

## HEALTHIA LIMITED ACN 626 087 223

### MODERN SLAVERY STATEMENT | For the half year period ended 31 December 2024

#### 1. Reporting Entities and Structure

This statement is made jointly by Harold Topco Limited and the other entities within the Healthia group of companies that are reporting entities for the purposes of the Modern Slavery Act 2018 (**the Act**) (identified in **Annexure 1**). In this report, we refer collectively to the group as “Healthia Group”, “Healthia” or “we”, “us”, “our”).

This Modern Slavery Statement is issued by the Healthia Group for the six-month period from 1 July 2024 to 31 December 2024 (**reporting period**) as a result of the Healthia Group changing its financial year end from 30 June to 31 December during the reporting period. This statement provides a summary of:

- Healthia’s group structure, operations, and supply chain;
- The risks of modern slavery in Healthia’s operations and supply chains; and
- The efforts taken by Healthia to minimise the risk of modern slavery practices with Healthia’s operations and supply chain.

The Healthia Group is committed to improving its practices to combat slavery of all forms including “modern slavery” as defined in the Modern Slavery Act 2018 (Cth).

#### 2. Operations and Supply Chains

The Healthia Group is a leading allied health care provider and through collaboration with its teams and through its integrated network of allied health businesses, Healthia continually strives to create positive, lasting impacts on the communities we serve, empowering our patients to lead happier and healthier lives.

The principal activities of the Healthia Group during the reporting period were the provision of allied health services and related products as well as being an aggregator of allied health businesses.

The Healthia Group operates an integrated portfolio of over 350 allied health businesses which includes:

- Over 95 podiatry clinics including 3 orthotics laboratories.
- Over 220 physiotherapy and hand therapy clinics; and
- Over 60 optometry stores including 1 wholesale eyewear frame distribution business.

Healthia’s operations are largely based in Australia, with a small number of businesses operating in New Zealand and 1 orthotics laboratory in the US and includes salaried employees, employees under modern pay awards or enterprise bargaining agreements and a small number of independent contractors.

As at the end of the reporting period, Healthia had approximately 3,200 employees in Australia, 30 employees in New Zealand and 30 employees in the US. This does not include independent contractors, including a small number based in the Philippines.

Most of Healthia’s team members are allied health professionals who deliver allied health care and support services to patients. Healthia has support offices located in Brisbane and Sydney which provide its clinic

and store teams with corporate support functions including human resources, recruitment, finance, IT and marketing.

Healthia's supply chain is centred around the provision of allied health services and related products which are largely sourced from tier one suppliers based in Australia and broadly grouped into the following areas:

- Allied health related equipment and consumables
- The leasing of commercial real estate
- Engagement and procurement of its team members
- Information technology hardware and software
- Other services including utilities, phone, internet, cleaning, and marketing services including advertising

### 3. Risks of Modern Slavery Practices in Our Operations and Supply Chains

Healthia assesses risks across its operations and supply chain by considering factors such as:

- Geographical location
- Nature of sourced products and services; and
- Industry-specific risks

The risk of modern slavery within Healthia's core operations remains low and has not materially changed since the last reporting period. Key factors contributing to this assessment include:

- **Employment Practices:** Healthia engages employees under modern awards, enterprise agreements and other contractual arrangements that are underpinned by the *Fair Work Act 2009 (Cth)* or the National Employment Standards. The People & Culture team oversees recruitment and ensures compliance with employment laws and obligations, maintaining strong oversight and reducing potential modern slavery risks.
- **Domestic Suppliers:** The majority of Healthia's key suppliers are based in Australia, which presents a lower inherent risk of modern slavery. Healthia acknowledges that sourcing goods and services overseas can pose a higher risk.
- **Industry and Product Risk:** Healthia operates primarily in the healthcare sector, which is highly regulated and generally considered lower risk. However, certain areas of procurement present elevated risks:
  - o Cleaning services: which are recognised as high-risk for modern slavery
  - o Technology and medical goods: which are also considered high-risk due to complex global supply chains

### 4. Actions Taken to Assess and Address Those Risks

Healthia is committed to identifying, assessing and addressing modern slavery risks within its operations and supply chains. The following actions were taken during the reporting period:

- **Supplier Engagement and Risk Assessment:**
  - o Healthia continues to foster long-term relationships with its valued suppliers, with key supplier partnerships remaining largely unchanged since the first reporting period.
  - o A modern slavery risk assessment was conducted on key suppliers, including a review of publicly available information such as:
    - Published modern slavery statements
    - Relevant policies

- Terms and conditions
- Responses to due diligence questionnaires

- **Policy Framework and Governance:**

- Healthia maintains a comprehensive suite of policies aimed at promoting ethical conduct and a safe, fair workplace: These include:
  - Anti-Bribery and Corruption Policy
  - Bullying, Harassment and Discrimination Policy
  - Code of Conduct and Behaviour Policy
  - Work Health and Safety Policy
  - Whistleblower Policy

All policies are accessible to team members and form part of Healthia's broader governance and compliance framework.

- During the reporting period, Healthia reviewed and updated its Modern Slavery Policy to strengthen its approach to supplier expectations and legal compliance. The updated policy requires suppliers to:
  - Adequately address modern slavery risks
  - Assist Healthia in complying with modern slavery laws
  - Undertaken their own due diligence procedures
  - Comply with applicable modern slavery legislation

A copy of the updated policy has been provided to identified key suppliers.

- **Whistleblower Protection:**

Healthia's Whistleblower Policy encourages the reporting of concerns related to unethical or unlawful conduct, including modern slavery.

- The policy ensures that individuals can raise concerns safely and confidentially, with protection from retaliation.
- This policy applies to both Healthia team members and suppliers, who are also encouraged to report any suspected issues.

- **Strengthening Supplier Standards:**

- During the reporting period, Healthia implemented a Supplier Code of Conduct which outlines the minimum standards expected of suppliers, including:
  - Ethical business practices
  - Labour rights and protections
  - Compliance with modern slavery laws
  - Active steps to identify, assess and address modern slavery risks within their operations
- Healthia also plans to review and enhance its supplier due diligence processes in the next reporting period, including updates to its modern slavery questionnaire.

## 5. Effectiveness of Actions taken

During the reporting period, Healthia continued to strengthen its approach to modern slavery risk management by gathering and analysing data across its supply chains. This included updating its key supplier lists to maintain a current understanding of potential risk exposures.

Healthia recognises that evaluating the effectiveness of its actions to identify and address modern slavery risks is an ongoing and evolving process. To support continuous improvement, Healthia has implemented annual performance measures designed to monitor, assess, and refine its approach. These measures include:

- Periodically checking Healthia's risk assessment processes;
- Tracking progress against set objectives and reviewing the outcomes of our actions; and
- Identifying opportunities to enhance our modern slavery risk management practices.

## **6. Consultation and Approval**

Healthia's consultation process is ongoing and reviewed at key intervals throughout the year. Healthia's Board of Directors is responsible for reviewing the Company's risk management framework, which includes modern slavery and other operational risks. The Board consults with the Executive Team to ensure that governance and compliance practices remain appropriate and effective for all businesses within the Healthia Group. Responsibility for meeting Healthia's obligations under the Modern Slavery Act rests with the Group Chief Executive Officer and Executive Team supported by team members involved in sourcing, production and sustainability.

This Modern Slavery Statement was approved by the Board of Directors of the Healthia Group on 26 June 2025.

Signed on behalf of the Board by



Wesley Coote  
Chief Executive Officer and Managing Director

## **Annexure 1**

The following entities within the Healthia group of companies are reporting entities for the purposes of the Act:

- Harold Topco Limited
- Harold Holdco Pty Ltd
- Harold Midco Pty Ltd
- Harold Bidco Pty Ltd
- Healthia Limited

The subsidiaries of Healthia Limited comprise:

- Healthia (Services) Pty Ltd
- Allsports (Aust) Limited
- Healthia Podiatry Limited
- Extend Rehab Pty Ltd
- BIM Physiotherapy Group Holding Limited
- Healthia Physiotherapy Pty Ltd
- Healthia Allied Pty Ltd
- The Optical Company Pty Ltd
- Australian Eyewear Distributors Pty Ltd
- The Optical Company (NSW) Pty Ltd
- The Optical Company (Aust) Pty Ltd
- DBS Australia Pty Ltd
- iOrthotics Pty Ltd
- Healthia USA Inc

