

HEALTHIA PTY LIMITED ACN 626 087 223

MODERN SLAVERY STATEMENT | For the period ended 31 December 2025

Reporting Entities and Structure

This statement is made jointly by Harold Topco Limited and the other entities within the Healthia group of companies that are reporting entities for the purposes of the *Modern Slavery Act 2018 (the Act)* (identified in **Annexure 1**).

In this statement, we refer collectively to these entities as the **Healthia Group, Healthia, we, us or our**.

This Modern Slavery Statement is issued for the period 1 January 2025 to 31 December 2025 (**reporting period**) and addresses the mandatory reporting criteria under the Act. The Statement outlines the actions taken by Healthia during the reporting period to identify, assess and address modern slavery risks across its operations and supply chains.

Operations and Supply Chains

The Healthia Group is a leading allied health care provider and through collaboration across its teams and its integrated network of allied health businesses, Healthia continually strives to create positive, lasting impacts on the communities we serve, empowering our patients to lead happier and healthier lives.

The principal activities of the Healthia Group during the reporting period were the provision of allied health services and related products as well as being an aggregator of allied health businesses.

As at the end of the reporting period, Healthia operated:

- Approximately 365 allied health businesses, including podiatry clinics, physiotherapy and hand therapy clinics and optical stores; and
- A workforce comprising approximately:
 - 3,500 employees in Australia;
 - 55 employees in New Zealand; and
 - 20 employees in the United States, (excluding independent contractors).

Healthia's operations are primarily based in Australia, supported by corporate offices in Brisbane and Sydney which provide centralised functions including human resources, finance, IT, education and clinical services support and marketing.

Healthia's supply chain is centred on the delivery of allied health services and related products and is largely comprised of tier one suppliers based in Australia. Key categories of procurement include:

- Allied health related equipment and consumables
- Leasing of commercial real estate
- Workforce engagement and recruitment
- Information technology hardware and software
- General business services (including utilities, cleaning, telecommunications and marketing)

Risks of Modern Slavery Practices in Our Operations and Supply Chains

Healthia assesses modern slavery risk with reference to factors including:

- Geographical location
- Nature of goods and services procured; and
- Industry-specific risk exposure



The risk of modern slavery within Healthia's core operations remains low having regard to the location and nature of its operations and has not materially changed since the previous reporting period. This assessment reflects that the majority of Healthia's core business activities are undertaken in Australia (and New Zealand), which are generally considered to present a lower risk of modern slavery. However, Healthia acknowledges that modern slavery risks may still arise, particularly within supply chains, and remains committed to ongoing monitoring and assessment.

Key factors contributing to this assessment include:

- **Employment Practices:** Healthia engages **employees** under modern awards, enterprise agreements and other contractual arrangements that are underpinned by the *Fair Work Act 2009 (Cth)* or the National Employment Standards. The People & Culture team oversees recruitment and ensures compliance with employment laws and obligations, maintaining strong oversight and reducing potential modern slavery risks.
- **Domestic Suppliers:** The majority of Healthia's key suppliers are **based** in Australia, which presents a lower inherent risk of modern slavery. Healthia acknowledges that sourcing goods and services overseas can pose a higher risk.
- **Industry and Product Risk:** Healthia operates primarily in the healthcare sector, which is highly regulated and generally considered lower risk. However, certain areas of procurement present elevated risks including:
 - Cleaning services: which are recognised as high-risk for modern slavery
 - Technology and medical goods: which may present modern slavery risks where they involve complex global supply chains

Actions Taken to Assess and Address Those Risks

During the reporting period, Healthia continued to build on the actions taken in prior years to identify and address modern slavery risks across its operations and supply chain. This included:

- **Supplier Engagement and Due Diligence:**
 - Ongoing review of key supplier relationships, which remain broadly stable during the reporting period;
 - Periodic review of key suppliers, informed by publicly available information, supplier policies and governance frameworks, and previously complete due diligence materials;
 - Continued engagement with suppliers regarding Healthia's expectations in relation to ethical conduct and modern slavery risk management.
- **Policy Framework and Governance:**
 - During the reporting period, Healthia maintained and applied its suite of policies and frameworks supporting ethical conduct and compliance with modern slavery obligations, including its Modern Slavery Policy, Supplier Code of Conduct, Code of Conduct, Anti-Bribery and Corruption Policy, Work Health and Safety Policy and Whistleblower Policy, and continued to review and monitor these frameworks as part of its broader governance processes.
- **Governance and ESG Integration**
 - During the reporting period, Healthia strengthened its governance framework through the establishment of an Environmental, Social and Governance (ESG) Committee.
 - The ESG Committee was established toward the end of the reporting period. The Committee's functions include identifying, developing, implementing and monitoring ESG strategies and initiatives, including those relating to modern slavery risk, and will form part of Healthia's governance framework for the oversight of modern slavery risks in future reporting periods.
- **Procurement and Supply Chain Visibility**
 - During the reporting period, Healthia engaged a dedicated procurement lead to support a more structured and centralised approach to procurement across the Group.



- As part of this initiative, Healthia undertook a review of its supply chain and associated spend, improving visibility over supplier relationships and key procurement categories.
- This work supports Healthia's ability to identify and assess potential modern slavery risks within its supply chain and will inform the continued development of its supplier risk assessment and due diligence processes.

Effectiveness of Actions taken

During the reporting period, Healthia continued to strengthen its approach to modern slavery risk management by gathering and analysing data across its supply chains, including updating its key supplier lists to maintain a current understanding of potential risk exposures and support the ongoing assessment of supplier-related risks.

Healthia recognises that evaluating the effectiveness of its actions is an ongoing process and that continuous improvement is required and continues to apply measures to monitor and assess its approach, including review of risk assessment processes, tracking progress against objectives, and identifying opportunities for improvement.

During the reporting period, Healthia did not receive any reported incidents, whistleblower disclosures or complaints alleging breaches of modern slavery laws. Whilst this is a positive indicator, Healthia acknowledges that the absence of reported incidents does not necessarily indicate that no modern slavery has occurred and remains committed to maintaining accessible and effective reporting mechanisms.

The ESG Committee, which was established toward the end of the reporting period, will support the ongoing development of these processes in future reporting periods as part of Healthia's governance framework.

Consultation and Approval

This statement is made pursuant to the *Modern Slavery Act 2018 (Cth)* and constitutes Healthia's Modern Slavery Statement for the financial year ended 31 December 2025.

This Modern Slavery Statement was approved by the Board of Directors of the Healthia Group. In preparing this statement, relevant entities within the Healthia Group were consulted to support a consistent approach to identifying and addressing modern slavery risks across the Group. This consultation was supported by the governance structure of the Healthia Group, including oversight by Harold Topco Limited as the controlling entity and the involvement of directors and senior management across related entities. The ESG Committee, which was established toward the end of the reporting period, will support this consultation process in future reporting periods as part of Healthia's broader governance framework.

Signed on behalf of the Board by



Wesley Coote
Chief Executive Officer and Managing Director
Healthia Group
Dated: 29/06/2026



Annexure 1

The following entities within the Healthia group of companies are reporting entities for the purposes of the Act:

- Harold Topco Limited
- Harold Holdco Pty Ltd
- Harold Midco Pty Ltd
- Harold Bidco Pty Ltd
- Healthia Pty Limited

The subsidiaries of Healthia Pty Limited comprise:

- Healthia (Services) Pty Ltd
- Allsports (Aust) Limited
- Healthia Podiatry Limited
- Extend Rehab Pty Ltd
- BIM Physiotherapy Group Holding Limited
- Healthia Physiotherapy Pty Ltd
- Healthia Allied Pty Ltd
- The Optical Company Pty Ltd
- Australian Eyewear Distributors Pty Ltd
- The Optical Company (NSW) Pty Ltd
- The Optical Company (Aust) Pty Ltd
- Healthia Supplies Pty Ltd
- iOrthotics Pty Ltd
- iOrthotics South Australia Pty Ltd
- Healthia USA Inc

