

HEALTHIA LIMITED ACN 626 087 223

MODERN SLAVERY STATEMENT | For the period ended 30 June 2024

1. Reporting Entities and Structure

In December 2023, Healthia Limited (ASX:HLA) was acquired by funds managed by Pacific Equity Partners, together with a number of existing Healthia shareholders, and became a private company.

Although a number of new holding companies were introduced into the group as part of the acquisition, Healthia's operations are essentially unchanged from its FY23 Modern Slavery Statement.

The ultimate holding company of the Healthia Group of companies is Harold Topco Limited. This statement is made jointly by Harold Topco Limited and the other entities within the Healthia group of companies that are reporting entities for the purposes of the Modern Slavery Act 2018 (**the Act**) (identified in **Annexure 1**). In this report, we refer collectively to the group as "Healthia Group", "Healthia" or "we", "us", "our").

This is the fourth Modern Slavery Statement issued by the Healthia Group and sets out how we have identified, addressed and remediated against modern slavery pursuant to the Act during the year ended 30 June 2024 (**reporting period**) and its plans to continually address modern slavery within our operations.

The Healthia Group 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 operations. This is central to our business, and we consider any modern slavery or human trafficking of any kind to be entirely unacceptable.

2. Operations and Supply Chains

The Healthia Group is a leading allied health care provider and through collaboration with its teams and through its integrated network of allied health businesses, Healthia continually strives to create positive, lasting impacts on the communities we serve, empowering our patients to lead happier and healthier lives.

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 operates approximately 350 allied health businesses as follows:

1. Over 95 podiatry clinics including 2 orthotics laboratories and an allied health wholesale supplies business.
2. Over 195 physiotherapy and hand therapy clinics; and
3. Over 60 optometry stores including 1 wholesale eyewear frame distribution business.

Healthia's operations are largely based in Australia, with a small number of businesses operating in New Zealand and 1 orthotics laboratory in the US 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, Healthia had approximately 3,000 employees in Australia, 34 employees in New Zealand and 24 employees in the US. This does not include independent contractors, including a small number based in the Philippines.

Most of Healthia's team members are allied health professionals who deliver allied health care and support services to patients. Healthia has a support office located in Brisbane which provides its clinic teams with corporate support functions including human resources, recruitment, finance, IT and marketing.

Healthia's supply chain is centred around the provision of allied health services and related products which are sourced from tier one suppliers largely based in Australia and broadly grouped into the following areas:

- Allied health related equipment and consumables
- The leasing of commercial real estate
- Engagement and procurement of its team members
- Information technology hardware and software
- Other services including utilities, phone, internet, cleaning, and marketing services including advertising

3. 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. Healthia assesses risk in its operations and supply chain based on geographical location, sourced products and services and the industry generally within which it operates.

The Healthia Group recognises that modern slavery can occur within its supply chain as well as in its own operations. Healthia's supply chains and operational activities have remained relatively unchanged since Healthia's first Modern Slavery Statement and the risk of modern slavery within Healthia Group's core operations has not materially shifted over the past 12 months and remains low given we operate within a heavily regulated industry.

The Healthia Group utilises various controls to manage the risk of modern slavery within its operations and workforce. As stated above, Healthia engages employees under modern awards, enterprise agreements and otherwise contracts that are underpinned by the *Fair Work Act 2009* (Cth) or the National Employment Standards. Further, Healthia's People & Culture team manages our recruitment processes and is responsible for compliance with employment laws and obligations to maintain control and visibility over these practices and thereby reducing any potential modern slavery risks to Healthia.

The majority of Healthia's key suppliers are based in Australia which presents a lower inherent risk of modern slavery. Healthia acknowledges that sourcing goods and services overseas can pose a higher risk of modern slavery. In terms of industry and product risk, Healthia's main business operations are within the healthcare industry which is heavily regulated and therefore lower risk; however, Healthia engages cleaning companies to service its businesses which is an industry which is considered high risk. Healthia also procures technology and medical goods to support the provision of its services and to support its patients and customers. These are other high-risk areas for potential modern slavery.

4. Actions Taken to Assess and Address Those Risks

The Healthia Group continually works on developing and maintaining long term relationships with its valued suppliers which is evident in the fact that Healthia's key suppliers have remained largely unchanged since Healthia's first reporting period.

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 those key suppliers published modern slavery statements, policies, terms and conditions and due diligence questionnaires.

In addition, the Healthia Group continues to address the risks of modern slavery practices in its operations and supply chains through its policies and procedures to ensure we provide a fair and safe workplace for our team members and suppliers. Healthia's relevant policies include its Anti-bribery and Corruption Policy, Bullying, Harassment and Discrimination Policy, Code of Conduct and Behaviour Policy, Work, Health and Safety Policy, Modern Slavery Policy and Whistleblower Policy. All of these policies are clearly visible and accessible to its team members.

Healthia's 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.

A copy of Healthia's Modern Slavery Policy has been provided to its identified key suppliers.

Healthia's Whistleblower Policy encourages the raising of any concerns about reportable conduct and the whistleblowing process ensures that people can raise any such concerns safely, securely and with confidence that they will be protected and supported. Healthia team members who make a report under this policy will not be personally disadvantaged in their employment. This policy also applies to Healthia's suppliers are also encouraged to report any such concerns.

During the next reporting period, Healthia is proposing to implement a Supplier Code of Conduct to clearly set out the minimum standards that it requires from its suppliers and requiring its suppliers to take reasonable steps to identify, assess and address risks of Modern Slavery within their business operations. We will also be reviewing and updating our existing due diligence for suppliers, including our modern slavery questionnaire.

5. Effectiveness of Actions taken

During this reporting period, as part of Healthia's supply risk assessment, we continued to gather and analyse data on our supply chains and updated our key supplier lists to ensure a current understanding of potential modern slavery risks. We recognise that assessing the effectiveness of our efforts to identify and address these risks across our operations, supply chain, and broader compliance program is an ongoing and evolving process. To support continuous improvement, we have implemented specific annual measures to monitor, evaluate, and refine our approach. These measures include tracking progress against set objectives, reviewing the outcomes of our actions, and identifying opportunities to enhance our modern slavery risk management practices.

6. Consultation and Approval

The Healthia Groups consultation process is ongoing and continues to be reviewed at key points throughout the year. Healthia's Board of Directors is 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 consults with Healthia's Executive Team to ensure that compliance and governance practices remain suitable and appropriate for the businesses which operate within the Healthia Group.

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 22 December 2024.

Signed on behalf of the Board by



Wesley Coote
Chief Executive Officer and Managing Director

Annexure 1

The following entities within the Healthia group of companies are reporting entities for the purposes of the Act:

- Harold Topco Limited
- Harold Holdco Pty Ltd
- Harold Midco Pty Ltd
- Harold Bidco Pty Ltd
- Healthia Limited

The subsidiaries of Healthia Limited comprise:

- Healthia (Services) Pty Ltd
- Allsports (Aust) Limited
- My FootDr (Aust) Limited
- Extend Rehab Pty Ltd
- BIM Physiotherapy Group Holdings Limited
- Healthia Physiotherapy Pty Ltd
- Healthia Allied Pty Ltd
- The Optical Company Pty Ltd
- Australian Eyewear Distributors Pty Ltd
- The Optical Company (NSW) Pty Ltd
- The Optical Company (Aust) Pty Ltd
- Motion Health Group Limited
- DBS Australia Pty Ltd
- iOrthotics Pty Ltd
- Healthia USA Inc

