

Modern Slavery Statement 2024



PARTNERED HEALTH



1. About this Statement, our reporting entity and our structure

Introduction

Partnered Health is pleased to share its 2024 Modern Slavery Statement (**Statement**) covering the period from 1 January 2024 to 31 December 2024 (**Relevant Period**) in accordance with the *Modern Slavery Act (Cth) 2018* (the **Act**).

The information set out in this Statement is provided as a consolidated description for the Partnered Health Group (the **Group, Partnered Health or PH Group**), except where information is identified as relevant to a specific reporting entity within the Group. References to the Group, Partnered Health or PH Health and terms such as "we" and "our" are used in this Statement to refer collectively to the Partnered Health Group, and are collective expressions used for ease of reference only and do not imply any other relationship between the companies.


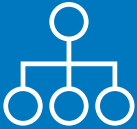


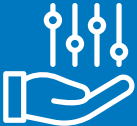

In preparing this Statement we engaged with the reporting entity covered by this Statement and consulted entities we own or control. The consultation process included a wide variety of stakeholders

across our finance, procurement, people and culture, legal, marketing and business development teams across our business units in several regions.

Partnered Health has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its business partners or suppliers, consistent with its obligations under the *Modern Slavery Act 2018 (Cth)*.

Our ongoing commitment to identify, assess, manage and mitigate our modern slavery risks has been overseen by the Partnered Health Modern Slavery Working Group, as well as our National Quality & Risk Manager, our Technical Information Security Officer and ultimately our Board. We are committed to contributing to the elimination of modern slavery.

The table below sets out the section in this Statement where we have addressed the criteria under the Act:

The Act	Section in this Statement
 <p>Identify the reporting entity</p>	<p>1. About this Statement, our reporting entity and our structure</p> <p>7. Board approval</p>
 <p>Our structure, operations and supply chains</p>	<p>1. About this Statement, our reporting entity and our structure</p>
 <p>Describe the risks of modern slavery practices in our operations and supply chains and any entities the reporting entity owns or controls</p>	<p>1. About this Statement, our reporting entity and our structure.</p> <p>2. Risks of modern slavery practices</p>
 <p>Describe the actions taken by the reporting entity (and any entities the reporting entity owns or controls) to assess and address those risks, including modern slavery due diligence and remediation processes</p>	<p>3. Actions taken to mitigate modern slavery risks</p> <p>5. Next steps and forward looking commitments</p>
 <p>Describe how the reporting entity (and any entities the reporting entity owns or controls) assesses the effectiveness of the actions taken</p>	<p>4. Assessment of effectiveness of our actions</p>
 <p>Describe the process of consultation with entities owned and/or controlled by the reporting entity</p>	<p>1. About this Statement, our reporting entity and our structure.</p> <p>6. Consultation between Owned and Reporting Entity</p>

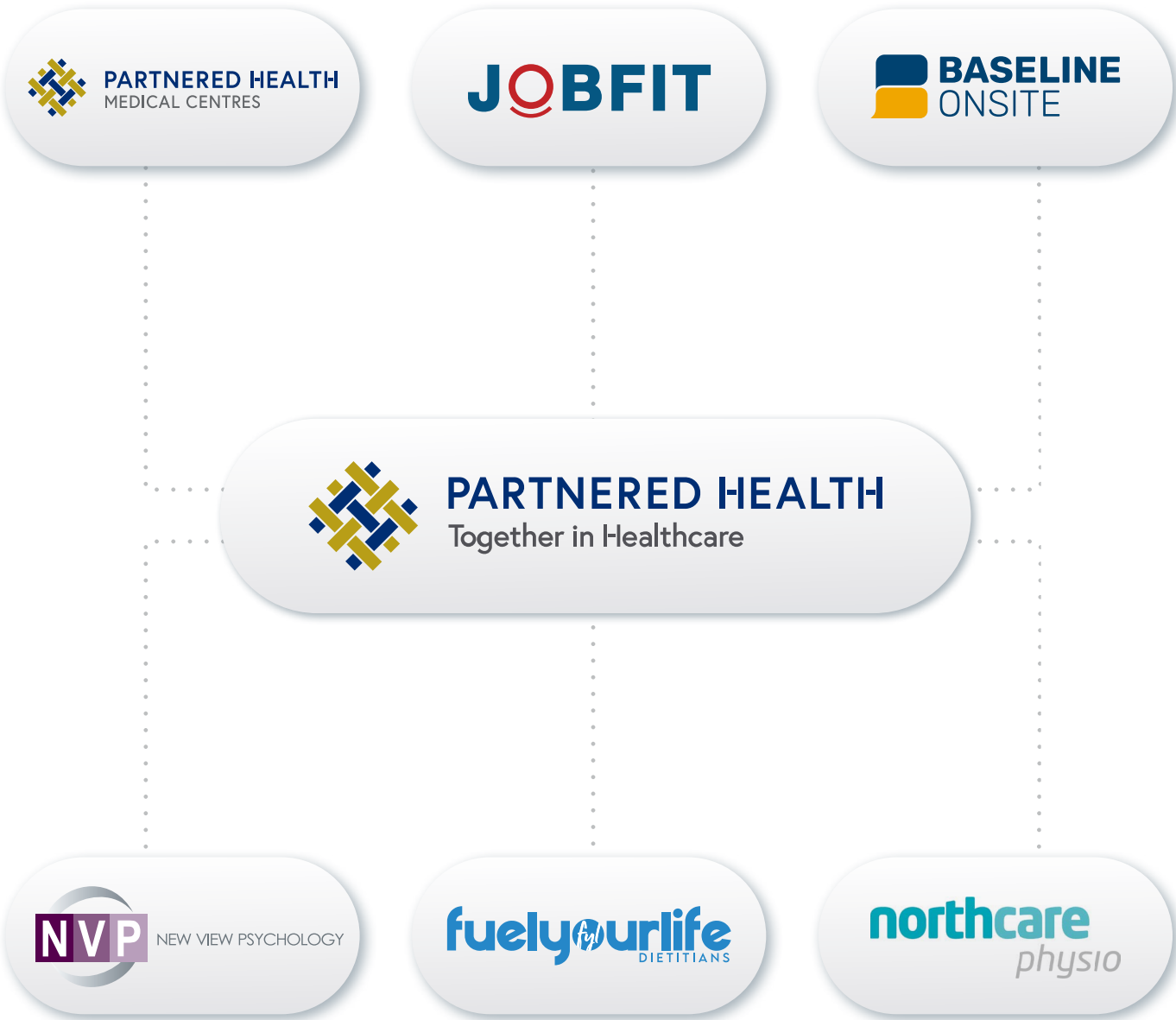
Our reporting entity

In accordance with the Act, the reporting entity for this Statement is Partnered Health Pty Ltd (ACN 164 892 924) (the **Reporting Entity**), having met the reporting threshold in the Reporting Period.

The parent company of the Reporting Entity is Figtree Head TopCo II Pty Ltd (ACN 65 158 404) incorporated in Australia. We are owned by six shareholders: Quadrant Private Equity No.6A Pty Ltd, Quadrant Private Equity No.6B Pty Limited, Quadrant

Private Equity No.6C Pty Limited, Quadrant Private Equity No.6C Pty Limited, QPE No. 6LP Pty Limited and Other Co-investors.

This Statement also covers, and the Reporting Entity has consulted with, the wholly owned entities: Partnered Health Medical Centres Pty Ltd, Jobfit Medical Services Pty Ltd, Partnered Allied Health Pty Ltd and Allied Performance Pty Ltd, which operate below the threshold of reporting.



Our business, structure, operations and supply chains

Our business

Partnered Health was established in 2013. The group is made up of a number of established businesses that have been delivering health services to more than five million people over the last 25 years. Our brands include Jobfit Health Group, Partnered Health Medical Centres, Baseline Onsite, New View Psychology, Fuel Your Life and Northcare Physio.

Partnered Health employs approximately 1,500 workers in Australia and New Zealand in a variety of management, administration and clinical roles.

We bring superior health services to Australia through our experienced health professionals and trusted partnerships.

We are **committed to improving Australian healthcare.**

Our **focus and vision** are to create healthier communities and workplaces through exceptional healthcare.

Our **purpose** includes to positively impact people's lives through providing exceptional healthcare, strong partnerships and continuous improvement.

Our **values** of empathy, excellence and engagement are what guide us each day:

- **Empathy:** we embrace diversity and encourage inclusion.
- **Excellence:** we collaborate, learn and innovate.
- **Engagement:** We support our people, patients and partners.

Partnered Health is committed to fostering a supportive and open environment for employees and stakeholders. As part of our commitment, we encourage individuals with concerns about any actual or suspected improper conduct or state of affairs or circumstances to come forward and make a disclosure.



Our operations

Our operations are streamed into three business units:

- Corporate Health (occupational health, onsite services & psychology);
- Primary Care (medical centres, physiotherapy & dietetics); and
- Partnered Health Corporate (support/shared services).

Corporate Health

Occupational Health

Jobfit Health Group has delivered reliable, high quality occupational healthcare services in Australia for over two decades with a level of expertise and understanding of workforce health that is second to none.

Founded in 1996, [Jobfit Health Group](#) is a leading occupational healthcare provider with wholly owned and operated centres across Australia. We are focused on creating lasting business partnerships, tailoring our approach to meet specific industry and organisational requirements. Jobfit delivers a broad range of occupational healthcare services to thousands of businesses nationally, including pre-employment and periodic medical assessments, work fitness assessments, injury management and prevention, drug and alcohol screening, onsite medical services, health surveillance, and health and wellness programs for proactive health management.

Onsite Services

Established in 2010, Baseline Onsite has built a reputation as a trusted partner to some of the world's leading resource companies for onsite medical and emergency support and risk management solutions.

[Baseline Onsite](#) specialise in providing remote security, medical and rescue services to the mining, construction, energy, and marine industries. Services include the provision of highly qualified personnel, support equipment and vehicles, together with emergency response training (ERT) for both onshore and offshore projects. Baseline Onsite is a Registered Training Organisation (RTO) Provider: 51654.

Psychology

[New View Psychology](#) is Australia's largest psychology provider, providing counselling and psychological service nationally.

Primary Care

Medical Centres

Partnered Health Medical Centres is one of Australia's leading primary healthcare providers with 57 clinics located throughout metropolitan and regional locations. Our clinic network includes medical centres and dedicated skin cancer clinics trading as [Molescan – Trusted Name in Skin Cancer](#).

With a long history in providing healthcare services, our team is genuinely passionate about the health and well being of our community. We care about the communities in which we operate and work hard to ensure we deliver the very best healthcare to individuals and families.

Our services span all aspects of primary healthcare from general health assessments, paediatrics, travel medicine, skin checks, and chronic disease health assessments and management including diabetes and asthma. In many locations we also offer allied health services which will continue to expand, together with occupational health services.

Physiotherapy

[Northcare Physio](#) provides quality, personalised healthcare to patients including physiotherapy, remedial massage and rehabilitation using research-based techniques built on our strong foundation of experience and knowledge.

Dietetics

[Fuel Your Life](#) is a multi-award-winning dietetics company – the largest and most successful in Australia. The large team of dietitians combines their dietetics experience to develop custom nutrition solutions for a diverse range of clients and organisations.

Partnered Health Corporate

Provides a shared support services model supporting business units across departments including but not limited to finance operations, procurement, people and culture, information technology, cyber security, legal services, property management and other corporate governance, compliance and risk management.

Our Supply Chain

Partnered Health sources various healthcare-related products and services, as well as usual business-related products and services and draws from both domestic and international suppliers to ensure the provision of quality and, where possible, ethical products.

Medical Consumables

Includes personal protection equipment (PPE), rubber gloves, masks, bandages, needles, drug & alcohol testing, audiometric, and spirometry consumables.



Facilities Management

Includes cleaners, waste removal and general maintenance.



Utilities

Includes gas, water, electricity and solar.



Construction Services

Includes fit-outs, renovations, building, construction and trade services.



General Procurement

Includes uniforms, office supplies/stationary, kitchen consumables e.g. fruit, coffee, water, equipment such as scales, tape measures etc.



Corporate Services

Includes training/ accreditation services, travel management.



IT

Includes supply and co-management of critical IT infrastructure, software and hardware (components and devices), and IT system support services for health platforms supported by third party vendors.



Professional Services

Includes marketing, accounting, legal services and financial & auditing services.



Our supply chain is comprised of the following product/ service categories:

Partnered Health strongly believes in, supports and adheres to principles of ethical conduct and procurement involving all businesses it transacts with and in particular, compliance with Australian and international Modern Slavery legislation, especially relating to the exploitation of children, women and vulnerable workers.

2. Risks of modern slavery practices

Partnered Health does not accept modern slavery practices in any of our business operations or activities from our suppliers or third parties. We have a zero tolerance towards any form of forced labour, child labour, physical or verbal assault or harassment within our workplace.

We are aware that health services supply chains and risk factors include large scale procurement of goods produced by multi-tiered supply chains, connected to high-risk sectors and geographies, as well as reliance on third party labour hire. Known categories of potential risk include:

- PPE (e.g. rubber gloves, surgical masks)
- Uniforms and linens
- Surgical instruments
- Cleaning, maintenance, waste removal and security



Identifying and addressing key risks in our supply chain

We procure a range of products from supply chains that includes medical goods, technology, and equipment. We are yet to identify any specific instances of modern slavery, however, acknowledge that there may be a risk of sourcing products from supply chains associated with modern slavery overseas.

Our Procurement, IT, Finance, Legal and People and Culture teams work closely with our Business Unit Management teams to ensure that Partnered Health and its suppliers comply with the Act.

We identify and assess key risks in our supply chain in the following ways:

- Enter into open and transparent communication with our suppliers on the changes in our business to identify risks on modern slavery, and work towards introducing specific modern slavery questions in our third party/vendor/supplier questionnaire to new and existing third parties/vendors/suppliers based on the accepted risk appetite with a focus on high risk.
- Due to the large number of suppliers, Partnered Health will focus on those that present an elevated risk of exposure due to the country of operation. High risk suppliers will be monitored and reported on by Procurement to the relevant Chief Executive Officer.
- During any Partnered Health initiated tender process, Partnered Health can communicate to suppliers its Supplier Code of Conduct and integrate this into the due diligence process. Any supplier that is identified as being a potential risk will be assessed further by Procurement and Finance.
- New and renewed supplier agreements will include obligations on suppliers to comply and report on modern slavery in accordance with the Act. We will engage with our existing suppliers to inform them of our newly created Supplier Code of Conduct, to ensure that they are aware of the requirement to comply with the Act, and

Partnered Health considers its modern slavery risks using the following methods:



inform all new suppliers of this document as part of the procurement process.

Based on our internal assessment, the following categories were identified as having a **risk of modern slavery**:

- **Medical Consumables other than PPE and gloves** (sourced mostly from China, Australia, Spain, France and Slovenia)
- **Stationary** (sourced predominantly from China and Asia)

- **Cleaning** (sourced in Australia)
- **Coffee** (sourced from the Netherlands)
- **IT Hardware & Software** (sourced from multinational organisations with a preference for those that are Australian-based, noting that manufacture or software development work may be performed by vendors based in Australia and other countries including the United Kingdom, United States, European Union countries and China)
- **Uniforms** (sourced in Australia)

3. Actions taken to mitigate modern slavery risks

Our approach to addressing modern slavery risks includes:

- our policies;
- implementation, training and awareness relating to modern slavery risks;
- internal assessment and identification; and
- collaboration with internal and external stakeholders.

Our policies

Our policies are the first step in our approach to addressing modern slavery and provide a strong foundation for us to monitor and combat modern slavery risks in our operations and supply chains. Partnered Health has continued to develop, maintain, implement and monitor compliance with its policies and procedures.



Modern Slavery Policy

Acknowledges our responsibility through our internal processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

Clarifies that we will work pro-actively to reduce modern slavery within its supply chains and operations and will expect all organisations that we engage with to do the same.



Code of Conduct

Reaffirms Partnered Health's commitment to ethical principles by detailing the requirement of staff to abide by this code, behaving professionally and with respect and consideration for others.

Sets out our expectations that our staff:

- behave with honesty, integrity, competence, care, diligence, respect and in an ethical manner.
- foster, promote and contribute to a work environment that is fair, inclusive, equitable and free from any form of harassment, discrimination, victimisation, or bias in any form.
- carry out duties in a manner that is consistent with applicable health, safety, and environmental laws and regulations



Supplier Code of Conduct

Outlines our commitment to an ethical, sustainable, and socially responsible procurement process, and the expectations of the same high standards of our suppliers in the areas of: integrity, ethics, and conduct; conflict of interest; corporate supply chain and governance; labour and human rights; workplace, health, and safety and environmental management.



Whistleblower Protection Policy

Encourages and expects our staff, officers, suppliers of goods or services (whether paid or unpaid) (such as contractors, consultants, and business partners) and relatives, dependants, or spouses of those persons, to raise concerns about any actual or suspected improper conduct or state of affairs or circumstances to come forward and make come a disclosure.



Aboriginal and Torres Strait Islander Peoples – Procurement

Outlines our commitment to providing opportunities for all Aboriginal and Torres Strait Islander businesses to engage with the Company and the projects it works on.

Acknowledges that our procurement process is informed by the International Standard for Sustainable Procurement Guidance (ISO 20400).

We are also reviewing and developing related procedures and policies that are informed by ISO 14001 and ISO 270001.

The above mentioned policies and/or documents are available via Partnered Health's internal systems and introductory training.

Implementation, training and awareness

We view implementation, training and awareness as critical in addressing modern slavery risks. Our training assists our employees to identify, approach and raise potential breaches of modern slavery so we can address them.

As with our policies, our induction and training packages are developed by and/or in consultation with the relevant Business Unit(s) or functional areas within those units, and records of completed training sessions are maintained by the appropriate human resources contacts and training platforms (including Litmos) supported by IT.

Our workforce is required to read and acknowledge key policies and complete mandatory training at the commencement of their employment:

Code of conduct & related mandatory training

Our employees are required to complete mandatory training at the commencement of their employment, and read and acknowledge the following policies, procedures and/or documents:

- Code of Conduct;
- Prevention of Sexual Harassment;
- Prevention of Workplace Bullying;
- Whistleblower Protection; and
- Conflict of Interest.

Additionally, our online training modules cover: workplace ethics, privacy, diversity and inclusion, safety and hygiene, prevention of bullying and harassment and whistleblower awareness.

When our workers cannot easily access online training, we provide guidance in other ways including our onboarding and induction processes. We operate grievance mechanisms for our stakeholders throughout our operations to raise issues.

Whistleblower policy

At commencement of employment all employees are required to read and acknowledge the whistleblower

policy and complete mandatory whistleblower training as part of the induction process.

We are working towards inclusion of wording that specifically references and addresses modern slavery in the whistleblower policy.

Supplier code of conduct implementation

We are taking a risk-based approach in implementing the supplier code of conduct which defines our expectations for all suppliers in our supply chains with regard to ethical business practices, health and safety, labour standards and human rights, the environment and local communities.

The current version of our Supplier code of conduct is available on internal systems with its contents communicated during engagement with suppliers and/or potential suppliers.

We are working towards a further review of this code with the intent to make suppliers aware of the code via publication of it on our external website as well as continuing to work with them to share our expectations. We anticipate that this will improve transparency and ensure we can take the necessary steps to ensure the suppliers we work with uphold the same principles as Partnered Health.

Modern Slavery policy

We are working towards further expanding on the reporting process set out in this policy, to make sure it is appropriately robust as well as arrange targeted training on modern slavery to appropriate individuals in the business.

Modern Slavery Working Group

Modern Slavery Working Group was established that consists of members from Partnered Health's Executive Leadership Team, Legal, Procurement, Human Resources, Finance and Management and Senior Managers from each Business Unit, as well as our National Quality & Risk Officer and our Technical Information Security Officer, to: assess our policies and procedures, approvals and controls in relation

¹Please also refer to our 'Identifying Modern Slavery Risks' diagram on page 9, Section 2 of this Statement.



to modern slavery (including relevant grievance processes) over the next 12 months, to ensure we identify and take steps to make improvements.

Identification and due diligence

We work on the premise of giving responsibility to our staff, noting that with that responsibility comes the obligation to act ethically and identify and report human rights breaches including modern slavery through escalating to leaders and managers in the business and via our processes. These processes enable us to help mitigate modern slavery risk in our supply chain.

Code of Conduct & Whistleblower programmes

If one of our people believes they have encountered a breach of policy, including human rights and modern slavery, we encourage them to raise it promptly with their supervisor or manager.

Alternatively, the individual may bring it to the attention of another manager, a local contact, or a member of Partnered Health's Modern Slavery Working Group.

However, if they feel their concern remains unresolved or wish to remain anonymous, we provide a Whistleblower procedure where people can submit the matter.

Modern Slavery policy and engagement with suppliers

Ongoing open and transparent communications and engagement with our suppliers on the changes in our business to identify risks on modern slavery. Our modern slavery clauses in our contracts as well as our Modern Slavery policy makes clear that if a modern slavery risk is detected with a supplier, our 'zero tolerance' approach means that:

- Suppliers must use best endeavours to ensure that there is no modern slavery in their supply chains and operations.
- In the event Suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk.
- Suppliers must notify us as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.
- We can terminate our commercial relationship with suppliers, and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

4. Assessment of effectiveness of our actions

Partnered Health is committed to continuing to manage, evolve and strengthen its response and strategies toward mitigating and, where possible, eliminating modern slavery risks in our supply chain. We assess our effectiveness of our risk reduction actions as follows:

- **Procurement process compliance:** Our Modern Slavery Working Group consults with our Business units and functional areas to oversee compliance with our procurement and onboarding processes.
- **Whistleblower and/or modern slavery reporting:** Partnered Health continues to consider and report on whistleblower and/or modern slavery instances. No reports were received during 2024 through the whistleblower or modern slavery reporting processes.
- **Focused modern slavery training** for managers and any staff that are identified as being involved in procurement or in approvals for new supply chains. This includes review of the dedicated online course forming part of an internal training program for identified managers and staff, to improve their knowledge on modern slavery risk management and the risk to those impacted by modern slavery.
- **Collaboration with our suppliers** to inform them of Partnered Health's approach to managing modern slavery risks and our Supplier Code of Conduct.
- **Ongoing review of our suppliers** to identify the country of operation and assess risks of country and modern slavery.
- **Ongoing review of our Modern Slavery Policy** to ensure that it is aligned to our Supplier Code of Conduct.
- **2024 Actions:** With respect to our 2024 actions, we can confirm that:
 - We received no reported breaches concerning modern slavery, through our processes/channels;
 - New and existing suppliers continue to be managed and reviewed for compliance, as noted above;
 - Continue to add modern slavery clauses, referring to compliance with the Act, to Partnered Health and/or its subsidiaries', contracts.
 - A new e-learning training module platform was introduced during FY23 and has a completion rate of over 95%. This e-learning module is included as a mandatory training module as part of Partnered Health's onboarding process for new staff members.



5. Next Steps and forward-looking commitments

We are committed to continuing to evolve and strengthen our response and strategies toward mitigating and, where possible, eliminating such risks in our supply chain. Over the next reporting period we will assess the effectiveness of our actions as follows:

(a) Third Party/Vendor questionnaire

Developing specific modern slavery questions to be included in our third party/vendor/supplier questionnaire for new and existing third parties/vendors/suppliers with a focus on those identified as high risk. These will be in addition to questions that address information security and privacy. We will also develop a separate Modern Slavery Supplier questionnaire which can be provided as a stand alone document for identified suppliers to complete.

(b) Whistleblower policy

Inclusion of wording that specifically references and addresses modern slavery in our whistleblower policy.

(c) Review and publication of Supplier Code of Conduct

Further review of this code with the intent to make suppliers aware of the code via publication of it on our external website as well as continuing to work with them to share our expectations.

(d) Modern Slavery Policy and training

Further expanding on the reporting process set out in this policy, to make sure it is appropriately robust. We also anticipate rolling out a modern slavery training module at the commencement of employment with us, as well as arrange annual targeted training on modern slavery to appropriate individuals in the business.

(e) Conduct a survey to determine the effectiveness of training

The survey is currently in development, and we anticipate rolling it out in the next financial year. The objective is to improve our training and ensure our training goals remain relevant and are being achieved.

Questions will be designed to provide feedback on what improvements need to be implemented to make the training more relevant. Key evaluation criteria will include relevance, coherence, effectiveness against goals, impact and level of engagement.



6. Consultation between Owned & Reporting Entity

All Partnered Health Group entities are wholly owned subsidiaries of Figtree Head TopCo II Pty Ltd ACN 651 158 404. Further, all Partnered Health entities have largely common directors and company secretaries.

The Modern Slavery Working Group is responsible for consulting with all Partnered Health Group entities through the relevant Business Units and functional areas. For the Relevant Period, the membership of the Modern Slavery Working Group included members from Partnered Health's Executive Leadership Team (Managing Director, CEOs, CFO, General Counsel,

Head of People & Culture), Procurement, Human Resources, Finance and Management and Senior Managers from each Business Unit, as well as our National Quality & Risk Officer and our Technical Information Security Officer. Consultation between member(s) of the Modern Slavery Working Group and the shareholders' Head of Sustainability also formed part of this process.

It follows that modern slavery risks have been appropriately identified, assessed and addressed and each entity has been consulted and is aware of their required actions.



7. Board Approval

This Statement has been prepared by the Modern Slavery Working Group in accordance with the *Modern Slavery Act 2018 (Cth)* in consultation with the Partnered Health Group subsidiaries and has been reviewed and approved by Board of Directors of Partnered Health Pty Ltd on 5 June 2025.



Dr Malcolm Parmenter

Managing Director/CEO

A handwritten signature in black ink, appearing to read 'Dr Parmenter', written over a thin horizontal line.

Partnered Health Pty Ltd

5 June 2025



PARTNERED HEALTH