



Harmony Nursing Australia

We care for you

Harmony Nursing Modern Slavery Statement 2023

This Modern Slavery Statement (Statement) has been aligned with the mandatory criteria of the Modern Slavery Act 2018 (Cth) legislation.

This is Harmony Nursing's Modern Slavery Statement (Statement) and is for the financial year ending 30 June 2026. It represents Harmony Nursing and its subsidiaries and has been approved by the Harmony Nursing Board on **30/6/2025**

Harmony Nursing | Modern Slavery Statement 2023 Contents

- 1 Message from the CEO and Managing Director
- 2 Reporting Entity
- 3 About Harmony Nursing – our structure, operations and supply chains
 - 3.1 About Harmony Nursing
 - 3.2 Operations
 - 3.3 Governance
 - 3.4 Our supply chains
- 4 Areas of modern slavery risk in operations and supply chains
 - 4.1 Operational risks
 - 4.2 Caused, contributed, directly-linked
 - 4.3 Building on our category risk allocation
- 5 Actions taken to assess and address modern slavery risks
 - 5.1 Engagement and training
 - 5.2 Remediation and reporting
- 6 Assessing the effectiveness of our actions
- 7 Consultation

1. Message from the CEO and Managing Director

Dear stakeholders,

Harmony Nursing is pleased to present its first Modern Slavery Statement, which has been prepared and delivered in accordance with the Modern Slavery Act 2018 (Cth).

As one of Australia's premium care providers, we value care for our valued clients and their well-being as our highest priority. To deliver the quality community aged care services they require, we rely on a diverse range of suppliers to source essential goods, services and equipment. In caring for some of the most vulnerable members of our society, we are also conscious of the need to commit to protecting other vulnerable members of society, in Australia and worldwide.

We are aware of the ongoing pressure on global supply chains, including medical supplies, and that the past COVID-19 pandemic has amplified some of the major drivers of modern slavery, including poverty and financial crisis during a time when vulnerabilities in global governance and human rights protection can be exacerbated. This means we must remain diligent with our approach to identifying any potential modern slavery risks in our supply chains.

Thank you to our valued suppliers for their support, transparency and collaboration as we look to address modern slavery risk.

I hope that you find this statement informative and welcome any feedback from our stakeholders.

A handwritten signature in black ink that reads "Amanda Borg". The script is fluid and cursive, with the first letter of each name being capitalized and prominent.

Amanda Borg

Chief Executive Officer/Managing Director
Harmony Nursing Australia

2. Reporting Entity

Harmony Nursing is an ASX-listed company, incorporated in Australia with its Registered Office in Adelaide, South Australia.

This Modern Slavery Statement (Statement) is made by Harmony Nursing Limited (Harmony Nursing) on behalf of itself and the following group entities:

Ultimate Holding Company

- **Harmony Nursing Pty Ltd (ABN 55 661 364 656)**

3. About Harmony Nursing – Our structure, Operations and Supply Chains

3.1 About Harmony Nursing

Harmony Nursing exists to deliver care and services to Australians and we have a clear organisational purpose ‘to enrich and celebrate life together’, caring for our clients annually. Our expectations for behavior and ethical standards are set out in our Harmony Nursing Code of Conduct (Code). Key aspects of this Code are to act with honesty, fairness and integrity in all dealings, to respect all people and reflect this in our actions and to maintain a safe working environment to safeguard the health and safety of anyone that lives works or visits a Harmony Nursing home clients or office.

3.2 Operations

We have a diverse portfolio in South Australia. We provide community nursing services on a long-term or short-term basis, including mental health nursing services as part of a veteran service agreement. As well as providing home care services delivered by our team of carers and support workers.

3.3 Governance

Harmony Nursing recognises that modern slavery and human rights abuses are interconnected with the governance of our organisation and its ability to recognise and manage risk. As an ASX-listed company, we have a requirement to establish stringent governance processes.

Our 2025 Corporate Governance Statement outlines Harmony Nursing’s corporate governance practices currently in place and addresses the ASX Corporate Governance Council’s Corporate Governance Principles and recommendations including reference to Principle 3, which is to act lawfully, ethically and responsibly.

Our Sustainability Charter outlines our commitment to the communities in which we operate and the people we, directly and indirectly, interact with. This commitment extends to the

protection of human rights and is evident throughout our core business and purpose ‘to enrich and celebrate life’. We manage our operations and supply chains in line with the UN Guiding Principles on Business and Human Rights, and the Modern Slavery Act (2018) (Cth).

Our approach to addressing modern slavery is embedded in Harmony Nursing’s broader governance framework, with the Modern Slavery Working Group (Working Group) reporting to the Executive Sustainability Committee before actions and results are reported and reviewed by the Board Risk Management Committee that oversees the effectiveness of Harmony Nursing’s system of risk management and internal controls.

Harmony Nursing Board Formally delegates certain functions to Board Committees and to management via the formal Board and Committee Charters. Directly retains responsibility for a number of matters, including:

- Overall strategic guidance, instilling of the Company’s values and approving the Code of Conduct
- Oversight of management
- Oversight of financial and capital management
- Promotion of effective engagement with shareholders
- Promoting ethical and responsible decision-making
- Ensuring a robust risk management framework is in place
- Establishing the Company’s risk appetite
- Monitoring the systems of compliance, risk management and control
- Overseeing the Company’s process for making timely and balanced disclosure of all material information
- Oversight of policies governing the Company’s relationship with other stakeholders and those related to ESG, WHS and other regulatory and statutory requirements

3.4 Our supply chains

Harmony Nursing sources a diverse range of goods and services from many suppliers; the majority are engaged on a long-term, contractual basis in areas across the key spend categories of:

- Corporate and operational procurement: these goods and services are necessary to deliver community aged care services to residents in their homes and for our corporate teams to support this delivery. Goods and services include medical equipment and consumables, allied health services, labour hire, uniforms and clothing, information technology and electrical equipment and office supplies

- Professional services: includes services to ensure compliance with the Aged Care Act 19972, accounting and auditing services, consultants, recruitment services and legal services

4. Areas of modern slavery risk in operations and supply chains

4.1 Operational risks

The labour market in Australia is highly regulated, with strict regulation of the aged care and nursing sectors and unions to represent employees. As a result, our operational risk rating of modern slavery and exploitative practices to our direct workforce is low. However, our supply chains have inherent human rights risks due to the complexity of global health supply chains, known human rights violations of forced and child labour in the production of medical instruments and consumables and other key spend categories.

4.2 Caused, contributed, directly-linked

When assessing the potential impacts of Harmony Nursing's operations and supply chains, utilising the United Nations Guiding Principles on Business and Human Rights, there are three ways Harmony Nursing could be linked to modern slavery.

UN Guiding Principles:

- Caused: we created direct harm to a person

This is the least probable way for modern slavery to be linked to Harmony Nursing due to the level of control and oversight we have over our own operations, effective governance and risk management practices, a workplace culture of safety and care and national modern slavery, human rights and labour laws in place.

- Contributed: our actions enabled a third party to harm a person

While Harmony Nursing would not knowingly contribute to modern slavery, it is possible that procurement practices may contribute to modern slavery issues and as such, we consider this the highest modern slavery risk to Harmony Nursing. *An example of this might be the procurement of urgent and critical Personal Protective Equipment that was in short supply at the onset of the COVID-19 pandemic, a shared risk across the industry and one we continue to monitor closely through our procurement practices.*

If a potential issue is raised through our Whistleblower hotline, we will immediately cease any contributing actions, take appropriate action and remediate according to the context of the situation.

- Directly linked: third-party with a business relationship with Harmony Nursing has enacted modern slavery practices

Subcontracting our work without our knowledge presents a risk to Harmony Nursing. As a result, we continue to strengthen our due diligence process in order to reduce the risk of being directly linked to modern slavery. In our operations, the key risk for Harmony Nursing is to be 'directly linked' to exploitative practices of migrant labour, deceiving recruitment practices and underpayment or poor working conditions, mainly for cleaning services and workers, with known cases here in Australia. We have mitigated this risk across operations in our homes as cleaning and catering services are delivered by direct Harmony Nursing employees.

4.3 Building on our category risk allocation

The level of risk allocated per category is proportional to both our annual spending and the inherent risk of transacting in the industries the suppliers belong to.

The risk assessment highlighted the areas of highest risk to people in the Harmony Nursing supply chain:

- Procurement of products and services that involve high-risk materials or low-skilled labour
- Outsourced labour-hire of construction workers, nurses, cleaning staff and other workers
- Subcontracting and offshoring low-skill business services

Key issues identified related to labour rights, decent work and health and safety. The categories of procurement with the highest latent risk for Harmony Nursing include:

- Construction
- Clothing and uniforms
- Medical equipment and consumables
- Labour hire agencies including nursing agencies
- Electrical products

5 Actions taken to assess and address modern slavery risks

Our Modern Slavery Statement outlined our planned approach to tackling modern slavery risk in our business and supply chain, identifying four key areas of focus and associated actions:

1. Governance and due diligence
 2. Engagement and training
 3. Remediation and reporting
 4. Collaboration
- Expand existing policies and Code of Conduct
 - Continue the due diligence process
 - Incorporate modern slavery process into supplier contracts
 - Open communication channels with suppliers and employees
 - Implement an internal modern slavery training program for key teams (e.g. procurement, property)
 - Design and implement a remediation process
 - Develop and implement a reporting and evaluation framework
 - Investigate and pursue collaboration with relevant networks or organisations

As part of our policy and process review, for any future tenders above \$250,000, our procurement team has implemented the supplier modern slavery self-assessment questionnaire as a part of standard practice, to enhance our existing due diligence processes.

5.1 Engagement and training

We have taken a collaborative approach to address modern slavery risk.

5.2 Remediation and reporting

Grievance mechanism

The key grievance mechanism for Harmony Nursing remains our independently operated 'Say Something Hotline' and website where disclosures of suspected misconduct, including modern slavery-related concerns and issues, can be made anonymously.

The Whistleblower Policy and services are available to suppliers, contractors and subcontractors and can be used to raise concerns in relation to modern slavery. Promotion of the Whistleblower Policy and Say Something Hotline to suppliers is a key element of our supplier engagement program.

Reporting and remediation framework

Once suppliers have completed the screening questionnaire, an initial risk allocation is given to each supplier. Following a review of supplied documentation, we then identify any required action. This may result in a revised risk allocation of some suppliers. In instances where suppliers do not respond or provide appropriate information, corrective action planning will commence.

This process is the initial step in creating a reporting and evaluation framework for our supply chain. Information obtained throughout this process may feed into a remediation plan if an incidence of modern slavery is found.

Risk allocation (following initial screening)

Step one actions (by response type)

Step two actions (to complete the process)

High-risk suppliers

Review responses: if required, clarify and verify the information provided to determine step two

Assess documentation for efficacy, finalise supplier risk allocation and record in the supplier master report and records

Agree and implement required actions, assess outcomes at end of the agreed timeframe, update risk allocation Implement awareness and training program (one workshop in FY21, six suppliers attended)

If no response/insufficient information: commence corrective action planning

Review responses: for those that supplied their own Modern Slavery Statement, review Statements to determine step two Suppliers that did not respond to the survey: continue to follow up before determining the next steps Medium-risk suppliers

Review of responses: if required, clarify and verify the information provided to determine step two

Low risk No perceived risk, record results

6 Assessing the effectiveness of our actions

We recognise we are early in our implementation of supply chain transparency and modern slavery mitigation, with limited visibility beyond the first tier of suppliers. We will develop an evaluation framework to measure the effectiveness of the actions taken and establish key performance indicators (KPIs) to assess our progress.

The Modern Slavery Working Group is committed to eradicating modern slavery from our supply chains, our three-step approach to measuring the effectiveness of our actions includes:

1. **Self-evaluation:** based on reported information and recorded data, Harmony Nursing will conduct a yearly internal evaluation to assess the progress of the planned activities in the road map and the established KPIs
2. **Progress survey:** every year Harmony Nursing will survey the suppliers engaged in modern slavery training to understand the impact of the training on awareness and understanding of the issues to identify if our suppliers have taken additional action as a result of our approach and to proactively seek feedback on how we can improve our approach
3. **External support:** Harmony Nursing will continue to partner with external consultants such as Edge Environment to independently assess the progress of the Roadmap and actions to determine and improve our impact. The partnership with specialist third parties provides assurance that we are consistent with good practice and ongoing continuous improvement

7 Consultation

The Modern Slavery Working Group, established in 2020, is comprised of senior management members. The Modern Slavery Working Group is accountable for the development, implementation and monitoring of the agreed actions to address the Modern Slavery Act requirements and report progress to the Executive Sustainability Committee and ultimately to the Board Risk Management Committee.

A consultation process led by the Working Group was undertaken with the shared board, executive and operational functions responsible for the governance, risk management and oversight across all active Group entities.

A consultation process was undertaken with the shared board, executive and operational functions responsible for the governance, risk management and oversight across all active Group entities.