



Australian Unity Limited Modern Slavery Statement

2025

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Introduction

Australian Unity Limited acknowledges that modern slavery still exists, and we are proud to play our part in eliminating it in all forms. We strongly believe that the right to work free from slavery is a basic human right and is central to our philosophy of real wellbeing and providing a safe place to work.

This statement outlines the steps that we have taken during the financial year ending 30 June 2025 to address the requirements of the *Modern Slavery Act 2018* (Cth).

It outlines what we have done so far to identify and assess the risk and mitigation of modern slavery in our supply chains and business operations, as well as measures and initiatives underway. Our approach is in our Group Modern Slavery Policy, which is approved by our board.

Our statement comes from a simple premise: if we can be bold, warm, and honest with each other, our customers and everyone we connect with, we can deliver on our purpose to positively impact the wellbeing of millions.



About us

Established in 1840, we are Australia's first wellbeing company, delivering health, wealth and care services for our members and Australian communities. From our early days, we've been strong advocates for positive change in the community and the wellbeing of millions of Australians; our vision is to enable Real Wellbeing for our members, customers and community through our portfolio of commercial, sustainable businesses.

For us, Real Wellbeing encompasses the whole life experience. It's about feeling supported in your health, connected with your community, and empowered to live life on your terms. Since 2000, we've measured the Real Wellbeing of Australians with Deakin University through the [Australian Unity Wellbeing Index](#). The Index is a tool that measures overall life satisfaction across Australia, focusing on seven key areas of wellbeing.

Today, while we've grown to a company whose operations employ over 10,000 employees and serve hundreds of thousands of members and customers, we remain true to our roots. As a social enterprise, we're motivated by our purpose to positively impact the wellbeing of millions. We reinvest profits to deliver products and services sustainably that matter most to our members, customers, and the community.

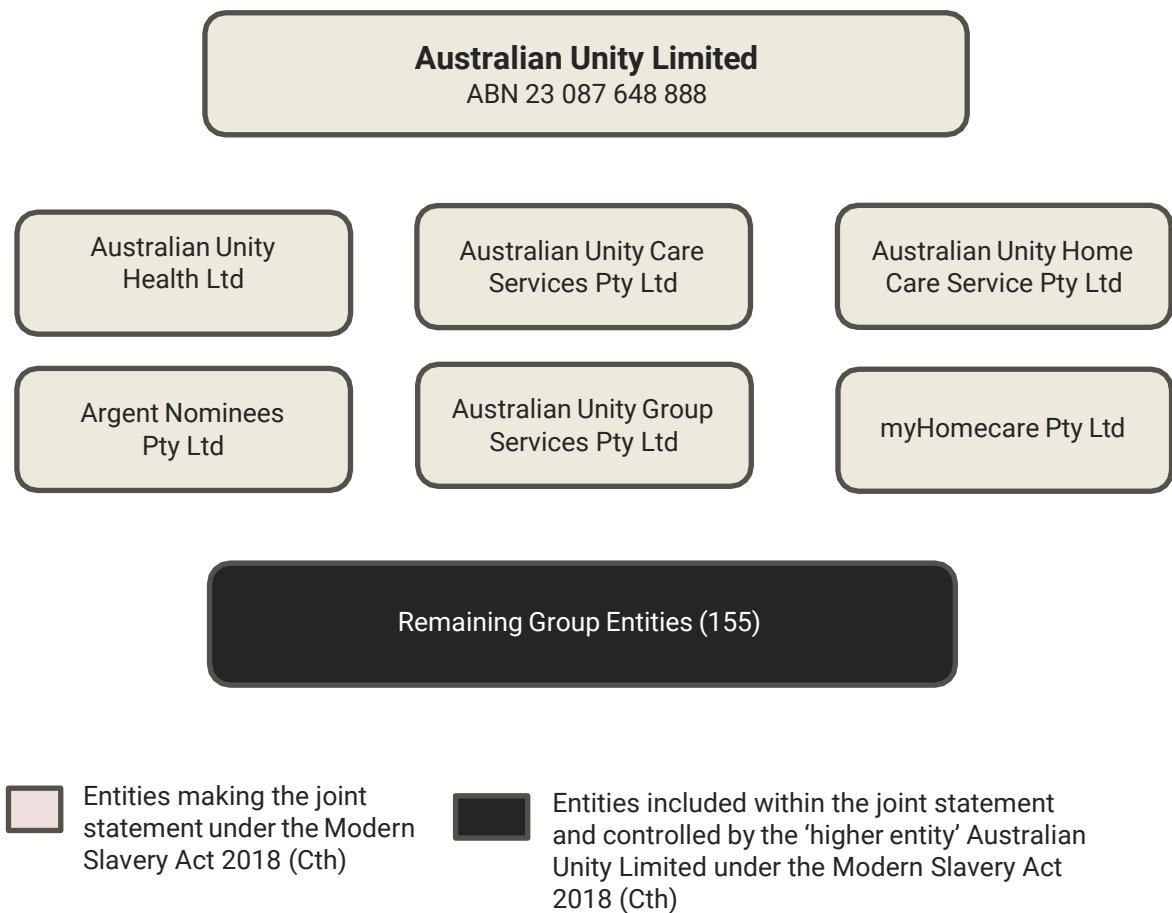
You can find further information about us [on our website](#).

Our organisational structure

Our structure and reporting entities

Australian Unity Limited is made up of 161 controlled entities within Australia (as of 30 June 2025) (the Group). Australian Unity Limited is our parent company and for the purposes of this statement, the ‘higher entity’. This joint statement covers Australian Unity Limited, Australian Unity Health Ltd, Australian Unity Home Care Service Pty Ltd, Australian Unity Care Services Pty Ltd, Argent Nominees Pty Ltd, Australian Unity Group Services Pty Ltd, and myHomecare Pty Ltd.

Other than those entities listed, no other entity meets the reporting entity criteria under the *Modern Slavery Act 2018* (Cth).



Our policy and governance frameworks

Our policies and frameworks

Our Group Modern Slavery Policy demonstrates our commitment to managing modern slavery risks and compliance across the Group. This policy is supported by a range of complementary and enabling policies and frameworks that ensure that our decisions are made transparently, with integrity, and in compliance with regulatory and legislative requirements. Key policies include the Enterprise Risk Management Policy, Vendor Management Framework, Supplier Code of Conduct, Whistleblower Protection Policy, and Material Service Provider Policy as well as others that reflect our ongoing commitment to maintaining a safe, fair, and inclusive work environment including our Code of Conduct, Supporting Your Wellbeing Policy and the Welcoming Difference Policy.

Our Code of Conduct

Our Code of Conduct (Code) defines who we are and guides our people to support decisions and actions that are in line with our values and legal obligations. Our employees must be familiar with the requirements of the Code and complete the corresponding online training module annually. The guiding principles of our Code are as follows:

- Align with our values: Our actions reflect our core values of being bold, warm, and honest
- Do the right thing: We act professionally, ethically, legally, and honestly in all situations
- Protect what matters: We safeguard intellectual property, privacy, and confidentiality at all times
- Prioritise safety and wellbeing: We maintain a safe and inclusive workplace, promoting both the physical and mental health of our employees
- Act with integrity: We uphold honesty and integrity, avoiding any exploitation or improper use of our position. We neither give nor accept inappropriate gifts or benefits
- Speak up: We encourage open communication and so that everyone feels empowered to raise concerns, regardless of the circumstances
- Stay informed: We understand and adhere to the policies, procedures, laws, and regulations that govern our actions.

Compliance training

Modern slavery awareness and compliance training continue to form an essential element of our approach, as it enables our employees to understand their responsibilities in identifying, preventing, and managing modern slavery risks, including the safe reporting of concerns. We deliver e-learning modules to communicate and maintain a foundational level of awareness regarding Group initiatives among all staff, complemented by targeted training sessions for personnel directly involved with suppliers and third parties.

| | Internal Code of Conduct Training | Vendor Management Training |
|--------------------------|--|--|
| Key Message | Introduces key messages of why modern slavery compliance is important and the Group's approach | Builds on the Group's approach to modern slavery compliance and the role of the vendor owner and vendor manager in supporting the Modern Slavery Working Group in compliance initiatives |
| Audience | All employees (over 10,000) | Vendor Managers and Owners for Material Vendors (Approx. 200) |
| Percentage of Completion | Approx. 99% | 100% |

Our workforce

As a leading wellbeing company, we are dedicated to supporting our people and enhancing their physical and mental health, safety, and overall wellbeing. At 30 June 2025, our direct workforce comprised over 10,000 employees, all based in Australia.

We recognise that responsible decision making, transparency and accountability in our governance practices are critical to fostering trust, ethical behaviour and societal impact. Our values of being Bold, Warm and Honest in what we do, encapsulate how Australian Unity makes decisions, fulfils its purpose and meets its goals and guide how we relate to members, customers, communities, stakeholders and each other.

As an organisation whose mission is to be Australia's most trusted wellbeing company, we prioritise the wellbeing of our employees alongside the needs of our members, customers, and the broader community. Our employee wellbeing initiatives include various leave options, employee discounts, and wellbeing support. We are also committed to lifelong learning and career development for our workforce.

We are committed to fostering an inclusive and diverse workplace that reflects and serves the communities in which we operate. We value the unique capabilities and perspectives of all individuals, including those from First Nations, multicultural, and diverse backgrounds.

All new and existing employees are required to undertake diversity and inclusion training, including a dedicated module on Reconciliation.

We are committed to implementing our endorsed Stretch Reconciliation Action Plan, focusing on three core areas: 1) cultural learning, 2) meaningful career and opportunities, and 3) business support and growth. Our meaningful careers initiative aims to create opportunities for Aboriginal and Torres Strait Islander peoples across the entire organisation.



Our Welcoming Difference Policy sets out our approach to diversity and inclusion, supported by standards for an inclusive and equal workplace. We strive for gender balance at all levels and regularly review pay and compensation to prevent gender bias.

Our recruitment and employment policies address inclusion, anti-discrimination, equal opportunity, bullying, and harassment. We ensure equity, fairness, and transparency throughout the hiring, selection, and appointment processes.

Through our policies and processes in talent acquisition, background checks, anti-discrimination & equal employment opportunity, and remuneration, we provide employees with fair and consistent working conditions, including hours of work, minimum wage, and leave entitlements.

Our operations

As a wellbeing company, we've built a diverse and thematically linked portfolio, delivering health, wealth and care products and services, organised under four customer-focused platforms.

| | | |
|--------------------------|-------------------------------|--|
| Home Health | | Delivering an integrated model of care that incorporates home care, health services and mental health interventions, and underpinned by a robust care partnering model, with the goal of supporting our customers to age actively and independently right where they want to be—at home. |
| Insurances | Health and General Insurances | Supporting customers to improve their health and wellbeing outcomes through a range of private health insurance options and the distribution of general insurance products. |
| Residential Aged Care | | Delivering high-quality clinical, care and service offerings in a Better Together® small household setting to ageing Australians. |
| Wealth & Capital Markets | Funds Management | Providing specialist investment propositions that serve investors well (including healthcare and aged care property, mortgages, emerging Australian companies, and Australian equities) and managing the Group's investment portfolio. |
| | Social Infrastructure | Providing broad social infrastructure property sector investment exposure, and managing the Group's retirement living and aged care property portfolio, retirement living operating business and Herston Quarter Precinct. |
| | Life | Providing investment bonds, funeral bonds and education savings plans. |
| | Trustee Services | Providing traditional Trustee services including financial, estate and trust administration such as tax services and resident trust fund support. |

Portfolio structure as at 30 June 2025.

Our compliance initiatives

The Group's approach to modern slavery compliance involves ongoing risk assessment and activities integrated into daily operations, building upon our ongoing compliance activities that have been disclosed in previous Modern Slavery Statements.

Modern Slavery Working Group

In 2019, the Group established the Modern Slavery Working Group to manage and drive the modern slavery risk management and compliance program.

The Working Group includes representatives from Group Sourcing, Governance and Group Risk and Compliance, and supplier owners and managers from across our organisation. Activities in the compliance program is supported by a Group Modern Slavery Risk Policy and supporting Modern Slavery Risk Management Procedures.

The Working Group is further responsible for the development, review and approval prior to lodgment of the annual Group Modern Slavery Statement.



Group modern slavery compliance approach

The Group does not manufacture goods, and most operations are managed internally. Material exposure to modern slavery risks arises from sourcing and third-party relationships. Accordingly, the focus of our compliance initiatives remains across the following areas:

- Material supply chain suppliers
- Third parties or products and services such as managed investment schemes, investment trusts and social infrastructure initiatives.

We adopt a risk-based approach to our compliance initiatives. Our Enterprise Risk Management Framework and supporting policies and processes provides the basis for the modern slavery risk assessment that supports our compliance activities. The risk assessment is reviewed and refreshed periodically and is aimed at addressing categories of spend/ classes of suppliers and partners that demonstrate a higher propensity to risk of modern slavery in their operations. Our likelihood assessment incorporates the following key risk criteria provided by the Commonwealth in its Modern Slavery Compliance Guidance to reporting entities¹.

- Use of a workforce that is generally transient with a relatively high turnover
- Geographical locations of supplier's manufacturing facilities (or their suppliers)
- The potential for child labour within the supply chain
- Goods and services delivered with low margins and high volumes.

¹ Australian Government (2023) Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities. Modern Slavery Statements Register.

This list of material suppliers is refreshed annually, and the compliance review is then performed through automated modern slavery risk assessments that are facilitated by the Group Third Party Risk Management (TPRM) tool.

The risk assessment is aimed at obtaining a view of the third party's operations and its own modern slavery compliance and covers the following areas:

- Supplier management
- Operations
- Employee management (including benefits)
- Regulatory framework and compliance
- Modern slavery initiatives.

We tailor the risk assessments to size and scale of vendors. This reflects the nature of our supply chain with over 10,000 suppliers of various sizes largely based in Australia. There are a limited amount of goods and services purchased from multinational companies, including managed IT services, systems, applications, hardware, professional services. Where we purchase supplies which may be manufactured outside Australia, such as personal protection equipment (PPE) and medical consumables, we purchase through Australian distributors.

An inherent risk assessment that is performed for vendors identified with the vendor owner for smaller suppliers or where the supplier is new and has just been onboarded in the risk categories identified. A condensed set of risk assessment questions are provided to the vendor owner to discuss and obtain the response with their supplier via the TPRM platform. For all other vendors, the full risk assessment is issued. Exceptions to this process are reviewed by the Modern Slavery Working Group. Exceptions are generally in the event where the vendor or third-party has been engaged as a one off and there was initial modern slavery checks performed at the point of onboarding, or the material 'spend' with the vendor was a one off.

The TPRM platform provides the Modern Slavery Working Group with the ability to manage and monitor responses and to also follow up with automated notifications to vendor owners to prompt for late or pending responses. It also allows suppliers to delegate their response to a more appropriate person in their organisation, which reduces turnaround time for risk assessment response. From FY2023, an increasing number of vendors are choosing to not respond to the risk assessment questionnaires but propose that we rely upon their published Modern Slavery Statement to form a view on their compliance initiatives. We have incorporated this step into our compliance process as this reflects the growing maturity in modern slavery compliance reporting in Australia.

Suppliers that have provided a response that indicates good modern slavery risk management processes are rated as 'Managing'. Suppliers that are making good progress with some gaps are noted as 'Progressing' and others that require additional follow-up and clarification, are noted as 'Not Managed'. Where the response is 'Not Managed', action plans are raised in the TPRM platform for the vendor owner to complete remedial activities with the vendors.

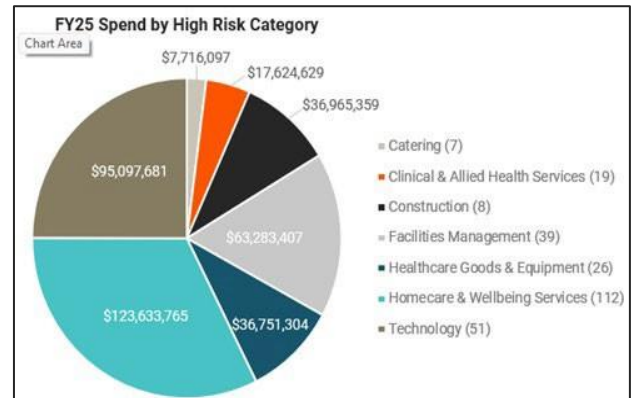
In FY2025 we implemented an additional measure to enhance awareness and offer guidance to suppliers whose compliance responses were assessed as less than 'Managing'. These suppliers will be directed to the Commonwealth modern slavery resource site, which provides valuable templates and materials designed to support improvements in modern slavery risk management and compliance processes.

The image shows a screenshot of a web-based questionnaire titled 'Australian Unity' with the logo. The form is powered by Coupa. It contains two main sections, 2.7 and 2.8, each with a question, a 'Select an option' dropdown menu, a 'Please add any comments' text area, and an 'Attach any documents here' button. Section 2.7 asks 'Do you provide training to your employees on modern slavery risk?' and section 2.8 asks 'Does your organisation have a process for your employees, agents, or subcontractors to report anonymously, without fear of retaliation, on matters relating to slavery and human trafficking (e.g., Whistleblower policy)?'. Both sections have radio button options for 'No', 'Partially', and 'Yes'. At the bottom, there is a 'Thank you for completing our Modern Slavery in Supply Chains questionnaire.' message, followed by a statement: 'Your assessment indicates that there is an opportunity for your organisation to further enhance its management of modern slavery risks. We are committed to supporting our suppliers on this journey of continuous improvement. Please review the Australian Government's Modern Slavery Resources. Demonstrating progress in this area will help strengthen our ongoing business relationship.'

Financial year 2025 compliance initiatives

Our compliance activities in FY2025 addressed the following:

- 1159 vendors where the risk of modern slavery was assessed as part of the revised supplier onboarding process. The initial assessment then triggers additional modern slavery risk assessments depending on the initial screening
- 262 material suppliers identified across the risk relevant categories of expenditure as outlined in the diagram below. These suppliers account for approximately A\$381 million spend across the Group or approximately 50% of the overall Group procurement spend as of 30 June 2025
- These suppliers were put through the TPRM automated risk assessment for either the inherent risk assessment or the comprehensive assessment. In the current year of reporting, our compliance review includes the vendors that have been integrated from the acquisition of the myHomecare Group in March 2024.



The following key metrics and numbers summarise the current state of our compliance program. We continue to follow up with the outstanding assessments with vendors and we expect to make progress towards the end of the year.

| Type of risk assessment | # of vendors | % of completion | Risk assessment outcome | Managing | Progressing | Not managed |
|-------------------------------|--------------|-----------------|--|----------|-------------|-------------|
| Onboarding Screening | 1159 | 100% | Identifies vendors with potential risk of modern slavery, these are tagged for further assessment. | | N/A | |
| Inherent Risk Assessment | 165 | 79% | Initial onboarding screening is qualified as Yes or No for modern slavery risk | | N/A | |
| Comprehensive Risk Assessment | 128 | 74% | Comprehensive risk assessment for qualifying vendors. | 70% | 2% | 2% |

Other themes remain consistent with prior years and include:

- Suppliers who are required to issue Modern Slavery Statements under the Act are predictably able to demonstrate robust risk management programs in place
- The same was demonstrable with suppliers who chose to publish a Statement while not required under the Act to do so.

Organisational awareness

We continue to keep our employees informed about our compliance initiatives. A summary communiqué has been distributed to all leadership team members, detailing ongoing compliance requirements. The current Modern Slavery Statement is available in the Group key policies repository and on our external website. A dedicated modern slavery intranet page is consistently reviewed and maintained; it contains Group policies, procedures, and the modern slavery risk assessment questionnaire. This page offers comprehensive information about the Group's perspective on modern slavery, outlines our compliance activities and the responsibilities of our people, and provides access to previous Group Modern Slavery Statements.

Our remediation and grievance mechanisms

Everyone has a voice at Australian Unity. We encourage our employees and suppliers to speak up about any conduct or activity they believe to be dishonest, corrupt, or illegal.

Through our Whistleblower Protection Policy and Speak Up Policy, we provide guidance on how concerns can be reported free from retribution. It's a governance mechanism designed to facilitate open and frank communication, through channels that are always available, to ensure that genuine grievances are investigated quickly.



Consultation with joint and controlled entities

All entities providing this statement are owned or controlled by Australian Unity Limited. In turn, we also maintain common support to all entities.

This support includes the policies, processes, operations, and supply chain management that underpin our modern slavery risk assessment, which was carried out by the Group Modern Slavery Working Group.

This statement is made pursuant to section 14(1) of the *Modern Slavery Act 2018* (Cth). It constitutes the joint statement of Australian Unity Limited (the ultimate parent company in the Australian Unity Group), Australian Unity Health Ltd, Australian Unity Home Care Service Pty Ltd, Australian Unity Care Services Pty Ltd, Argent Nominees Pty Ltd, Australian Unity Group Services Pty Ltd, and myHomecare Pty Ltd and was approved by the board of Australian Unity Limited (the 'higher entity') on 24 November 2025.

A handwritten signature in black ink, appearing to read 'K. Bayer Rosmarin'.

Kelly Bayer Rosmarin
Group Managing Director & Chief Executive Officer

19 December 2025

This Modern Slavery Statement has been submitted to the Australian Government's Modern Slavery Statements Register and is published here pending review by the Attorney-General's Department.