

Healthcare Australia's Modern Slavery Statement FY2025

For reporting period 1st of January 2025 to 31st of
December 2025

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Overview

Healthcare Australia (ACN 108 180 589) Modern Slavery Statement (the Statement) is made pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (the Act). This Statement sets out the actions and strategies to identify, assess, and address modern slavery risks across operations and supply chains for the 2025 financial year reporting period, from 1st of January 2025 to 31st of December 2025.

Apollo Holdco Pty Ltd, Healthcare Australia Pty Ltd, and all subsidiaries (together referred to as HCA) is a reporting entity for the purposes of the Act as it is a company that conducts business in Australia with a consolidated revenue of over A\$100 million during the reporting period.

As required by the Act, HCA's 2025 Modern Slavery Statement was endorsed and approved by the Chief Executive Officer on 23rd of June 2026.

Consultation

This statement is made pursuant to the Act and constitutes HCA's Modern Slavery statement in respect of the 31 December 2025 financial year. It is approved by the principal governing body of Healthcare Australia, being its Board of Directors.

The related HCA entities have the same Board of Directors, and therefore Directors of all related entities have been consulted in preparing this Modern Slavery Statement.

John Pappalardo

Chief Executive Officer, Healthcare Australia Pty Ltd

Dated: 23/06/2026



Introduction

Healthcare Australia recognizes modern slavery risk as a complex global human rights issue, and is committed to ethical operations, including limiting the risk of modern slavery occurring within its own business, and related supply chains.

Modern slavery’ describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

HCA’s understanding of modern slavery risk areas considers a number of factors and assesses inputs from a range of sources. Our approach is informed by the UN Guiding Principles on Business and Human Rights (UNGPs), the Global Slavery Index, government advice, and ongoing developments in modern slavery risks and issues both globally and in Australia.

HCA’s awareness and actions to address modern slavery are maturing, as we strengthen each reporting period.

About HCA

HCA is one of Australia’s largest healthcare providers and predominately provides clinical and support services in the healthcare industry, including the provision of services supporting community and corporate health.

At the end of FY 2025, HCA’ total workforce consisted of 8,236 people, comprising 13.1% full-time employees, 6.9% part-time employees, 79.9% casual and temporary employees, and 0.1% contractors. The majority of the casual workers engaged were clinical, support workers and other professionals, who provided services to HCA at least once during the financial year.

HCA delivers workforce solutions nationwide, with 24 offices across Australia support employers and clients in metropolitan, regional and remote areas.

HCA’s principal business activities are:

Recruitment	HCA places healthcare professionals into private and public hospitals on a short or long term or permanent basis. We also place healthcare professionals in home and residential facilities.
NDIS and Disability	HCA is a registered NDIS provider and provides customised NDIS support for eligible participants such as nursing and complex care, supported independent living and community services
Allied Health	HCA provides specialist allied health services in residential aged care, community care and NDIS.
Aged Care	HCA provides aged care services including in-home support, nursing & specialist care, family & respite, and social support care.
Corporate Health Services	HCA provides corporate health programs to workplaces including vaccinations, general health checks and ergonomic assessments.
Training and Courses	HCA delivers mandatory training, accredited qualifications and continuing professional development online and face-to-face for individuals and organisations.
Large Health Projects and Programs	HCA develops and delivers large bespoke comprehensive health programs for governments and health organisations.

Board of Directors

The Board of Directors is HCA's governing body and has responsibility for the general directions and superintendence of the business.

The Board's primary responsibilities include setting the strategic direction and financial plans, monitoring performance, ensuring effective risk management, overseeing business activities, and monitoring major strategic projects.

The Board continues to provide accountability and oversight for our modern slavery risk management approach, bearing responsibility for the review and endorsement of this statement.

The ESG Committee acts on behalf of the Board to provide independent assurance regarding the business risk, control and compliance frameworks.

The ESG Committee holds the Boards' responsibility for oversight of modern slavery risk management practices.

Policy

HCA is committed to identifying, preventing and addressing modern slavery, labour exploitation, and human rights risks across its operations and supply chains. This commitment is embedded within HCA's governance framework and supported through the organisation's certified Quality Management System (ISO 9001:2015).

HCA maintains a framework of policies and procedures designed to promote ethical business practices, responsible decision-making, and compliance with applicable legislative and regulatory requirements. The policy framework supports the identification, assessment, and management of risks related to modern slavery and human rights within business operations and supply chains.

Under the framework, all policies are subject to a comprehensive review at least every three years, or earlier where legislative, regulatory, operational, or organisational changes require an update. As part of the review and consultation process, policies are assessed to determine whether additional controls, guidance, or commitments can be incorporated to further strengthen the organisation's approach to human rights and modern slavery risk management.

The following key policies and governance documents support HCA's approach to preventing and responding to modern slavery risks:

- Code of Conduct
- Whistleblower Policy
- Modern Slavery Policy
- Enterprise Risk Management Standard

Modern Slavery Policy was recently updated to improve the policy. The policy contains definitions that help the staff to understand the terminology, responsibilities, how can be reported modern slavery issues.

Modern Slavery Policy

HCA recently reviewed and updated its Modern Slavery Policy to strengthen the organisation's commitment to preventing modern slavery and promoting respect for human rights.

The policy also details reporting mechanisms and escalation pathways to ensure actual or suspected instances of modern slavery can be reported confidentially and addressed appropriately. Through these measures, the policy promotes awareness, accountability, and a consistent approach to managing modern slavery risks throughout the organisation.

The updated policy supports employee awareness and understanding of modern slavery risks and reinforces HCA's commitment to maintaining ethical and responsible business practices throughout its operations and supply chains.

Supply chain and modern slavery risks

HCA is committed to identifying, assessing, and addressing modern slavery risks within its operations and supply chains. Modern slavery risks are managed through HCA's Enterprise Risk Management Framework, which provides a systematic approach to the identification, assessment, treatment, monitoring, and reporting of risks, including risks related to human rights and modern slavery.

The framework is supported by:

- A Risk Management Policy aligned with ISO 31000:2018 Risk Management principles, which establishes HCA's approach to risk management and defines roles, responsibilities, and accountabilities for the effective management of risks.
- Oversight by the ESG Committee, which regularly monitors and reports on the progress of ESG activities (including modern slavery) to ensure that risks are effectively managed.
- Active management and monitoring by all employees and managers throughout the year to ensure that appropriate mitigation measures are in place and risk exposures remain consistent with HCA's objectives.
- Risk management tools, guidance, awareness, programs, and training to support employees in recognizing and responding to modern slavery risks.
- Periodic review of modern slavery risks through procurement, supplier engagement, internal audits and risk assessments.

Supply Chain - Staff

HCA predominately provides human resources, with staff costs accounting for 91.56% of total expenditure.

HCA recruits healthcare practitioners including internationally qualified professionals seeking employment opportunities in Australia. The recruitment, credentialing and onboarding of healthcare practitioners are subject to strict regulatory, immigration, professional registration, and compliance requirements designed to protect workers and ensure ethical recruitment practices.

HCA has assessed these workforce recruitment activities as presenting a low risk of modern slavery due to the highly regulated nature of the Australian healthcare sector, and the controls in place to verify employment eligibility, professional registration, qualifications and compliance with workplace laws.

In addition, HCA has implemented a range of measures to further mitigate the risk of modern slavery and labour exploitation within its recruitment and employment practices.

These measures include:

Vetting	All HCA staff are recruited through HCA's stringent recruitment programs and are vetted through HCA Australia's compliance and competency standards, including all international staff.
Visa controls	International visa holders are vetted and approved for work in Australia by the Department of Home Affairs to ensure compliance with their visa terms and conditions. HCA ensures that no employees are indentured or restricted and the only restrictions that may exist are imposed by the Department of Home Affairs on visa workers.
Contracts	All staff are employed under contracts, which are based on awards or industry requirements under the Fair Work Act 2009.
Policies	Working standards and conduct are supported by HCA's Code of Conduct, and HCA's Whistleblower Policy which supports anonymous and protected reporting of any breaches.

Supply Chain - Other goods and services

Goods make up a minority of HCA's total expenditure (6.07%). This is comprised of operating expenses (5.63%), Consumables (0.23%) and Uniforms (0.21%). The majority being 91.56% of total expenditure is on operating expenses that include Staff (91.56%), Marketing & Communications (1.22%), and Facilities and training (1.16%).

HCA sources the majority of goods and services from Australian providers and suppliers, with only minimal expenditure being attributed to international marketing spend. This spend is with large reputable multinational corporations.

HCA continues to apply a risk-based approach to supplier engagement and monitoring to identify and address any potential modern slavery risks.

Risks of Modern Slavery Practices in the Operations and Supply Chains

HCA acknowledge that while our suppliers are based in Australia, some of these suppliers may have complex supply chains and source inputs from higher-risk geographies. We also recognise that Australia is not immune to modern slavery risks and are committed to also monitoring our onshore suppliers for risks.

Given the limited visibility beyond Tier 1 suppliers, HCA recognises the importance of understanding its relationship to potential modern slavery risks throughout its supply chain. Consistent with the United Nations Guiding Principles on Business and Human Rights (UNGPs), HCA seeks to identify whether its activities may cause, contribute to, or be directly linked to modern slavery practices and to take appropriate action to prevent, mitigate, and address such risks.

In 2025, HCA reviewed and strengthened its modern slavery compliance framework to enhance supplier due diligence, improve supply chain visibility, and support the effective identification and management of modern slavery risks. **Key initiatives included:**

- Reviewing and updating the procurement policy to incorporate modern slavery requirements
- Introducing a purchase order requirement for ICT suppliers, identified as higher risk supplier category, to strengthen supplier accountability and reinforce obligations relating to ethical business practices, human rights and modern slavery risk.
- Continuing the implementation of the Modern Slavery Supplier Questionnaire as part of the supplier onboarding process for suppliers operating in higher-risk industries, including electronics, cleaning services, and clothing and textiles.
- Assessing supplier questionnaire responses to evaluate modern slavery risk exposure. Suppliers are required to provide information regarding the countries in which they operate, as well as the policies, procedures, and controls they have in place to prevent and manage modern slavery risks. Responses are maintained by the procurement team and reviewed by designated Quality Coordinators to assess supplier risk profiles and support compliance with modern slavery obligations.
- Continuing the delivery of online training to all employees to increase awareness of modern slavery, human rights risks, reporting obligations and individual responsibilities in identifying and managing potential risks.

Summary of Actions taken to address modern slavery risks

HCA continues to improve the mitigation of modern slavery risks within its operations and supply chain. The ESG Committee provides ongoing oversight of modern slavery risk management and monitors the implementation and effectiveness of initiatives designed to prevent, detect, and address modern slavery risks across the organisation.

This includes:

- The ESG Committee meeting bimonthly to oversee and address modern slavery risks.
- Updating the supplier register to incorporate suppliers associated with newly acquired entities and new business projects, enabling these suppliers to be assessed and invited to complete the Modern Slavery Supplier Questionnaire.
- Delivering Modern Slavery awareness training to employees who joined the organisation through acquisitions completed during 2025, ensuring alignment with HCA's policies, expectations, and reporting requirements.
- Monitoring and promoting completion of the mandatory online Modern Slavery training module across the workforce to increase awareness of modern slavery risks, reporting mechanisms. The current participation rate is 72.40%, with ongoing efforts to improve completion rates.
- Continuing supplier due diligence activities to improve supply chain visibility and support the identification and management of potential modern slavery risks.

Future Actions

HCA will continue to strengthen its approach to identifying, managing, and mitigating modern slavery risks across its operations and supply chains.

Planned activities for the coming reporting period include:

- Monitoring training completion rates to maintain a high level of participation, with a target completion rate of at least 90% for relevant staff and suppliers.
- Continuing the review of modern slavery risk controls to assess their effectiveness and identify opportunities for ongoing improvement. Continue checking in regularly with suppliers to see how they are progressing any actions to which they have committed.
- Utilising the ESG Committee to oversee and monitor progress against established actions, ensuring accountability and effective governance of modern slavery initiatives.
- Continuing to embed modern slavery considerations into procurement and supplier management practices to strengthen the organisation's ability to identify and address potential risks within the supply chain.

Effectiveness

As part of our commitment to eliminating all forms of modern slavery from our operations and supply chains, we regularly review and monitor the effectiveness of our actions to identify, prevent, mitigate, and address actual or potential modern slavery risks and adverse human rights impacts.

During the 2025 reporting period, no incidents, whistleblower disclosures, or complaints alleging breaches of the Modern Slavery Act were reported through our established reporting channels. While this is encouraging, we recognise that the absence of reported incidents does not necessarily indicate the absence of modern slavery risks or occurrences. We remain committed to ensuring that our incident management and whistleblowing mechanisms are accessible, trusted, and effective for all stakeholders.

The implementation and progress of the Modern Slavery Improvement Plan are regularly monitored by the ESG Committee. The Committee reviews the status and effectiveness of planned actions, identifies opportunities for improvement, and provides oversight to ensure ongoing accountability. Feedback and recommendations from Committee members are incorporated into decision-making processes and inform the development of future initiatives aimed at strengthening our modern slavery risk management framework.