



2025 Modern Slavery Statement



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Acknowledgements

HBF acknowledges the Traditional Owners of the lands and waters across Australia as the continuing custodians of Country and Culture dating back to the creation of the Dreaming. We pay our respects to First Nations peoples and their Elders both past and present.

Message from the Chair

Modern Slavery Statement

This Modern Slavery Statement (Statement) covers the activities of HBF Health Limited ABN 11 126 884 786 and each of its wholly owned and controlled entities (HBF) and outlines our approach to monitoring and minimising the risk of modern slavery and human trafficking in our operations and supply chain.

This Statement is valid for the financial year to 30 June 2025 and has been drafted pursuant to the requirements of the *Modern Slavery Act 2018* (Cth).

Rejecting modern slavery

Corporates have an important role to play in addressing the evolving environmental, social, and governance (ESG) expectations of the communities in which they operate, including modern slavery.

As one of Australia's largest private health insurers, HBF firmly rejects all forms of modern slavery and is dedicated to its global eradication.

This Statement marks our sixth under Commonwealth legislation, detailing our efforts to monitor and mitigate modern slavery risks. It summarises our activities from FY25 and outlines our priorities for FY26. While we assess our operations as presenting a low risk for modern slavery, we are committed to ongoing improvement in this critical area.

HBF aligns with the '2030 Agenda for Sustainable Development' and its 17 Sustainable Development Goals (SDGs). We particularly focus on SDG 8 – Decent Work and Economic Growth, by actively pursuing initiatives that enhance our procurement capabilities and frameworks. These efforts aim to strengthen our approach to positively impacting the elimination of modern slavery practices. More details can be found within this statement.

The Board of HBF is pleased to announce that on 27 November 2025, it approved this Modern Slavery Statement in accordance with Rule 10.6 of the Constitution. We will provide annual updates on our progress in reducing modern slavery risks within our operations and supply chain.

Diane Smith-Gander AO
Chair



We are committed to UN SDG Goals

Introduction

As one of Australia’s largest private health insurance funds, HBF commits to operating ethically, responsibly, and transparently, doing the right thing by HBF members, stakeholders, and the broader community.

HBF rejects any form of modern slavery, supporting the goal to eliminate modern slavery worldwide. This year represents HBF’s sixth Modern Slavery Statement, developed in accordance with the *Modern Slavery Act 2018* (Cth).

This Statement covers activities of HBF for the financial year to 30 June 2025 and details the approach and activities HBF has applied to identify and mitigate risks of modern slavery in HBF’s business operations and direct supply chain. During the reporting period, HBF has engaged and consulted with the companies it wholly owns or controls including, HBF Dental Services Pty Ltd (HBF Dental) and Life Ready Health Group Pty Ltd (Life Ready) in the development of this Statement.

This engagement has included conducting modern slavery consultations on HBF’s reporting requirements and responsibilities for an HBF-aligned approach and actions to be taken to address modern slavery risks. HBF has, in development of this Statement, assessed the material suppliers of each of its entities. As part of the onboarding process, these suppliers are issued pre-qualification questionnaires to understand their processes and controls to manage modern slavery risk. HBF then evaluates the responses, requests supporting artefacts and seeks clarification where necessary. Follow-up consultation with internal stakeholders and suppliers then occurs to inform appropriate actions to monitor and manage these risks.

HBF Dental’s operations are delivered under a management services agreement with Pacific Smiles Group Limited ABN 42 103 087 449 (PSG). PSG, as a reporting entity, will publish a Modern Slavery Statement. Any additional or on-going queries relating to the actions undertaken by PSG will be incorporated as part of HBF’s periodic review of PSG.



HBF was founded more than 80 years ago and has provided private health insurance to generations of Australians. HBF is committed to actively connecting with and supporting the communities in which it operates as a trusted member-based organisation.

As a not-for-profit organisation incorporated as an Australian public company limited by guarantee under the *Corporations Act 2001* and a private health insurer under the *Private Health Insurance Act 2007*, HBF maintains its registered office at 570 Wellington Street, Perth, Western Australia. With offices in Western Australia, Queensland, Victoria and New South Wales, and a branch network spanning the Perth metropolitan area, HBF employs 1,377 people across Australia (as at 30 June 2025).

Health insurance

HBF has expanded to become Australia’s second largest not-for-profit health fund, providing hospital and ancillary insurance to approximately 1.2 million members nationwide.

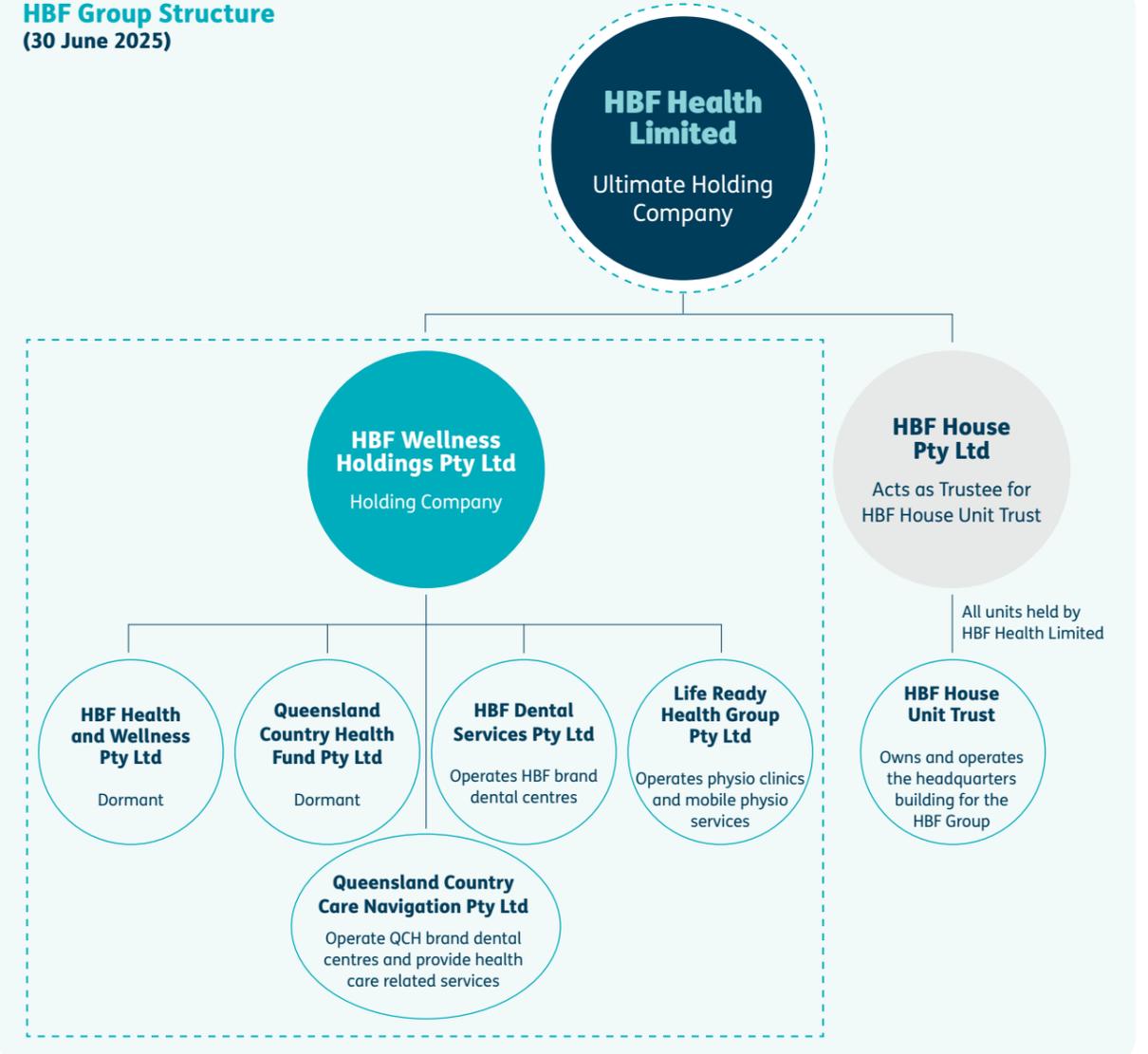
Health services

HBF is an active participant in health services through its physiotherapy business Life Ready and its expanding HBF Dental operations.

Life Ready operates through 24 subsidiary entities covering 23 physiotherapy clinics and a mobile physiotherapy practice across Western Australia and Victoria. HBF Dental operates 10 centres across Western Australia.

In addition to these HBF owned and operated physiotherapy and dental services, other ancillary providers operate independently of HBF. HBF’s role is limited to processing member benefit payments for services rendered directly to members. As independent businesses, these providers are not considered part of HBF’s operations or supply chain for this Statement.

HBF Group Structure (30 June 2025)



Represents income tax group

Assessing modern slavery risks in HBF's supply chain

HBF has implemented controls and activities and works with suppliers to manage modern slavery risk within our operations and supply chains.

Modern slavery assessment criteria

HBF has adopted the Minderoo Foundation's Walk Free Initiative Global Slavery Index (GSI) along with guidance provided by the Modern Slavery and Human Trafficking Branch of the Australian Border Force as the basis in which we assess scope of works and supply chains for inherent modern slavery risk.

HBF's approach considers:

- 1. Product and service**
Is there a prevalence of modern slavery risk associated with the goods or services being provided, as guided by GSI?
- 2. Sector and industry**
Is there a prevalence of modern slavery risk in the industry or sector within the country where the supply chain resides, as guided by GSI?



In FY25 HBF's supply chain included 405 suppliers (third-party provider of goods and/or services provided to HBF) in support of its operations – of these, 56 were new suppliers.

There has been minimal change to HBF's supply chain risk profile over the past 12 months as supplier spend by activity type has not changed. HBF's annual supplier spend in FY25 was approximately \$154 million. The HBF supplier spend profile highlights that HBF is a service-based organisation with 91 per cent of its supply chain made up of services with the balance being the supply of products. While the majority of HBF's suppliers are headquartered in jurisdictions with a lower prevalence of modern slavery risk, we recognise that delivery models particularly for outsourced technology services may involve offshore operations in higher-risk regions. These arrangements are subject to enhanced due diligence and contractual controls.



Modern slavery assessment process

HBF's modern slavery process is a multi-stage assessment.

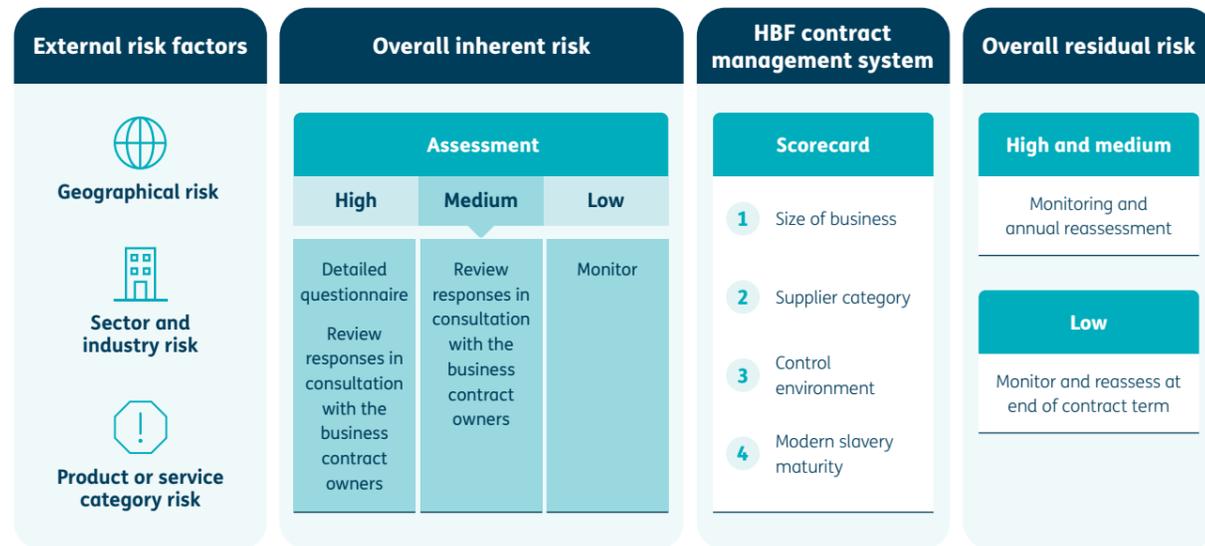
The HBF Procurement Procedure outlines the modern slavery risk assessments and subsequent controls that apply throughout the contract life cycle.

Where a scope of work has been assessed as having potential medium or high modern slavery risk, an internal assessment of the supplier's supply chain is undertaken using a pre-qualification questionnaire.

On completion of the supplier assessment, suppliers are tiered, and appropriate risk controls are applied dependent on the risk tier.

This may include requiring suppliers to provide evidence of their internal risk control framework and modern slavery controls.

HBF's modern slavery assessment process



Modern slavery risks

HBF has assessed its own operations as having a low modern slavery risk.

During FY25, we identified 405 suppliers for modern slavery risk screening against the GSI criteria. All the new suppliers were requested to complete a modern slavery pre-qualification questionnaire and evidence their supply chain and risk control framework, which resulted in one per cent classified as high residual risk and 4 per cent classified as medium residual risk.

The residual risk rating is dependent on the responses of the questionnaire, evaluation of the supplier's certifications, statements and/or frameworks and their maturity in its modern slavery processes.

We then engage the relevant stakeholders to implement controls such as modern slavery compliance in our contracts and to manage and monitor the risk.

The assessment of the HBF supply chain completed during 2025 highlighted the procurement categories with higher potential modern slavery risks (marketing apparel and merchandise products, technology consumables and hardware products, personal protective equipment and cleaning products and consumables used in HBF's corporate office and branch network).

HBF extended its assessment of its operations to include contractual arrangements with West Australian hospital providers and will work further with these organisations to understand their modern slavery risks. Hospital providers outside Western Australia are managed through an agent where the agreements have contractual controls in place for specific providers to address the modern slavery assessment required.

Managing modern slavery risks in HBF's supply chain

Modern slavery risk management

Corporate Governance

HBF's Board is responsible for risk management, supported by the Risk Committee, a sub-committee of the HBF Board.

The Risk Committee provides objective, non-executive review and oversight of the implementation and operation of HBF's Risk Management Framework and Strategy (RMFS). The Risk Committee meets a minimum of four times annually and makes recommendations to the Board on managing strategic and operational risks including modern slavery risk.

HBF's Management Committees, the Executive Committee and the Executive Risk and Compliance Committee, provide review and oversight for all categories of financial and non-financial risk (respectively).

Risk and Compliance

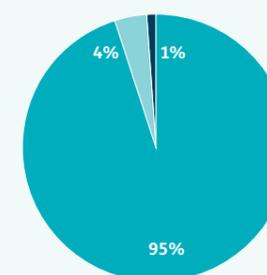
- Developing risk management and compliance policies, systems, tools, and processes for consistent risk identification, assessment, and management of risk.
- Promoting a positive risk culture through awareness, training, and specialist advice.
- Conducting objective review and challenge of Risk Management Framework and Strategy (RMFS) implementation, data quality, risk identification and analysis, effectiveness of risk and obligation controls, and action plans to mitigate and manage risks.

- Providing oversight of risk and obligations compliance levels and control effectiveness across HBF, including alignment with risk appetite, reporting and escalation to the Board or Board Risk Committee as necessary.

HBF Procurement Process

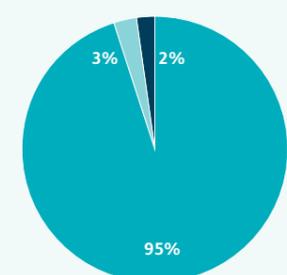
- HBF's procurement team is responsible for assessing, monitoring, and reporting on modern slavery risk across HBF's supplier network.
- HBF's procurement team manages the procurement processes that apply the modern slavery risk controls during supplier engagement, contract management and offboarding.
- HBF's legal team and Company Secretariat support the development and maintenance of HBF's corporate governance framework, including the design of contract templates and policy documents that embed modern slavery controls and set clear expectations for supplier conduct.
- HBF's compliance team advises on regulatory obligations related to modern slavery and supports the implementation of governance processes that ensure HBF meets its commitments under applicable legislation and internal policy frameworks.
- Contract owners and managers are responsible for adhering to the modern slavery processes when they engage suppliers.
- HBF's enterprise resource planning system enable modern slavery risk screening workflows during the creation of purchase requisitions for transactional procurement. Scopes of works with identifiable modern slavery risk are escalated to Procurement for further due diligence and application of risk controls as appropriate. HBF's corporate governance documents provide a foundation for guiding employees on the organisation's commitment to modern slavery and how to operate with appropriate conduct which, directly or indirectly, impacts the behaviour and approach HBF takes to addressing modern slavery risk.
- Modern slavery concerns are recorded in HBF's enterprise Risk Management and Compliance System (RMCS). The RMCS is maintained as the source of truth for enterprise risk and compliance management. The RMCS is used to measure, assess, and report regular, timely and accurate information on material risks, including Third Party risks like Modern Slavery risks to the Board, Board Committees and Senior Management.

Modern Slavery within HBF's Supply chain



■ Low risk ■ Medium risk ■ High risk

Geographical Distribution



■ Australia ■ United States ■ Others (Ireland, Lithuania, Netherlands, Singapore, Spain)

Over the past 12 months, HBF has:

- Embedded the Informed365 assessment platform across HBF and its controlled entities, including Life Ready, enabling independent and verified supplier risk assessments.
- Partnered with Health Funds Australia and Informed365 to streamline supplier assessments and reporting, contributing to industry-wide alignment and simplifying compliance for suppliers.
- Enhanced our third-party risk management framework by embedding modern slavery controls into the contract lifecycle and procurement workflows. This included extending assessments to investment providers and onboarding new fund managers with modern slavery due diligence.
- Delivered targeted training for Contract Owners and Managers, including a dedicated workshop to uplift awareness and application of modern slavery controls.
- Continued active participation in Health Funds Australia working groups and monthly Informed365 platform user meetings to share best practices and benchmark our approach. Strengthened governance and reporting, with formal updates provided to the Executive Committee, Risk Committee, and Board, and endorsement of the FY25 Modern Slavery Statement for submission under the Modern Slavery Act 2018.

Grievance mechanisms

HBF reminds third-party suppliers and anyone with concerns of their ability to raise modern slavery issues through our whistleblowing channels, including the independent HALO platform, which is accessible via web, email, or phone. These channels are referenced in supplier communications and contract documentation, and third parties are afforded the same protections as internal whistleblowers under HBF's Whistleblower Policy.

Code of conduct

The HBF Code of Conduct sets out clear expectations for employees' behaviour.

Modern slavery contract terms and conditions

HBF's standard contract terms for the supply of goods and services contains modern slavery provisions. These provisions detail supplier obligations and HBF's expectations pertaining to human trafficking and modern slavery controls. These controls include:

- Compliance to relevant statutory and regulatory laws – including the prohibition of modern slavery practices by the supplier or its subcontractors.
- Periodical evidence and independent verification of compliance to supplier modern slavery controls (this includes independent certification to international standards and/or audits by recognised international bodies).
- Rights of termination provisions for breaches of modern slavery controls.
- Rights for HBF to conduct audits of modern slavery compliance.

Contract scope delivery

HBF's Procurement Procedure prescribes post-award controls for contracts considered to hold a heightened risk for modern slavery. These controls include:

- **Supplier mobilisation:** evidence that modern slavery controls and activities are operational prior to the commencement of scope delivery.
- **Supplier performance management:** defines the reporting obligations, key performance indicators and assurance activities to monitor modern slavery risk during scope delivery.
- **Supplier offboarding:** closes out the contract and captures lessons learnt.

Subsidiary engagement

HBF continues to actively engage with its subsidiaries to manage modern slavery risks:

- **Life Ready:** HBF meets regularly with Life Ready Executives to raise awareness of modern slavery.
- **HBF Dental:** HBF meets with PSG to understand their approach to modern slavery risks. HBF obtains a six-monthly risk attestation from PSG, which seeks further information from PSG around their modern slavery activities. PSG provides an annual Modern Slavery Statement which is reviewed by HBF and additional queries, if required, are made to address any modern slavery risks.

Key governance documents include:

Code of Conduct

Risk Management Framework and Strategy (RMFS)

Risk Appetite Statement (RAS)

Whistleblower Policy

Service Provider Management and Procurement Policy and Guideline

Measuring the effectiveness of HBF's actions

To ensure the effectiveness of HBF's approach to manage modern slavery risk, a clear assurance process is in place.

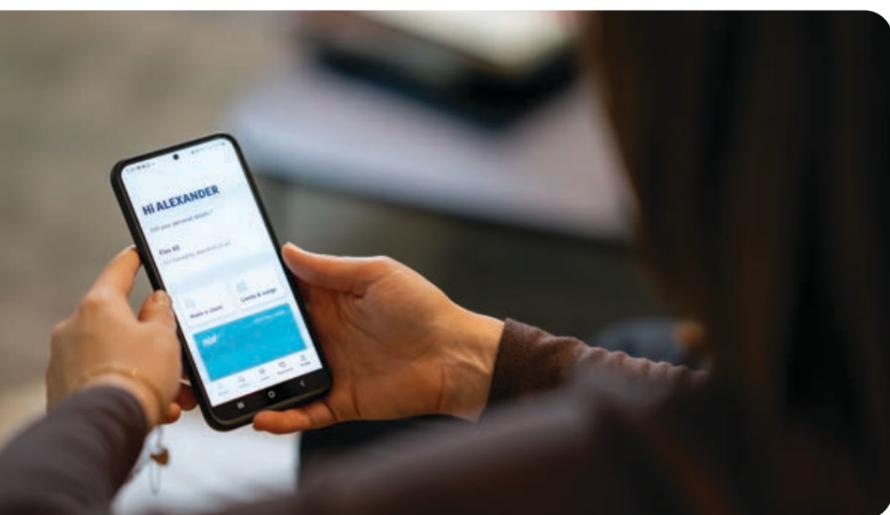
- The Board of HBF, through the Risk Committee, is responsible for monitoring the effectiveness of HBF's Risk Management Framework, which includes reviewing activities associated with managing modern slavery risks.
- HBF management annually reports to the Risk Committee on progress on modern slavery controls and effectiveness. This reporting includes procurement and contract management activities which include monitoring and reporting modern slavery risks.

Specific indicators to truly measure whether HBF's efforts are contributing to the reduction of modern slavery risk are challenging to define. Notwithstanding those challenges, HBF commits to enhance its effectiveness and modern slavery governance by actively seeking advice and knowledge from external consultants, industry consortium members and stakeholders.

Focus for FY26

Building on the progress achieved in FY25, HBF will strengthen its modern slavery risk management approach through targeted enhancements that reflect evolving regulatory expectations and industry best practice:

- Implement a comprehensive supplier portal that captures modern slavery attestations, policies, and risk assessments during onboarding.
- Scale the use of the modern slavery assessment platform with automated evidence validation and periodic re-assessment.
- Launch interactive, scenario-based training for Contract Owners and Managers, incorporating case studies and compliance simulations aligned to the procurement lifecycle.
- Continuing engagement with suppliers and service providers including hospital, medical and ancillary member service providers to understand their modern slavery risks and aligning industry engagement with the PHI (Private Health Insurance) modern slavery community interest working group.



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