



# Modern Slavery Statement 2025

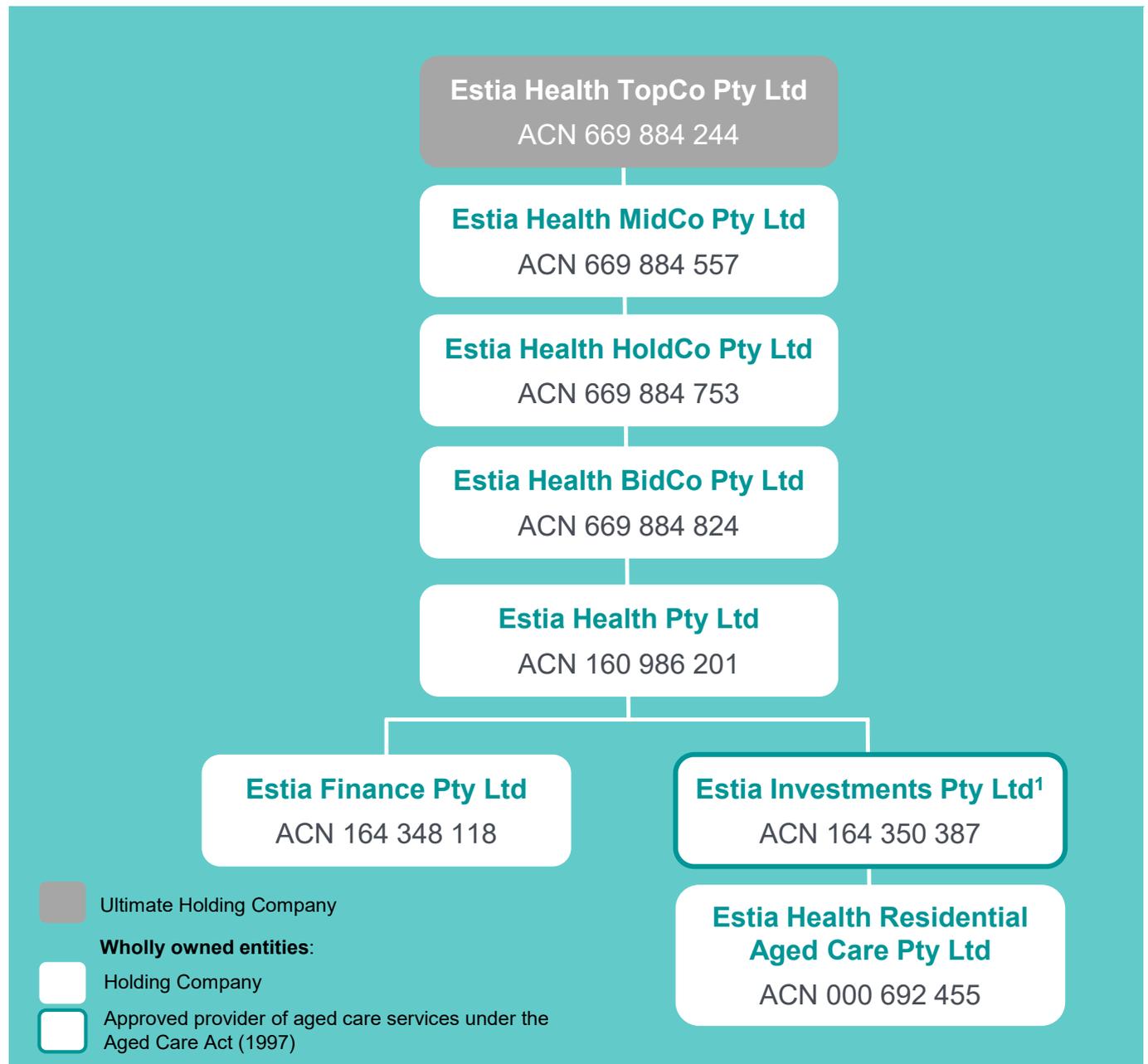
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# 1 Reporting entity

This Modern Slavery Statement ('Statement') has been prepared and published in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)* ('the Act') and uses the Act's definition of modern slavery. It identifies the steps that the ultimate Australian holding Company, Estia Health TopCo Pty Ltd (ACN 669 884 244) and each of the entities that it owns and controls (collectively referred to as 'Estia Health', 'the Group', the Company or 'we', 'us' or 'our') took to identify, assess, mitigate and where required, remediate modern slavery risks in the Group's operations and supply chain. It covers the period 1 July 2024 to 30 June 2025 ('FY25') representing Estia Health's FY25 financial year.

## Reporting entity and operating entity structure



<sup>1</sup> Estia Investments Pty Ltd is the approved provider of aged care services under the *Aged Care Act (1997)* (Cth) operating all 87 aged care homes and employing all Estia Health employees as at 30 June 2025.

## 2 A message from our CEO

At Estia Health, we exist to enrich and celebrate life together, creating residential aged care homes where everyone is welcome and which reflect the residents who choose us, the local communities around us and the people that support and work with us.

People are at the core of Estia Health and our aim is to ensure their fundamental human rights are respected in our own organisation, as well as by our business partners and suppliers. The implementation of the Aged Care Act 2024 presents an opportunity to recognise the broader significance of its rights-based framework, not only as a regulatory change, but as a moral and legal alignment with Australia's international human rights obligations, including those aimed at preventing modern slavery.

During FY25, Estia Health has continued to grow, welcoming 12 additional homes and ~1,400 more operational places<sup>2</sup>. This expansion not only strengthens our ability to provide quality care for older Australians but also increases our responsibility to uphold human rights and prevent modern slavery across a broader network of operations and suppliers. As we grow, we remain committed to ensuring that our values and ethical standards are reflected throughout our organisation and supply chains.

Addressing modern slavery remains a priority for Estia Health, as identified in our 2025-2027 Sustainability Strategy, which ensures we focus on the material issues that impact our business and stakeholders in delivering care and services.

Our FY25 Modern Slavery Statement details our progress to improve our transparency and understanding of risks within our complex supply chains. We acknowledge and appreciate the commitment of our suppliers in collaborating to mitigate modern slavery risks and deliver meaningful, lasting improvements for workers across our supply chains.



**Sean Bilton**  
CEO and Managing Director

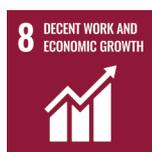
A handwritten signature in black ink, appearing to read 'S. Bilton', written in a cursive style.

**Sean Bilton**

Chief Executive Officer and Managing Director

### Acknowledgement of Country

Estia Health acknowledges all Aboriginal and Torres Strait Islander Traditional Owners of Country throughout Australia and recognises their connection to land, sea, culture and community. We pay our respect to Elders past, present and emerging and extend that respect to all Aboriginal and Torres Strait Islander Peoples.



Estia Health supports the [United Nation Sustainable Development Goals](#). This includes Goal 8 and Target 8.7: *take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.*

<sup>2</sup> Each Australian Government-funded aged care facility has a certain number of operational places (sometimes called 'beds') that are either occupied, or available to be occupied, AIHW

# 3 About Estia Health

## Our purpose, principles and values

At Estia Health, our purpose is to enrich and celebrate life together. To enrich a life means every small action we take can make a difference and as aged care professionals, we look after people at an incredibly important time of their lives.

Our residents, their families and our employees, often say they feel as if they're part of the Estia Health family, which is why our organisation's purpose is built on the foundations of our family code: *a family where everyone belongs*. This is brought to life through a set of five principles, guided by values, which our employees demonstrate daily in their varied and valued roles within each of our 87 aged care homes and across the broader organisation.



## Sustainability Strategy

We know that for our organisation to have a sustainable future, it is dependent on the wellbeing of our people, supporting and integrating within our local communities and the continued health of the natural environment. Estia Health's 2025 - 2027 Sustainability Strategy is focused on three material areas, including sustainable procurement, with the aim to reduce harm to people and the planet through sustainable procurement processes and partnerships, which includes a continued commitment to identifying and addressing modern slavery risks within our organisation and supply chain.

## Structure and governance

Estia Health comprises a group of proprietary companies (Pty Ltd), with Estia Health TopCo Pty Ltd as the ultimate Australian holding company. It owns and controls seven subsidiary proprietary entities. The Group's registered office is located at Level 9, 227 Elizabeth Street, Sydney NSW 2000.

This includes Estia Investments Pty Ltd, the approved provider of aged care services under the *Aged Care Act (1997)* (Cth) which operates all 87 residential aged care homes and employs all Estia Health employees and is as such, the main operating company of the Estia Health Group.



Diagram represents relevant Committees for Modern Slavery only and not Estia Health's complete governance structure

Estia Health is built on the foundations of strong governance, with experienced Board members, including four independent directors, supported by a stable Executive team. Together, they lead the organisation to responsibly manage the care and support services for residents and their families.

Our strong governance framework includes committees across the Executive and senior management levels, supported by subject matter experts to ensure effective delegation and execution of responsibilities. The Board retains ultimate accountability for the Group's performance and operations, with clear oversight provided through this structure.

This includes oversight of our approach to human rights, including the approval of the Group's annual Modern Slavery Statement. The Board is assisted by the Audit and Risk Committee, the Sustainability Committee and a Modern Slavery Working Group. Material business risks, including modern slavery related risks, are identified and reported via the Audit and Risk Committee.

## Operations

Estia Health operates a diverse network of 87 residential aged care homes across NSW, QLD, SA, and VIC, providing permanent and respite care for older Australians. Services include dementia, palliative and complex clinical care, delivered by skilled teams in safe, welcoming environments. Each home is staffed by experienced teams of registered nurses, carers, lifestyle coordinators and hospitality professionals who work together to deliver high quality outcomes for our residents. Our person-centred approach supports not only clinical needs but also emotional, social, and spiritual wellbeing, with personalised care plans, nutritious meals, and engaging activities that promote dignity, choice, and connection.

**About Estia Health**

 <b>Homes:</b> 87 operational aged care homes	 <b>Places:</b> ~8,500 places	
 <b>Employees:</b> over 12,000	 <b>Residents:</b> over 10,000 a year	
 <b>Compliance:</b> 100% ACQSC accreditation requirements fully met	 <b>Star ratings system:</b> All homes rated equal to or greater than 3 star	

<b>100%</b> of operations are based in Australia 	<b>95.6%</b> Estia Health employees are employed under Enterprise Agreements 	
<b>\$1.22 billion</b> annual revenue in FY25 	<b>12</b> aged care homes acquired in the year 	

**Local home roles:** each home has a local management team assisted by regional support teams and a centralised shared services function. Home-based employee roles include nurses, carers, lifestyle assistants and chefs, hired on a full-time, part-time and contract/agency basis (where a contingent workforce is required).

**Central services teams:** provide expertise, policy, process, training, support and reporting across:

- **Care and safety:** clinical services, quality of care, risk management, health and safety
- **People and workforce:** human resources, recruitment, talent acquisition, rostering
- **Operations and support:** customer engagement, sales, marketing and communications, finance, technology, legal and risk, operational management
- **Property and procurement:** property and maintenance services, centralised procurement and supplier selection

## Supply chains

Estia Health partners with long-standing, trusted suppliers to ensure the reliable delivery of goods and services that underpin high-quality care across our homes. Our centralised procurement team oversees sourcing, tendering, contracting, and performance management to drive value, consistency, and operational efficiency. Following the acquisition of 12 homes from 3 providers over the past year, Estia Health has successfully transitioned high-spend categories such as food services, medical consumables, equipment and utilities to our preferred suppliers, ensuring continuity, quality, and cost-effectiveness. At the same time, we recognise the importance of local connections and where relevant, have retained select community-based suppliers, such as lifestyle and entertainment providers, to preserve each home’s unique character and support local economies.

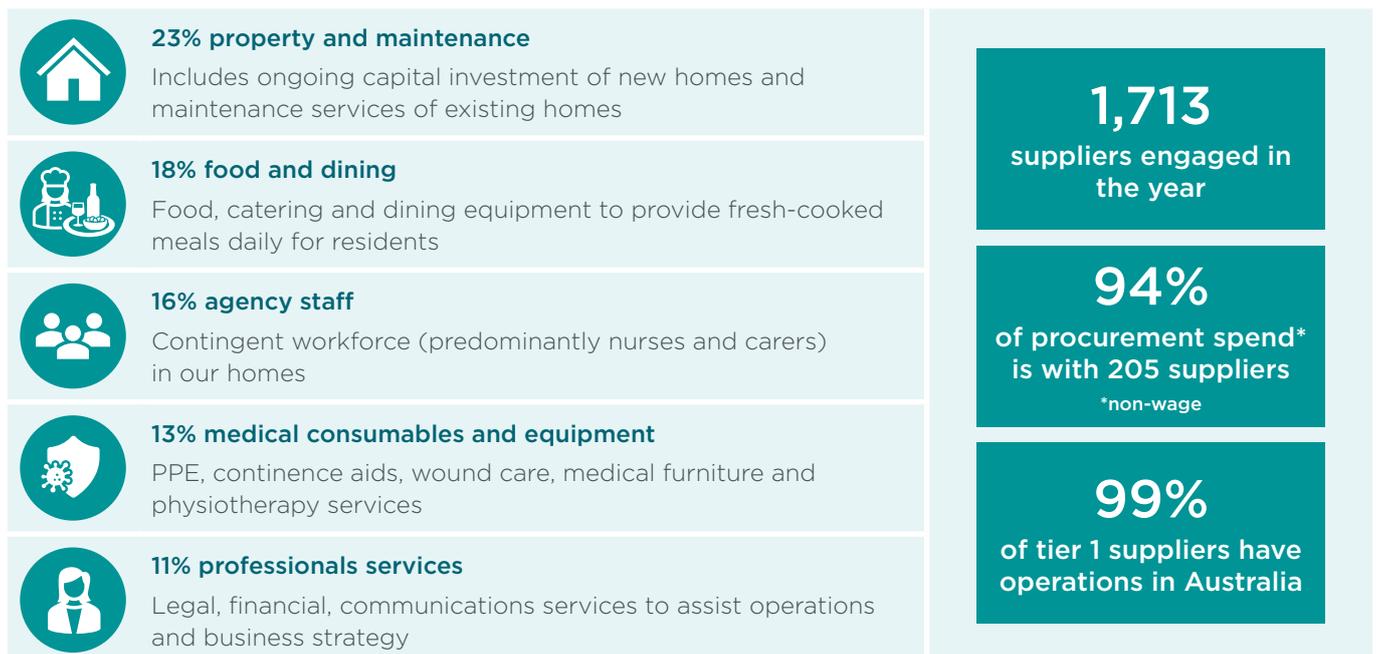
Estia Health’s procurement categories can be classified into three key areas:

<p><b>Corporate and operational procurement</b></p> <p>Includes procured products and services required to provide care to residents living at one of Estia Health’s 87 aged care homes, including:</p> <ul style="list-style-type: none"> <li>• Catering and hospitality: food and beverage supplies, kitchen equipment, dining service items and cleaning products</li> <li>• Medical equipment: mobility equipment like walkers, wheelchairs and resident transfer devices, beds and furniture</li> <li>• Medical consumables: personal protective equipment (PPE), wound care and hygiene products and diagnostic and monitoring equipment</li> <li>• Other: IT equipment, office supplies and employee uniforms.</li> </ul>	<p><b>Capital and property work</b></p> <p>Includes the products and services required for the maintenance, refurbishment and upkeep of existing Estia Health residential aged care homes and construction of new aged care homes:</p> <ul style="list-style-type: none"> <li>• Maintenance and upkeep: products include building materials, paints and coatings, flooring, fixtures and fittings, lighting and furniture, HVAC and solar panel maintenance, furniture and safety equipment including fire safety and emergency lighting</li> <li>• Construction of new homes: construction, architect and design services, specialist trades like tiling and roofing, plumbing and electrical and building materials, floorings, fixtures and fittings.</li> </ul>	<p><b>Professional services</b></p> <p>Includes professional services to support the governance, compliance, and operational efficiency of Estia Health across a range of specialist areas:</p> <ul style="list-style-type: none"> <li>• Financial, accounting, auditing legal, and governance: including legal services, tax advisory, auditing and risk management systems</li> <li>• Workforce and care consulting: including recruitment and employee engagement systems, consulting and training, clinical and aged care advisory and compliance services</li> <li>• Strategy, marketing and specialist advisory: including management strategy, IT consulting, marketing, design and communications and sustainability services.</li> </ul>
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The above provides an overview of Estia Health’s procurement categories and is not exhaustive of all categories, services and products.

Estia Health’s top five categories of spend in the FY25 period remain consistent with the previous year, with 94% of procurement spend attributed to 205 suppliers.

### Top 5 categories of procurement spend in FY25



Remaining categories within top 205 suppliers: utilities (7%), IT/systems (6%), specialist cleaning/waste services (4%), miscellaneous inc. uniforms, linen, media (2%).

# 4 Modern slavery risks in our operations and supply chains

Estia Health adopts a comprehensive approach to assessing modern slavery risks, guided by both a 'risk to people' lens and an assessment of material risk to the organisation. The 'risk to people' approach is grounded in the UN Guiding Principles on Business and Human Rights<sup>3</sup>, which define salient risks as those human rights most at risk of severe negative impact through a company's operations or business relationships, which prioritises the protection of vulnerable individuals potentially affected by its activities.

In parallel, Estia Health evaluates material risks to the business through its Risk Management Framework, which supports a continuous improvement model, ensuring that supporting processes and practices evolve to effectively identify, assess, and manage modern slavery risks across both direct operations and the broader supply chain.

The UN's Guiding Principles outline three ways in which an organisation can negatively impact human rights by causing, contributing to or being directly linked to adverse human rights impacts. We have assessed Estia Health's risk in alignment with these definitions as:

## Caused

A business could cause modern slavery where its own actions or omissions directly result in harm.

**Risk example:** failure to implement fair rostering for direct employees could lead to exploitative working conditions such as excessive unpaid overtime.

We believe this to be the least probable way for Estia Health to be linked to modern slavery. We maintain strong governance and compliance with Australian labour laws, including fair wage policies, workplace health and safety standards, and grievance mechanisms, with over 95% of our workforce covered by a Fair Work Enterprise Agreement.

## Contributed

A business could contribute to modern slavery where its actions or omissions significantly increase the risk of harm occurring.

**Risk example:** placing cost pressure on suppliers of uniforms and textiles could lead to sourcing from factories in regions where exploitative practices such as forced labour or debt bondage are prevalent in garment production.

In FY25, Estia Health strengthened its uniform procurement process by embedding modern slavery risk assessments and requiring suppliers to demonstrate ethical sourcing and supply chain transparency.

## Directly linked

A business could be directly linked to modern slavery if its operations, products or services are connected through the operations of another entity it has a business relationship with.

**Risk example:** sourcing fresh produce from distributors who procure from global agricultural supply chains where child labour or debt bondage may occur during harvesting.

This is the most likely way Estia Health could be connected to modern slavery, given the complexity of global supply chains and the presence of high-risk geographies. We mitigate this risk through supplier engagement, Fair Supply risk assessments, and contractual agreements.

## Operating risk

All of Estia Health's residential aged care homes and direct operations are based in Australia and operate in a highly regulated labour market, with a low likelihood of modern slavery cases occurring within direct operations and direct workforce. The Company adheres to and reports against regulatory requirements and has a number of internal policies and governance processes to promote a workplace culture of safety and care and upholds protections relating to workplace rights, freedom of association and workplace discrimination.

84.4%<sup>4</sup> of the Group's total costs (excluding depreciation, interest and tax) are remuneration to Australian-based employees, contractors and agencies protected by stringent Australian workplace regulations and monitoring by unions and government agencies, with 95.6% of Estia Health employees engaged under union negotiated, state-based enterprise agreements (EAs) which cover a wide range of terms and conditions, in addition to pay levels.

The Australian Government has highlighted potential modern slavery risks within the aged care sector, driven by increasing regulatory requirements such as the introduction of mandated care minutes per resident per day. These requirements amplify existing workforce shortages, with projections indicating a shortfall of more than 110,000 direct care workers by 2030<sup>5</sup>. By 2042, the number of Australians aged 85 and over is expected to more

<sup>3</sup> UN Guiding Principles Reporting Framework, [Salient Human Rights Issues](#)

<sup>4</sup> Excluding non-recurring business acquisition related costs, depreciation, interest and tax

<sup>5</sup> [https://www.jobsandskills.gov.au/sites/default/files/2023-11/care\\_workforce\\_labour\\_market\\_study.pdf](https://www.jobsandskills.gov.au/sites/default/files/2023-11/care_workforce_labour_market_study.pdf)

than double, to over 1 million people<sup>6</sup>. These pressures are more significant in regional and rural areas, where recruitment and retention challenges can lead to greater reliance on migrant workers and third-party labour hire, factors that may heighten exposure to modern slavery risks. In this context, Estia Health could be directly linked to modern slavery risks through its use of third-party labour providers, even though it does not cause or contribute to such practices. This reinforces the importance of strong oversight and due diligence in managing external labour arrangements.

Estia Health considers its operational risk of modern slavery to be low because it maintains direct oversight of recruitment and employment practices through a dedicated, centralised talent acquisition team. This team proactively addresses workforce gaps across our homes through strategic initiatives such as streamlined recruitment and onboarding, targeted domestic campaigns, international recruitment pathways, and support for traineeship and graduate programs. These measures aim to build a sustainable talent pipeline, and ensure compliance with mandated care minutes to reduce reliance on third-party labour hire, which is where modern slavery risks are most likely to arise.

## Supply chain risk

Across supply chain sectors, there are often multiple inherent risks, which arise most commonly from four key dimensions: vulnerable populations, high-risk business models, high-risk geographies and high-risk products or services. These risks can commonly intersect and amplify exposure and understanding these inherent risk drivers is essential for prioritising due diligence and implementing effective mitigation strategies.

Modern slavery risks are most likely to arise through our supply chains, which span a wide range of goods and services and involve multiple layers of suppliers.

While our direct relationships are primarily with suppliers who deliver finished products to our aged care homes and offices, the materials and components they use often originate from deeper tiers in the supply chain. These upstream activities, such as the mining, growing, and processing of raw materials are where visibility is limited and the potential for exploitation is higher, making it more challenging to identify and address modern slavery risks.

As reported in FY24, Estia Health engaged Fair Supply, a modern slavery and sustainability data provider to complete an independent risk screening of 100% of our suppliers for modern slavery risk. Fair Supply's proprietary technology aggregates world leading datasets from the Global Slavery Index, International Labor Organisation and other verified datasets to enable reporting of the theoretical risk of modern slavery occurring for each supplier, termed inherent risk (methodology outlined in the Appendix). Of all 1,629 suppliers screened, the majority were determined as low or moderate low for inherent modern slavery risk, with our uniform supplier identified as moderate risk due to inherent risk factors in the textile industry. Following a review of our uniform supplier through a formal tender process, a new uniform supplier was engaged, with a more proactive approach to sustainability, including addressing modern slavery risks.

Following the inherent risk screening of all suppliers completed in FY24, the Group engaged a key number of suppliers through Fair Supply's tailored Self-Assessment Questionnaire (SAQ) to provide detailed insight into their modern slavery mitigation frameworks. Responses are quantified into a mitigation score (methodology outlined in Appendix), which reflects the strength of a supplier's governance, due diligence, grievance mechanisms, and remediation processes. This score enables Estia Health to apply a mitigated risk rating to each supplier, reducing inherent risk where robust controls are demonstrated and develop supplier action plans where improvements are required.

Estia Health maintains a consistent and disciplined approach to supplier integration, even as we expand through acquisitions. Newly acquired homes are gradually aligned with our national procurement standards, particularly for high-value categories like food, clinical supplies and utilities. While some local suppliers remain to support home-specific services, our centralised procurement team ensures clear oversight and governance across the supplier network. This structured approach helps minimise operational risk, maintain compliance, and ensure continuity of care.

## Inherent modern slavery risk factors



Adapted from: [Health services sector modern slavery guide, KPMG](#)

<sup>6</sup> <https://www.abs.gov.au/articles/population-aged-over-85-double-next-25-years>

## Inherent risk summary relevant to Estia Health

This table highlights sectors in Estia Health's supply chain with potential inherent modern slavery risks. These insights guided our prioritisation of future due diligence and supplier engagement. We have considered risk at different tiers within our supply chains. Tier 1 refers to Estia Health's direct suppliers and subsequent tiers (2-3+) represent indirect suppliers further upstream.

Sector and product	Inherent risk factors	Potential Estia Health exposure to be assessed	Linkage type (Caused / Contributed / Directly Linked)
Food, beverage, hospitality and agriculture sectors	 <ul style="list-style-type: none"> <li>High-risk geographies (China, India)</li> <li>Vulnerable populations in agriculture</li> </ul>	<ul style="list-style-type: none"> <li>Risk sits primarily in upstream agriculture and transport within global supply chains, not in on-site food preparation, which is cooked fresh onsite in our homes by Estia Health employees</li> </ul>	<ul style="list-style-type: none"> <li>Directly linked</li> </ul>
Third party labour hire	 <ul style="list-style-type: none"> <li>High-risk business model (labour hire for workforce shortages)</li> <li>Vulnerable migrant worker</li> <li>Geographies: China, India, Australia, Pacific region</li> </ul>	<ul style="list-style-type: none"> <li>Exposure via agency staff in aged care</li> <li>Tier 1 for migrant workforce engaged to work in our aged care homes, where contingency workforce is needed</li> </ul>	<ul style="list-style-type: none"> <li>Directly linked</li> </ul>
Apparel and textiles	 <ul style="list-style-type: none"> <li>High-risk products (uniforms)</li> <li>High-risk geographies (China, India)</li> <li>Vulnerable low wage workers</li> </ul>	<ul style="list-style-type: none"> <li>Exposure through uniforms worn by the majority of Estia Health employees</li> <li>Tier 2+ for raw material sourcing like cotton, fabric mills and production factories</li> </ul>	<ul style="list-style-type: none"> <li>Contributed</li> </ul>
Construction and maintenance in property sector	 <ul style="list-style-type: none"> <li>High-risk business model (subcontracting and tight deadlines)</li> <li>Vulnerable low-wage workers</li> </ul>	<ul style="list-style-type: none"> <li>Exposure through property maintenance and refurbishment, with specific product risks: solar panels, quarried stone, tiles, steel, timber and wood</li> <li>Tier 1-2 risk for vulnerable construction workers and deeper in the supply chain for mining of raw materials and production in other countries</li> </ul>	<ul style="list-style-type: none"> <li>Directly linked</li> </ul>
Medical consumables and equipment	 <ul style="list-style-type: none"> <li>High-risk products (gloves, PPE)</li> <li>High-risk geographies (China, India)</li> </ul>	<ul style="list-style-type: none"> <li>Exposure through medical gloves and consumables used in our aged care homes</li> <li>Tier 2-3 risk for factory production</li> </ul>	<ul style="list-style-type: none"> <li>Directly linked</li> </ul>
Cleaning and waste	 <ul style="list-style-type: none"> <li>Vulnerable populations</li> <li>High-risk business model (multi-tiered outsourced services)</li> </ul>	<ul style="list-style-type: none"> <li>Risk sits primarily in waste removal as our aged care homes are maintained and cleaned by Estia Health employees</li> <li>Tier 2-3 risk for multiple sub-contractors, limiting visibility</li> </ul>	<ul style="list-style-type: none"> <li>Directly linked</li> </ul>
<b>Key</b>  <b>Vulnerable population</b>  <b>High-risk business model</b>  <b>High-risk geographies</b>  <b>High-risk product</b>			

The above table represents an overview summary only and is not an exhaustive list of all the Group's potential risks and areas of focus.

# 5 Actions taken to assess and address modern slavery risks

Estia Health continues to adopt a continuous improvement approach to identifying, assessing and addressing modern slavery risks across our operations and supply chains. Building on the foundations of our multi-year roadmap and actions taken in previous reporting periods, we have further strengthened our governance, due diligence and supplier engagement processes in FY25.

## Summary of planned and completed actions in FY25

Action categories	Planned actions	FY25 progress update
<b>1. Governance and oversight</b>	<ul style="list-style-type: none"> <li>Maintain Board oversight and reporting</li> <li>Integrate modern slavery risk into corporate strategy and risk management</li> </ul>	<ul style="list-style-type: none"> <li>Modern slavery risks and annual Statement reviewed and approved by Board-level Audit and Risk Committee</li> <li>Modern Slavery Risk identified as key material risk in 2025-2027 Sustainability Strategy</li> </ul>
<b>2. Risk assessment and due diligence</b>	<ul style="list-style-type: none"> <li>Conduct inherent risk screening of all suppliers</li> <li>Apply risk ratings and prioritise high-risk sectors for deeper engagement</li> </ul>	<ul style="list-style-type: none"> <li>Inherent risk rating of all suppliers enabled focused approach for further engagement of 'higher-risk' suppliers</li> </ul>
<b>3. Supplier engagement and contractual controls</b>	<ul style="list-style-type: none"> <li>Embed modern slavery clauses in contract</li> <li>Issue SAQs to 'higher-risk' suppliers</li> <li>Implement corrective actions where needed</li> </ul>	<ul style="list-style-type: none"> <li>Issued 20 additional contracts in the period, which included a modern slavery clause and a Supplier Code of Conduct</li> <li>SAQs issued to 40 'higher-risk' suppliers with answers directing ongoing supplier engagement and areas for improvement</li> </ul>
<b>4. Training and awareness</b>	<ul style="list-style-type: none"> <li>Implement modern slavery training for internal teams</li> </ul>	<ul style="list-style-type: none"> <li>Engagement session with Talent and Acquisition team on modern slavery risks</li> <li>Implemented whistleblower training with 2,309 completions by Estia Health employees</li> </ul>
<b>5. Grievance and remediation</b>	<ul style="list-style-type: none"> <li>Maintain whistleblower hotline and grievance channels</li> <li>Review remediation framework</li> <li>Prepare escalation and corrective action process for identified risks</li> </ul>	<ul style="list-style-type: none"> <li>No calls received by the 'Say Something' Whistleblower Hotline in relation to Modern Slavery allegations</li> <li>No supplier contracts were terminated as a result of the identification of modern slavery concerns</li> </ul>
<b>6. Continuous improvement and collaboration</b>	<ul style="list-style-type: none"> <li>Investigate and pursue collaboration with relevant networks and organisations</li> </ul>	<ul style="list-style-type: none"> <li>Head of Sustainability, lead for delivery of the Modern Slavery roadmap, attended multiple roundtables, including a member of Be Slavery Free, an Australian coalition partnering with businesses to eliminate slavery from supply chains, and advocating for stronger government policies</li> </ul>

## Annual review commitment

Estia Health is committed to continuously improving our approach to identifying, assessing, and addressing modern slavery risks. Each year, we will review our policies, procedures, and actions to ensure they remain effective and reflect current best practice. Feedback from our teams, suppliers, and stakeholders will be considered as part of this annual review, and any necessary updates or enhancements will be implemented to strengthen our response to modern slavery risks across our operations and supply chains.

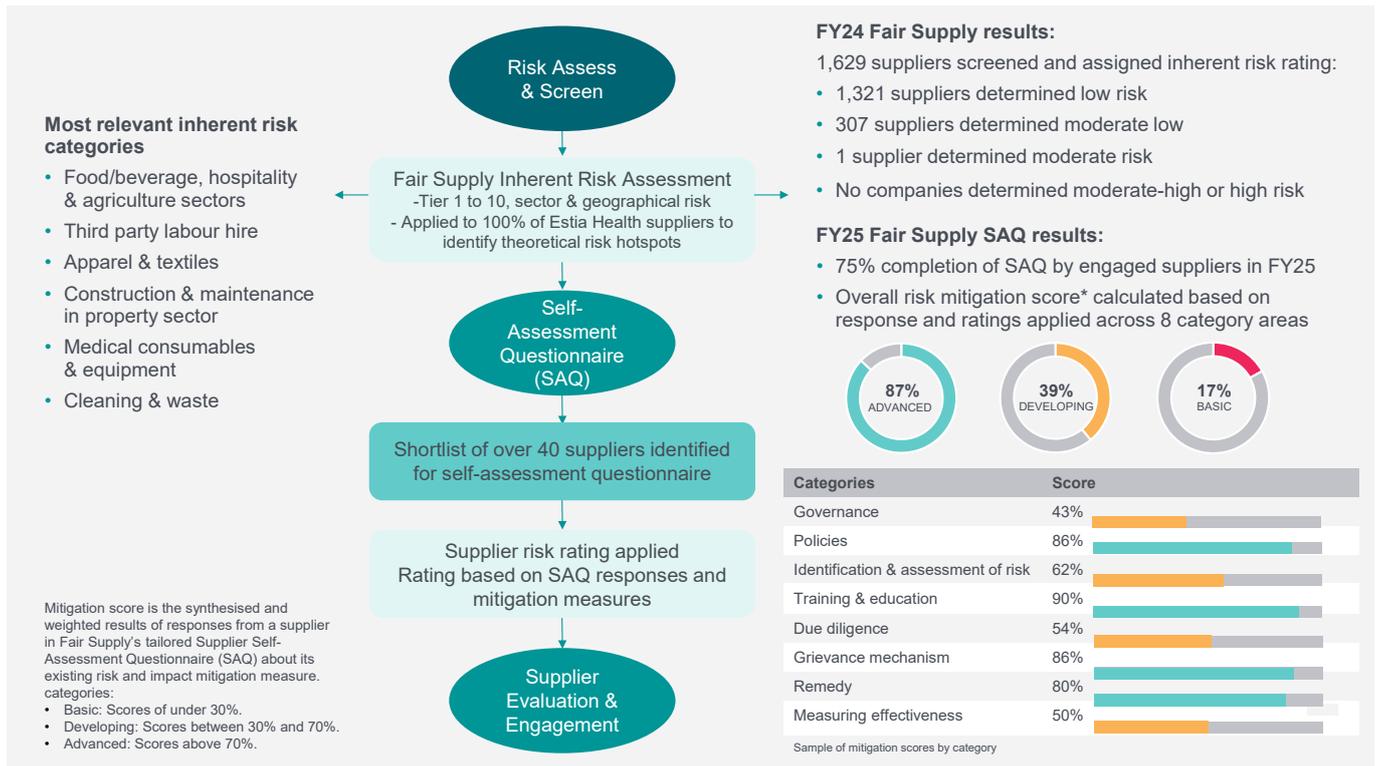
## Risk assessment and due diligence

As reported in FY24, Estia Health adopted Fair Supply's technology to improve our understanding of inherent modern slavery risk within our supply chains, completing an initial inherent risk screening of 100% of our suppliers. Fair Supply's proprietary technology aggregates world-leading datasets from the Global Slavery Index, International Labor Organisation and other verified datasets, to enable reporting of the theoretical risk of modern slavery occurring for each supplier, termed 'inherent risk'. Risk ratings are generated from a weighted combination of geographic and industry-based risks, with each supplier's modern slavery risk level expressed on a five-point spectrum from low to very high risk and assigned a numerical figure representing the theoretical number of forced labourers in the supply chain, per million dollars of procurement spend.

In FY25, we advanced our approach to understanding and assessing risk with targeted supplier engagement, issuing self-assessment questionnaires (SAQs) to over 40 suppliers identified for deeper review, achieving a 75% completion rate. Within the questionnaire, suppliers answered a series of questions in eight categories which align with the Modern Slavery Act's requirement to disclose actions taken to assess and address risks, including governance, policies, risk identification, due diligence, training, grievance mechanisms, remediation, and measuring effectiveness. A rating is assigned to each of the eight categories under three rankings of: basic, developing and advanced as well as a combined overall rating to better understand each supplier's level of maturity in taking action to manage potential modern slavery risks in their own operations and supply chain. This supports Estia Health in understanding where our greatest risks may lie and develop the appropriate action plan of where focus and resources are required.

Feedback and insights gathered from supplier self-assessment questionnaires are reviewed by our procurement and sustainability teams. This information helps us identify areas where suppliers may need additional support or guidance and informs our ongoing engagement and training efforts. Where common gaps or risks are identified, we work with suppliers to strengthen their practices and update our own processes to better address modern slavery risks across our supply chain.

## Risk screening and due diligence process



## Supplier evaluation and engagement

During the period, Estia Health engaged with several suppliers within the top 5 procurement categories as part of a supplier review project, which involved a tender process to engage and evaluate key products and services to ensure the continued quality of supplied products and services, a high level of customer service, and alignment with our sustainability criteria.

## Grievance mechanism

Estia Health has a structured process for escalating concerns, addressing and resolving complaints through established grievance procedures for employees, suppliers and other external parties, including modern slavery. Methods for communication of the relevant policies and programs (see relevant policies and programs, [page 15](#)) occur at multiple stages of the employee and supplier lifecycle, including being referenced in contractual engagements, induction training and annual training, to ensure these mechanisms are accessible and understood by all stakeholders.

## Case study: ethical uniform procurement

In FY25, Estia Health enhanced its procurement practices by embedding sustainability and modern slavery risk assessments into its uniform tender process, recognising the higher inherent risks in textile supply chains. From forced labour in cotton farming to environmental impacts from water-intensive production and chemical use, the tender process required suppliers to demonstrate strong governance, due diligence, and innovation in addressing these risks.



Suppliers were evaluated against weighted sustainability criteria, including ethical sourcing and closed-loop recycling. The selected supplier met these standards, demonstrating a clear commitment to sustainability, which included uniforms made from recycled polyester and certified organic, traceable cotton. The supplier achieved an 'advanced' mitigation score within Fair Supply's modern slavery self-assessment questionnaire (SAQ), with activity including holding Ethical Clothing Australia accreditation for fair local labour and using Sedex audits for global supply chain transparency.

To address waste from rebranding during acquisitions, Estia Health implemented a closed-loop recycling scheme with the chosen supplier with the delivery of new Estia Health branded uniforms and the collection of old uniforms to be recycled. This diverted approximately 211 kg of textile waste from landfill with an estimated 150 old uniforms being turned into new fibres, delivering environmental and social benefits. Estia Health employees are proud to wear the uniform, knowing it reflects a stronger commitment to ethical sourcing and sustainability.

## Remediation process

Estia Health has established standards, policy, procedures, and controls as part of a broader remediation process, including the Reporting and Resolving a Grievance Policy. This policy applies to all employees, other workers, and contractors of Estia Health, and provides guidance for dealing with a grievance and the process for escalation, without fear of retribution. In FY25, we did not receive any reports of modern slavery through our whistleblower hotline and no supplier contracts were terminated due to modern slavery concerns. We recognise that the absence of reports does not mean there are no risks. If an incident is identified, we will review and improve our remediation process to ensure it meets best practice standards.

## How Estia Health would respond to a modern slavery incident

If Estia Health identifies a case of modern slavery in our operations or supply chain, we will act quickly and responsibly. We will investigate the situation to understand what has happened and who is affected. We would also work with the supplier or business partner to address the issue, and if needed, we will engage independent experts to support the investigation.

Our priority is always to support any individuals impacted, ensuring their safety and access to any necessary help. We would subsequently review our relationship with the supplier and require corrective actions, such as changes to their practices or policies. If the supplier does not cooperate or resolve the issue, we may end our business relationship.

We would also review our own processes to prevent similar incidents in the future and share lessons learned with our teams and suppliers.

## Case study: medical glove risk assessment

In FY25, Estia Health undertook a comprehensive review of its medical consumables procurement, focusing on personal protective equipment (PPE) and assessing modern slavery risks in disposable medical glove production. This procurement category has been historically linked to forced labour risks, particularly in Southeast Asia during the COVID-19 pandemic, where demand pressures intensified vulnerabilities in global supply chains. Risks reflect all four inherent modern slavery risk factors: high-risk products, high-risk geographies, high-risk business models, and reliance on vulnerable populations, which were exacerbated during the pandemic due to unprecedented PPE demand.



Gloves sourced for Estia Health are primarily vinyl from China and nitrile from Thailand—countries highlighted by our supplier as having medium to high inherent risk due to the manufacturing location. To understand and mitigate these risks, Estia Health requested detailed information from the supplier, including completion of Fair Supply’s modern slavery SAQ, which received an ‘advanced’ mitigation score. This provided a foundation for further due diligence, including Estia Health requesting documented evidence of the supplier’s own risk assessment and controls.

The supplier confirmed that gloves intended for Estia Health were not listed on any import ban registers in jurisdictions such as the United States or Europe. They also demonstrated robust compliance measures, including use of third-party platforms such as SEDEX, and independent third-party audits which found no indicators of bonded labour, deceptive recruitment, or movement restrictions. Workers were directly employed, with no labour agents or subcontracting, and dormitory accommodation was voluntary and compliant. The supplier also maintained the relevant ISO certifications.

Estia Health’s review extended beyond Tier 1 suppliers, investigating Tier 2 and Tier 3 risks through traceability checks and supplier performance monitoring, reinforcing our commitment to ethical sourcing and safeguarding human rights across our operations and supply chains.

## Relevant policies and programs

Policy/Program	Summary
<p><b><u>Code of Conduct</u></b></p>	<p>Underpins and supports our organisational purpose, principles and values. It is designed to provide consistent expectations about our behaviour and conduct in the workplace as representatives of Estia Health.</p>
<p><b><u>Supplier Code of Conduct</u></b></p>	<p>Sets out the minimum standards expected of Estia Health suppliers, contractors, consultants, agents and other providers of goods and services. By entering a contract with Estia Health, suppliers are also requested to view and agree to make all reasonable endeavours to comply with the Supplier Code of Conduct and ensure their employees, subcontractors, and agents also adhere to its principles.</p>
<p><b><u>Whistleblower Policy</u></b></p>	<p>Provides whistleblower protection under Australia's whistleblowing laws, with specific protections against harassment, vilification, or employment consequences to anyone who makes a report. Whistleblowing information is reported regularly through the Estia Health governance structure, which includes Estia Health's Audit and Risk Committee.</p> <p>Whistleblower training included 2,309 completions across the Group at the end of FY25.</p>
<p><b><u>Whistleblower Hotline</u></b></p>	<p>The 'Say Something' hotline is independently operated and allows for anonymous disclosures of alleged incidents of suspected misconduct, including modern slavery concerns. Suppliers, contractors, and sub-contractors can utilise Estia Health's Whistleblower Policy and services to report modern slavery concerns. In FY25, the hotline received no modern slavery related calls.</p>
<p><b><u>Health, Safety, and Wellbeing Policy</u></b></p>	<p>The Policy commits to providing and maintaining a working environment that is safe, without risks to health, and eliminates or minimises work-related hazards and risks. It complies with Work Health and Safety Acts and Regulations for the jurisdictions in which we operate, as well as codes of practice, with the process allowing for the reporting of safety concerns and risks to managers and SolvSafety, an online safety management system.</p>
<p><b><u>Employee Assistance Program (EAP)</u></b></p>	<p>The employee support service REACH is an independent Employee Assistance Program (EAP) offering a range of free and confidential services to Estia Health employees and their families including 24/7 counselling and coaching, financial support and legal advice.</p>

# 6 Effectiveness of actions taken to assess modern slavery risks

Estia Health continues to mature our methodology in identifying and mitigating modern slavery risk, as well as measuring the effectiveness of our mitigation actions. In FY25, we have disclosed measurement metrics to assess the effectiveness of our actions and we will continue to assess these through Estia Health’s Sustainability Committee.

Key Performance Indicator	FY25 results
<b>Policy/contracts:</b> percentage of key preferred suppliers* that have sustainability and modern slavery commitments incorporated into new or renewed contracts	85%
<b>Grievance mechanism:</b> total number of modern slavery allegations received and resolved by Estia Health’s grievance mechanism (Say Something hotline)	0 allegations received
<b>Supplier engagement:</b> percentage of self-assessment questionnaires (SAQ) completed	75%

\*Defined as long-term suppliers from preferred supplier list under procurement and property team management. Excludes entertainers and IT suppliers.

## Future plans and continuous improvement

As part of our effectiveness review, we have identified key areas for improvement and future actions to enhance our modern slavery risk management to be undertaken in FY26.

Estia Health will continue to strengthen supplier engagement as a core component of our modern slavery risk management strategy, building on FY25 progress.

Aim	Continuous improvement plan
<b>Increase SAQ coverage and depth</b>	Increase completion of self-assessment questionnaires by engaged suppliers, with enhanced engagement regarding tier 2 and 3 supplier information.
<b>Increase number of suppliers with modern slavery and sustainability contract commitments</b>	Focus on closing the gap for the remaining 15% of key suppliers that have not yet incorporated sustainability and modern slavery commitments into their contracts. This will involve targeted engagement during contract renewals, prioritising high-risk categories, and reinforcing alignment with our Supplier Code of Conduct. By addressing this gap, we aim to achieve full coverage and strengthen our overall supplier governance framework
<b>Risk-based supplier engagement</b>	Prioritise supplier engagement in identified potential high-risk categories (for deeper engagement, including follow-up discussions and evidence verification). Also engage Tier 1 suppliers to disclose upstream sourcing relationships and complete mapping of Tier 2 suppliers in high-risk categories
<b>Collaborative improvement work plans</b>	Work with suppliers rated ‘basic’ or ‘developing’ to co-create improvement plans, focusing on governance, grievance mechanisms and remedy processes
<b>Capacity building</b>	Provide targeted training and resources for suppliers to strengthen modern slavery controls, including access to best practice templates and remediation guidance
<b>Performance monitoring</b>	Introduce KPIs for supplier engagement effectiveness, such as percentage of suppliers with improvement plans implemented and verified

# 7 Consultation and approval

Estia Health's TopCo Board holds the responsibility for approving and supervising the Group's modern slavery risk management approach and the disclosures in this Statement. A groupwide consultation of this Statement and its contents was conducted with the Board directors of each entity within the Group and discussed at a joint Board meeting. Draft versions of the statement were circulated to all relevant entities, and feedback was actively sought regarding the accuracy, completeness and relevance of the disclosures.

Comments and suggestions received from each entity were reviewed by the Head of Sustainability and the Chief Financial Officer. Where appropriate, feedback was incorporated into the final statement to ensure it accurately reflects the perspectives and operational realities of all entities within the Group. This collaborative approach supports a consistent and comprehensive response to modern slavery risks across Estia Health's operations and supply chains.

## Principal Governing Body Approval

This Modern Slavery Statement was approved by the *principal governing body*<sup>7</sup> of Estia Health as defined by the *Modern Slavery Act 2018 (Cth)* (the Act) on Tuesday 16 December 2025 .

## Signature of Responsible Member

This Modern Slavery Statement is signed by a responsible member(s)<sup>8</sup> of Estia Health Ltd as defined by the Act.



**Mike Murphy**

Chairman, Estia Health TopCo Pty Ltd



**Sean Bilton**

Chief Executive Officer and Managing Director

## Mandatory criteria

The following page number(s) of the Statement address each of the mandatory criteria in Section 16 of the Act.

Mandatory criteria	Page number(s)
a) Identify the reporting entity	<u>2</u>
b) Describe the reporting entity's structure, operations and supply chains	<u>4, 5, 6</u>
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns and controls	<u>7, 8, 9</u>
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	<u>10, 11, 12, 13, 14, 15</u>
e) Describe how the reporting entity assesses the effectiveness of these actions	<u>16</u>
f) Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	<u>17</u>
g) Provide any other relevant information	<u>18, 19</u>

<sup>7</sup> *Principal governing body*: means the body or group of members of the entity that are responsible for the governance of the entity.

<sup>8</sup> *Responsible member*: means a decision-making member of the entity. Where an entity has a principal governing body, the responsible member will be a member of that body.

# Appendix

## Fair Supply Initial Risk Assessment Methodology Summary

1. As detailed in Section 4 of this Statement (Modern slavery risks in our operations and supply chains) we applied the initial risk assessment methodology to 100% of Estia Health's suppliers in FY24. This baseline exercise provides the basis for our subsequent focus for ongoing due diligence and remediation activities across not only the present reporting period but for upcoming years.
2. Incorporating company spend data throughout global markets, we have utilised external consultants with proprietary technology to trace the economic inputs required to produce products and services sourced from Tier 1 suppliers to Tier 2 suppliers, Tier 2 suppliers to Tier 3 suppliers, and so on, all the way to Tier 10 suppliers of the supply chain of Estia Health's top suppliers by spend.
3. This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using the following sources:
  - a) The United Nations' (UN) System of National Accounts;
  - b) UN COMTRADE databases;
  - c) Eurostat databases;
  - d) The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
  - e) Numerous National Agencies including the Australian Bureau of Statistics.
4. The MRIO is then examined against the following international standards:
  - a) The UN Guiding Principles on Business and Human Rights;
  - b) The Global Slavery Index;
  - c) International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
  - d) The United States' Reports on International Child Labour and Forced Labour.
5. A proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier.
6. This analysis was performed for the purposes of risk identification under the Act. It does not purport to confirm the actual existence (or non-existence) of slavery in Estia Health's supply chains and operations. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.
7. The multi-faceted approach to modern slavery risk assessment that we have undertaken has included examination and analysis of the following:
  - a) The individual suppliers and industries with the most elevated risk of modern slavery;
  - b) Supply chain plots to provide a visual representation of the supply chains for Estia Health's top 3 first tier industries;
  - c) Plotting the relative slavery risk in the supply chain by tier, up to tier 10;
  - d) Geographical depiction of the cumulative risk of modern slavery across the supply chain around the world; and
  - e) An overview of the classification of the first tier of our supply chain by country and industry, including relative modern slavery risk.
  - f) Suppliers in our supply chains and operations that posed any calculated risks in relation to modern slavery were identified.

## Fair Supply Mitigation Score Methodology

1. Fair Supply's tailored Supplier Self-Assessment Questionnaire (SAQ) is designed to assist our customers in obtaining important baseline information about the nature and extent of ESG mitigation frameworks currently being implemented by their suppliers.
2. Issuing SAQs to suppliers should not be viewed as an end for achieving maximum impact in ESG due diligence. SAQs relating to modern slavery and other ESG issues have historically very low response rates, although we have seen a recent uptick in engagement, particularly with more targeted efforts. Perhaps the best way of viewing our SAQ is as a valuable springboard that can be effectively used as part of a broader response framework, to assist our customers with developing strategies for more targeted and effective due diligence and deepening supplier engagement.
3. Mitigation Score is an SAQ-related feature on the Fair Supply platform that quantifies the responses from suppliers and provides a numerical evaluation of ESG mitigation framework implementation of the suppliers. The Mitigation Score is based on synthesised results of responses that a supplier provides in their SAQ about its existing mitigation framework. It is important to stress that there is no standardised or objective measure that is universally accepted as the most appropriate method for assessing a supplier's mitigation framework.
4. We have developed our approach through integrating several of the most respected international and Australian supplier assessment methodologies, coupled with our own subject matter knowledge and experience with Australian and international customers across a broad spectrum of industries. The Modern Slavery SAQ incorporated UNGP Reporting Framework and Assurance Indicators, the Corporate Human Rights Benchmark, Know the Chain Benchmark, the Business & Human Rights Resource Centre's FTSE 100 & the UK Modern Slavery Act benchmarks, and the approach adopted by Monash University's Centre for Financial Studies analysing Modern Slavery Statement Disclosure Quality among the ASX100 companies in Australia. In the Emission SAQ we incorporated Task Force on Climate-related Financial Disclosures, IFRS S2 Climate-related Disclosures, Greenhouse Gas Protocols, Partnership for Carbon Accounting Financials, GRI 305: Emissions 2016, European Sustainability Reporting Standards (ESRS), Australian Prudential Regulation Authority CPG 229 Climate Change Financial Risks Framework, and CDP Climate Change Questionnaire. Biodiversity SAQ incorporated IFRS S1 - Sustainability related financial disclosures, GRI 304: Biodiversity 2016, Partnership for Biodiversity Accounting Financials (PBAF), Climate Disclosure Standards Board framework, and European Sustainability Reporting Standards.
5. The evaluation of any entities' approach to ESG-issues is not an exact science. It is important to always bear in mind that the underlying purpose and intended use of the Mitigation Score is to be one of several tools that our customers can use in determining where to focus their ongoing ESG response efforts, including the most appropriate potential opportunities for positive supplier partnerships, and the beneficial multiplier effect that this can have in reducing overall ESG risk and impact in key supply chains. Subjective judgment calls are an inherent feature of any scoring approach in this space.
6. We divided the questions in each SAQs into sections with specific theme in ESG risk and impact mitigation framework. In modern slavery SAQ these sections are: Due Diligence, Grievance Mechanism, Industry Collaboration & Supplier Engagement, Internal Governance & Policy Framework, Internal Training & Education, Measuring Effectiveness of Modern Slavery Response, Remediation, and Risk Identification & Assessment. In emission and biodiversity SAQs these sections are: Governance, Strategy, Risk and Impact Management, Metrics and Targets.