

## **Modern Slavery Statement**

This statement has been published in accordance with the *Modern Slavery Act 2018* (Cth). It sets out the steps taken by Adams Group Aus Holdings Pty Limited ACN 637 089 162 (**Adams**) and other relevant Adams group companies during the year ended 30 June 2025 (**reporting period**) to identify and reduce the risks of modern slavery and human trafficking in its business and supply chains.

### **Reporting entity covered by this statement**

This statement covers:

- Adams; and
- Abano Healthcare Australia Pty Ltd ACN 131 333 492 (**Abano**)

In addition, the following capitalised terms used throughout this statement are defined as follows:

- Adams Group means the Adams consolidated group which comprises Adams and its subsidiaries.

### **Structure and Operations**

Adams Group manages dental centres in Australia and New Zealand and provides facilities and services to the dentists and other dental practitioners who operate from them. We provide the administrative and non-dental services that those dental practitioners need to provide patients with dental services. Normally, those dental practitioners are not our employees and, in providing dental services and doing other things, operate their own independent dental businesses.

Adams is a private company and is headquartered in Melbourne, Victoria. In addition to its headquarters, Adams Group operates support offices in Auckland, Brisbane and Sydney. Adams Group operates centralised management functions from its support offices including IT and finance.

Adams Group now operates through Abano and 1300 Smiles Pty Ltd in Australia and through Lumino Dental Limited in New Zealand.

Adams Group is one of Australasia's largest providers of facilities and services to dental practitioners. In Australia it operates 105 dental clinics through Abano and 1300 Smiles, with clinics in all Australian states and also the ACT. The significant majority of these clinics operate under the "Maven Dental" or "1300 Smiles" brands with the balance being operated under legacy brands.

Adams Group operates a further 123 dental clinics in New Zealand through its subsidiary Lumino Dental Limited. The significant majority of these clinics operate under the "Lumino The Dentists" brand.

### **Staff**

Adams Group's operations are split roughly evenly between Australia and New Zealand and include salaried employees, employees under modern pay awards and temporary contractors. As at the end of the reporting period (30 June 2025), there were 1,311 employees working in the Australian business and a further 998 employees working in the New Zealand business. These do not include the independent dental practitioners who receive services from Adams Group.

Adams Group operates a number of programmes to support professional development and the health and safety of our employees, including operating an Employee Assistance Program to support staff in dealing with personal, family and/or work-related concerns. Adams Group aims for continuous improvement in its treatment of employees and frequently reviews the efficacy of our programmes in rewarding and supporting our people.

### Supply chains

Adams Group's major supply chain areas include:

- the lease of commercial real estate
- dental equipment and consumables
- laboratory services and dental devices
- IT hardware and associated software subscriptions and licensing
- utility services
- marketing services including advertisements on global social media platforms.

### **Risks of modern slavery practices in the operations and supply chains**

Adams employs people and provides services to dental practitioners in accordance with all applicable laws. As a service provider in the heavily regulated allied health industry, we believe risks of modern slavery in our operations are low and are primarily limited to potential downstream supply chain activity, such as where and how equipment may be produced or how services may be provided. We acknowledge that there are pockets of increased risk of modern slavery within our supply chain, including higher-risk categories of consumables and particular services.

Approximately 90% of staff in Australia are covered by modern awards and approximately 10% are paid annualised salaries in full satisfaction of the award. The nature of these government instruments significantly mitigates the risk of modern slavery within our operations. Additionally, Adams has several policies, procedures, codes of conduct, and standards that reflect our ethics and values. They guide the way we treat our employees and demonstrate our commitment to conducting business with integrity, probity, and accountability. These policies include:

- Employee Code of Conduct
- Standards of Behaviour Policy
- Diversity, Equity and Inclusion Policy
- Modern Slavery Policy
- Work Health & Safety Policy Statement
- Whistleblower Policy
- Immediate Incident Escalation and Reporting Policy
- ESG Policy

## **Our measures to address modern slavery risks**

We have continued to focus on our relationships with suppliers with whom we have a direct contractual relationship (i.e. "tier 1" suppliers). Due to the broad range of products that are used in our business we believe that these tier 1 suppliers are best placed to undertake detailed due diligence on their suppliers.

More than 50% of our spending on dental equipment and consumables is with companies that are reporting entities under the Modern Slavery Act. We note that our key suppliers are taking active steps to mitigate slavery risk in their supply chains.

Our other suppliers show a greater variability in their awareness of, and steps to mitigate, slavery risk within their supply chains. This is particularly evident with smaller suppliers and with New Zealand domiciled suppliers who have less regulatory impetus to improve in this area. Adams Group continues to consider how it can work with suppliers to improve their processes and address its risk here (which may include discontinuing relationships with suppliers if considered appropriate or necessary).

Further, as part of a review of our systems and controls, Adams is working to further improve the way we identify and manage Modern Slavery risks. Up to the date of this report, our key action points and effectiveness measures have been as follows:

### **Procurement**

Adams Group assesses the modern slavery risks of various suppliers of dental equipment and consumables in the form of a modern slavery survey. Adams Group assesses the responses provided by suppliers to determine the maturity and level of modern slavery risk associated with these suppliers and any assistance the Adams Group can provide to these suppliers to help them identify and manage modern slavery risks.

During this reporting period, Adams identified garment supply as a potential source of increased modern slavery risk within our supply chain. To better understand and address this risk, we undertook a review of our key garment suppliers. This involved sending a "deep dive" questionnaire to each of our two key garment suppliers (one based in Australia and the other based in New Zealand). The purpose of the questionnaire was to allow us to gain a deeper understanding of our suppliers' own supply chains and their internal processes to manage the risk of modern slavery. Our questionnaire contained targeted questions across a number of issues, including:

- organisational structure (including geographical locations);
- countries of origin of raw materials used in supply chain (if known);
- employee and worker information, including employment of persons under 18 and foreign nationals;
- employment conditions, including whether employees are provided with pay slips and the use of automated time and attendance systems and processes;
- processes in place to monitor compliance with visa, employment and other legal requirements for seasonal and temporary workers (at their company as well as within their own supply chains);
- grievance and redress mechanisms for workers to raise concerns, and for the company to respond to or remedy those concerns; and
- their overall awareness and governance of modern slavery as an issue within their business, including their own supply chain.

We also provided both suppliers with links to our internal modern slavery training module. One of the two suppliers successfully completed the course. One of the suppliers demonstrated a strong understanding of modern slavery risks and the steps they have taken to manage these risks. The other supplier demonstrated a lower level of awareness so there is opportunity for us to work with them to improve their understanding of modern slavery risk and how this risk can be managed.

#### Policies and Procedures

Adams Group regularly reviews its key policies to ensure compliance with all applicable legislation, including employment and modern slavery laws.

During the reporting period, Adams Group adopted an updated version of its employee Code of Conduct and Speak Up Policy (which has been renamed as the Whistleblower Policy). Both of these policies clearly outline the expectation that instances, or suspected instances, of non-compliance with applicable laws (which would include the *Modern Slavery Act 2018*) are reported through the appropriate channels. Adams also adopted a new ESG Policy during the reporting period. The ESG Policy outlines (amongst other things) Adams' commitment to promoting the elimination of all forms of modern slavery, and to identifying, mitigating and managing modern slavery risks in its supply chain.

#### Contracting

Adams Group mitigates modern slavery risk by the inclusion of appropriate clauses in material contracts and those where it considers there to be an enhanced risk, such as labour hire agreements and contracts with offshore suppliers. Those clauses require the suppliers (amongst other things) to take reasonable steps to identify, assess and address risks of modern slavery practices in their operations and supply chains.

A significant proportion of Adams Group's spending on dental equipment and consumables is on a non-contracted basis. Adams Group does not have visibility of its Tier 2 and Tier 3 suppliers when buying this dental equipment and consumables and notes that a significant proportion of dental equipment and consumables are produced in overseas jurisdictions which may have enhanced modern slavery risks.

Adams Group continues to engage with existing suppliers regarding compliance with the Adams Group Supplier Code of Conduct. The Supplier Code of Conduct specifically references our requirements regarding our suppliers' conduct, including that they will not engage in modern slavery.

#### Training

Adams Group refined its modern slavery training during the reporting period to ensure it remained relevant to Adams Group and its business activities.

This reporting period, we again expanded the group of employees who were required to complete the training. This reporting period, the group included members of the Adams Group Executive Leadership Team, Senior Leadership Team, Regional Managers and various members of relevant functions such as Procurement, People & Culture and Workplace Health & Safety. We achieved a 100% completion rate for this training which was an improvement on previous reporting periods.

We also offered access to the training module for external suppliers for the first time.

## Whistleblowing

Adams Group offers multiple ways to report potential compliance concerns, including anonymously, under the Adams Group's Whistleblower Policy. This policy has a broad application, including all current and former directors, officers, employees and suppliers of the Adams Group. This policy specifically refers to the reporting of instances, or suspected instances, of non-compliance with laws (which may include instances of modern slavery) as being within the scope of this policy.

## **Assessing the effectiveness of Adams Group actions**

During the reporting period, Adams Group has established a number of measures to enhance the effectiveness of its modern slavery risk management. The measures taken by Adams Group in the reporting period include:

*Modern Slavery education and awareness:* the Adams Group has reviewed and refined the content of its Modern Slavery training and expanded the training requirements to a larger number of employees than in previous years. This has included regional managers who are responsible for a group of dental centres and who have oversight of each of these centres, including direct management of each practice manager. Expanding the training to these individuals and increasing their awareness of the risks of modern slavery will assist the Adams Group in identifying any instances of modern slavery within the dental centres it operates.

*Key Performance Indicators:* In the last reporting period, Adams Group established a KPI framework to improve the management of modern slavery risks by those responsible for managing these risks within the Adams Group. These KPIs include:

- the percentage of modern slavery clauses in contracts with counterparties;
- modern slavery training participation and completion rates; and
- embedding of modern slavery risk within the broader Group Risk Framework and reporting of modern slavery risks and priority actions.

We believe that these measures have been, and will continue to be, effective in increasing awareness of and managing modern slavery risk, particularly given the high completion rate and expanded audience of our modern slavery training. Over the next and subsequent reporting periods, we intend to continue to review and enhance the KPIs we have established. In particular, we intend to further develop the reporting of modern slavery risks and targeted priority actions within the Group Risk Framework (which was established in the reporting period). We have also identified opportunities to increase the number of contracts which contain modern slavery clauses and expect this will further enhance the effectiveness of this measure. We expect that these KPIs will ensure that we continue to develop the awareness of, and ability to identify and address, modern slavery risks within our own business as well as within our supply chains.

### **Consultation Process and Approval**

This statement has been prepared by Adams in consultation with Abano. It was approved by the board of directors of Adams Group Aus Holdings Pty Limited (being the principal governing body for the reporting entities) on 30 September 2025.

The process of consultation involved engagement with Adams Group's senior leadership team who represent relevant internal stakeholder groups including Procurement, Human Resources, Legal and Finance.

This statement is signed by David Brooks in his role as a director of Adams Group Aus Holdings Pty Limited ACN 637 089 162 on 30 September 2025.

Signed:



David Brooks

Director of Adams Group Aus Holdings Pty Limited

30 September 2025