

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 2024 (**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 Australasia's largest provider of facilities and services to dental practitioners. In Australia it operates 117 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 122 dental clinics in New Zealand through its subsidiaries Lumino Dental Limited and Abano NZ 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, there were 1,303 employees working in the Australian business and a further 903 employees working in the New Zealand business (as at 30 June 2024). 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 minimal 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.

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
- Work Health & Safety Policy
- Speak Up Policy

Our measures to address modern slavery risks

Our focus to date has been 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 is considering its existing suppliers' responses to its enquiries and considering how it can work with suppliers to improve their processes and address its risk here. This may include discontinuing relationships with suppliers.

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 have been as follows:

Procurement

Adams Group assesses the modern slavery risks of various suppliers of dental equipment and consumables in the form of an annual modern slavery survey conducted during the reporting period. 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.

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 updated its Modern Slavery policy and also adopted a Modern Slavery Response and Remediation Plan to assist in responding to any instances of modern slavery identified in the future.

In addition to this, the Adams Group adopted an updated version of its employee Code of Conduct and Speak Up Policy. Both of these policies specifically refer to modern slavery risk and the expectation that instances, or suspected instances, of modern slavery are reported through appropriate internal or external channels.

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 has updated its Supplier Code of Conduct and requires new suppliers of dental equipment and consumables to commit to comply with this. We are engaging with existing suppliers regarding compliance. The Supplier Code of Conduct specifically references our requirements regarding our suppliers' treatment of their workers, including that they will not engage in modern slavery.

Training

Adams Group has updated its modern slavery training during the reporting period to make it more relevant to Adams Group and its business activities. This was one of the key priorities in the reporting period.

This training was completed by a larger and broader group of employees within the Adams Group than in previous years, including members of the Adams Group Executive Leadership Team, Senior Leadership Team and various members of relevant functions such as Procurement, People & Culture and Workplace Health & Safety.

Whistleblowing

Adams Group offers multiple ways to report potential compliance concerns, including anonymously through an external provider under the Adams Group's Speak Up Policy. This policy applies to all

current and former directors, officers, employees and suppliers of the Adams Group and has recently been updated and approved by the board of the Adams Group. This policy specifically refers to the reporting of instances, or suspected instances, of modern slavery as being within the scope of this policy and associated Speak Up procedure.

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 improved the content of its Modern Slavery training and expanded the training requirements to a larger number of employees than in previous years.

Key Performance Indicators: Adams Group has 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.

At this stage, we are unable to adequately assess the effectiveness of these measures, however we expect to be in a position to do so in the next reporting period. Over the next and subsequent reporting periods, we will continue to review and enhance these KPIs. In the next reporting period, we also intend to review our progress against the modern slavery maturity framework exercise undertaken by an external party on the Adams Group in the previous reporting period which will enable us to assess our progress and effectiveness in managing these risks.

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 24 September 2024.

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 Simon Harle in his role as a director of Adams Group Aus Holdings Pty Limited ACN 637 089 162 on 24 September 2024.

Signed:

A handwritten signature in black ink, appearing to be 'SH' followed by a long horizontal stroke.

Simon Harle
Director of Adams Group Aus Holdings Pty Limited
24 September 2024