



Modern Slavery Statement

Vision Eye Institute Limited | A.C.N. 098 890 816
and its wholly owned subsidiaries

2025 Calendar Year Reporting Period

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1. Introduction

Vision Eye Institute Limited (ABN 21 098 890 816) and its wholly owned subsidiaries (collectively referred to as “VEI”) present this Modern Slavery Statement in accordance with the *Modern Slavery Act 2018 (Cth)*.

As a healthcare provider, VEI recognises that our responsibility extends beyond delivering high-quality clinical care. It includes ensuring dignity, fairness and ethical conduct across all aspects of our operations and supply chains. We are committed to identifying, assessing and addressing modern slavery risks, and to continuously improving our approach to protecting the rights of individuals who may be impacted by our business activities.

This statement outlines the actions taken by VEI during the reporting period to identify and address modern slavery risks within our operations and supply chains.

2. Reporting Entity, Structure, Operations and Supply Chains

About Us

VEI is a leading Australian provider of ophthalmic services, operating consulting clinics and day hospitals across Victoria, New South Wales, Queensland and South Australia.

VEI employs over 500 employees and works alongside partner and visiting doctors to deliver specialist eye care services. While partner doctors are not employees, they are expected to operate in accordance with VEI’s ethical and professional standards.

Our Values and The Vision Way

At Vision Eye Institute, our commitment to ethical conduct, accountability and respect for people underpins the way we operate as a healthcare provider and employer.

We strive to deliver high quality clinical outcomes for patients while respecting the medical sovereignty of our doctors and fostering a culture built on integrity, teamwork and excellence. We recognise that community expectations of healthcare organisations extend beyond clinical care and include responsible and ethical business practices across our operations and supply chains.

VEI’s values guide the behaviours and standards expected of all employees and leaders:

Medical Sovereignty	We will ensure company policies and procedures facilitate medical sovereignty
Accountability	We will be accountable to our patients, our colleagues and Vision Eye Institute for the provision of quality patient care, our personal efforts and the culture we create
Excellence	We will set the highest standards in everything we do
Operational Excellence	We will grow our business through operational excellence, while delivering sustainable levels of shareholder value
Integrity	We will be open and honest in our clinical and business practices to protect the integrity of Vision Eye Institute and each employee
Teamwork	We believe success depends on teamwork at all levels of our organisation

These values are reinforced through *The Vision Way* — VEI's behavioural and cultural framework comprising 10 key principles and behaviours that guide how we work, communicate and support one another across our national organisation.

The Vision Way reflects our shared commitment to professionalism, respect, accountability and belonging, and supports VEI's broader commitment to ethical business conduct and responsible supply chain practices.

Reporting Group

The VEI reporting group includes VEI and the following entities (wholly owned by VEI):

Name	ACN
Icon Laser (Aust) Pty Ltd	094 059 220
Lee Lenton Medical Pty Ltd	010 616 038
Macquarie Eye Centre Pty Ltd	103 788 129
P H Hughes Pty Ltd	002 678 284
Swordfish Nominees Pty Ltd	088 487 432
The Eye Centre Pty Ltd	082 489 165
The Eye Institute Pty Ltd	073 751 756
VEI Pharmacy SLA Pty Ltd	606 982 165
VEI Properties Pty Limited	106 763 562
VEI Services Pty Ltd	097 821 906
VEI Wholesale Pty Ltd	606 188 185
Vision Group Gold Coast Pty Ltd	104 778 805
Vision Group North Qld Pty Limited	107 339 444

Our Suppliers

Our operations are supported by a diverse supply chain, comprising over 800 suppliers with an estimated value of \$82 million, providing goods and services across key categories, including:

- » Medical consumables and clinical equipment
- » Facilities management (cleaning, maintenance and utilities)
- » Labour hire and recruitment services
- » Textiles (linen and uniforms)
- » Information technology hardware and software
- » Professional and corporate services

The majority of VEI's suppliers are Australian based, however some goods are sourced through global supply chains.

3. Risks of Modern Slavery Practices

VEI recognises that modern slavery risks may arise within both its operations and supply chains, particularly where there is reduced visibility or reliance on third-party labour.

While VEI operates predominantly within Australia, where regulatory protections are strong, we acknowledge that modern slavery risks can still occur, particularly through indirect or supply chain

exposures. Our approach focuses on identifying risks to people, including the potential for exploitation, underpayment, coercion, or unsafe working conditions.

In assessing our risk profile, VEI considers where it may cause, contribute to, or be directly linked to modern slavery risks through its operations and supply chains.

Supply Chain Risks

VEI procures goods and services across multiple industries. Certain categories present a higher inherent risk due to complex or globalised supply chains, including:

- » Medical consumables and PPE, which may involve offshore manufacturing
- » Textiles such as uniforms and linen
- » IT hardware and electronic equipment
- » Cleaning and facilities services

These supply chains may involve multiple tiers, limiting visibility beyond direct (Tier 1) suppliers.

Labour and Workforce Risks

While VEI's workforce is primarily directly employed, some reliance exists on:

- » Labour hire and agency staff
- » Contractors and outsourced service providers

These arrangements may present increased risk where there is reduced direct oversight of employment conditions.

Geographic Risks

Although most direct suppliers are Australian based, some goods are sourced through international supply chains, including regions where modern slavery risks are higher.

Vulnerable Worker Groups

Risks may be heightened for:

- » Migrant workers
- » Contracted or outsourced workers
- » Workers in lower-paid or less secure roles

VEI acknowledges that visibility beyond Tier 1 suppliers is limited and that modern slavery risks may exist deeper within supply chains. These insights inform our ongoing risk assessment and prioritisation activities.

4. Actions Taken to Assess and Address Risks

VEI continues to implement processes to assess and address modern slavery risks across its operations and supply chain.

Governance and Oversight

The VEI Board and Risk Management Committee oversee the organisation's risk framework, including modern slavery risks. This includes regular review of supplier risk profiles and emerging risk areas.

Supplier Due Diligence

VEI applies due diligence processes to new and existing suppliers, including:

- » Completion of supplier due diligence questionnaires for new and higher-risk suppliers
- » Annual review of key suppliers, including Modern Slavery Statements where available
- » Risk-based assessment of supplier categories and procurement activities

These processes are applied proportionately, with increased scrutiny applied to higher-risk sectors or supply chains.

Supplier Standards

VEI maintains a Supplier Code of Conduct outlining expectations regarding:

- » Compliance with modern slavery laws
- » Ethical labour practices
- » Transparency within supply chains

Suppliers are expected to align with these standards and manage risks within their own operations and supply chains.

Risk Mitigation and Response

Where potential risks are identified, VEI may:

- » Seek further information from suppliers
- » Monitor remediation actions
- » Consider alternative suppliers where appropriate

Training and Awareness

VEI supports awareness of modern slavery risks through:

- » Employee onboarding and policy frameworks
- » Access to internal resources
- » Ongoing reinforcement of ethical expectations

Key Actions During the Reporting Period

During the reporting period, VEI:

- » Continued annual review of key suppliers, including assessment of publicly available Modern Slavery Statements
- » Applied due diligence processes to new and higher-risk suppliers prior to engagement
- » Maintained oversight of a previously identified supply chain risk and monitored supplier remediation actions
- » Reinforced supplier expectations through ongoing use of VEI's Supplier Code of Conduct

These actions reflect VEI's ongoing commitment to strengthening visibility and oversight across its supply chain.

5. Assessing Effectiveness

VEI assesses the effectiveness of its actions to address modern slavery risks through governance oversight, monitoring activities and ongoing review processes.

The VEI Risk Management Committee provides oversight of supplier risks and reviews the effectiveness of controls in place, including any identified risks or emerging issues.

Effectiveness is assessed through:

- » Completion and review of supplier due diligence processes
- » Annual review of key supplier Modern Slavery Statements
- » Monitoring of concerns raised through VEI's whistleblower framework
- » Tracking of identified risks and follow-up actions

During the reporting period, VEI continued to monitor a previously identified risk relating to a third-party supplier associated with the manufacturing of disposable gloves. Corrective actions implemented by the supplier have reduced the risk, and VEI continues to monitor developments.

VEI recognises that its approach to assessing effectiveness will continue to evolve, including the development of more formal metrics and reporting mechanisms over time.

6. Consultation

This Modern Slavery Statement was developed through consultation with relevant stakeholders across the VEI Group.

As all VEI entities operate under a shared governance framework, consultation was undertaken through established internal structures, including:

- » The Executive Leadership Team
- » The VEI Risk Management Committee
- » Functional areas including procurement, finance and operations

Information relating to supplier risks and operational practices was consolidated to inform this statement, ensuring a consistent and coordinated approach across the organisation.

7. Other Relevant Information

VEI remains committed to continuous improvement in its approach to identifying and addressing modern slavery risks.

Looking Ahead

In the next reporting period, VEI will focus on:

- » Strengthening visibility of supplier risk across key procurement categories
- » Enhancing internal processes for monitoring and reporting modern slavery risks
- » Continuing to build awareness and understanding of modern slavery risks across the organisation

These focus areas support VEI's ongoing commitment to ethical business practices and responsible supply chain management.

8. Statement

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) for Vision Eye Institute Limited (A.C.N. 098 890 816) and relates to the financial year ended 31 December 2025. The Statement incorporates each of the entities set out in the Reporting Group.

This statement was approved by the VEI Board on 26/06/2026.



Amanda Cranage

Director

Vision Eye Institute Limited