



Modern Slavery Statement

Reporting Entity: Fitness Passport Pty Limited

ABN: 50 118 426 029

Registered Address: Level 11, 323 Castlereagh Street, Sydney NSW 2000

Reporting Period: 1 July 2024 to 30 June 2025

Date of Statement: December 2025

Introduction

This is the fifth Modern Slavery Statement issued by Fitness Passport Pty Limited (Fitness Passport or the Company). This statement is published in accordance with the *Modern Slavery Act 2018* (Cth) and covers the reporting period 1 July 2024 to 30 June 2025.

It sets out the modern slavery risks in the Company's operations and supply chains, as well as the steps taken to monitor and address those risks.

Fitness Passport is committed to acting on any modern slavery risks identified within its operations and supply chain and reporting on these as required by the *Modern Slavery Act 2018* (Cth).

This Modern Slavery Statement has been circulated to the executive team for comment and endorsement prior to being put to the Board. The Board approved the statement on 17 December 2025.

Criteria 1: Reporting Entity & Structure

This statement has been prepared by and on behalf of **Fitness Passport Pty Limited** (ABN: 50 118 426 029).

Structure

Fitness Passport Pty Limited is a proprietary company registered in Australia and headquartered in Sydney. The Company is a wholly-owned subsidiary within the Everness Topco Pty Limited group structure.

Fitness Passport operates with centralised governance, legal, finance and operational functions coordinated from its Sydney head office.

Criteria 2: Operations and Supply Chain

Operations

Fitness Passport's mission is to motivate people to exercise and improve their health by creating a valued wellness solution that reduces barriers and expands choice.

Fitness Passport operates a corporate fitness and wellness program that partners with employers and gym facilities across Australia and New Zealand. We contract with employers to make a subsidised fitness benefit available to their employees and separately contract with



gyms, pools, and other fitness facilities to provide access to our members. Employees who join pay a weekly membership fee to access a network of participating facilities.

The Company directly employs approximately 90 staff in Australia and New Zealand. Their roles include Sales, Account Management, IT, Finance, HR and Operations.

Fitness Passport services members across Australia and New Zealand, including metropolitan and regional locations.

Supply Chain

Fitness Passport partners with over 2,200 facilities across Australia and New Zealand. These partners supply Fitness Passport with access to their facilities and Fitness Passport pays for member visits. The facilities include council-run facilities, independent gyms, and large brand gym groups.

Other key services that Fitness Passport sources include:

- **Software and cloud services:** SaaS platforms, cloud infrastructure, and enterprise software tools
- **IT support and development:** Application development, system integration, and technical support services, including providers based in the Philippines and Sri Lanka
- **Marketing and creative services:** Digital marketing, content creation, and brand development
- **Customer service platforms:** Contact centre technology and business process outsourcing (BPO) services
- **Professional services:** Legal, accounting, insurance, cybersecurity and consulting services
- **Office services:** Facilities management, office equipment, and corporate supplies

Fitness Passport does not manufacture physical goods, import products for resale, or operate overseas facilities.

Criteria 3: Risks of Modern Slavery Practices

Operations

Given the level of direct control that Fitness Passport exercises over its operations, we consider that we have a low modern slavery risk profile. All policies and procedures relating to our people are carried out in line with the *Fair Work Act 2009* (Cth), National Employment Standards and the Modern Awards.

Supply Chain

Fitness Passport has considered the extent to which it may contribute to, cause or be linked to modern slavery risks in its supply chains. The Company has identified the following key risk areas:



- **Cleaning service providers** engaged to support our office, where labour hire and subcontracting arrangements may create vulnerability
- **The use of direct and outsourced labour by our facility partners** in respect of cleaning, security and casual staff, where we have limited visibility
- **The use of service providers located in the Philippines and Sri Lanka** to provide IT development, support and contact centre services, noting these jurisdictions present elevated labour rights risks
- **The procurement of IT equipment** that may be manufactured in jurisdictions with known modern slavery risks in electronics supply chains

Despite these identified risk areas, Fitness Passport's overall modern slavery risk profile remains low due to:

- The predominantly Australian-based, professional services nature of our supply chain
- The absence of manufacturing, importation or physical goods production
- Strong regulatory protections in our primary operating jurisdictions
- Direct engagement models with most suppliers

Criteria 4: Actions to Address Modern Slavery Risks

Internal Policies & Procedures

Fitness Passport has a robust set of policies and procedures to guide internal operations. Policies are reviewed annually and updated as required. The policies that outline the management of issues related to modern slavery include:

- Employee Code of Conduct
- Whistleblower Policy
- Supplier Code of Conduct

Within our operations, compliance with applicable laws and internal policies is reviewed regularly and Employees have received training on whistleblowing procedures.

Supply Chain Due Diligence

Supplier Risk Assessment and Tiering

Fitness Passport has implemented a risk-based approach to supplier management. During the reporting period, the Company completed a comprehensive supplier risk assessment, tiering suppliers based on:

- Geographic location and jurisdiction
- Industry sector and known risk factors



- Spend level and materiality
- Nature of services provided

This tiering exercise enables Fitness Passport to focus due diligence efforts on higher-risk supplier relationships.

Facility Partners

In respect of our facility partners, due diligence is carried out as part of the onboarding process, which includes onsite visits to facilities where practicable. Representatives of our leadership team maintain regular contact with major facility partners; however, we do not have complete visibility over the operations of all facilities on the program.

Fitness Passport monitors the modern slavery statements of material facility partners to assess the modern slavery risks that may be present within our supply chains. Approximately 15% of our facility partners have published Modern Slavery Statements, noting that many are below the threshold to report on modern slavery risks.

Offshore IT and BPO Providers

Fitness Passport sources IT and BPO services from providers based in the Philippines and Sri Lanka. During the reporting period, the Company ceased using support staff based in Fiji, reducing the geographic footprint of offshore service providers.

Members of our executive and operations teams maintain regular contact with our offshore partners. Working conditions and labour practices were also discussed with our Sri Lanka-based service provider during the reporting period.

Supplier Code of Conduct

Fitness Passport has developed and implemented a Supplier Code of Conduct that has been provided to those suppliers where risks have been identified. The Supplier Code of Conduct is also shared with new suppliers as part of the Company's onboarding processes.

Contractual Protections

Modern Slavery Clauses

Fitness Passport's supplier contracts include clauses that require suppliers to:

- Warrant that they do not engage in conduct that contravenes modern slavery laws
- Adhere to all labour laws in their jurisdiction, including legislation related to remuneration and employment entitlements
- Notify Fitness Passport of any modern slavery risks or incidents identified in their operations or supply chains

These contractual protections are included in new supplier agreements and are being incorporated into existing agreements as they come up for renewal.

Facility Partner Contracts

Our facility partner contracts include specific warranties that they do not engage in conduct that contravenes modern slavery laws.



Supplier Self-Assessment

A supplier questionnaire has been introduced to further assist Fitness Passport in assessing and mitigating modern slavery risks in our supply chain. The questionnaire is sent to suppliers that:

- Are located in higher-risk countries where labour rights protections may be limited; and/or
- Operate in high-risk industries that have previously been affected by undeclared labour, illegal labour and/or trafficking

Grievance Mechanisms and Remediation

All Fitness Passport employees are encouraged to speak up if they have any concerns about any misconduct, improper situation or circumstances within the organisation, including any concerns relating to potential modern slavery issues. The Company's Whistleblower Policy provides clear channels for reporting concerns confidentially and without fear of retaliation. During the reporting period, no modern slavery-related concerns were raised through internal reporting channels.

If a modern slavery issue were to be identified, Fitness Passport would:

1. Conduct an immediate investigation to understand the nature and scope of the issue
2. Engage with the relevant supplier to cease any harmful practices
3. Work collaboratively with the supplier to remediate the situation where appropriate
4. Consider termination of the supplier relationship if remediation is not possible or appropriate
5. Report the matter to relevant authorities as required by law

Actions During the Reporting Period

During the reporting period (1 July 2024 to 30 June 2025), Fitness Passport:

- Completed annual risk assessments of the supply chain, with particular focus on higher-risk supplier categories
- Continued to roll out the Supplier Code of Conduct to material suppliers
- Incorporated modern slavery clauses into new supplier contracts and major contract renewals
- Maintained training for relevant staff members
- Monitored published modern slavery statements of major suppliers
- Undertook consultation across the business and with the Board to ensure modern slavery risk is managed effectively



- Conducted an onsite inspection of our Philippines service provider's operations to directly observe working conditions and meet with staff
- Maintained regular communication with offshore service providers regarding labour practices and working conditions

Next Steps

In the year ahead, Fitness Passport intends to undertake the following actions:

- Continue to carry out risk assessments for at-risk suppliers as well as new suppliers as part of the onboarding process
- Deliver modern slavery training to employees to ensure awareness of the Act and modern slavery risk areas is maintained
- Share the updated annual statement with employees
- Continue to incorporate modern slavery contractual protections into supplier agreements as they are renewed
- Monitor evolving regulatory guidance and best practice in modern slavery risk management

The Company recognises the importance of maintaining awareness of evolving requirements related to managing modern slavery risk, particularly as the supply chain expands and develops. Fitness Passport is committed to ensuring its workforce and supplier partners are equipped to identify and address modern slavery issues effectively.

Each year, Fitness Passport will review its Modern Slavery policies and procedures to ensure they remain relevant and up to date, while considering any trends in modern slavery issues and the risks posed to the Company.

Criteria 5: Effectiveness of Actions

The effectiveness of the actions that Fitness Passport takes in relation to modern slavery risk in its operations and supply chains is reliant on continued review of those actions.

Measuring Effectiveness

Fitness Passport assesses the effectiveness of its modern slavery risk management through the following indicators:

- **Supplier engagement:** Percentage of material suppliers who have acknowledged and agreed to the Supplier Code of Conduct
- **Contractual coverage:** Percentage of supplier contracts that include modern slavery protections
- **Training completion:** Percentage of relevant staff who have completed training



- **Risk assessment coverage:** Completion of annual risk assessments across the supplier base
- **Incident reporting:** Monitoring of any modern slavery concerns raised through internal or external channels

Results During the Reporting Period

During the reporting period (1 July 2024 to 30 June 2025), Fitness Passport:

- Undertook consultation across the business and with the Board to ensure modern slavery risk is managed effectively
- Visited high risk and key suppliers to conduct an in-person evaluation of practices
- Maintained regular contact with major offshore suppliers to monitor working conditions and labour practices
- Maintained a Supplier Code of Conduct outlining minimum requirements and expectations in different ESG areas, including modern slavery
- Ensured all new supplier contracts and major renewals include requirements for compliance with modern slavery laws and labour laws in the supplier's jurisdiction
- Utilised a Supplier Self-Assessment Questionnaire for higher-risk suppliers to assess operational metrics and disclose modern slavery and supply chain risk management practices
- Received no reports of modern slavery concerns through internal reporting channels

Areas for Improvement

Fitness Passport recognises that measuring effectiveness in this area is an ongoing process.

Areas for continued focus include:

- Enhancing data collection on supplier engagement with modern slavery due diligence processes
- Deepening our understanding of labour practices within the broader fitness facility sector
- Maintaining awareness of emerging risks and best practices in modern slavery risk management

Criteria 6: Consultation

This Modern Slavery Statement has been prepared by Fitness Passport Pty Limited.

As Fitness Passport is a single reporting entity, consultation with other entities was not required. However, in preparing this statement, input was obtained from the Company's



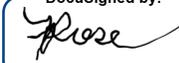
operations, finance, human resources, legal and IT functions. The statement was then presented to the executive team for review and comment before being submitted to the Board for final approval.

The Board of Fitness Passport Pty Limited approved this Modern Slavery Statement on 17 December 2025.

Approval

This statement has been approved by the Board of Fitness Passport Pty Limited.

Signed:

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Fiona Rose

CEO

Fitness Passport Pty Limited

Date: 19 December 2025