

# Modern Slavery Statement

K Care Holdings Pty Ltd (ABN 80 626 058 035) (ACN 626 058 035)

For the financial year 1 July 2024 to 30 June 2025 (Reporting Period)

## 1 INTRODUCTION

At K Care Holdings Pty Ltd, we are committed to improving our practices to combat any form of modern slavery within our operations and supply chains. Modern slavery has no place in our business or society.

To uphold this commitment, we have implemented comprehensive policies and due diligence processes aimed at identifying and mitigating modern slavery risks. These processes include regular audits, training programs for our staff, and supplier engagement strategies. We are dedicated to continually improving our efforts to ensure that our business remains free from modern slavery and upholds the highest standards of ethical conduct.

## 2 REPORTING ENTITY, ORGANISATIONAL STRUCTURE, OPERATIONS AND SUPPLY CHAIN

### 2.1 Reporting Entities and Structure

This Modern Slavery Statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) by K Care Holdings Pty Ltd (ABN 80 626 058 035) (ACN 626 058 035) (**KCH**) of registered office c/- Findex Level 1, 86-88 Deakin Avenue, Mildura.

This statement covers the following KCH entities and each of them jointly submit this Statement:

- K Care Healthcare Solutions Pty Ltd (ACN 159 431 099) (ABN 47 159 431 099)
- The County Care Group Pty Ltd (ACN 088 222 226) (ABN 26 088 222 226) (**Country Care Group**)
- Country Care Management Services Pty Ltd (ACN 606 437 101) (ABN 23 606 437 101)
- Country Care Group Home Modifications Pty Ltd (ACN 619 350 435) (ABN 81 619 350 435)
- Specialised Mobility Pty Ltd (ACN 159 633 664) (ABN 59 159 633 664)
- MT Hogan Enterprises Pty Ltd (ACN 616 278 829)
- Willaid Pty Ltd (ACN 616 282 663) (ABN 98 616 282 663)
- RIH Holdings Pty Ltd (ACN 628 783 031) (ABN 22 628 783 031)
- Specialised Wheelchair Company Pty Ltd (ACN 001 326 558) (ABN 98 001 326 558)
- 24 Hour Positioning Pty Ltd (ACN 629 646 493) (ABN 96 629 646 493)
- Uccello Marketing Pty Ltd (ACN 602 569 595) (ABN 50 602 569 595)

KCH is a proprietary limited company governed by CCGA Holdings Pty Ltd (ACN 662 906 523) and overseen by a Board of Directors. The company exercises control over all entities listed above that jointly submit this Statement. As a consolidated group, KCH (referred to as “the Group,” “we,” or “our”) generates annual revenue exceeding \$100 million.

### 2.2 Operations

We are a group of national businesses which manufacturer, distribute and sell a large range of innovative healthcare products and services for the Australian and International markets both independently and through a national group of resellers.

Our head office is in Mildura, regional Victoria. We have over 700 employees and 60 manufacturing, distribution, warehousing and retail locations across Australia in the Reporting Period.

Our manufacturing and distribution division, “K Care Healthcare Solutions” (**K Care**), is one of Australia’s largest manufacturers and wholesale healthcare equipment brands. We are proud to design, develop and manufacture a wide variety of industry-leading products right here in Australia. K Care is home to some of Australia's best-known industry brands, including Air Comfort, OxfordEME, EasyVet, R&R, Kerry, Alivio, Uccello Designs, Carilex and Merits Australia.

K Care provides products and services to retail distributors and resellers, and direct to aged care facilities, residential homes, hospitals, and healthcare centres across Australia and overseas.

Our retail and contracts division known as Country Care Group, provides healthcare equipment to individuals independently through its retail stores, as well as through servicing major government contracts, such as Department of Veterans’ Affairs, Queensland Government Medical Aids Subsidy Scheme, Victorian Government State-wide Equipment Program, Western Australia Health, Transport Accident Commission and HealthShare NSW.

### 2.3 Supply Chain

We procure goods and services from suppliers located all around the world, including the procurement of:

- manufactured products,
- raw materials,
- warehousing & logistic services,
- marketing & advertisement services,
- goods needed for the Group’s everyday corporate operations, including office supplies, and
- services needed for the Group’s everyday operations, including professional services such as recruitment, legal and tax, and non-professional services such as IT, telecommunications, and cleaning.

Several of our suppliers operate internationally, providing healthcare-related equipment such as raw materials, assistive technology components for assembly and manufacturing, as well as beds, hygiene products, pressure care items, wheelchairs, commodes, lifts, and hoists. From Australian suppliers, we source items including castors, stainless steel sheets and tubular products, along with other manufacturing consumables.

## 3 RISKS OF MODERN SLAVERY PRACTICES

### 3.1 Supplier risk

Recognising that certain supply chain segments carry greater exposure, we undertook a comprehensive risk assessment using third-party software and the Modern Slavery Assessment Tool (MSAT). This process involved evaluating a number of our suppliers and resulted in an Insight Report detailing the level of modern slavery risk across our supply chain.

#### Inherent and Unmitigated Risks

The Modern Slavery Assessment Tool (MSAT) assigns two distinct metrics: an **Inherent Risk Score** and an **Unmitigated Risk Score** based on the supplier assessment.

The **Inherent Risk Score** reflects the baseline level of modern slavery risk inherent to the supplier’s operations, determined by factors such as geographic footprint, industry sector, and the nature of high-risk goods within their production or supply chain.

The **Unmitigated Risk Score** represents the residual risk after accounting for the supplier’s implemented controls, including documented policies, governance frameworks, and operational procedures designed to mitigate modern slavery exposure.

		Inherent risk		
		Low	Moderate to High	Very high
Risk control	Adequate		Low-risk (Adequate risk control)	
	Partial	Low-risk (Low levels of inherent risk)	Medium-risk (Partial risk control)	High-risk (High levels of inherent risk)
	Inadequate		High-risk (Inadequate risk control)	

FIGURE 1: Risk Categories

### 3.2 Annual Supplier Assessments

Annual supplier assessments are undertaken by the Quality Assurance team, and its outcomes inform the development of the Modern Slavery Statement. Suppliers are required to disclose the sectors in which they operate, manufacture goods, and source materials. These disclosures are benchmarked against the Global Estimates of Modern Slavery to identify potential exposure to forced labour risks. High-risk sectors, as defined by these estimates, include Accommodation and Food Services, Agriculture, Forestry and Fishing, Construction, Domestic Work, Motor Vehicle Maintenance and Repair, Manufacturing, Mining and Quarrying, Personal Services, Retail, Transportation and Storage, and Wholesale.

For this reporting period we asked **238** of our top suppliers to complete a self-assessment questionnaire online using the Modern Slavery Assessment Tool. **131** suppliers completed the assessment (a 9.24% increase of supplier responses from last year), a completion rate of **55.04%**. The higher participation strengthens the reliability of the aggregated risk profile, giving a more comprehensive view of systemic vulnerabilities and control effectiveness across the supply chain.

Based on Supplier’s answer, individual supplier scores were consolidated to produce an aggregated risk profile for the Group’s supply chain, providing a comprehensive view of systemic vulnerabilities and control effectiveness.

**Inherent Risk Score:** FY25 score is **41.91%**, representing a 0.97% decrease compared to FY24 42.32%. Supplier engagement rose by 9.24%, and greater visibility contributed to a marginal decrease which may indicate improvements in supplier practices, better awareness, or reduced supply chain vulnerabilities.

**Unmitigated Risk Score:** FY25 score is **31.90** out of 100, representing a 0.79% increase compared to FY24 31.65. A 9.24% rise in supplier engagement enhanced visibility, exposing further vulnerabilities for improvement.

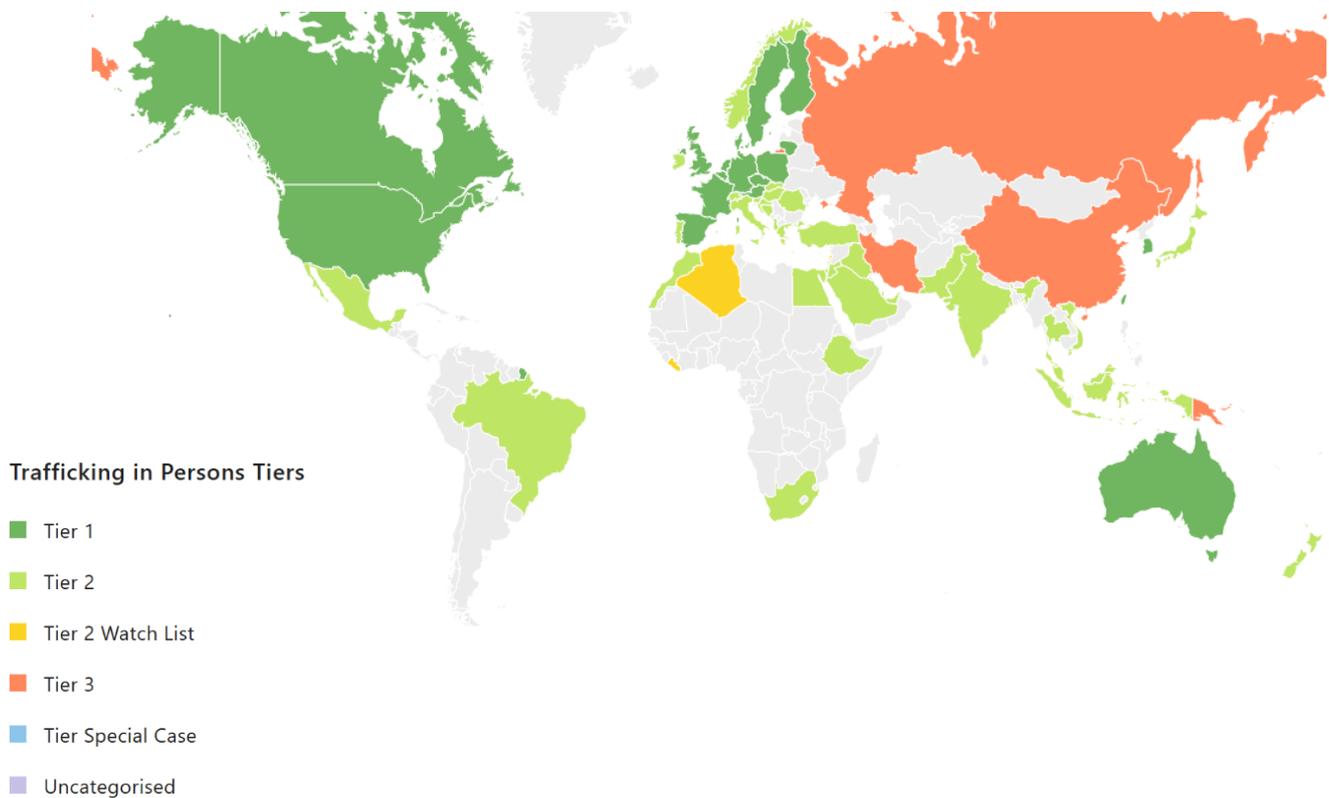
### 3.3 High risk goods and services

Suppliers evaluated using the Modern Slavery Assessment Tool (MSAT) indicated the high-risk goods and/or services produced were Electronics, Textiles and Furniture.

The high-risk goods and/or services sourced by Suppliers are Alarms and access control, Commercial cleaning, Mobile patrols, Perimeter security, Security, Warehouse packing, CCTV, Industrial cleaning, Other labour hire services, Recruitment and placement, Warehouse labelling, Warehouse sorting, Aluminium, Lead acid batteries, Polyvinyl Chloride, Solar Modules, Thread/Yarn, Vinyl, Electronics, Lithium-Ion batteries, Solar Cells, Textiles, Tyres, surgical instruments and furniture.

### 3.4 Geographic risks

Assessed Suppliers indicated that they operate in various locations around the world as set out in Figure 2 below:



**FIGURE 2: Supplier countries by risk tier**

The number shown next to each country or region above represents the number of suppliers with operations in that location.



**FIGURE 3: Suppliers by geographic location**

**Explanatory Note:**

\* Our supplier confirms that it does not buy or source any goods from Tier 3 Country of Origin. The supplier has reviewed its supply chain and verified that none of its products, materials, or services originate from this country. The supplier's operations with Tier 3 countries are limited to selling activities only and do not involve procurement or sourcing of goods or materials. Furthermore, our purchases from this supplier are immaterial in value (less than \$5k).

## 4 ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

The Group has implemented systems and software to:

- Identify and assess risk areas in our business operations and supply chains
- Mitigate the risk of modern slavery occurring in our business operations and supply chains
- Monitor risk areas in our business operations and supply chains
- Supplier Audits
- Training and awareness
- Remediate harm caused.
- Protect those reporting through grievance mechanisms.

### 4.1 Governance

The Board of KCH Group retains ultimate responsibility for setting the strategic direction to address modern slavery risks and for providing oversight and formal approval of this Statement.

To strengthen governance and operational efficiency, we have undertaken a restructuring of the Supply Chain function. This initiative is designed to enhance knowledge sharing, foster cross-functional collaboration, and improve procurement practices. The objective is to ensure robust supply chain management processes that reduce exposure to modern slavery risks and align with best-practice compliance standards.

## 4.2 Policies

### **Modern Slavery Policy**

The Groups Modern Slavery Policy applies to all employees, directors, officers, labour hire staff, contractors, or other representatives of our businesses or of any business in our supply chain.

The Modern Slavery Policy affirms our commitment to full compliance with the Modern Slavery Act and to preventing any form of modern slavery within our operations and supply chain. It ensures that all employees understand the associated risks and responsibilities. The policy is accessible to all staff through our online quality management system, and a statement reflecting the Group's commitment to human rights is prominently displayed on our websites.

### **Other Policies**

The Group also has policies in place relating to Grievance's, Whistleblowers, Risk assessments, Environmental Social & Governance, and Code of Conduct.

## 4.3 Due Diligence & Screening

We assess our material suppliers and have identified a need to strengthen our due diligence and screening process. In this Reporting Period, we have continued to request self-assessment questionnaires from the suppliers analysed in the past and have extend the questionnaire to a much broader group of our suppliers. In the future, we intend to continue to strengthen our processes to include; -

- Embedding modern slavery risk management into procurement and governance processes.
- Treating modern slavery due diligence as an ongoing process, not a one-off compliance exercise
- New supplier screening for modern slavery risk and take necessary precautions to reduce the risk to our operations.
- Improve monitoring and reporting requirements
- Improve existing suppliers audit cycle.
- Track corrective action plans and supplier improvements

## 4.4 Supplier Agreements

Our legal department reviews Supplier agreements to ensure that high level of transparency, accountability and ethics is upheld by third parties with whom we work. We aim to include a modern slavery clause to ensure suppliers acknowledge their responsibility to maintain safe labour practices.

## 4.5 Training

Our internal Modern Slavery training program encompasses relevant mandatory policies and course modules for all employees. During the reporting period, the "Combatting Modern Slavery" course, developed by a third-party provider, was delivered to all staff, achieving a completion rate of **88.15%**. This training provides a comprehensive overview of modern slavery practices, including indicators of risk within our operations and supply chain, and outlines the appropriate actions to take should such practices be identified. Further training initiatives are planned for the procurement function, which has been identified as a critical risk area due to its direct involvement in sourcing goods and services across complex, multi-tiered supply chains.

## 5 HOW EFFECTIVENESS IS ASSESSED

The Group measures the effectiveness of its modern slavery risk management initiatives through a structured monitoring and reporting framework. The Modern Slavery Assessment Tool (MSAT) provides key personnel, including the procurement team, with real-time dashboard insights, supplier risk categorisation, and tailored action plans to support mitigation strategies.

### 5.1 Monitoring

Insight reports are prepared for the Directors and Executive Management team to ensure transparency and accountability. Regular executive reviews assess the impact of implemented measures, identify emerging risks, and guide strategic decisions for continuous improvement.

All improvement actions are tracked by the Legal, Quality, and Compliance teams, with progress systematically reported to the Executive Management team. This process ensures accountability, transparency, and alignment with best-practice governance standards.

The Group has observed measurable improvements across reporting periods and remains committed to strengthening its modern slavery risk management systems through continuous monitoring, structured reporting, and executive oversight.

## 6 CONSULTATION PROCESSES

An Executive Director of KCH also serves as a director for each wholly owned subsidiary, ensuring visibility and transparency across all operations, actions, and responses within the Group. Executive Management maintains oversight of all operating businesses and convenes regularly to review and discuss Group-wide activities. All employees of the Group have a responsibility to uphold our commitment to preventing modern slavery in every aspect of our operations and supply chains: -

- **Awareness:** Understanding what modern slavery is and recognising potential risks.
- **Compliance:** Following all company policies, procedures, and legal obligations under the *Modern Slavery Act 2018 (Cth)*.
- **Due Diligence:** Acting with integrity in business dealings, ensuring suppliers and partners meet ethical standards.
- **Reporting:** Promptly raising concerns or suspected breaches through the appropriate channels.
- **Accountability:** Taking personal responsibility to ensure that our work does not contribute to exploitation.

By complying with these obligations, each employee helps protect human rights and supports the Groups commitment to ethical and sustainable practices.

## 7 OTHER RELEVANT INFORMATION

Our Modern Slavery management practices have been developed, and we are committed to strengthening and improving our understanding of our supply chain, understanding the risks of modern slavery, and mitigating those risks through supplier contracts, communication, education, and effective due diligence. We recognise the importance of identifying and bringing modern slavery practices to an end and are committed to working with our supply chain to eliminate these practices.

### 7.1 Continuous improvement

A targeted Action Plan has been developed based on supplier responses to the Modern Slavery Assessment Tool (MSAT). Actions within this plan are prioritised according to their potential impact on reducing the Group's unmitigated risk score, ensuring resources are directed toward initiatives that deliver the greatest risk mitigation outcomes. Key priorities include:

- Continuous Monitoring and Reporting of Risk Mitigation Progress
- Develop and implement measurable Key Performance Indicators (KPIs) to monitor adherence to modern slavery risk management requirements.
- Advanced Training for Procurement Personnel in Key Purchasing and Decision-Making Roles
- Enhanced Due Diligence and Screening Processes for High-Risk Suppliers

This structured approach ensures accountability and alignment with best-practice governance standards while addressing systemic vulnerabilities identified through MSAT analysis.

## 8 PRINCIPAL GOVERNING BODY APPROVAL

This statement was approved by the board in their capacity as principal governing body of K Care Holdings Pty Ltd on 19 December 2025.

## 9 AUTHORISED BY

This statement is signed by an authorised representative of K Care Holdings Pty Ltd on 19 December 2025.



Thomas Hogan  
Director on behalf of the Board of Directors