

# **HEALTHIA LIMITED ACN 626 087 223**

# MODERN SLAVERY STATEMENT | For the period ended 30 June 2023

# **Reporting Entities and Structure**

For the purposes of the Modern Slavery Act 2018 (Cth) (the Act), this statement covers:

- 1. Healthia Limited ACN 626 087 223 ("Healthia"); and
- Those subsidiaries required to report under the Australian Modern Slavery Act, including but not limited to My FootDr (Aust) Limited, Allsports (Aust) Limited, The Optical Company Pty Ltd, BIM Physiotherapy Group Holding Ltd, Extend Rehab Pty Ltd, Natural Fit Footwear Pty Ltd, iOrthotics Pty Ltd and DBS Australia Pty Ltd.

### (Collectively the "Healthia Group").

This Statement sets out how the Healthia Group has identified, addressed and remediated against modern slavery pursuant to the Act during the year ended 30 June 2023 (**reporting period**) and its plans to continually address modern slavery within its businesses. Healthia is committed to upholding all human rights including rights to be free from exploitation, slavery, forced labour, child labour and domestic servitude. Healthia enforces strong ethical standards in the way it delivers its services and the way it manages its businesses. This is central to our business, and we consider any modern slavery or human trafficking of any kind to be entirely unacceptable.

During the reporting period, Healthia was an Australian public company that was listed on the Australian Securities Exchange (ASX:HLA). Healthia's registered office is at Level 4, 25 Montpelier Road, Bowen Hills QLD 4006.

While each of the Healthia Group entities has its own Board of Directors, all Healthia Group entities report to Healthia's Board of Directors (**Board**) and a shared services team is responsible for the implementation and day-to-day management of policies and communication with the Board.

#### **Operations and Supply Chains**

The Healthia Group is a leading diversified health care provider and operates over 300 allied health businesses across Australia and New Zealand as follows:

- 1. Over 100 podiatry clinics including retail footwear stores, 2 orthotics laboratories and an allied health wholesale supplies business.
- 2. Over 160 physiotherapy and hand therapy clinics; and
- 3. Over 55 optometry stores including 1 wholesale eyewear frame distribution business.

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

The Healthia Group's operations are largely based in Australia, with a small number of businesses operating in New Zealand and includes salaried employees, employees under modern pay awards or enterprise bargaining agreements and a small number of independent contractors. As at the end of the

reporting period, there were approximately 2,653 employees working in the Australian businesses and 50 employees working in the New Zealand businesses. This does not include independent contractors.

The Healthia Group operates a number of programmes to support professional development and the health and wellbeing of its team members, including the offering of an Employee Assistance Programme to those team members who may need support in dealing with work related concerns as well as personal and family matters. The Healthia Group remains committed to its frequent review of the efficacy of the programmes that it offers to its team members.

The Healthia Group's major supply chain areas include:

- Allied health related equipment and consumables
- The leasing of commercial real estate
- Other services including utilities, cleaning, IT hardware and associated software subscriptions and licences and market services including advertising

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

During the reporting period, the Healthia Group continued to assess and identify risks within its operations and supply chain. The risk of modern slavery within the Healthia Group's core operations has not materially shifted over the past 12 months and remains low as a provider of allied health services, which is a heavily regulated industry. A risk of modern slavery within the Healthia Group's operations is largely limited to potential downstream supply chain activity including where and how equipment and products are produced.

The Healthia Group has a Modern Slavery Policy and has provided a copy of this to each of its identified key suppliers. Through our ongoing assessment and identification process, the Healthia Group identified that certain key suppliers had already implemented their own modern slavery policies and statements within their own businesses. For those key suppliers who do not have their own modern slavery policies and statements implemented within their businesses, the Healthia Group sent out a questionnaire designed to gather information about their business practices and own supply chains to enable the Healthia Group to assess and identify any potential modern slavery risks or concerns within those key suppliers' businesses.

## **Actions Taken to Assess and Address Those Risks**

The Healthia Group continually works on developing and maintaining long term relationships with its valued suppliers. Our Modern Slavery Policy details our supplier expectations, including addressing modern slavery risks, and requires suppliers to:

- 1. Adequately address Modern Slavery;
- 2. Assist us with our own compliance with Modern Slavery Laws;
- 3. Undertake their own due diligence procedures; and
- 4. Comply with Modern Slavery Laws.

During the reporting period the Healthia Group continued its modern slavery risk assessment of its key suppliers and obtained a level of assurance by reviewing these key suppliers published modern slavery statements, policies, terms and conditions and due diligence questionnaires. In addition, the Healthia Group continued is regular reviews of its governance and management frameworks including updating policies and procedures to ensure compliance with all applicable legislation.

The Healthia Group offers multiple ways of reporting potential compliance concerns, and its whistleblower policy is clearly visible and accessible to its team members and members of the public.

During the next reporting period, the Healthia Group will be focused on the continuous improvement of its procurement and governance frameworks to better identify and minimise any potential risks of modern slavery within its operations including through the ongoing regular review of its key suppliers and the completion of questionnaires by suppliers.



## **Process of Consultation**

The Healthia Groups consultation process is ongoing and continues to be reviewed at key points throughout the year. Healthia's Board and committees are responsible for reviewing the Company's risk management framework, which modern slavery and other such business and operational risks form part of. Healthia's Board and committees consult with management to ensure that compliance and governance practices remain suitable and appropriate for the businesses which operate within the Healthia Group.

## **Governance**

The Healthia Group Chief Executive Officer and Executive Team are responsible for ensuring that the Healthia Group meets its responsibilities under the Act. They are supported by other Healthia Group team members responsible for sourcing, production and sustainability.

This Modern Slavery Statement by the Healthia Group was approved by the Board on 23 December 2023.

Signed on behalf of the Board by

Wesley Coote

Chief Executive Officer and Managing Director

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