

# MODERN SLAVERY STATEMENT 2026



# MESSAGE FROM THE CEO

RetireAustralia continues to strengthen its approach to identifying and addressing modern slavery risks across our operations and supply chains. As a developer, owner and operator of retirement communities, we recognise our responsibility to uphold high standards of integrity, respect and accountability. These standards guide all aspects of our business.

We are also committed to safeguarding the rights and wellbeing of all those connected to our business — especially our people and those working within our supply chains — as part of our ongoing efforts to prevent modern slavery.

Over the past year, we have advanced the foundations established through our three year continuous improvement plan, embedding modern slavery considerations more deeply into our governance, systems and day to day operations. Oversight of these risks has matured, supported by increased engagement with the Executive Leadership Team and growing awareness at Board and Audit Committee levels. This reflects meaningful progress in integrating modern slavery into our broader risk and governance framework.

During the reporting period, our focus has been on strengthening supplier oversight and building organisational awareness. Key initiatives included:

- Enhancing supplier due diligence and accountability through targeted reviews and the inclusion of modern slavery KPIs in all new supplier contracts.
- Progressing the consolidation and formalisation of our supply chain through structured procurement processes and panels, improving management of higher risk service categories.
- Increasing employee awareness through targeted training and accessible materials across our villages and offices.

This Statement outlines the steps we are taking to identify, prevent, measure, mitigate, and address modern slavery risks. We recognise that education, transparency and accountability are essential to driving meaningful change, and we will continue to build capability across our business, strengthening awareness and responsibility within our own workforce and deepening engagement with suppliers.

Addressing modern slavery is an ongoing responsibility requiring sustained focus and continuous improvement. To the best of my knowledge, the information in this Statement is accurate, complete and reflective of our current practices and organisational commitment.



*Brett*

**Dr Brett Robinson**

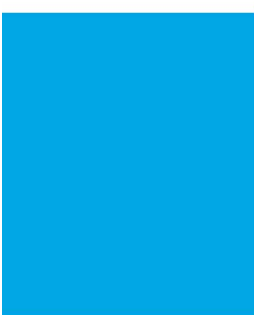
Chief Executive Officer



# Mandatory criteria

Set out below is a schedule of the mandatory information criteria for a Modern Slavery Statement under the *Modern Slavery Act 2018* (Cth) (the **Act**) and the location of the relevant information in this statement.

| Criteria                                                                                                                                                                                           | Reference in the Act | Location in Statement |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-----------------------|
| Identify reporting entity or entities covered by the Statement                                                                                                                                     | s.16(1)(a)           | Section 2             |
| Describe the structure, operations and supply chains of the reporting entity                                                                                                                       | s.16(1)(b)           | Sections 2,4,5        |
| Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls                            | s.16(1)(c)           | Section 6             |
| Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes | s.16(1)(d)           | Section 7             |
| Describe how the reporting entity assesses the effectiveness of such actions                                                                                                                       | s.16(1)(e)           | Section 7, 8          |
| Describe the process of consultation with any entities the reporting entity owns or controls and in the case of a reporting entity covered by section 14 the entity giving the statement           | s.16(1)(f)           | Section 3             |
| Include any other relevant information                                                                                                                                                             | s.16(1)(g)           | Sections 1, 8         |
| Details of approval of relevant principal governing bodies                                                                                                                                         | s.16(2)(b)           | Section 2             |



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# 1

# INTRODUCTION



# Introduction

## Our values, Code of Conduct and policies

At RetireAustralia, our values, Code of Conduct and policies set the foundation for the way we work and interact with others. They establish the expectations and behaviours required of all individuals working for, or alongside, the organisation and guide decision-making across all business activities.

RetireAustralia is committed to conducting business responsibly, ethically and transparently. This commitment extends to the management of our workforce, including employees (workers), contractors, volunteers and consultants, as well as to the actions we take to identify and reduce modern slavery risks within our operations and supply chain activities.

We have systems in place to ensure our workers, volunteers and contractors are made aware of the legal, ethical and policy obligations associated with their role. They are also responsible for raising concerns regarding any suspected breaches of legislation, organisational policies or the Code of Conduct.

Executives and leaders are responsible for setting the tone from the top and fostering a culture where ethical behaviour, accountability and compliance are embedded into everyday practices.

Mandatory annual compliance training relating to key policies and procedures is facilitated through our online learning platform. The system enables leaders to monitor completion rates and follow up on any overdue or outstanding training requirements within their teams.

### Our values

Our values shape how we operate and the standards to which we hold ourselves accountable. They are:



Through **Leadership**, we support our workers, volunteers and suppliers by building awareness of obligations under the Act and encouraging shared accountability in meeting these responsibilities.

Living our value of **One Team**, we work closely with employees and supply chain partners to identify, assess and respond to potential modern slavery risks.

Acting with **Integrity**, we seek to ensure that concerns relating to unethical conduct or human rights risks are appropriately addressed and are not overlooked in favour of commercial outcomes.

We demonstrate **Respect** by recognising the rights, dignity and wellbeing of people across our workplaces, communities and supply chains.

Our commitment to **Excellence** drives ongoing efforts to strengthen how we identify, monitor and mitigate modern slavery risks, while continuing to progress the Continuous Improvement Action Plan outlined in Section 8.

Through the use of value shares and nominations at the commencement of regular meetings, morning teas and information sessions, our leaders regularly enforce the importance of our ethics in our everyday decision making.

## Code of Conduct

The Code of Conduct sets out the standards expected in relation to behaviour, communication and decision-making across RetireAustralia. It supports a consistent and accountable approach to ethical conduct and compliance obligations throughout the organisation.

As part of our Continuous Improvement Action Plan, the Code is currently being revised to incorporate the United Nations Guiding Principles on Business and Human Rights. All employees, Board members, Executive Leadership Team members, consultants and contractors receive the Code as part of their onboarding and are required to complete annual refresher training.

## Policies

RetireAustralia maintains a range of policies that support ethical, compliant and responsible business practices. These include the Privacy Policy, Anti-Discrimination Policy, Code of Conduct, Diversity Policy, Employee Relations Policy, Equal Employment Opportunity Policy, Prevention of Harassment and Bullying Policy, Recruitment, Selection and Appointment Policy, Prevention of Sexual Harassment Policy, Whistleblower Policy and Procurement Policy.

These policies define responsibilities, expectations and governance requirements across the organisation and are reviewed annually to ensure they remain current and aligned with regulatory obligations and industry best practice.

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# ABOUT RETIREAUSTRALIA



# About RetireAustralia

In accordance with the *Modern Slavery Act*, RA (Holdings) 2014 Pty Limited ACN 603 289 792 (**RetireAustralia**), and its wholly owned subsidiary, RA 2014 Pty Limited, with their registered office at Level 4, 200 Mary Street, Brisbane, Queensland 4000, Australia, jointly issue this Statement.

The following list of entities operating in Queensland, New South Wales and South Australia make up the RetireAustralia Group.

## Entities comprising the RetireAustralia Group

|                                                        |                                                  |
|--------------------------------------------------------|--------------------------------------------------|
| 30 Andrew Avenue Pty Ltd <sup>2</sup>                  | Lifestyle Care Services Pty Limited              |
| Aberdeen (N.S.W.) Pty Limited                          | Lifestyle Consolidated Pty Limited               |
| Barton Vale Pty Limited                                | Lifestyle Holdings (NSW) Pty Limited             |
| Bartonvale Consolidated Pty Limited                    | Lifestyle Management Services Pty Limited        |
| Bartonvale Holdings (SA) Pty Limited                   | Lifestyle Property Services Pty Limited          |
| Bartonvale Lodge Pty Limited                           | Lincoln Grove Estate Partnership                 |
| Boambee Gardens – Coffs Harbour Pty Limited            | Lincoln Grove Estate Pty Limited                 |
| Boambee Gardens Estate Partnership                     | Manor Group Consolidated Pty Limited             |
| Carlyle Gardens Retirement Village Bargara Pty Limited | Manor Group Holdings (QLD) Pty Limited           |
| Coull Trust 1                                          | MEP Trust <sup>3</sup>                           |
| Drayton Villas Pty Limited                             | Murray Gardens Estate Unit Trust                 |
| Errol Investments Pty Limited                          | Murray Gardens Retirement Estate Pty Limited     |
| Forresters Beach Partnership                           | Noyea Operations Pty Limited                     |
| Gannon Consolidated Pty Limited                        | Noyea Pty Limited                                |
| Gannon Estates Pty Limited                             | Palm Gardens Consolidated Pty Limited            |
| Gannon Holdings (SA) Pty Limited                       | Palm Gardens Holdings (SA) Pty Limited           |
| Gannon Retirement Services Pty Limited                 | Quantivale Pty Limited                           |
| Gannon Retirement Trust                                | RA (Holdings) 2014 Pty Limited                   |
| Glengara Unit Trust                                    | RA 2014 Pty Limited                              |
| Glengara Village Pty Limited                           | Retire Australia (Ashgrove) Pty Ltd              |
| Glengowrie Estate Pty Limited                          | Retire Australia (Burleigh) Pty Ltd              |
| Glengowrie Estate Unit Trust                           | Retire Australia (Lutwyche) Pty Ltd              |
| Hatway Holdings Pty Limited                            | Retire Australia (Palm Gardens) Pty Limited      |
| Krogate Management Pty Limited                         | Retire Australia (Palm Gardens) Unit Trust       |
| Laurels Estate Partnership                             | Retire Australia (Palm Gardens) Unit Trust No. 2 |

|                                                |                                                  |
|------------------------------------------------|--------------------------------------------------|
| Retire Australia (Tarragindi) Pty Ltd          | Riverina Gums Settlement                         |
| Retire Australia (Yeronga) Pty Ltd             | Scarborough Estate Trust                         |
| Retire Australia Care and Services Pty Ltd     | Scarborough Mews Estate Pty Limited              |
| Retire Australia Finance Pty Ltd               | Spring Grove Estate Pty Limited                  |
| Retire Australia (Graceville) Pty Ltd          | Spring Grove Partnership                         |
| Retire Australia Management No. 2 Pty Limited  | Stevens Holdings Trust <sup>1</sup>              |
| Retire Australia Management Pty Limited        | Stevens Nominees (Sydney) Trust                  |
| Retire Australia Sales (QLD) Pty Limited       | Tarragal Glen Retirement Village II Pty Limited  |
| Retire Australia Tarragindi Trust <sup>2</sup> | Tarragal Glen Retirement Village III Pty Limited |
| Retire Australia Unit Trust No. 3              | Tarragal Glen Retirement Village Pty             |
| Retire Australia Unit Trust No. 4              | Tea Tree Gardens Holdings Pty Limited            |
| Retire Australia Unit Trust No. 5              | The Glen Group (NSW) Pty Limited                 |
| Retire Australia Unit Trust No. 6              | The Manor Group Pty Limited                      |
| Retire Australia Unit Trust No. 7              | Tincture Press Pty Limited                       |
| Retire Australia Unit Trust No. 8              | Torrens Grove Partnership                        |
| Retire Australia Unit Trust No. 9              | Ultimate Staff Suppliers Pty Limited             |
| Retire Australia Unit Trust No. 10             | Wellington Manor Pty Limited                     |
| Retire Australia Unit Trust No. 11             | Wood Glen Retirement Village Pty Limited         |
| Retire Australia Unit Trust No. 12             | Wytown Trust <sup>1</sup>                        |
| RetireAustralia (Lane Cove) Pty Ltd            | Yeronga Heart Pty Ltd <sup>2</sup>               |
| Riverina Gums Estate Pty Limited               |                                                  |

<sup>1</sup> No equity is held in these entities, and all beneficial rights are attributable to the RetireAustralia Group.

<sup>2</sup> These entities are joint ventures and or the RetireAustralia Group owns less than 100%.

<sup>3</sup> This entity has an independent trustee.

RA (Holdings) 2014 Pty Ltd & RA 2014 Pty Ltd have a consolidated revenue in excess of \$100M. No other entity in the RetireAustralia Group has consolidated revenue of over \$100M.

In 2025, RetireAustralia was purchased by Invesco Real Estate.

RetireAustralia and its subsidiaries are governed by a board of non-executive directors with expertise spanning healthcare, property development, corporate finance and business development. We currently manage 30 retirement villages with over 4,400 homes across New South Wales, Queensland and South Australia. We directly employ over 620 workers across these locations.

# 3

## CONSULTATION



# Consultation

RetireAustralia continues to manage and oversee the activities of the entities it owns or controls, as detailed in Part 2 of this Statement. These entities are largely wholly owned subsidiaries operating within an integrated governance structure, with shared management responsibilities across the group. Oversight of governance, operational and enterprise risks is maintained through board and audit committee processes, together with broader management and governance forums involving RetireAustralia and representatives of these entities.

Although a separate formal consultation process with these entities, including partnerships, was not undertaken specifically in connection with the preparation of this Statement, their business activities and supply chain arrangements operate in conjunction with those of RetireAustralia. Consequently, the initiatives, controls and mitigation measures outlined throughout this Statement are intended to apply across the broader group.

RetireAustralia also continues to embed consideration of modern slavery risks within operational and procurement practices. Risk identification and mitigation activities are considered on an ongoing basis through procurement induction sessions and regular state-based care, operations and sales meetings.

# 4

## OUR OPERATIONS

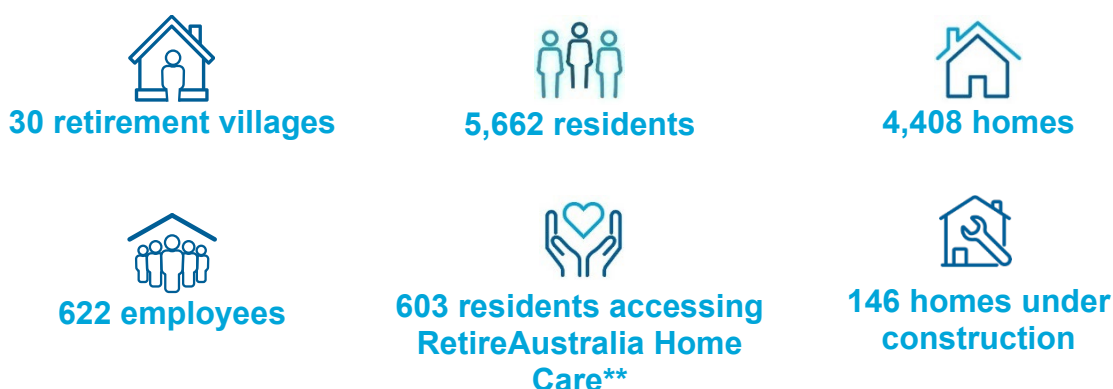


# Our operations

RetireAustralia is a leading private owner, operator and developer of retirement villages in Australia. Our core business is to develop, own and operate retirement communities for older Australians and to provide integrated living, care and support options within those communities.

As of 31 March 2026, operated 30 retirement villages across New South Wales, Queensland and South Australia, with over 5600 residents, over 4,400 homes and more than 620 employees.

*Table: Overview of our core operations\**



\* As of 31 March 2026

\*\*This includes fee for service and government funded RA home care customers

Our operations span three interconnected areas:

**Retirement village operations.** We operate retirement communities across metropolitan, coastal and regional locations in Queensland, New South Wales and South Australia. These communities provide independent living and, depending on location, access to Support at Home services and on-site higher acuity care facilities - serviced apartments, care apartments and care hubs.

**Development, refurbishment and resale.** We refurbish and resell homes within established villages and develop new homes and communities. During the financial year ending 31 March 2026, we refurbished and resold 368 units and completed the sale of 68 new units.

**Care and support services.** We operate RetireAustralia Support at Home services (Retire Australia Care and Services Pty Ltd), providing home care services exclusively to residents in our villages. Services are either funded by the government Support at Home Program or fee-for-service.

## Our governance framework

RetireAustralia is governed by a board of non-executive directors with expertise spanning healthcare, property development, corporate finance and business development. The board is supported by the Audit Committee, Clinical and Care Governance Committee, and Remuneration Committee. Executive accountability sits across the functions of Care and Operations, Culture and Strategy, Information and Technology, Development and Acquisitions, Finance, and Sales, Marketing and Communication.

Most of our retirement villages also have a resident committee, and we work closely with residents' families and advocates. We also run Consumer Advisory Forums for residents receiving care and support services from us.

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# OUR SUPPLY CHAIN



# Our supply chain

Our supply chain comprises a broad range of suppliers supporting the development, operation, maintenance and management of retirement living communities across Australia.

This includes a broad range of suppliers, the majority of which are engaged under formal contractual arrangements, ranging from large national organisations to smaller local businesses and trade-based contractors. Each supplier type presents different opportunities and challenges in relation to modern slavery risk management, governance capability and supply chain oversight. Larger national suppliers often have greater awareness of modern slavery risks, together with more established governance frameworks, resources and compliance systems to support risk management activities. In contrast, smaller local suppliers play an important role in supporting local communities and maintaining the individual character and connection to community within our villages, although they may have more limited resources, governance capability or visibility over their own supply chains and sourcing practices.

During the reporting period, we engaged suppliers across categories including construction, refurbishment, facilities management services, home care services, food products, utilities, technology, marketing, recruitment, travel, uniforms and professional consulting services. Based on total supplier expenditure of approximately \$231 million, the largest areas of spend related to construction activities (66%) and refurbishments (17%), followed by facilities management services (5%).

The majority of our supplier expenditure relates to suppliers operating within Australia. We also engage a limited number of overseas suppliers, primarily associated with software, technology and consulting-related services. Foreign supplier expenditure represented a very small proportion of overall organisational spend during the reporting period.

To support supplier oversight and compliance management, RetireAustralia utilises onboarding and compliance processes through ComplyFlow, together with contractual controls embedded within its procurement and supplier management framework. These processes assist RetireAustralia in maintaining visibility over supplier engagement, contractor compliance requirements and workforce-related obligations across various areas of the supply chain.

The table below provides a snapshot of RetireAustralia's supply chain.

| Supply Chain Area        | Summary                                                                 |
|--------------------------|-------------------------------------------------------------------------|
| Total procurement spend  | Approximately \$231 million                                             |
| Primary spend categories | Construction, Refurbishments and Facilities Management services         |
| Supplier types           | National suppliers, local businesses, contractors and service providers |

|                              |                                                                                                                  |
|------------------------------|------------------------------------------------------------------------------------------------------------------|
| Geographic spread            | Metropolitan and regional New South Wales, South Australia and Queensland                                        |
| Foreign supplier spend       | Approximately \$165,000                                                                                          |
| Number of foreign suppliers  | 8                                                                                                                |
| Key contracting frameworks   | Preferred Supplier Panels under Master Goods and Services Agreements                                             |
| Supplier compliance platform | ComplyFlow                                                                                                       |
| Key services procured        | Construction, refurbishment, maintenance, healthcare, utilities, recruitment, cleaning and professional services |
| Key goods procured           | Fixtures and Fittings, IT hardware, food products, office products                                               |

# 6

# MODERN SLAVERY RISKS

IN OPERATIONS &  
SUPPLY CHAIN



# Modern Slavery risks in operations and supply chain

We recognise that modern slavery risks can arise across a range of industries and supply chains. While the risk within our direct operations is considered relatively low due to our Australian-based and predominantly directly employed workforce, some areas of our supply chain and outsourced services may present a higher risk exposure.

## Our operations

RetireAustralia did not identify any instances of modern slavery within its operations during the reporting period.

We acknowledge that certain members of our workforce may face increased vulnerability to exploitation. As of 31 May 2026, our workforce included approximately 102 visa holders, 203 part-time employees and 143 casual employees. RetireAustralia remains committed to safeguarding all workers and minimising the risk of modern slavery practices within our operations through a range of preventative measures, including:

- Adhering to all relevant Australian employment, industrial relations and human rights legislation.
- Ensuring all workers are engaged through formal employment or contractual arrangements.
- Applying comprehensive internal policies, frameworks and workplace practices  
Providing workers with information regarding their workplace rights and access to reporting and grievance mechanisms.
- Delivering mandatory annual compliance refresher training for team members  
Completing annual remuneration reviews to confirm alignment with legislative and award obligations.
- Undertaking onboarding due diligence processes, including verification of identity and legal working rights for all new employees.
- Conducting quarterly Visa Entitlement Verification Online (VEVO) audits to monitor compliance with visa conditions and right-to-work requirements.
- Maintaining strong payroll governance processes, including fortnightly reconciliation of timesheets and wage records, with any discrepancies investigated and resolved promptly.

## Our supply chains

RetireAustralia's operations rely on a diverse and multi-layered supply chain to support the delivery of retirement living, care and corporate services across its portfolio.

A significant proportion of our procurement expenditure during the reporting period related to construction, refurbishment and facilities management activities, reflecting the operational and capital works requirements of the organisation. Additional procurement categories included marketing, consultants, home care services, food products, utilities, recruitment and IT software and hardware. While these categories represented a smaller proportion of

expenditure, they continued to be managed through our procurement framework and supplier due diligence processes.

RetireAustralia recognises that modern slavery risks are more likely to arise within sectors involving vulnerable workforces, labour hire practices, manufacturing supply chains and extensive subcontracting structures. While larger national suppliers may provide broader operational capability and established governance frameworks, they can also present increased risks associated with complex subcontracting arrangements and reduced visibility across extended supply chains. To assist in mitigating these risks, RetireAustralia's contractual arrangements require suppliers to obtain written consent prior to subcontracting services.

Accordingly, heightened attention continued to be given to higher-risk procurement categories including construction, facilities management, recruitment, catering and cleaning services. As part of its supplier management framework, RetireAustralia continued to require suppliers to comply with contractual obligations relating to ethical employment practices, lawful work rights, workplace laws and the prohibition of forced labour, child labour and exploitative practices.

Our supplier agreements incorporate performance measures relating to modern slavery risk management, which are assessed annually as a minimum. These measures include requirements for suppliers to maintain documented evidence of legal work rights for all workers prior to commencing work, ensure workers are paid at or above applicable Award or enterprise agreement rates, pay workers through traceable banking methods and, where relevant, identify the country of origin for higher-risk materials.

Suppliers operating within higher-risk categories were also subject to additional engagement and monitoring activities, including targeted due diligence, supplier questionnaires, compliance reviews and ongoing supplier performance management processes.

RetireAustralia also continued to strengthen transparency and supplier awareness through the publication of procurement information, policies, the Supplier Code of Conduct and grievance reporting pathways on its website and through signage displayed in the village staff common areas. These measures support supplier understanding of RetireAustralia's expectations regarding ethical conduct, human rights and modern slavery risk management across its supply chain.

During the reporting period, RetireAustralia continued to monitor payment practices and supplier engagement processes to support the fair and responsible treatment of suppliers, particularly small businesses. RetireAustralia's Payment Times Reporting submissions demonstrated that 93.10% of small business invoices were paid within 30 days, with an average payment time of 16.05 days and a median payment time of 14 days. RetireAustralia considers fair payment practices to be an important component of responsible procurement and supplier sustainability, particularly for smaller suppliers who may otherwise be vulnerable to financial pressure or exploitative labour practices.

Since implementing the ComplyFlow contractor compliance platform in 2024, RetireAustralia has continued to utilise the system to support supplier due diligence and modern slavery risk monitoring activities across its supply chain. Suppliers must complete the onboarding process by registering with ComplyFlow. As part of the registration process, suppliers are required to confirm via a declaration, that they agree to comply with the *Modern Slavery Act*.

During FY26, 465 declarations from suppliers were reviewed, with the results indicating varying levels of maturity in relation to modern slavery governance and risk management practices. While a number of suppliers had implemented formal modern slavery policies, grievance mechanisms, workforce training and supplier monitoring processes, many smaller suppliers had not formalised these measures. The review also identified that only a small number of suppliers considered their services to operate within higher-risk modern slavery sectors. The findings have been used to inform ongoing supplier engagement, education initiatives and risk-based monitoring activities.

## Supplier case study: Managing risk in the aged care labour hire sector with Shine Nursing Agency

Shine Nursing Agency provides services to RetireAustralia via a Brokerage Agreement and are a panellist on the RetireAustralia Support at Home panel of suppliers.

Operating within the healthcare staffing sector, Shine Nursing Agency recognises that labour hire and temporary workforce arrangements can present elevated modern slavery risks, particularly where vulnerable workers, recruitment practices, or indirect supply chains are involved. While the organisation is not required to report under the *Modern Slavery Act 2018* (Cth), it has voluntarily implemented measures aligned with the objectives of the Act to strengthen ethical labour practices and support the prevention of worker exploitation across its operations.

The organisation has embedded modern slavery risk management into its operational framework through the implementation of a formal Modern Slavery Policy, supported by employment screening processes, right-to-work verification checks, and ongoing monitoring of employment conditions. All workers are engaged under formal employment arrangements designed to ensure lawful remuneration, fair treatment, and compliance with applicable workplace and labour hire obligations.

Recognising that awareness and early identification are critical in preventing exploitation, Shine Nursing Agency has also invested in staff education and awareness initiatives to assist employees in identifying indicators of modern slavery, including deceptive recruitment practices, wage withholding, excessive unpaid overtime, coercion, and other forms of exploitative conduct. Confidential reporting mechanisms are available to workers and staff to encourage the reporting of concerns in a safe and transparent environment.

As part of its ongoing commitment to continuous improvement, the organisation undertakes regular reviews of its operations and supplier relationships to identify and assess potential modern slavery risks. This includes due diligence activities focused on ethical standards, workplace practices, and compliance obligations across the supply chain. The organisation acknowledges that visibility across multi-tier supply chains and temporary workforce arrangements can present challenges within the healthcare staffing industry and that maintaining effective oversight requires ongoing vigilance and active management.

To date, Shine Nursing Agency has not identified any confirmed incidents of modern slavery within its operations. The organisation attributes this to its proactive focus on prevention through governance measures, workforce screening, training, due diligence, and accessible reporting channels. This approach demonstrates how smaller organisations can play a meaningful role in addressing modern slavery risks by embedding ethical labour practices and promoting accountability throughout their operations and business relationships.

# 7

## ACTIONS TAKEN & EFFECTIVENESS



# Actions taken and effectiveness

During the reporting period, RetireAustralia continued to strengthen modern slavery controls across its procurement and supplier management activities. This included the continued use of contractual obligations requiring compliance with workplace laws, legal work rights, ethical employment practices and the prohibition of forced labour, child labour and other exploitative practices. RetireAustralia also continued to embed modern slavery clauses and references to the *Modern Slavery Act 2018* (Cth) across its precedent agreements and supplier contracting frameworks.

RetireAustralia undertook supplier engagement and due diligence activities across selected higher-risk and high-spend suppliers, including supplier questionnaires, compliance reviews and ongoing monitoring processes. These activities were used to support improved visibility of supplier practices and identify areas requiring further engagement or monitoring.

RetireAustralia also continued to maintain supplier onboarding and contractor compliance processes through ComplyFlow, with the findings continuing to inform us on our strengths and weaknesses and what actions or improvements are needed to support ongoing supplier engagement, supplier education and risk-based monitoring activities.

The table below outlines a number of the key initiatives undertaken during FY26, together with the intended outcomes and effectiveness of those activities.

| Focus area                                   | Actions undertaken                                                                                                                                                                               | Intended outcome / effectiveness                                                                                                         |
|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Supplier engagement and due diligence</b> | Undertook a supplier case study with Shine Nursing Agency, a supplier operating within a higher-risk labour hire sector                                                                          | Improved understanding of supplier controls, labour practices and potential modern slavery indicators within higher-risk service sectors |
| <b>Procurement and supplier oversight</b>    | Continued consolidation and formalisation of supplier arrangements through procurement processes and panel arrangements, including the Support at Home and Facilities Management Panel           | Strengthened oversight of supplier practices and reduced reliance on informal supplier engagements                                       |
| <b>Supplier contract management</b>          | Introduced modern slavery-related KPIs into new supplier contracts, including requirements relating to legal work rights, award-compliant wages, traceable payment methods and identification of | Established clearer supplier expectations and strengthened ongoing supplier accountability and monitoring                                |

|                                                |                                                                                                                                                                                     |                                                                                                                                     |
|------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
|                                                | country of origin for higher-risk materials                                                                                                                                         |                                                                                                                                     |
| <b>Higher-risk supplier categories</b>         | Continued procurement and contractor management activities across higher-risk categories including facilities management, catering, recruitment and information technology services | Improved visibility of labour practices and supported ongoing due diligence across higher-risk sectors                              |
| <b>Training and awareness</b>                  | Delivered modern slavery awareness training across operational teams and employees involved in procurement and supplier engagement activities                                       | Improved staff awareness of modern slavery risks, escalation pathways and reporting obligations                                     |
| <b>Workforce awareness</b>                     | Developed and displayed modern slavery awareness signage (and fact sheet) and reporting information across villages and staff common areas                                          | Increased visibility of reporting pathways and supported workforce awareness and early identification of potential concerns         |
| <b>Governance and reporting</b>                | Provided updates to the Audit Committee regarding progress of the Modern Slavery action plan and preparation of the FY26 Modern Slavery Statement                                   | Supported Board and Executive oversight of modern slavery governance and reporting obligations                                      |
| <b>Policies and governance</b>                 | Reviewed and updated governance policies, including the Whistleblower Policy                                                                                                        | Strengthened alignment with ethical conduct expectations and human rights principles                                                |
| <b>Supplier transparency and communication</b> | Enhanced the procurement section of RetireAustralia's website to include procurement information, policies, the Supplier Code of Conduct and grievance pathways                     | Improved supplier awareness, accessibility of information and transparency across the supply chain                                  |
| <b>Payment practices</b>                       | Continued monitoring supplier payment practices through the Payment Times Reporting Scheme                                                                                          | Supported responsible procurement practices and supplier sustainability, with 94.20% of small business invoices paid within 30 days |

RetireAustralia considers these activities to have strengthened supplier oversight, procurement governance, supplier awareness and internal capability across areas of the business and supply chain considered to present elevated modern slavery risks.

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# LOOKING AHEAD



# Looking ahead

In RetireAustralia's previous Modern Slavery Statement, a few initiatives were identified under the "Looking Forward" section as part of a broader three-year continuous improvement approach to strengthening the identification, assessment and management of modern slavery risks across the business and its supply chains. During the reporting period, RetireAustralia completed and progressed a number of these initiatives (as outlined in Section 7), while recognising that several actions remain ongoing and will continue to be developed over the remaining period of the plan.

RetireAustralia recognises that managing modern slavery risks requires an ongoing and evolving approach across governance, procurement, supplier engagement and workforce practices. The initiatives outlined below represent key focus areas that RetireAustralia will continue to progress as part of its ongoing modern slavery risk management framework.

| Focus area                                   | Continuous improvement initiatives                                                                                                                                                     | Intended focus / outcome                                                                                |
|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| <b>Governance and accountability</b>         | Continue strengthening governance oversight of modern slavery and ESG-related matters, including consideration of governance structures, Board reporting and executive accountability  | Support clear governance accountability and oversight of modern slavery risks and reporting obligations |
| <b>Supplier engagement and due diligence</b> | Continue supplier engagement, supplier mapping and targeted due diligence activities across higher-risk supplier categories, including use of external risk analysis and mapping tools | Improve visibility and understanding of higher-risk supply chains and supplier controls                 |
| <b>Procurement and supplier oversight</b>    | Continue formalisation and consolidation of supplier arrangements through procurement processes, contractual controls and supplier management frameworks                               | Strengthen supplier oversight, consistency and accountability across higher-risk procurement categories |
| <b>Supplier risk monitoring</b>              | Continue development of supplier monitoring, auditing and risk-based information gathering processes tailored to supplier risk profiles                                                | Support more effective identification, assessment and monitoring of modern slavery risks                |
| <b>Training and awareness</b>                | Continue delivery of targeted training and awareness initiatives for employees involved in procurement, supplier                                                                       | Improve understanding of modern slavery risks, escalation                                               |

|                                           |                                                                                                                                                                                           |                                                                                                      |
|-------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
|                                           | engagement and operational management activities                                                                                                                                          | pathways and reporting obligations across the business                                               |
| <b>Supplier education and capability</b>  | Continue engagement and education activities with suppliers, including smaller and local suppliers, to improve awareness of RetireAustralia's expectations and modern slavery obligations | Support supplier capability uplift and strengthen awareness of ethical sourcing and labour practices |
| <b>Policies and governance frameworks</b> | Continue review and enhancement of governance policies and supporting frameworks relating to human rights, ethical conduct, whistleblowing and supplier expectations                      | Strengthen alignment with ethical governance practices and human rights principles                   |
| <b>Systems and process improvements</b>   | Continue improving procurement reporting, spending visibility and identification of higher-risk procurement categories through process and technology enhancements                        | Improve data quality, reporting capability and visibility of higher-risk supply chain activities     |
| <b>Technology and risk identification</b> | Explore opportunities to utilise technology, analytics and emerging tools to support modern slavery risk identification and supplier analysis                                             | Enhance risk identification capability and support more proactive supplier monitoring                |
| <b>Transparency and reporting</b>         | Continue strengthening supplier communication and accessibility of procurement information, policies, reporting pathways and governance expectations                                      | Improve supplier transparency, awareness and engagement across the supply chain                      |

This statement is made on behalf of RetireAustralia as the reporting entity pursuant to the *Modern Slavery Act 2018* (Cth) in respect of RetireAustralia and all entities owned or controlled by RetireAustralia (**RetireAustralia Group**) for the year 1 April 2025 to 31 March 2026.

This statement was approved by the *principal governing body* of RA (Holdings) 2014 Pty Ltd ABN 603 289 792 as defined by the *Modern Slavery Act 2018* (Cth) (“the Act”) on 25 August 2026.

This modern slavery statement is signed by a *responsible member* of RA (Holdings) 2014 Pty Ltd as defined by the Act.

A handwritten signature in black ink, appearing to read 'Brett Robinson', written in a cursive style.

**Dr Brett Robinson**  
**Chief Executive Officer**

On behalf of the Directors of RetireAustralia