



Acknowledgement of Country

Northwest acknowledges the Traditional Owners of Country throughout Australia, especially the lands on which we live and work, and recognises their continuing connection to lands, waters and communities.

We pay our respects to all First Nations peoples and to Elders past, present and emerging.



Introduction

This statement is made by Northwest Healthcare Australia RE Limited ACN 612 310 148 (NWHARE) (the Company, we or our), who is a reporting entity under the Modern Slavery Act 2018 (Cth) (Act).

The Company makes this statement in accordance with section 13 of the Act. The Act requires reporting entities subject to the Act to produce an annual modern slavery statement.

This is NWHARE's fourth annual statement (noting that previous statements were joint statements made with Northwest Healthcare Australian Property Limited for reporting periods to 30 June 2025). This is its first statement as a single reporting entity and is for the Australian Financial Year ended 31 December 2025.

This statement was prepared in consultation with the entities owned or controlled by, or related to, NWHARE. This process included discussions with senior leadership and giving them an opportunity to comment on the draft Modern Slavery Statement.

This modern slavery statement has been approved by the principal governing body of the Company, namely the Board of Directors of the Company, on 19 June 2026.

The statement has been prepared in accordance with the requirements of the Act, and we remain committed to complying with the highest standards of governance in our efforts to address modern slavery.

DocuSigned by:
A handwritten signature in black ink, appearing to read "Richard John Roos".
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Richard John Roos

Director of Northwest Healthcare Australia RE Limited



Our Structure, Operations and Supply Chain

Structure

NWHARE acts as trustee of a number of real estate owning trusts or funds with approximately 13 members of staff located in Melbourne, Australia.

As of 31 December 2025, NWHARE provides trustee services to 26 properties, an approximately A\$2.7 billion healthcare property portfolio owned by trusts and funds in Australia.

To the extent this statement describes operations, the risk of modern slavery in operations and supply chains, and the actions taken to address those risks, the descriptions apply to all controlled entities of NWHARE.

Operations

The primary business operations of NWHARE involve acquiring, developing, managing and maintaining healthcare real estate assets, including private hospitals and medical office buildings.

Supply Chain

Whilst most of our workforce is employed locally in professional services roles, our supply chains include a diverse range of services integral to our operations, such as building renovation, property maintenance and facility management.

We categorise our primary supply chains into two key areas: asset management and construction. We also acknowledge the operational supply chain which supports our day-to-day business operations.

Asset management supply chain: This includes local service and equipment providers, facility maintenance, cleaners, security personnel, landscapers, and professional service firms, many of which are located in proximity to our real estate assets in Australia.

Construction supply chain: Our current operations focus on minor construction such as fit-outs and refurbishment which can involve designers, subcontractors, material suppliers, design and project management teams and equipment suppliers. Many of these suppliers are located in proximity to our real estate assets in Australia. We recognise the inevitability that some of our construction materials are sourced internationally, where the risks of modern slavery can be higher.

Operational supply chain: This supports the broader business functions and includes hotel accommodation, travel, entertainment, office equipment providers, cleaning services, professional services such as lawyers, auditors, IT services and procurement of goods such as furniture and stationery.



Risks of Modern Slavery and approach to Address Modern Slavery

NWHARE is committed to eliminating potential for modern slavery practices. Our preferred suppliers are premium grade, reputable suppliers whose values align with ours. The majority of our suppliers are based in Australia with none of our direct suppliers located in high-risk countries.

There are, however, several identified key risk areas within our supply chains and we set out below our approach to these risks.

Specific details with respect to the action taken to address the risks is set out in the next section.

Risk	Approach
Raw material sourcing: The risk of modern slavery is most pronounced in the sourcing of raw materials, such as bricks, cement and other items not produced in region, as well as plant and equipment, such as elevators and air-conditioning systems. These products are often procured from regions where labour exploitation may be prevalent.	To address risks linked to the sourcing of raw materials and manufactured components, our due diligence includes assessing supplier practices, prioritising local or accredited sources where possible and incorporating modern slavery clauses in contracts to improve transparency and accountability across supply chains.
Labour practices in construction: Whilst much of the construction workforce in Australia is covered by stringent labour laws, we accept that there are aspects of the sectors in which we operate which are vulnerable to exploitation, especially where cheap labour reduces costs and enhances returns. We recognise that robust oversight of these tiers is essential to preventing modern slavery. We also note that NWHARE does not undertake major construction projects and only undertakes small scale renovations and fit outs.	To mitigate risks associated with labour practices in construction we conduct due diligence on contractors and subcontractors to ensure compliance with labour laws and ethical standards. We monitor labour hire practices and undertake site visits where appropriate.
Offshore suppliers: Our reliance on offshore suppliers for certain construction and technology products, which can involve complex and opaque supply chains, presents an ongoing challenge for risk management.	We recognise the heightened risk of modern slavery within offshore supply chains due to limited visibility and complex sourcing arrangements. Our focus continues to be on improving transparency by strengthening supplier due diligence processes and contractual obligations, particularly for overseas manufacturers of plant equipment and technology.



	We continue to review opportunities to enhance traceability and work with partners who demonstrate robust ethical sourcing practices.
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Actions to Address Industry Risks of Modern Slavery

In order to address the modern slavery risks identified above, and consistent with the approaches set out, NWHARE engages in a variety of activities to manage the broader risk of modern slavery, including:

1. Implementation and enforcement of a Supplier Code of Conduct

NWHARE has implemented a Supplier Code of Conduct which sets out the expectations NWHARE has for suppliers in relation to modern slavery risks. The Supplier Code of Conduct is distributed to new suppliers who are required to confirm they comply with these expectations.

2. Modern Slavery Supplier Questionnaires

Annual updates and information on modern slavery risk assessments are requested from suppliers via the Informed365 platform.

Informed365 is a platform to support our business with assessing and addressing modern slavery risks in our supply chains. Informed365 is free for suppliers to register, access and use, and assessment information is updated annually with suppliers, who are prompted to record improvements in their business operations.

The platform also provides updates on year-on-year progress. This allows us to monitor improvements, identify recurring risks and measure overall progress in supplier engagement and performance over time.

3. Industry Collaboration

We continue to undertake collaboration with industry on understanding present and emerging risks relating to modern slavery within the real estate industry, through industry forums and ad hoc meetings.

4. Staff Training

Ongoing staff training on modern slavery risks and management through annual refresher training.

5. Grievance mechanisms

Grievance mechanism for both internal and external stakeholders for raising and investigating suspected non-compliance issues.



Assessment of Effectiveness of the Actions Taken

NWHARE engages in the following processes which are aimed at assessing effectiveness of our actions taken to prevent modern slavery:

- Annual review of its modern slavery statement
- Undertaking updated modern slavery risk reassessments and implementing any identified changes in business operations or procedures
- Engaging with external platform "Informed365" to assess modern slavery risk of current suppliers by monitoring the engagement rate and response rate of suppliers, including promptly responding should any suppliers exceed the risk threshold.