on all new material suppliers of dental equipment and consumables, and suppliers where it considers that there may be an enhanced risk of modern slavery due to their location or industry.

Policies

Adams Group regularly reviews its key policies to ensure compliance with all applicable legislation, including employment and modern slavery laws.

Contracting

Adams Group mitigates modern slavery risk by the inclusion of appropriate clauses in material contracts and those where it considers there to be an enhanced risk, such as labour hire agreements and contracts with offshore suppliers. Those clauses require the suppliers (amongst other things) to take reasonable steps to identify, assess and address risks of modern slavery practices in their operations and supply chains.

A significant proportion of Adams Group's spending on dental equipment and consumables is on a non-contracted basis. Adams Group does not have visibility of its Tier 2 and Tier 3 suppliers when buying this dental equipment and consumables and notes that a significant proportion of dental equipment and consumables are produced in overseas jurisdictions which may have enhanced modern slavery risks.

Adams Group has updated its Supplier Code of Conduct and requires all new suppliers of dental equipment and consumables to commit to comply with this. We are engaging with existing suppliers regarding compliance. The Supplier Code of Conduct specifically references our requirements regarding our suppliers' treatment of their workers, including that they will not engage in modern slavery.

Training

Adams Group is currently reviewing the modern slavery training that it provides to senior staff and those members of staff who are involved in procurement, with the intention of making this more relevant to Adams Group's procurement scenarios.

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 Abano. It was approved by the board of directors of Adams Group Aus Holdings Pty Limited (being the principal governing body for the reporting entities) on 22 September 2023.

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 22 September 2023.

Signed:

A handwritten signature in black ink, appearing to be 'SH', with a long horizontal line extending to the right.

Simon Harle
Director of Adams Group Aus Holdings Pty Limited
22 September 2023