

Silverchain Group Modern Slavery Statement 2024-25

31 December 2025

1. Introduction

This Modern Slavery Statement outlines the actions and commitments of Silver Chain Group Limited (ACN 077 082 725) (**Silverchain**), and its wholly owned subsidiaries, for the reporting period 1 July 2024 to 30 June 2025. As a corporate group with a consolidated revenue exceeding the AUD\$100 million threshold, a single statement covering all entities within our Silverchain group is appropriate.

With over 130 years of experience as a not-for-profit leader in home care, Silverchain has consistently delivered high-quality, comprehensive care to Australians in their homes. Each year, our dedicated team supports more than 140,000 individuals of all ages through a wide range of services, including hospital in the home, palliative care, aged care programs, allied health, social support, and virtual care monitoring.

As a national leading provider of complete in-home care services in Australia, Silverchain is committed to enabling people to live confidently and independently in their own homes. Our mission is to set the standard for world-class health and aged care delivered at home. Central to our operations is a strong commitment to ethical practices and meaningful impact, including proactive efforts to identify and address modern slavery risks within our organisation, supply chains, and the broader community.

This Statement, our sixth, is submitted in accordance with the Modern Slavery Act 2018 (Cth) for the period from 1 July 2024 to 30 June 2025, incorporating for the first time Silverchain Care Pty Ltd (formerly known as Kincare Health Services Pty Ltd) (ACN 095 961 005), and KinCare Management Pty Ltd (ACN 095 961 032) which were acquired by Silverchain on 1 July 2024.

For further information about our Silverchain group, please visit www.silverchain.org.au.

2. Reporting Entity

For the relevant reporting period, Silverchain was a public company limited by guarantee, with the following wholly owned subsidiaries:

- Access Care Network Australia Pty Ltd (ACN 601 017 430) (**ACNA**) (a proprietary company limited by shares which provides assessment, coordination and case management services and operates independently from other entities within the Silverchain group as further described in section 3 below);
- Silver Chain - Victoria Limited (ACN 649 647 914) (a public company limited by guarantee with operations in Victoria);
- Royal District Nursing Service of SA Limited (ACN 15 858 025) (a public company limited by guarantee with operations in South Australia);
- Silver Chain Foundation Ltd (ACN 077 086 670) (a public company limited by guarantee focused on fundraising initiatives to support its constitutional objects);
- Kincare Health Services Pty Ltd (ACN 095 961 005) (a proprietary company limited by shares delivering aged care services across Australia); and
- KinCare Management Pty Ltd (ACN 095 961 032) (a proprietary company limited by shares supporting Kincare Health Services Pty Ltd to deliver aged care services).

Silverchain and its subsidiaries are all registered charities with the Australian Charities and Not-for-Profit Commission.

3. Governance

Silverchain's corporate governance is established through company constitutional documents, a Board Governance Charter and a Delegations Policy. Silverchain also has in place an intercompany services agreement and Subsidiary Governance Protocol for the management of ACNA, and a Subsidiary Governance Protocol for the management of the remaining subsidiaries. The Board is supported by Board subcommittees, comprised of members of the Board and external members, as well as the Silverchain Group Executive team.

Representatives from each subsidiary either sit on the Modern Slavery Working Group or the Group Executive. Review of modern slavery risk areas is conducted for the Silverchain Group as a whole.

Modern Slavery Risk Areas

Silverchain has identified and focussed on two key risk areas for modern slavery within its operations:

- Supply chain; and
- Labour hire and frontline operations.

Supply chain

Silverchain's supply chain encompasses a diverse array of over 2,800 suppliers across a broad range of procurement categories. In the financial year 2024/2025, our annual spend exceeded \$178 million across all reporting entities.

Our procurement activities are predominantly indirect, focusing on the acquisition of products and services essential to supporting day-to-day operations. These include medical consumables, vehicles and maintenance, information technology products, client equipment and services, and insurance.

Following the implementation of two new digital solutions in the financial year 2022/23—Microsoft Dynamics 365 Finance & Operations as our Procure-2-Pay (**P2P**) system, and SAP SuccessFactors (**Our People Portal**) for human capital management—we continue to enhance and update these platforms. These systems have improved visibility of suppliers, vendor spend, and data integrity, while strengthening governance and supporting contemporary staff development. They also facilitate the identification of suppliers for modern slavery assessment and provide greater insight into employee engagement and professional development, including modern slavery training. Silverchain remains committed to continuous improvement and continues to explore opportunities to further enhance our digital solutions.

We currently maintain just over 2,400 active supplier contracts within Agiloft and Salesforce (**Contract Management Systems**), representing the current and critical suppliers for Silverchain's business operations. All direct suppliers with whom we have contractual arrangements are classified as Tier-1 suppliers. These suppliers are assessed against modern slavery risk factors such as industry, country of origin, spend, and workforce or labour type. For this financial year, all suppliers who submitted a tender or were subject to a market evaluation were required to complete self-assessment questionnaires (**SAQ**), with responses used to verify credentials and scrutinise operations at a higher level. This year's cohort included suppliers in cleaning and medical consumables distribution and supply.

While the majority of our Tier-1 suppliers are based in Australia, we acknowledge that many products are sourced from overseas. We anticipate that our Tier-2 supply chain (primary suppliers to our Tier-1 suppliers) will be significantly more complex, and we intend to assess this data for selected high-risk suppliers as part of a future phase in addressing modern slavery risks. At present, we implement contractual measures to ensure our suppliers actively mitigate against modern slavery risks.

Labour hire and frontline operations

As a health and aged care organisation, Silverchain relies on a workforce comprising nurses, care staff, and casual employees, some of whom are employed in Australia under visa arrangements or engaged through labour hire agencies. Silverchain recognises the inherent modern slavery risks associated with visa processes, including, but not limited to, deceptive recruitment practices, debt bondage, and people trafficking.

To address these risks, Silverchain ensures that all contractual relationships with labour hire, recruitment, and agency partners incorporate robust anti-slavery clauses, as well as reporting and auditing mechanisms. The recruitment team maintains close collaboration with these vendors to understand and evaluate their processes for managing and eliminating modern slavery risks.

Silverchain acknowledges that not all instances of modern slavery can be identified at the recruitment stage. The organisation values the unique insights provided by its frontline workforce—whether in clients' homes, alongside other employees, or with contracted workers—outside of traditional corporate settings. Accordingly, Silverchain is committed to informing, training, and raising awareness of modern slavery risks among all employees, ensuring vigilance and proactive risk management throughout its operations.

4. Actions Taken to Address Modern Slavery in FY 2024/25

For financial year 2024/25 Silverchain undertook the following actions to mitigate modern slavery risks:

- All new contracts included a requirement for the supplier to remain compliant with Modern Slavery requirements
- Modern Slavery requirements and compliance requirements were incorporated into all tenders and market evaluation activities
- A Modern Slavery Self-Assessment Questionnaire (**SAQ**) was issued to all suppliers who submitted a response to a tender
- We used our bespoke Risk Assessment Tool to determine modern slavery risks across different areas.
- The Modern Slavery voluntary awareness e-learning module was completed by 30% of staff, which is in addition to the 40% completed in the previous reporting period
- The Modern Slavery Working Group (comprising representatives from across different business units across our business) met periodically to review actions, set goals, engage stakeholders and maintain accountability.

5. Further Actions Scheduled to Address Modern Slavery Risks

As part of our continued commitment to preventing modern slavery, Silverchain plans to undertake the following actions over the next reporting period and ongoing:

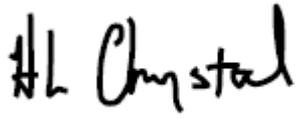
- Reviewing and redesigning of SAQs to ensure they continue to meet the requirements of continued assessment and review of supply chains
- Updating of the Risk Assessment Tool, with input of new data, monitoring of risk ratings and updating with current international news and events
- Preliminary assessment of Tier 2 suppliers (i.e. supply chains of our direct suppliers)
- Continued monitoring and updating of the modern slavery e-learning module to ensure heightening awareness and completion rates
- Working closely with the Communications Team to develop organisation-wide, targeted and even external communications regarding modern slavery awareness and Silverchain's commitment
- Engagement and partnership with high-risk suppliers.

Silverchain will continue to assess the effectiveness of its actions taken to address modern slavery through the following mechanisms:

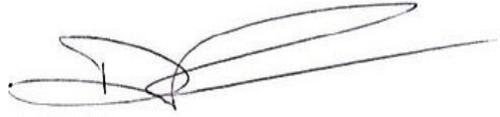
- Continued SAQ completion requests covering a wide range of suppliers and business areas
- Increased involvement of internal stakeholders across Silverchain and its subsidiaries, including further representation on the Modern Slavery Working Group
- Ongoing assessment of participation percentages for the modern slavery learning module
- Targeted and regular communication and awareness of the modern slavery learning module to increase uptake
- Monitoring of any internal feedback, engagement or reporting pathways to confirm effective understanding and awareness
- Monitoring business spend to identify new suppliers to engage on contracts compliance with modern slavery.

6. Approval

This Statement has been approved by the Board of Silverchain in its capacity as principal governing body of Silverchain and its wholly owned subsidiaries and is signed by Haydn Chrystal in his role as Chair of Silverchain.

Handwritten signature of Haydn Chrystal in black ink.

Haydn Chrystal
Silverchain Board Chair

Handwritten signature of Dale Fisher in black ink.

Dale Fisher
Chief Executive Officer

Health. Human. Home.

