



# Modern Slavery Statement 2025



Health is Life



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# Message from our CEO



At UFS Healthcare, our vision is to be a leading partner in connecting more people to high quality, integrated healthcare across our regions. This commitment extends beyond the services we provide — it encompasses the way we conduct business, the suppliers we engage with, and the standards we uphold across our entire supply chain.

## Why we produce a Modern Slavery Statement

Modern slavery is a global issue that affects millions of people, often hidden within complex supply chains. As a healthcare organisation, we recognise that our responsibility does not end at the point of care. We have an obligation to ensure that the products, services, and partnerships we rely on are free from exploitation and forced labour.

Producing a Modern Slavery Statement is not just a compliance requirement under Australian law—it reflects our values. It demonstrates transparency, accountability, and a proactive approach to identifying and mitigating risks. By publishing this statement, we affirm our commitment to human rights and ethical business practices.

## Our Approach

### Risk assessment

We have undertaken a comprehensive review of our operations and supply chains, guided by insights from our Modern Slavery risk assessment and industry benchmarks. This includes evaluating high-risk categories such as pharmaceuticals, medical consumables, and property services.

### Supplier engagement

We work closely with suppliers to ensure compliance with ethical standards, leveraging advanced tools to monitor and manage risk.

## Governance and accountability

Our Board and Executive Leadership Team oversee this process, embedding modern slavery risk management into our corporate governance framework. This includes clear policies, training, and reporting mechanisms across all departments.

## Why it matters

Modern slavery undermines human dignity and perpetuates inequality. As a member-owned organisation, UFS Healthcare is built on trust and community values. We cannot allow exploitation to exist within the systems that support our vision. By taking action, we contribute to a fairer, safer, and more sustainable future for all.

## Looking ahead

Our commitment does not end with this statement. We will continue to strengthen our processes, engage with suppliers and stakeholders, and improve transparency. Together, we can ensure that our organisation—and the healthcare sector more broadly—operates with integrity and respect for human rights.

A handwritten signature in black ink that reads "Matt Vagg". The signature is written in a cursive, slightly slanted style.

**Matt Vagg**  
Chief Executive Officer  
UFS Healthcare

# Mandatory Criteria

## Mandatory Criteria (a):

### Reporting entity

UFS Healthcare Ltd ACN 08 782 2259 is a member-owned mutual organisation with its registered address at 206 Armstrong St Nth, Ballarat Victoria 3550.

UFS has a wholly owned subsidiary Alfredton Chemist Pty Ltd ACN 64 088 5927 under the corporate structure. UFS also holds management authority over Western Victorian UFS Dispensaries Ltd ACN 087 822 277.

UFS Healthcare Ltd makes this single statement on behalf of the corporate entity and each other reporting entity as defined under the Modern Slavery Act 2018 (Cth).



This Statement was approved by the UFS Healthcare Board on 17 December 2025 and is signed by the Chief Executive Officer of UFS Healthcare Ltd.

The Statement has been lodged with the Australian Government Modern Slavery Statement Register as required under the Modern Slavery Act 2018 (Cth) and published on our website.

## Mandatory Criteria (b):

### Describe the reporting entity's structure, operations and supply chains.

#### Business structure

UFS Healthcare Ltd is a member-owned mutual organisation headquartered in Ballarat, Victoria. Established in 1880, we have been delivering healthcare services for over 145 years. Unlike shareholder-driven companies, UFS reinvests all profits back into the business to benefit our members, patients, and the wider community. Our purpose is to empower more people to live longer, healthier lives, with our vision to be a leading partner in providing integrated healthcare across regional Victoria.

Corporate governance is overseen by an independent Board of Directors, with operational leadership provided by an Executive Leadership Team.

UFS operates under a multi-layered governance structure designed to ensure compliance, strategic oversight, and quality care.



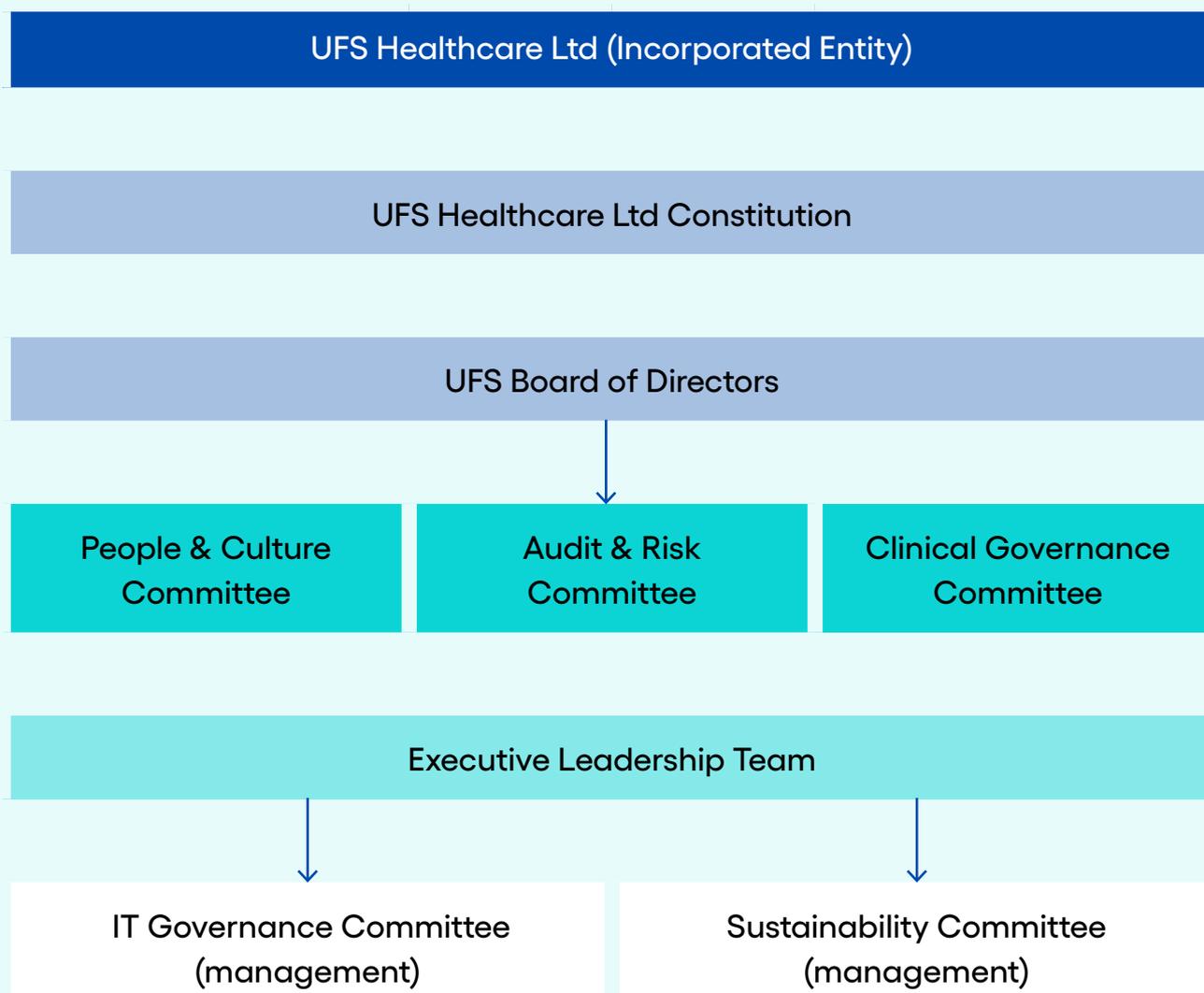
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The UFS governance framework is designed to balance strategic growth with robust risk management. At the apex, the Board of Directors ensures constitutional alignment and sets the organisation’s strategic direction, while maintaining governance, accountability, and sustainability across all subcommittees. This oversight includes monitoring financial performance and enterprise-wide risk, creating a foundation for informed decision-making and long-term resilience.

The Executive Leadership Team translates board-approved strategies into operational reality, embedding governance and accountability across corporate, pharmacy, medical, and allied health services. This alignment ensures that growth initiatives are executed within a controlled and compliant environment.

Specialised committees strengthen this structure by addressing critical risk domains. The Clinical Governance Committee safeguards quality, safety, and effectiveness in clinical services, supported by rigorous complaint and incident management systems. The People & Culture Committee mitigates workforce-related risks through strategic planning, remuneration oversight, diversity initiatives, and succession planning—ensuring talent stability and organisational agility.

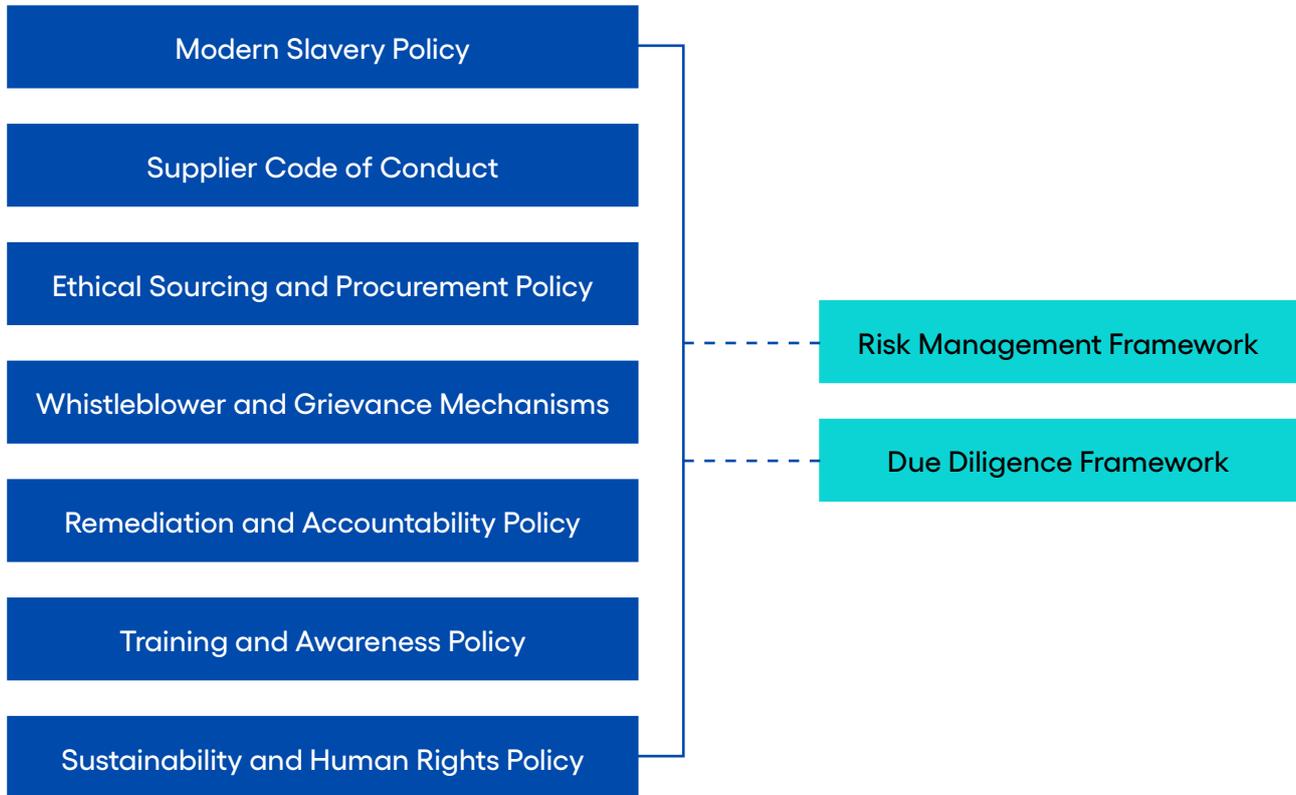
Financial and compliance risks are managed by the Audit and Risk Committee, which upholds financial integrity through robust reporting, internal controls, and risk management frameworks. Technology-related vulnerabilities are addressed by the IT Governance Committee, which provides strategic oversight of cybersecurity and data governance, protecting the organisation’s digital assets.

Finally, the Sustainability Committee integrates climate-related risk management and modern slavery compliance into decision-making, ensuring ethical and sustainable practices that support long-term growth. Together, these interconnected layers create a governance ecosystem that not only mitigates risk but also enables UFS to pursue strategic opportunities confidently and responsibly.

The governance structure at UFS is underpinned by a comprehensive suite of policies, procedures, and formal statements that form the backbone of operational integrity and strategic alignment. These instruments are not mere compliance artifacts; they are carefully designed to embed best practice principles, inclusiveness, and accountability into every facet of the organisation’s daily operations.



This suite of policies has been incorporated into the risk management and due diligence framework to specifically address modern slavery:



At their core, these policies serve multiple purposes: they ensure adherence to legislative and regulatory requirements, provide clarity on roles and responsibilities, and establish consistent standards for decision-making across all business lines. By codifying expectations and processes, UFS mitigates operational and reputational risks while fostering a culture of transparency and ethical conduct. This approach aligns with Australian governance principles that emphasise accountability, fairness, and sustainability as critical drivers of organisational resilience and stakeholder trust.

Beyond compliance, these frameworks actively guide our people in applying sound judgment and inclusive practices. They promote diversity in leadership and decision-making, encourage equitable treatment, and embed mechanisms for continuous improvement.

For example, workforce policies integrate diversity and succession planning, while clinical governance procedures safeguard patient safety and quality outcomes.

IT governance protocols ensure cybersecurity and data integrity, and sustainability policies address climate-related risks and modern slavery obligations—demonstrating UFS’s commitment to ethical and socially responsible operations.

Collectively, this UFS governance ecosystem transforms risk management from a reactive function into a proactive enabler of growth. By aligning operational conduct with strategic objectives, UFS has created a disciplined yet agile environment—one that empowers innovation while maintaining robust controls. This balance of risk oversight and strategic ambition positions UFS to deliver sustainable value to our members and the communities we serve.



ufs

Medical + Pharmacy



ufs

Medical + Pharmacy

General practice

# Operations

UFS Healthcare is an Australian based organisation that operates solely in Australia.

UFS Healthcare is an Australian based organisation that operates solely in Australia.

Our operations encompass diverse healthcare business lines dedicated to enhancing the health and wellbeing of members, customers, and the broader community. Guided by a profit-for-purpose model, we reinvest all surplus funds into expanding services, upgrading infrastructure, and delivering accessible, affordable healthcare solutions for the communities we serve.

## Pharmacy

16 UFS Healthcare locations and 3 Western Victorian UFS Dispensaries locations

## Medical

4 UFS Healthcare locations

## Urgent Care

1 UFS Healthcare location

## Eye Care

2 UFS Healthcare locations

## Dental Care

1 UFS Healthcare location



27 Locations  
across  
Victoria

# 2024-25 Highlights

# 1.5 million

scripts dispensed by  
UFS pharmacies



# 1.1 million

patient interactions  
at UFS pharmacies

---

## 19,827

Pharmacy  
vaccinations

## 1,995

Pharmacy  
medication reviews

---

## 79,559

Community  
medication  
packs prepared

## 206

In-home medication  
reviews performed  
by pharmacists



ufs  
Name

Laura  
Pharmacist

ufs  
Pharmacy

Stop the quest for your  
prescription with Healthier  
ufs Pharmacy  
Healthier in Life  
Prescription  
Stop the quest for your  
prescription with Healthier  
ufs Pharmacy



# 30,000+

GP hours spent with patients

---

# 178,745

Medical Centre attendances

---

# 370

Supercare Nursing  
Service consultations

# 79,368

Inbound and outbound  
calls managed by the  
phone hub, providing  
timely support to  
patients of UFS Medical

---

# 19,363

PPCC/Urgent Care  
Clinic attendances

477

total UFS  
employees

172

total health  
professionals

---

514

pharmacist  
prescriptions  
written (for UTIs  
and oral  
contraceptive)

135

In-pharmacy  
health clinics  
delivered to  
patients



Christine

ufs

# Employee Overview

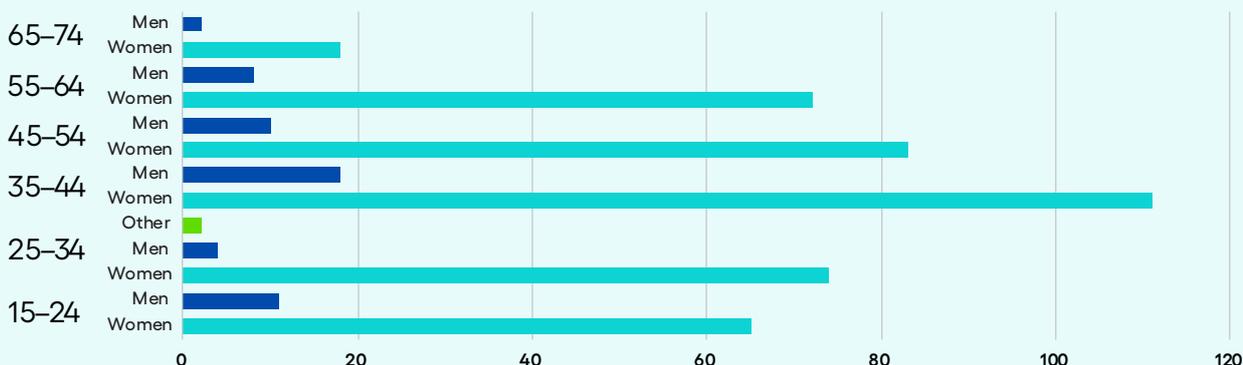
UFS Healthcare demonstrates a strong commitment to gender equality through transparent reporting under the Workplace Gender Equality Act (WGEA).

This includes annual submissions detailing workforce composition, pay equity, flexible work arrangements, and diversity initiatives. Our Gender Equality Policy and associated frameworks ensure compliance while embedding fairness and inclusivity across all levels of the organisation.

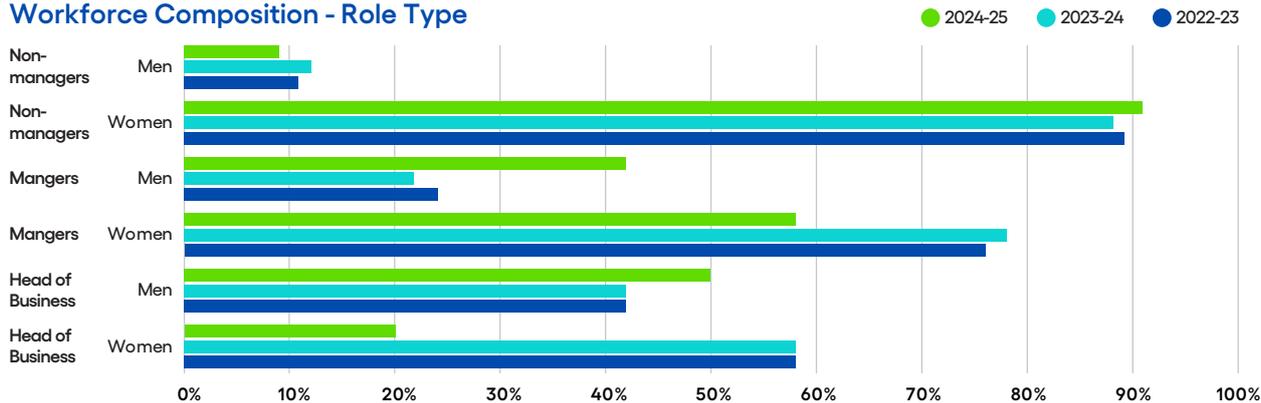
Supporting gender equality reporting delivers significant benefits for UFS and our stakeholders. It promotes transparency and accountability, builds trust with employees and strengthens our reputation as an ethical and inclusive employer. We see that gender-diverse teams drive innovation, better decision-making, and improved business performance, while aligning with ESG principles valued by the community. These initiatives foster a respectful, inclusive workplace culture that enhances engagement and wellbeing.

Importantly, gender equality reporting also reinforces our modern slavery reporting obligations. Both frameworks share a foundation in human rights and ethical governance. The systems developed for gender equality—such as workforce data collection, risk reviews, and supplier engagement—support modern slavery compliance by identifying vulnerabilities and promoting fair labour practices across our supply chain. Public disclosure of equality metrics fosters transparency and aligns with modern slavery requirements for clear communication of risk management actions.

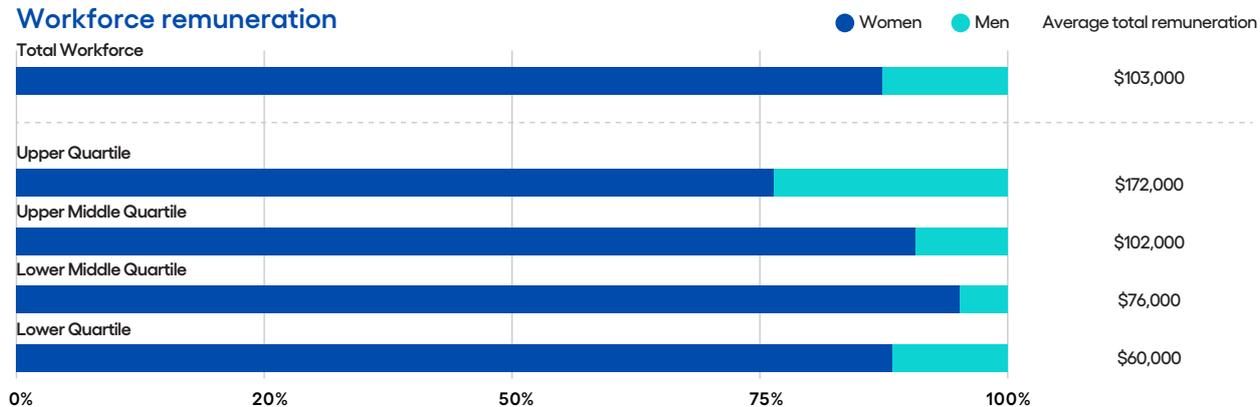
## Gender & Age Breakdown



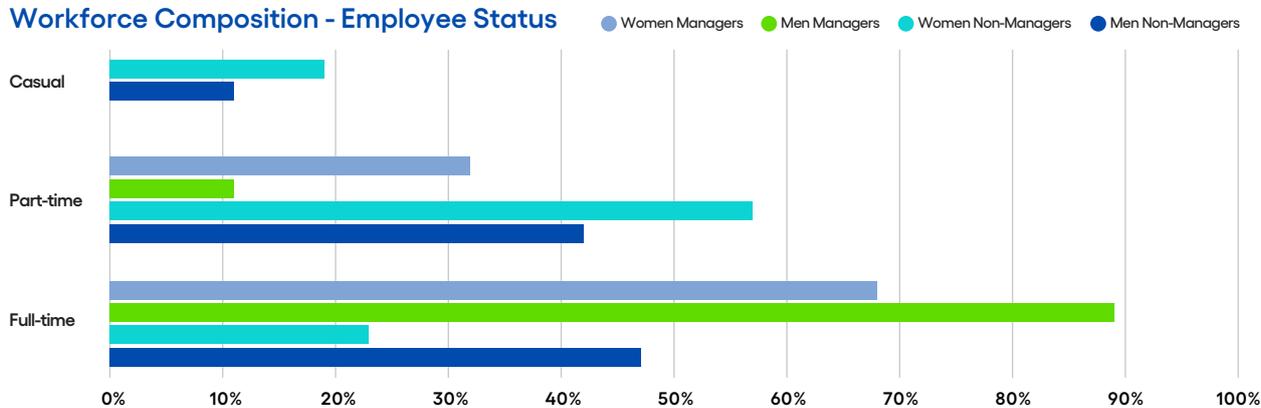
### Workforce Composition - Role Type



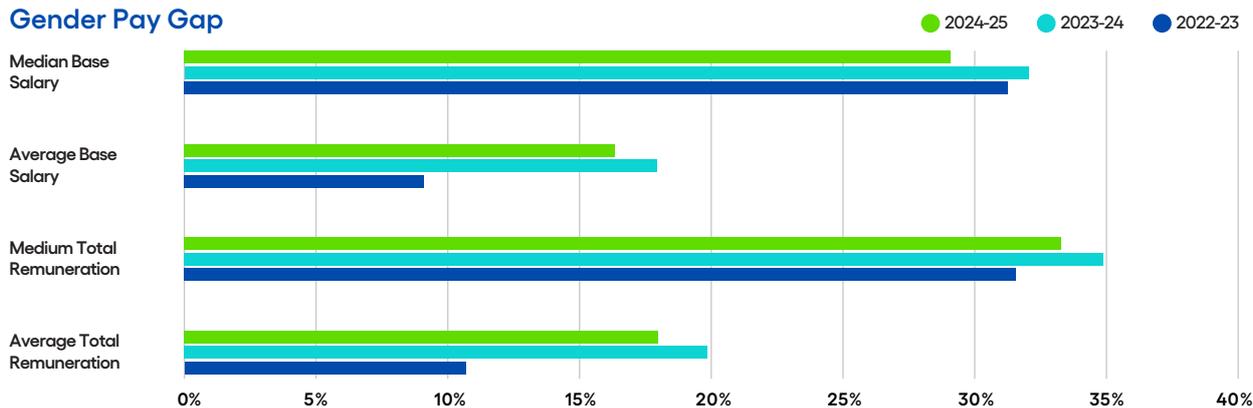
### Workforce remuneration



### Workforce Composition - Employee Status



### Gender Pay Gap



# Supply Chain

The UFS supply chain is a critical backbone of our healthcare operations, ensuring timely delivery of pharmaceuticals, medical supplies, and related services across our regional locations.

It is designed to balance efficiency, compliance, and resilience, while supporting UFS's broader vision of expanding access to high-quality, integrated healthcare.

Suppliers are categorised into three tiers based on annual spend, with any suppliers operating in high-risk sectors automatically classified as Tier 1 regardless of spend.

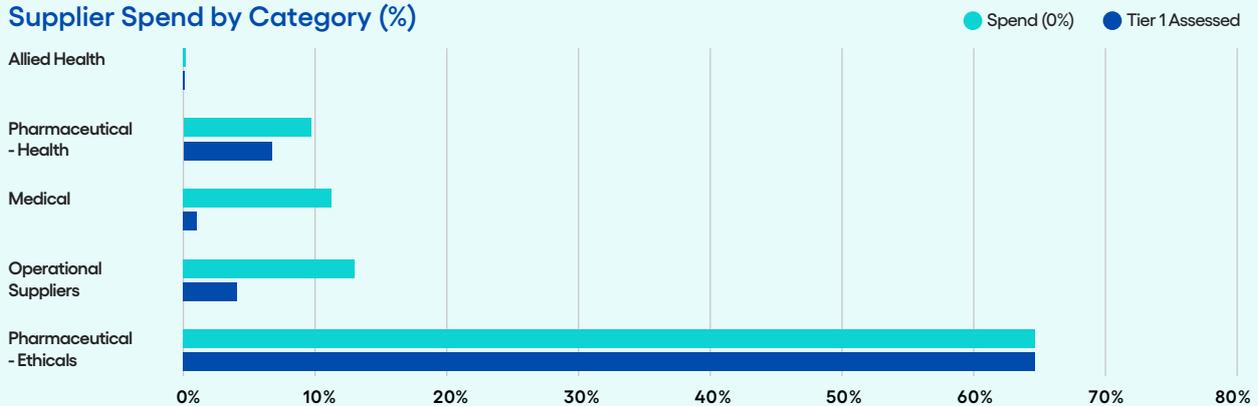
Our supply chain comprises 416 suppliers, with UFS spending \$88.9M on goods and services during the 2025 financial year. Tier 1 suppliers and those assessed as high risk accounted for 77.1% of total expenditure.

While UFS works with a large number of suppliers, a substantial share of our spend is concentrated with four key pharmaceutical partners. These companies are headquartered in Australia, presenting a low risk of modern slavery, and all complied with modern slavery reporting requirements for the 2025 financial year.

Our suppliers predominately operate in the following sectors:

- Accommodation and food service activities
- Administration and support services
- Agriculture, forestry, and fishing
- Arts, entertainment and recreation
- Building services contractor
- Cleaning
- Construction
- Domestic work
- Education
- Electricity, gas, steam and A/C supply
- Finance and insurance
- Government administration, defence and social security
- Health and social work
- Information and communication
- Labour hire

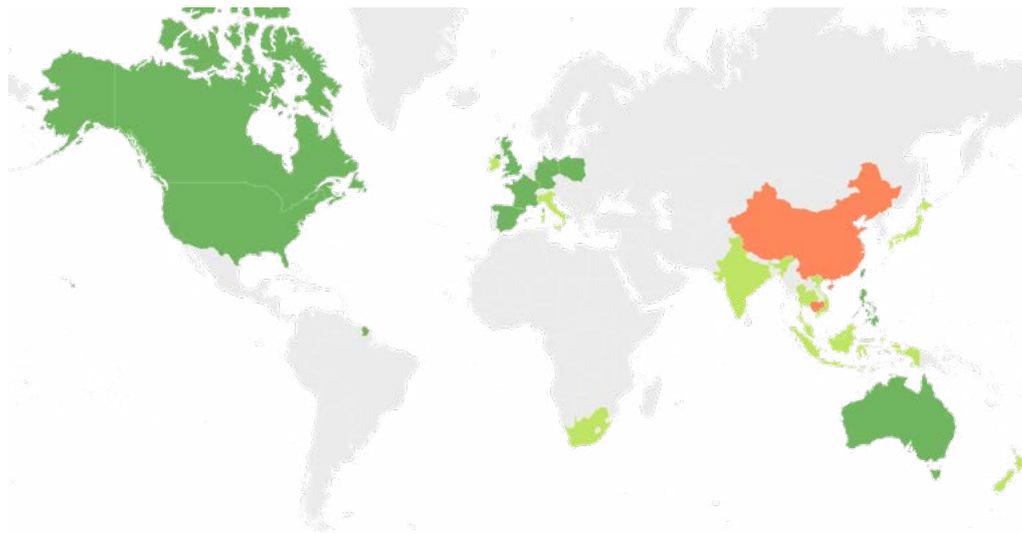
Supplier Spend by Category (%)



- Manufacturing
- Mining and quarrying
- Professional and scientific services
- Real estate
- Retail
- Security services
- Transportation and storage

- Water supply, sewerage and waste management
- Wholesale

Our suppliers operate across multiple regions worldwide, as illustrated in the accompanying graphic showing the number of suppliers trading with UFS by global location.



■ Australia (33)	■ Cambodia (1)	■ Canada (1)
■ China (3)	■ France (2)	■ Germany (2)
■ Hong Kong (3)	■ India (3)	■ Indonesia (3)
■ Ireland (1)	■ Italy (1)	■ Japan (2)
■ Malaysia (2)	■ New Zealand (5)	■ Philippines (3)
■ Poland (1)	■ Singapore (2)	■ South Africa (1)
■ Spain (1)	■ Taiwan (1)	■ Thailand (2)
■ United Kingdom of Great Britain and Northern Ireland (4)	■ United States of America (3)	■ Vietnam (2)

#### ● Tier 1

Countries and regions whose governments, at the date of this assessment, fully meet the Trafficking Victims Protection Act's (TVPA) minimum standards.

#### ● Tier 2

Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, but are making significant efforts to meet those standards.

#### ● Tier 2 Watch List

Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, and as the (increasing) number of victims is significant without proportional action, and/or no evidence of increased efforts to combat trafficking has been provided.

#### ● Tier 3

Countries and regions whose governments do not, at the date of this assessment, fully meet the minimum standards and are not yet making significant efforts to do so.

#### ● Tier Special Case

Due to civil conflict and humanitarian crises, gaining information is difficult and a tier has not been assigned.

#### ● Uncategorized

At the date of this assessment, insufficient information is available about these countries or regions and a tier has not been assigned.

# Mandatory Criteria

## Mandatory Criteria (c):

**Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.**

Modern slavery refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.



# Operations

UFS Healthcare is an Australian-based organisation operating in a sector identified as low risk for modern slavery.

Australia, with its comparatively high level of wealth and greater capacity to allocate resources to combat modern slavery, has delivered the strongest government response in the Asia-Pacific region. Australia is ranked equal second globally among countries with the lowest vulnerability to modern slavery in the Global Slavery index.

UFS conducted a self-assessment to identify any governance gaps related to modern slavery within its operations. The initial assessment classified the organisation as medium risk, with specific areas highlighted for further risk mitigation. No instances of modern slavery were identified internally or within the current supply chain.

UFS maintains robust internal controls and governance to minimise modern slavery risk, including:

- Clear notification processes and anonymous reporting channels for any suspected instances of modern slavery.
- Centralised procurement and supplier onboarding procedures to reduce exposure to high-risk practices.
- People & Culture policies aligned with best practices for ethical recruitment, incorporating mandatory employment screening and verification of work rights.
- Annual review of industrial instruments and awards to ensure compliance and prevent underpayment risks.
- No evidence of modern slavery was found within UFS Healthcare's operations or across the current supply chain.

## Your current risk category



### Medium-Risk (Partial risk control)

Decrease your unmitigated risk score by 30.73 to move to the Low-Risk (Adequate risk control) category.

## Inherent risk

25.00 / 100

= Moderate to High

## Unmitigated risk

44.19 / 100

= Partial risk control

# Supply Chain

Our suppliers operate, produce, and source across many different sectors. A small portion of these sectors can be described as high-risk.

High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).

Where possible, UFS will prioritise suppliers with operations in Australia; however, we recognise that their broader supply chains may extend beyond Australia, creating potential downstream risks of increased exposure to modern slavery.

UFS has identified eight high-risk sectors within our supply chain that provide goods or services directly to our operations. Regardless of spend or strategic importance, these suppliers have been classified as Tier 1 based on their current risk profile.

## Suppliers operating in high-risk sectors

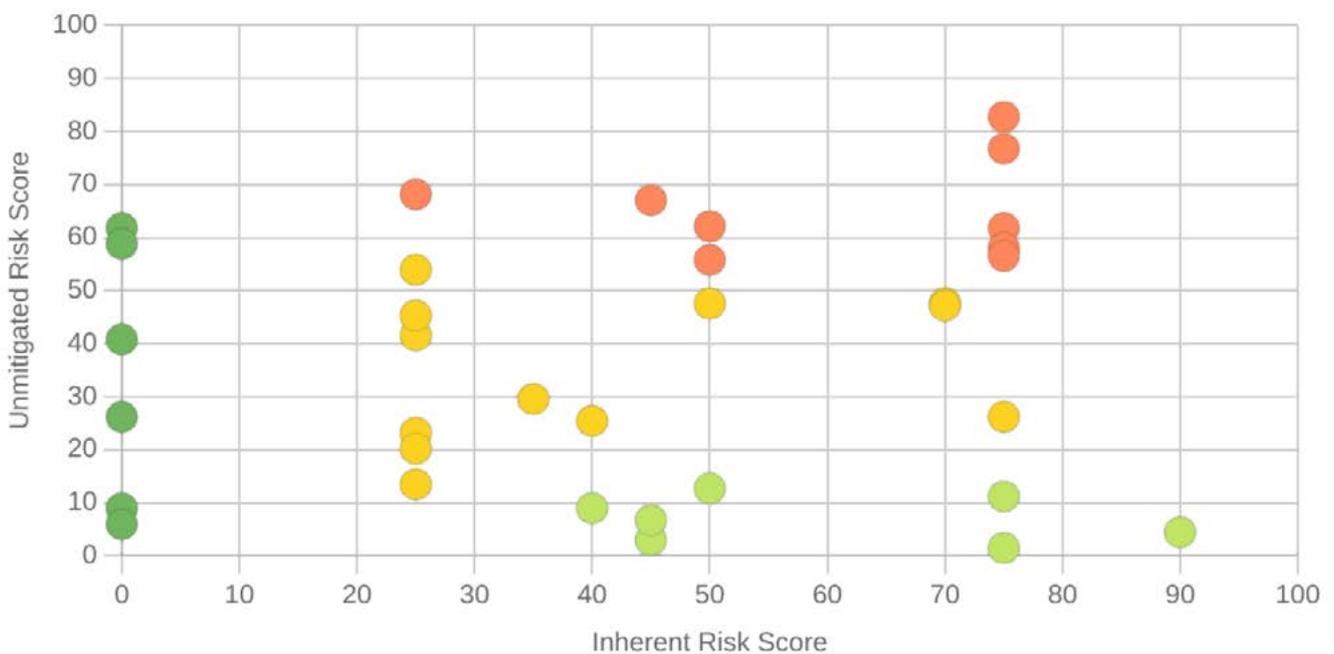
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 Building services contractor 3	 Cleaning 1
 Construction 4	 Labour hire 1
 Manufacturing 4	 Retail 3
 Security services 4	 Wholesale 6

---

UFS acknowledges that our supply chain may include additional links to high-risk industries or countries, which we have assessed for downstream risk where possible.

Our analysis shows that 74.3% of the assessed supply chain carries a low to medium modern slavery risk within their operations, while 25.7% lack adequate risk controls and represent a higher risk. All suppliers classified as high risk have been reviewed, with operations found to be based in Australia. The findings indicate gaps in governance and controls rather than any potential instances of modern slavery.



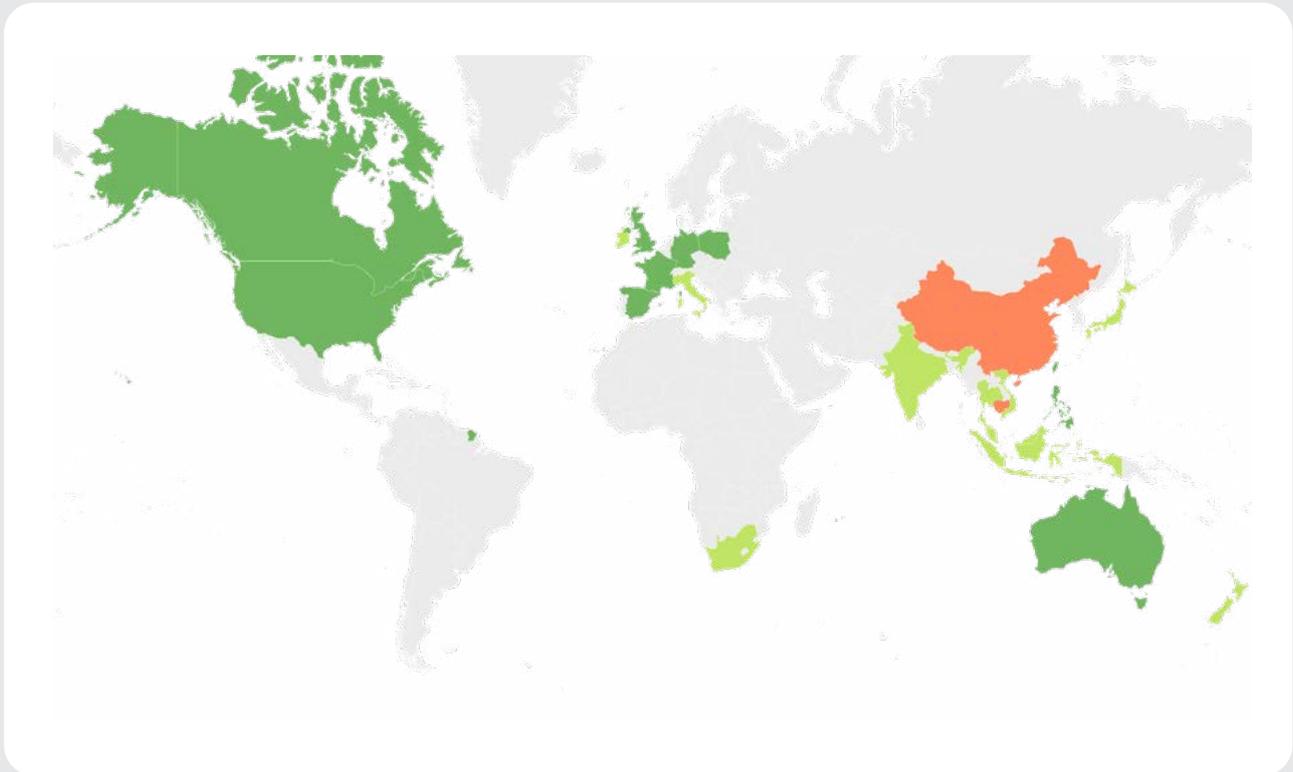
Risk categories	% of suppliers per risk category	# of suppliers per risk category
● Low-Risk	20%	7
● Low-Risk	20%	7
● Medium-Risk	34.3%	12
● High-Risk	25.7%	9
● High-Risk	0%	0

As part of our comprehensive modern slavery risk assessment, UFS evaluated the country of origin and global operations of our suppliers to identify potential exposure to high-risk regions. Certain countries and regions are recognised as high risk due to systemic vulnerabilities such as weak labour protections, prevalence of human trafficking, and limited enforcement of human rights standards. These factors increase the likelihood of modern slavery practices occurring within extended supply chains.

To strengthen transparency, we mapped the geographic footprint of our supply chain partners. The map below illustrates these regions and is overlaid with the colour-tier system from the Trafficking in Persons (TIP) Report, which categorises countries based on their efforts to combat human trafficking.

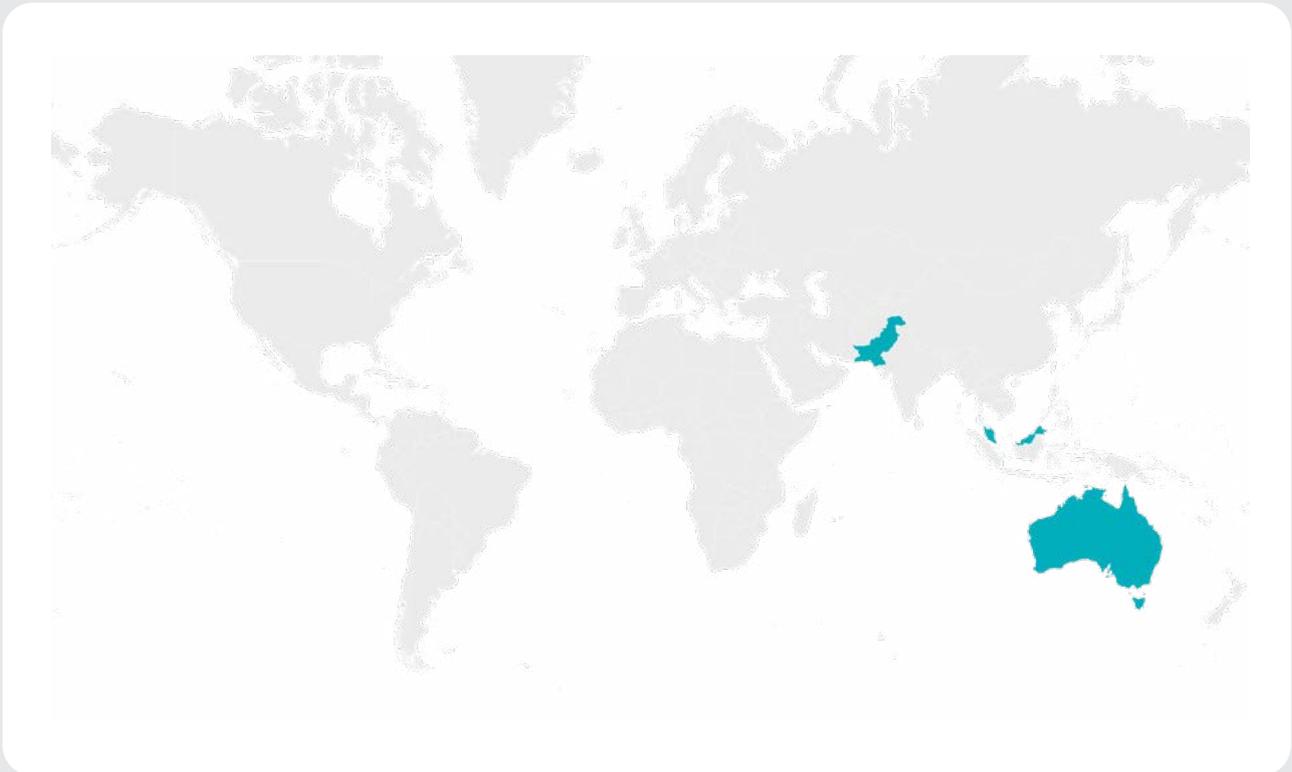
This visual representation has enabled us to:

- Identify high-risk jurisdictions where additional due diligence is required
- Prioritise supplier engagement and monitoring in regions with elevated risk profiles
- Inform procurement decisions by integrating geographic risk into our supplier onboarding and review processes



Certain goods and services produced or sourced by our suppliers are considered high risk due to potential links to modern slavery practices, including forced and child labour. The map below highlights the geographic regions where these high-risk goods and services may originate. The following countries are associated with modern slavery risks in the supply of these goods and services:

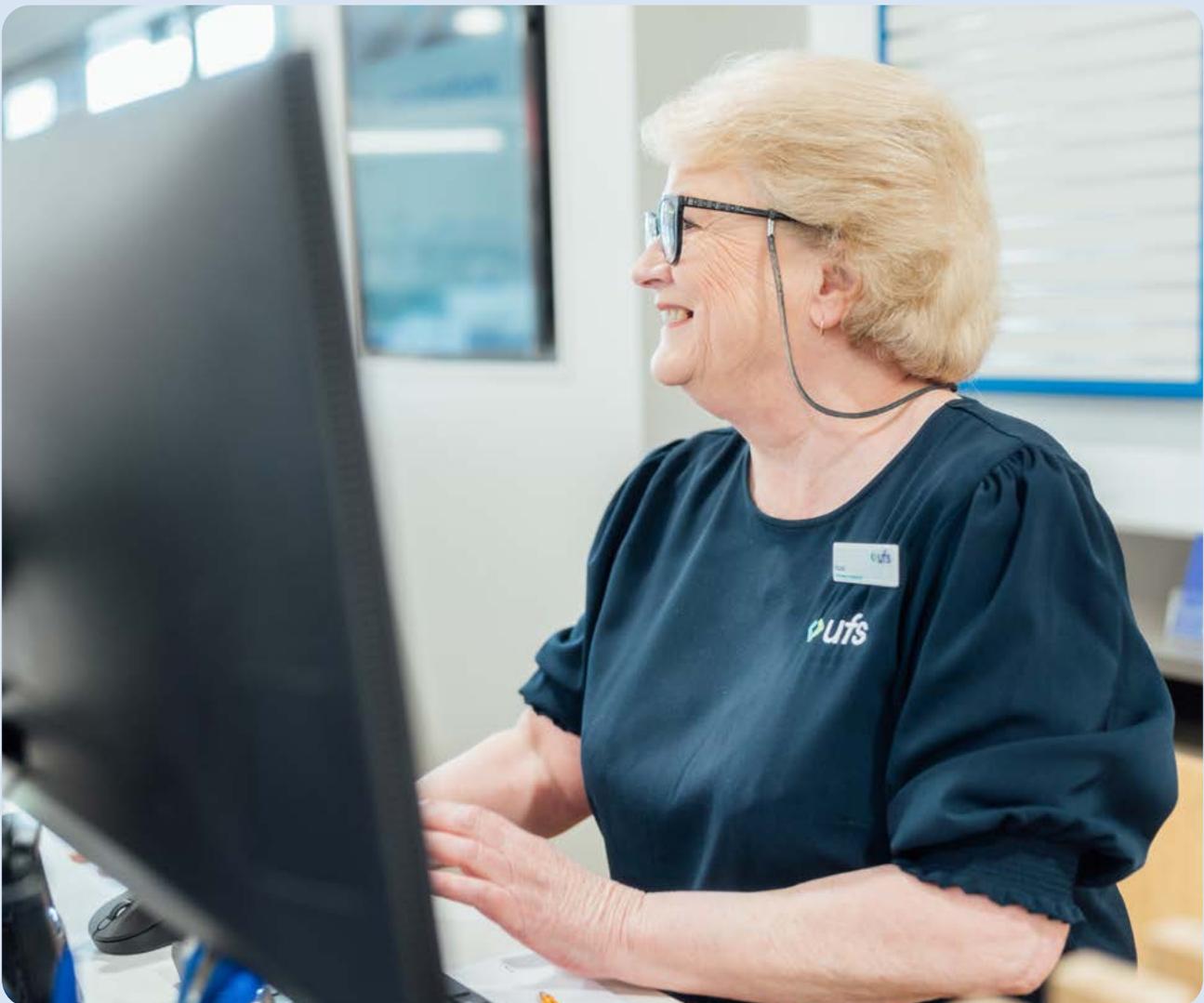
- Australia
  - Building services contractor
  - Cleaning
  - Labour hire
  - Security services
- Malaysia
  - Rubber gloves
- Pakistan
  - Surgical instruments



# Mandatory Criteria

## Mandatory Criteria (d):

Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.



# Risk Assessment

UFS utilises the iPRO Modern Slavery Assessment Tool to evaluate risks within our operations and supply chain.

All risks outlined in the previous section were identified using this tool. During the reporting period, we engaged iPRO to conduct assessments of our operations and a bulk review of 48 Tier 1 suppliers, classified based on spend and/or industry risk. We plan to continue this process annually to ensure ongoing monitoring and mitigation of modern slavery risks.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned one of the following risk categories as outlined in the matrix:

Inherent risk			
Risk control	Low	Moderate to High	Very high
Adequate	Low-risk Low levels of inherent risk	Low-risk Adequate risk control	High-risk High levels of inherent risk
Partial	Low-risk Low levels of inherent risk	Medium-risk Partial risk control	High-risk High levels of inherent risk
Inadequate	Low-risk Low levels of inherent risk	High-risk Inadequate risk control	High-risk High levels of inherent risk

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier’s operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire.

A supplier’s Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

# Risks Addressed

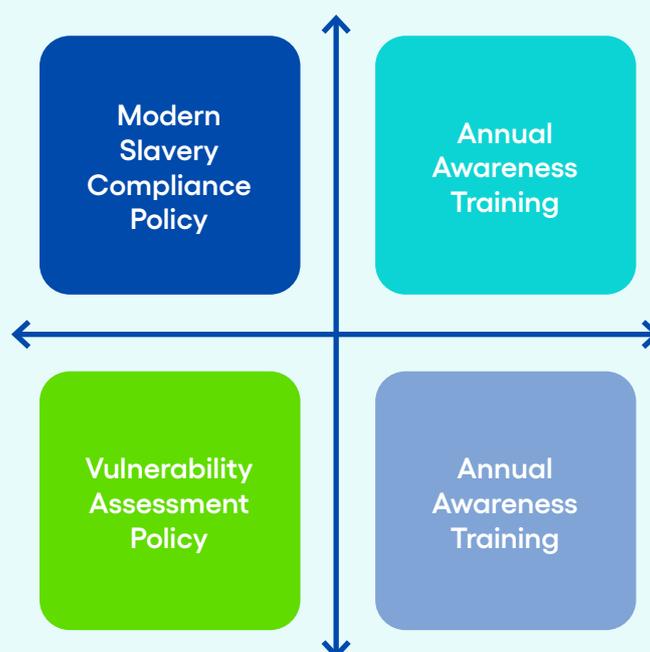
Suppliers that completed the self-assessment were given action items to complete post-assessment.

Action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment.

Action items were also aggregated, giving UFS a focused view of the most impactful actions that could be taken by suppliers across the supply chain.

We have started rolling out a supplier follow-up initiative to further discuss the action items and address the risks identified through the assessment. Primarily this involves ensuring that suppliers have the right policies and procedures in place to mitigate inherent risks in their business.

Some of the most impactful compliance objectives we are focusing on include:



Following the assessment, UFS identified a set of action items aimed at reducing unmitigated risks within our operations:

- Deliver annual awareness training on modern slavery risks to all employees.
- Update contractual terms and conditions to reinforce supplier commitments to modern slavery compliance.
- Continuously identify modern slavery risks when onboarding new suppliers.
- Implement a recruiter compliance policy.
- Establish a formal modern slavery risk assessment policy.

We have already begun addressing gaps in our operational risk management by implementing these actions. These measures are expected to transition UFS from a medium-risk profile to a low-risk profile in the next reporting period

# Mandatory Criteria

## Mandatory Criteria (e):

**Describe how the reporting entity assesses the effectiveness of the actions being taken to assess and address the risks of modern slavery practices in its operations and supply chains.**

UFS evaluates the effectiveness of its modern slavery risk management actions through benchmarking and key performance indicators (KPIs) embedded within the iPRO Modern Slavery Assessment Tool. This platform provides a structured and systematic approach to measuring progress against defined risk mitigation objectives, offering clear insights into supplier compliance, governance improvements, and overall reduction of exposure to modern slavery risks across our operations and supply chain.

As this is the first reporting year, we have used the platform to conduct our assessments and due diligence, we will be able to objectively measure the effect when the assessments are completed throughout the next reporting period.

## Our Key Performance Indicators

The primary KPIs used to benchmark our efforts are the risk scores generated during the assessment process. Each participating organisation is assigned two distinct scores:

### Inherent Risk Score

- This measures risks that are intrinsic to an organisation's operations. It is determined by evaluating factors such as countries and regions of operation, industry sectors, and the presence of high-risk goods within their production or supply chain.

### Unmitigated Risk Score

- This reflects the level of risk remaining after accounting for controls implemented to reduce modern slavery exposure. It is calculated based on supplier responses regarding policies, processes, and procedures designed to mitigate these risks.

## Aggregated Supply Chain Risk

UFS receives an aggregated risk score across all assessed suppliers, enabling us to monitor risk at a supply chain level. This aggregated view helps us identify trends, prioritise actions, and measure progress over time.

## Continuous Improvement

Our goal is to continuously improve these KPIs. As we implement actions internally and collaborate with suppliers, we aim to reduce the Unmitigated Risk Score by introducing relevant policies, strengthening governance, and enhancing supplier engagement.

UFS Operations Risk Scores	FY 2025 (Actual)	FY 2026 (KPI)
Inherent Risk Score	25.0%	25.0%
Unmitigated Risk Score	44.9%	27.6%

Aggregated Supply Chain Risk Scores	FY 2025 (Actual)	FY 2026 (KPI)
Inherent Risk Score	41.6%	41.6%
Unmitigated Risk Score	37.8%	32.6%
Supplier Completion Ratio	72.9%	80.0%
Review Tier 2 Impact		Assessed

### Supplier Engagement

Effectiveness is also measured by the level of supplier participation in our assessment program. We actively encourage suppliers to complete the assessment, as this enables better identification and mitigation of modern slavery risks throughout our supply chain.

Results from these assessments are reported to the Executive Leadership Team and Board Governance Committees as part of our compliance obligations under the Modern Slavery Act. These reports include:

- Aggregated risk scores and trends across the supply chain.
- Progress against KPIs and action plans.
- Recommendations for further mitigation measures based on assessment findings.

This governance oversight ensures accountability and transparency, enabling UFS to track improvements and make informed decisions to strengthen our modern slavery risk management framework.

## Assessing the effectiveness of our actions

UFS evaluates the effectiveness of its modern slavery risk management actions through benchmarking and key performance indicators (KPIs).



### Our key performance indicators

Each organisation is assigned two distinct scores:

**Inherent Risk Score:** Measures risks intrinsic to operations

**Unmitigated Risk Score:** Measures risks remaining after controls



### Continuous improvement

We aim to continuously improve these KPIs



### Supplier engagement

We encourage suppliers to participate in our assessment program



### Governance and reporting

Results are reported to Executive Leadership Team and Board Governance Committees



# Mandatory Criteria

## Mandatory Criteria (f):

**Describe the process of consultation with**  
**(i) any entities that the reporting entity owns or controls;**  
**(ii) and in the case of a reporting entity covered by a statement under section 14 – the entity giving the statement.**

UFS Healthcare adopts a structured, collaborative consultation process to ensure alignment and accountability across all entities under our ownership or management control. This approach promotes transparency and consistency in identifying and addressing modern slavery risks.

### Consultation with owned or management controlled entities

- **Governance integration:** All entities under UFS ownership or management control are engaged through our corporate governance framework, which includes regular reporting to the Executive Leadership Team and Board Committees.
- **Policy Alignment:** We ensure that each entity adopts UFS's Modern Slavery Policy and associated procedures, including supplier onboarding standards and risk assessment protocols.
- **Operational Engagement:** All entities participate in annual risk assessments using the iPRO Modern Slavery Assessment Tool, providing data on inherent and unmitigated risks within their operations and supply chains.
- **Training and Awareness:** Mandatory training sessions are delivered across all owned and management-controlled entities to build awareness of modern slavery risks and reporting obligations.

## Consultation for joint statements under Section 14

- **Collaborative Development:** Where UFS has owned and management-controlled entities covered by a joint statement under Section 14, we actively consult with all entities for issuing the statement. This includes sharing risk assessment outcomes, aggregated supply chain data, and progress against KPIs.
- **Information Exchange:** Regular meetings and data-sharing sessions are held to ensure that all relevant information—such as supplier risk scores, mitigation actions, and governance updates—is incorporated into the joint statement.
- **Alignment of Actions:** We work closely with owned and management-controlled entities to harmonise policies, procedures, and action plans, ensuring consistency in addressing modern slavery risks across all entities included in the statement.

## Continuous improvement

Our consultation process is reviewed annually to identify opportunities for improvement. Feedback from owned and management-controlled entities informs updates to our governance framework, risk assessment methodology, and supplier engagement strategies.

# Mandatory Criteria

## Mandatory Criteria (g):

**Include any other information that the reporting entity, or the entity giving the statement, considers relevant.**

At UFS Healthcare, we recognise that addressing modern slavery risks requires continuous improvement and collaboration. Over the next reporting period, we aspire to:

### Expand supplier engagement

- Register all new Tier 1, Tier 2, and high-risk suppliers on our compliance platform and ensure they complete a modern slavery risk assessment.
- Broaden engagement to include cascading ethical standards to sub-tier suppliers.

### Enhance risk management

- Further embed the iPRO Modern Slavery Assessment & Reporting Tool to automate risk identification and mitigation planning across our supply chain.
- Use UFS data-driven dashboards to monitor supplier risk segmentation and policy gaps.

### Strengthen governance and accountability

- Embed modern slavery risk management deeper into corporate governance, with regular Board oversight and annual effectiveness reviews.
- Develop KPIs to measure training completion, supplier compliance, and remediation outcomes.

### Improve transparency

- Internally publish detailed progress updates in our annual Modern Slavery Statement, including lessons learned and areas for improvement.
- Commit to external benchmarking against industry standards and share insights with stakeholders where appropriate.

### Advance remediation and reporting

- Enhance clear, anonymous reporting channels for workers and suppliers.
- Document and disclose remediation actions taken in response to identified risks.

### Collaborate for impact

- Participate in sector-wide initiatives and forums where appropriate to share best practices and drive systemic change.
- Explore partnerships with NGOs and advocacy groups to strengthen worker protections.

As part of our comprehensive modern slavery risk assessment, UFS evaluated the country of origin and global operations of our suppliers to identify potential exposure to high-risk regions. Certain countries and regions are recognised as high risk due to systemic vulnerabilities such as weak labour protections, prevalence of human trafficking, and limited enforcement of human rights standards. These factors increase the likelihood of modern slavery practices occurring within extended supply chains.

To strengthen transparency, we mapped the geographic footprint of our supply chain partners. The map below illustrates these regions and is overlaid with the colour-tier system from the Trafficking in Persons (TIP) Report, which categorises countries based on their efforts to combat human trafficking.

## Future Commitments UFS



### Expand supplier engagement

Register all new Tier 1, Tier 2 and high-risk suppliers on our compliance platform and ensure they complete a modern slavery risk assessment. Extend ethical standards to sub-tier suppliers.



### Strengthen governance

Integrate modern slavery risk management into governance with regular Board oversight and annual reviews. Set KPIs to measure training, supplier compliance and remediation.



### Advance remediation

Strengthen anonymous reporting channels for workers and suppliers. Record and disclose actions taken in response to identified risks.



### Enhance risk management

Embed the iPRO Modern Slavery Assessment & Reporting Tool to automate risk identification and mitigation. Use UFS dashboards to monitor supplier risk levels and policy gaps.



### Improve transparency

Report progress, lessons learned, and improvement areas in the annual Modern Slavery Statement. Benchmark against industry standards and share insights with stakeholders.



### Collaborate for impact

Engage in sector initiatives to share best practices and drive systemic change. Explore partnerships with NGOs and advocacy groups to enhance worker protections.

This Modern Slavery Statement has been reviewed and approved by the principal governing body of UFS Healthcare Ltd, in accordance with Section 14 of the Modern Slavery Act 2018 (Cth).

The approval was granted following a formal resolution by the Board, confirming that:

- The statement accurately reflects the actions and commitments undertaken by UFS Healthcare and any associated entities to identify, assess, and address modern slavery risks.
- The governing body acknowledges its responsibility for oversight and accountability in implementing these measures.

- The statement has been authorised for publication and submission to the Australian Government's Modern Slavery Register.

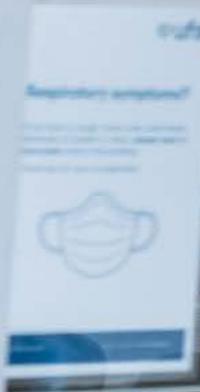
Signed on behalf of the principal governing body:

**Graeme Dixon**  
Chairperson UFS Healthcare Ltd  
17th December 2025



medicare  
Urgent Care Clinic

Urgent Care Services  
Victoria





Health is Life