

Healthcare Australia's Modern Slavery Statement FY2024

For reporting period 1st of January 2024 to 31st of
December 2024

Table of Contents

Overview	3
Consultation	3
Introduction	4
About HCA	4
Board of Directors	5
Policy	5
Supply chain and modern slavery risks	6
Supply Chain - Staff	6
Supply Chain – Other goods and services	7
Risks of Modern Slavery Practices in the Operations and Supply Chains	7
Summary of Actions taken to address modern slavery risks	7
Effectiveness	8

Overview

Healthcare Australia (ACN 108 180 589) Modern Slavery Statement (the Statement) is made pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (the Act). This Statement sets out the actions and strategies to identify, assess, and address modern slavery risks across operations and supply chains for the 2024 financial year reporting period, from 1st of January 2024 to 31st of December 2024.

Apollo Holdco Pty Ltd, Healthcare Australia Pty Ltd, and all subsidiaries (together referred to as HCA) is a reporting entity for the purposes of the Act as it is a company that conducts business in Australia with a consolidated revenue of over A\$100 million during the reporting period. As required by the Act, HCA's 2024 Modern Slavery Statement was endorsed and approved by the Chief Executive Officer on 27th of June 2025.

Consultation

This statement is made pursuant to the Act and constitutes HCA's Modern Slavery statement in respect of the 31 December 2024 financial year. It is approved by the principal governing body of Healthcare Australia, being its Board of Directors.

The related HCA entities have the same Board of Directors, and therefore Directors of all related entities have been consulted in preparing this Modern Slavery Statement.



John Pappalardo
Chief Executive Officer, Healthcare Australia Pty Ltd

Dated: 27/06/2025

Introduction

Healthcare Australia recognizes modern slavery risk as a complex global human rights issue, and is committed to ethical operations, including limiting the risk of modern slavery occurring within its own business, and related supply chains.

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

HCA's understanding of modern slavery risk areas considers a number of factors and assesses inputs from a range of sources. Our approach is informed by the UN Guiding Principles on Business and Human Rights (UNGPs), the Global Slavery Index, government advice, and ongoing developments in modern slavery risks and issues both globally and in Australia. HCA's awareness and actions to address modern slavery are maturing, as we strengthen each reporting period.

About HCA

HCA is one of Australia's largest healthcare providers and predominately provides clinical and support services in the healthcare industry, including the provision of services supporting community and corporate health.

At the end of FY 2024, HCA's total workforce consisted of 1,618 people, comprising 40.6 % full-time employees, 15.2% part-time employees, 42.9% casual and temporary employees, and 1.3% contractors. The majority of the casual workers engaged were clinical, support workers and other professionals.

HCA delivers workforce solutions nationwide, with 18 offices across Australia support employers and clients in metropolitan, regional and remote areas. HCA's principal business activities are:

Recruitment	HCA places healthcare professionals into private and public hospitals on a short or long term or permanent basis. We also place healthcare professionals in home and residential facilities.
NDIS and Disability	HCA is a registered NDIS provider and provides customised NDIS support for eligible participants such as nursing and complex care, supported independent living and community services
Allied Health	HCA provides specialist allied health services in residential aged care, community care and NDIS.
Aged Care	HCA provides aged care services including home support, nursing & specialist care, family & respite, and social support care.
Corporate Health Services	HCA provides corporate health programs to workplaces including vaccinations, general health checks and ergonomic assessments.
Training and Courses	HCA delivers mandatory training, accredited qualifications and continuing professional development online and face-to-face for individuals and organisations.
Large Health Projects and Programs	HCA develops and delivers large bespoke comprehensive health programs for governments and health organisations.

Board of Directors

The Board of Directors is HCA's governing body and has responsibility for the general directions and superintendence of the business.

The Board's primary responsibilities include setting the strategic direction and financial plans, monitoring performance, ensuring effective risk management, overseeing business activities, and monitoring major strategic projects.

The Board continues to provide accountability and oversight for our modern slavery risk management approach, bearing responsibility for the review and endorsement of this statement.

The ESG Committee acts on behalf of the Board to provide independent assurance regarding the business risk, control and compliance frameworks.

The ESG Committee holds the Boards' responsibility for oversight of modern slavery risk management practices.

Policy

HCA is committed to addressing modern slavery, labour and human rights risks in all relevant policies.

HCA has a framework for responsible and sustainable governance that is managed through the business's certified Quality Management System under ISO 9001:2015. HCA's policy framework supports the ethical and responsible operation of the business and endeavors identify exposures in business operations and supply chains.

As per the Framework, policies are subject to a major review at least every three years, or more frequently where changes to legislative or other requirements necessitate a review. During the review and consultation process, an assessment is made to determine whether the policy can be strengthened to support human rights issues, including modern slavery.

The following key documents are policies that either directly link to our approach to managing modern slavery risks or provide a governance mechanism through which modern slavery can be addressed.

- Code of Conduct
- Whistleblower Policy
- Supply Chain Integrity Policy
- Enterprise Risk Management Standard

Supply chain and modern slavery risks

HCA is committed to identifying possible instances of modern slavery within our operations and supply chains. HCA's risk management framework established a systematic process of identification, management and monitoring of risk, including in relation to modern slavery. The framework is supported by:

- A defined Risk Management Policy based on ISO31000:2018 Risk Management, that articulates HCA's approach to risk management and the key principles and responsibilities to facilitate the effective management of risks.
- ESG Committee, which regularly monitors and reports on the progress of ESG activities (including modern slavery) to ensure that risks are effectively managed.
- Active management and monitoring by all employees and managers throughout the year to ensure that appropriate mitigation measures are in place and risk exposures remain consistent with HCA's objectives.
- Provision of risk management support, advice, assessment tools and training for HCA staff.

HCA predominantly supplies health workforces to the Australian Health sector and procures a range of goods and consumables to support the delivery of these services. HCA operates in countries with a low inherent risk of human rights and the direct suppliers (Tier 1) are in the same countries.

Supply Chain - Staff

HCA predominately provides human resources, with staff costs accounting for 94.7% of total expenditure.

All core business activities are undertaken in Australia and New Zealand, which are considered as low risk for modern slavery occurrences. In addition, several measures are in place which further reduce this risk.

These measures include:

Vetting	All HCA staff are recruited through HCA's stringent recruitment programs and are vetted through HCA Australia's compliance and competency standards, including all international staff.
Visa controls	International visa holders are vetted and approved for work in Australia by the Department of Home Affairs to ensure compliance with their visa terms and conditions. HCA ensures that no employees are indentured or restricted and the only restrictions that may exist are imposed by the Department of Home Affairs on visa workers.
Contracts	All staff are employed under contracts, which are based on awards or industry requirements under the Fair Work Act 2009.
Policies	Working standards and conduct are supported by HCA's Code of Conduct, and HCA's Whistleblower Policy which supports anonymous and protected reporting of any breaches.

Supply Chain – Other goods and services

Goods make up a minority of HCA's total expenditure (2.6%). This is comprised of operating expenses (2.3%), Consumables (0.2%) and Uniforms (0.1%). The majority being 97.4% of total expenditure is on operating expenses that include Staff (94.7%), Marketing & Communications (1.0%), and Facilities and training (1.7%).

HCA sources the majority of goods and services from Australian providers and suppliers, with only minimal expenditure being attributed to international marketing spend. This spend is with large reputable multinational corporations.

Risks of Modern Slavery Practices in the Operations and Supply Chains

HCA acknowledge that while our suppliers are based in Australia, some of these suppliers may have complex supply chains and source inputs from higher-risk geographies. We also recognise that Australia is not immune to modern slavery risks and are committed to also monitoring our onshore suppliers for risks. Due to the limited visibility of our extended supply chain, we recognise the importance of understanding our relationship to potential modern slavery risks, in line with the UNGPs. As such, in identifying our risks, we endeavour to consider whether there is potential that we could cause, contribute to, or be directly linked to modern slavery practices.

In 2024, HCA reviewed and revised the controls in place in relation to modern slavery compliance management, to enable progress in supplier visibility including:

- Completion of Modern Slavery Supplier Questionnaire as part of the HCA supplier onboarding process, for suppliers categorised in a high-risk industry (electronics, cleaning and clothing).
- Reviewing questionnaire responses. Each potential supplier is questioned on their policies and procedures for the management of modern slavery risks; the responses are stored by the procurement team.
- Interactive online learning module to educate all suppliers and employees about modern slavery and broader human rights issues.

Summary of Actions taken to address modern slavery risks

HCA continues to improve the mitigation of modern slavery risks in the supply chain. ESG Committee continues monitoring the implementation of the different actions across the organisation to address modern slavery risk. This includes:

- ESG Committee meeting bimonthly to oversee and address modern slavery risks.
- Monitoring the completion of Supplier Questionnaire.
- Vigilant scanning of modern Slavery risk during the supplier's onboarding process.
- Monitoring the completion of the online Modern Slavery training module by all the staff.
- Modern Slavery policy was reviewed and updated.
- Development of Supplier Code of Conduct

Future Actions

HCA will continue implementing measures to enhance the management and mitigations of modern slavery risks. In the future, it is anticipated that these activities will include:

- Monitor training completion rates to ensure a high completion rate (90%) for staff and suppliers.
- Continue to use the supplier questionnaire as a principal activity to gather information on our supplier's operational and supply chain processes.
- Check in regularly with suppliers to see how they are progressing any actions to which they have committed.
- Continue to utilize ESG Committee to monitor the progress against established actions.

Effectiveness

As part of our commitment to eliminating all forms of modern slavery from our operations and supply chains, we regularly review and monitor the effectiveness of our efforts to identify, prevent, and address any actual or potential risks to human rights or instances of modern slavery

We did not receive any reported incidents or whistleblowing allegations or complaints that alleged breaches of the Modern Slavery Act in 2024. We acknowledge this does not necessarily indicate that no modern slavery occurred during this period and we remain committed to ensuring our incident management and whistleblowing mechanisms are trusted and accessible to our stakeholder groups.

Progress of the modern slavery improvement plan is regularly reviewed at the ESG Committee. Feedback from the committee members is used to inform decision-making and future activities within the plan.