

# Modern Slavery Statement 2024

## ForHealth Group includes:

Limestone Holdco Pty Ltd (ACN 639 416 667) Limestone Mezzco Pty Ltd (ACN 641 667 781) Limestone Midco Pty Ltd (ACN 639 417 280) Limestone Finco Pty Ltd (ACN 641 434 433) Limestone Bidco Pty Ltd (ACN 639 417 511) Bourke Street Clinic Pty Ltd (ACN 123 076 906) Brindabella Medical Practice Services Pty Ltd (ACN 618 932 291) Cooper Street Clinic Pty Ltd (ACN 002 974 058) Health & Co Pty Ltd (ACN 614 349 585) Healthyu Corporation Pty Ltd (ACN 123 076 915) HLS Medical Centre Holdings Pty Ltd (ACN 088 128 787) Idameneo (No 123) Pty Ltd (ACN 002 968 185) Idameneo (No 125) Pty Ltd (ACN 162 662 919) Medical Centre Services Pty Ltd (ACN 621 584 067) Occupational Health Holdings Pty Ltd (ACN 626 660 795) Pacific Medical Centres Pty Ltd (ACN 002 866 382) Park Family Practice Services Pty Ltd (ACN 617 747 725) Primary Health Care Pty Ltd (ACN 169 588 096) Sidameneo (No. 456) Pty Ltd (ACN 089 995 817) Logic Enterprises (WA) Pty Ltd (ACN 154 027 559)

(the 'Group', 'ForHealth' or 'ForHealth Group')



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## 1. About this Statement

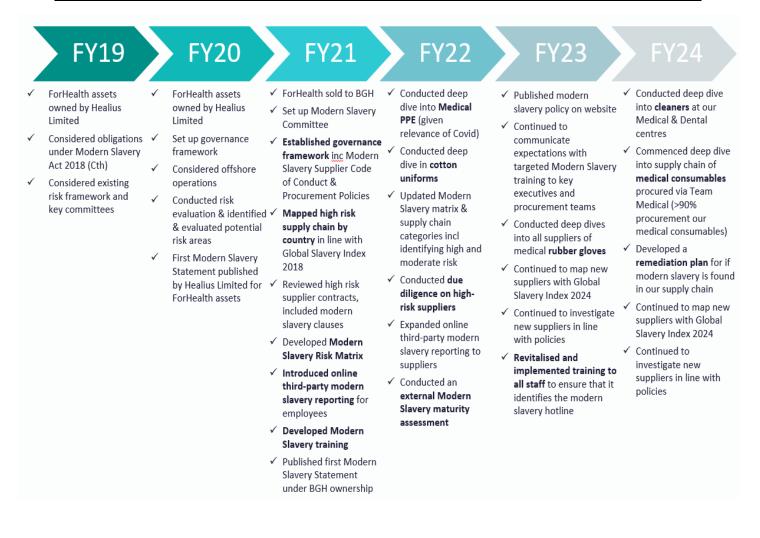
#### **Introduction**

ForHealth is pleased to release its 2024 Modern Slavery Statement (**Statement**) for the period 1 July 2023 to 30 June 2024 (**Relevant Period** or **FY24**) in accordance with the *Modern Slavery Act (Cth) 2018* (the **Act**). It is our fourth Modern Slavery Statement.

According to the *Global Slavery Index 2023*, the number of people impacted by modern slavery is rising each year with an estimated 50 million living in modern slavery, including 28 million being subjected to forced or compulsory labour.<sup>1</sup>

Our ongoing commitment to identify, assess, manage and mitigate our modern slavery risks has been overseen by the ForHealth Modern Slavery Committee, our Risk Committee and ultimately our Board. We are committed to contibuting to the elimination of modern slavery.

## 2. Our modern slavery journey so far



<sup>&</sup>lt;sup>1</sup> Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), Geneva, 2022



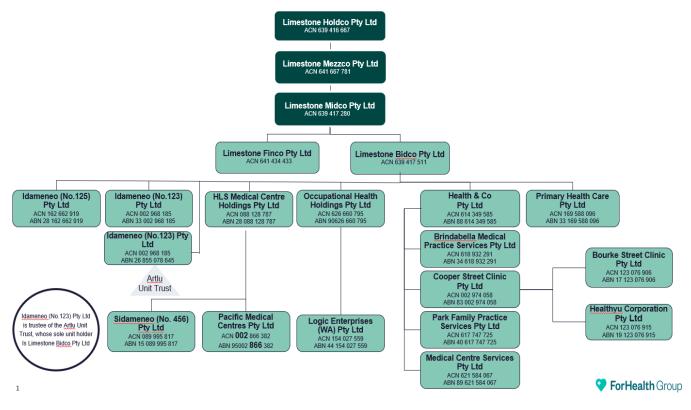
## 3. Our reporting entities

In accordance with the Act, the reporting entities for this Statement are:

- Limestone Holdco Pty Ltd ACN 639 416 667,
- Limestone Mezzco Pty Ltd ACN 641 687 781,
- Limestone Midco Pty Ltd ACN 639 417 280,
- Limestone Bidco Pty Ltd ACN 639 417 511,
- Idameneo (No. 123) Pty Ltd ACN 002 968 185,
- Occupational Health Holdings Pty Ltd ACN 626 660 795, and
- Health & Co Pty Ltd (ACN 614 349 585)

#### (collectively the Reporting Entities).

This is a joint statement under section 14 of the Act with respect to all Reporting Entities.



## 4. Our business, structure, operations & supply chains

 Image: Strategy of the strategy

## (a) Our business



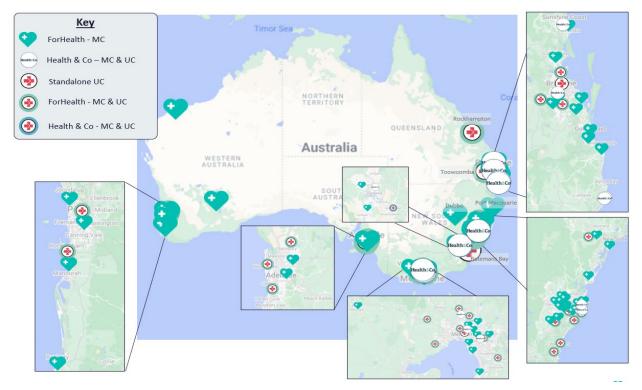
In FY24, ForHealth has had a positive year of growth with additional acquisitions of medical centres across NSW, ACT and QLD and expanding its Evoca, BUPA, Logic Health and Skin2 businesses.

ForHealth has also rolled out 30+ Federal and State Government funded urgent care clinicals (**UCCs**) around Australia. Through these UCCs, we are partnering with relevant governments, Primary Health Networks, communities and public hospitals to help reduce pressure on Australia's public hospital system. UCCs play a vital role in caring for urgent care patients, which in turn, protects our hospital system from overcrowding. They provide the community with the treatment they need quickly for an illness or injury that is not deemed an 'emergency' but is 'urgent', without having to wait long periods in emergency departments and is bulk billed for anyone with a Medicare card.

ForHealth now employs approximately 2,505 staff nationally (inclusive of full time, part-time and casual staff). We provide facilities and services to more than 1,100 independent General Practitioners (**GPs**) who operate their own businesses from within our more than 90 large multi-services medical and dental centres and who provide health services of more than 6 million patient visits and to approximately 1.3 million individual patients each year. Our 90+ large multi-service medical and dental centres include more than 50 outer metro / regional sites. We also support more than 200 independent dentists from 55 dental centres.

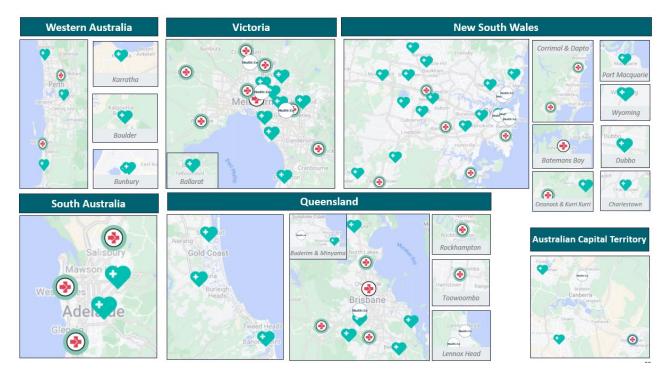
ForHealth sites operate as a single point of primary care for the community. This includes independent GPs, nursing treatment rooms, chronic disease facilities, pathology, extensive imaging capabilities, medical specialists, independent allied practitioners, dental services, pharmacies and where applicable Urgent Care Clinics. We also focus on sub-specialty care such as women's health, skin, occupational health, refugee support, Aboriginal and Torres Strait Islander support, LGBTQA+ health, immigration, and mental health.

Our mission *is high quality, accessible healthcare for all Australians. We believe that accessible healthcare is one of the best things about our country and we are proud to be a leader in this field.* 



## (b) <u>Our operations</u>





#### **Medical Centres**

ForHealth provides facilities and services to independent healthcare professionals (including GPs) (**HCPs**) who operate their own businesses from within our various large multi-service medical and dental centres. The facilities and services we provide to independent HCPs include the provision of premises, facilities management, nurses, reception staff, practice managers, practice management software, administrative and financial services, IT support, cleaning, waste removal, maintenance and provision of medical consumables.

ForHealth also supports the operation of imaging, pathology collection, pharmacy and physiotherapy services within many medical centres by offering facilities via lease agreements to these providers.

#### **Primary Dental**

ForHealth operates 55 dental facilities primarily co-located in its medical centres and provides facilities and services to over 200 independent dentists, who in turn service our communities and their patients.

#### **Urgent Care**

As noted above, ForHealth has been awarded 30+ urgent care facilities around Australia, working with both Federal and State Governments to reduce pressure on emergency departments by allowing the redirection of category 4 and 5 injuries to our urgent care treatment rooms. ForHealth is the largest Urgent Care provider in Australia and provides services to ~350,000 annual patient visits.

ForHealth leverages its large-scale medical centres, treatment rooms, reception areas and network of GPs to provide this new healthcare delivery model. Patients are able to access Urgent Care services via self-referral or walk-in, appointment or referrals via other health services (including emergency departments at nearby hospitals) and clinicians. Upon arrival, patients are triaged by nursing staff and assessed for eligibility of treatment by the Urgent Care service. Patients are then treated in order of assessed clinical urgency.



#### **Allied Health**

ForHealth also provides facilities and services to various allied health professionals who provide their patients with physiotherapy, podiatry, dietetics and psychology services. We also support occupational health and workers compensation injury management, onsite health and injury prevention solutions as well as job specific pre-employment medical systems.

#### **Logic Health**

Logic Health is one of the largest providers of occupational healthcare solutions to businesses in Australia. The services are provided via its owned and operated occupational health clinics located in both metro and regional areas. Logic Health is committed to providing the best occupational healthcare, delivered by highly trained, skilled and experienced independent practitioners, providing high quality and safe care.

# logichealth

#### **BUPA Immigration**

ForHealth also operates immigration medical service clinics for the Department of Immigration, as a subcontractor to BUPA. BUPA has the exclusive right from the Department of Immigration to provide immigration medical services nationally. In areas where BUPA does not physically have BUPA clinics to provide such immigration medical services, BUPA subcontracts to other primary health service providers, such as ForHealth.

#### Evoca

Evoca delivers accessible and holistic healthcare to women of all ages and stages of life. It comprises a group of independent GPs who specialise in, and are passionate about, women's healthcare. Its goal is to ensure women feel heard and their health symptoms are validated and addressed with compassion and understanding in a sympathetic setting.

Evoca launched its first site in Epping, Victoria in December 2022. Today, just 18 months later, there are ~35 clinics and over 100 GPs operating under the Evoca brand nationally. It is the only national network of women GPs in this space. Evoca provides GPs with an opportunity to follow their passion and develop portfolio-type work.



#### Skin2

Skin2 is a GP-led service dedicated to the diagnosis and treatment of skin cancer. It is an integrated network of medical centres located within ForHealth's existing centres, nationally. Its doctors provide premium skin cancer care and treatment for their patients with a focus on early detection, treatment and prevention to deliver positive clinical outcomes.

Skin2 launched its first site in Highett, Victoria in August 2018. Today there are ~40 clinics and ~60 GPs operating under the Skin2 brand nationally.





#### **Equality Health**

Equality Health delivers inclusive, culturally sensitive care that celebrates the uniqueness of every individual. It is represented by a group of GPs who are passionate about addressing the disparities in healthcare within the LGBTIQA+ communities. It aims to close the gap and provide a single point of contact for all general medicine, sexual health and mental health needs for the LGBTIQA+ community.

Equality Health launched its first site in NSW in September 2024. There are 8 clinics expected to be launched by the end of 2024, which will be supported by 13 independent GPs.

### (c) Our Supply Chain

ForHealth 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<sup>2</sup>.

Our supply chain is comprised of the following product / service categories. Our key change in FY24 is that we no longer have offshore typists and our IT service provider from India ceased providing services during FY24:

## Our Supply Chain largely remains unchanged

Our supply chain continues to be is comprised of the following vendors:



<sup>&</sup>lt;sup>2</sup> Ethically sourced means that products and services from each point of a business's supply chain are obtained in an ethical way, which includes upholding rights, decent working conditions, health and safety and good business ethics



## 5. Risks - FY24 Assessment of Modern Slavery risks

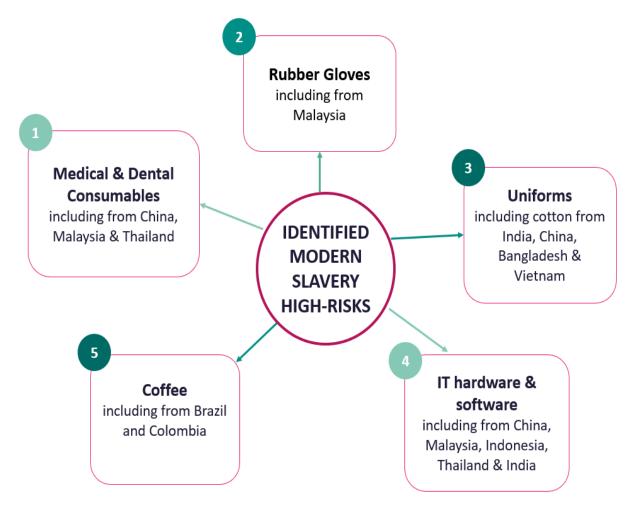
As noted previously, when considering modern slavery risk in our supply chain, ForHealth takes a '<u>risk-based influence</u>' approach to ensure resources are directed to those suppliers that have higher modern slavery risk profile and who we also have most influence over.

For example, we are unlikely to be able to influence where Apple or Microsoft procures its components from but, on the other hand, will have more influence over our medical consumables, dental consumables or local cleaning suppliers.

### (a) Assessing & identifying key risks in our supply chain

During FY24, our Modern Slavery Committee continued to map the Group's supply chain and identify potential risks of modern slavery by evaluating each first-tier supplier and class of product/service against a risk matrix. Our Modern Slavery Risk Matrix (see **Annexure A**) has been updated for the Relevant Period.

During FY24, the following products/services were identified by ForHealth as high-risk categories:





## 6. Actions – FY24 actions taken to mitigate Modern Slavery Risks

During FY24, we conducted various actions to address the risks identified as part of our risk assessment.

## (a) Modern Slavery Response & Remediation Plan



In FY24, ForHealth established a Modern Slavery response and remediation plan for handling any incidences where modern slavery is identified or reported in our supply chain. Where an incident of modern slavery is identified or reported within our supply chain, we will work with the relevant supplier and cooperate in remediation. This could involve a range of actions including rehabilitation (e.g. legal or medical assistance, housing / psychological support), restitution and / or further preventative remedies (e.g. requiring the relevant supplier to provide corrective action plans, periodic reviews, external audits etc). The overall goal of remediation is to prevent or mitigate the harm and reduce, where possible, the chance of harm recurring.

ForHealth's remediation process is guided by the following key principles:

- a victim centred approach;
- confidentiality is paramount;
- context-driven, consultative and multi-stakeholder approach to our response; and
- focusing on preventative actions to mitigate the need for a response.

In FY24, ForHealth had no modern slavery instances that required remediation.

Set out below are the steps for our response and remediation:





#### (b) Deep Dive into our suppliers who engage Cleaners



ForHealth recognises that domestic helpers and cleaners are often at high-risk of modern slavery. In our supply chain, we classify cleaners as medium risk (see **Appendix A: Modern Slavery Risk Matrix**).

In FY24, ForHealth conducted a deep dive into our key suppliers of cleaning services to understand our supply chain more closely and, where possible, minimise the risk of modern slavery.

#### The 'deep dive' process

ForHealth has three suppliers of cleaning services. ForHealth performed additional due diligence in relation to these suppliers by sending a '*deep dive*' questionnaire to each supplier of cleaning services.

The questionnaire was designed to assist us gaining a more thorough understanding of these three suppliers' supply chains with targeted questions concerning:

- geographical locations of their suppliers;
- countries of origin of raw materials;
- location of their employees and whether the suppliers employ low skilled and/or foreign nationals;
- processes these suppliers have in place to monitor whether seasonal or temporary workers work in compliance with their visa, employment or other legal conditions;
- whether these suppliers have automated time and attendance systems and processes;
- nature of working conditions of the suppliers' employees including whether they are free to join trade unions and/or freely terminate their employment arrangements and whether wages are paid by cash;
- details around minimum age requirements of each supplier's employees;
- details around the existence of a remediation framework to respond to suspected or reported instances of modern slavery; and
- their policies, procedures and governance.

#### Key learnings

Our key learnings from this 'deep dive' were:

- all our cleaning suppliers conduct modern slavery due diligence on their contractors;
- our cleaning suppliers do use some cleaning raw materials and products sourced from China, Malaysia and Taiwan although a majority of the products are sourced from Australia, New Zealand, United Kingdon and United States;
- while our cleaning suppliers do employ foreign nationals, all have visa checking processes to ensure adequate working rights;



- while our cleaning suppliers do not have automated time and attendance systems, all pay in accordance with relevant awards;
- all our cleaning suppliers ensure that employees have written contracts in a language they understand and clear terms which allow workers to resign from their employment. Further, a majority of our cleaning suppliers ensure that their supply chain does the same;
- our cleaning suppliers do not make any wage payments in cash but do not actively monitor whether their suppliers do;
- typically our cleaning suppliers do not employ anyone under 18 but in instances where they do, they have robust policies around hiring young workers between 15-18;
- all of our cleaning suppliers have policies to deal with modern slavery risks and ensure grievances can be effectively raised and managed (including protecting whistle-blowers) and ensure their own suppliers adhere to their policies for managing modern slavery risks;
- all suppliers have processes that go as far as withdrawing/terminating engagements with their own suppliers if modern slavery risks are identified in their supply chain;
- modern slavery and safety training are provided by our cleaning suppliers to all their employees; and
- our cleaning suppliers have formal teams to manage modern slavery risks with responsibility tracing to the board and management team.

#### (c) <u>Survey to determine the effectiveness of training</u>

During FY23, we revitalised our existing modern slavery training to all staff and developed and conducted targeted training for executive, management and procurement leads. In FY24, ForHealth developed a survey designed to confirm the effectiveness of that training and reveal any improvements that can be made to the modern slavery training module to improve its relevance, overall impact and learner engagement.

The survey was distributed through Microsoft 365 Forms to employees across different ForHealth Group business areas including ForHealth Medical Centres, Logic Health, Primary Dental and Health & Co. These employees were identified as executive, management and procurement leads who would have significant involvement in procurement and supplier liaison.

This survey found that the vast majority of employees felt that the modern slavery training course helped them learn about and broaden their understanding and awareness of what modern slavery is and the potential risks of this in supply chains. The majority of employees also felt the structure, content and activities in the course supported them in acquiring the knowledge. This signalled a great step in bringing attention to the issue of modern slavery and providing context to employees who may be unaware or have limited knowledge about modern slavery.

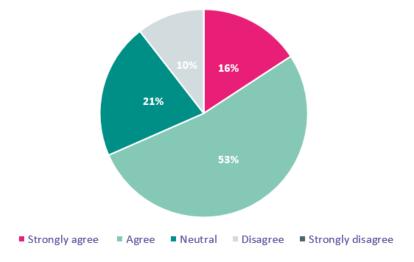
The survey also found that the relevance and impact of the modern slavery training could be improved by:

- designing a clearer learning outcomes that specifically stated its audience what specific actions they could undertake after completion of the training in relation to mitigating modern slavery risks;
- potentially simpler communication in explaining the approach and steps ForHealth takes to directing resources to reputable and compliant suppliers; and
- discerning more clearly the specific and detailed relevance and implications of our Modern Slavery commitment for people in different roles given that the survey was targeted to an audience throughout our business who have a wide spread of different engagement levels with supplies, suppliers and supply chains.

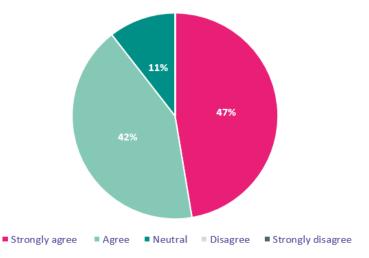


#### Below sets out 2 of 12 questions re: the effectiveness of Modern Slavery training

<u>Question</u>: "Prior to completing the Modern Slavery training module, you were aware and informed about the subject of Modern Slavery and its prevalence in society"



**Question**: "Did the training module increased your general understanding and awareness about Modern Slavery and the potential risks of this in supply chains"



## (d) <u>Commenced deep dive into Medical Consumables</u>

In FY24, we also liaised with our key medical consumable supplier who supplies the vast majority of our medical consumable needs within our business to further understand the risk mitigation strategies undertaken by that supplier. The supplier, via the Ethixbase 360 platform, has sent surveys and engaged with the suppliers of 90% of their own supplier base to accurately map out the modern slavery risks within their own supplier tiers.

ForHealth will continue to engage with this supplier on an ongoing basis in FY25 and collaborate to manage both the supplier's and ForHealth's Modern Slavery risks.



## 7. Effectiveness – Assessment of effectiveness of FY24 actions

ForHealth is committed to continuing to 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 in FY24 as follows:

- Modern Slavery training effectiveness: see section 6 above for details.
- **Procurement process compliance**: In FY24, our Modern Slavery Committee continued to ensure compliance with our procurement and onboarding processes including reviewing and assessing in detail any high-risk suppliers.
- Modern Slavery Hotline: The Committee continues to consider whistleblower and/or modern slavery instances. No reports were received during FY24 through the external / third party managed whistle-blower or Modern Slavery hotline.
- FY24 Actions: With respect to our FY24 actions, we can confirm that:
  - deep dives were conducted into our cleaning suppliers, all 3 cleaning suppliers replied to our requests, answers were analysed and learnings documented;
  - new and existing suppliers continue to be reviewed for compliance;
  - a detailed remediation process was developed for dealing with modern slavery risks if found in our supply chain in an appropriate & proportionate manner that takes in account our influence over the relevant supplier;
  - we conducted a survey of executives, senior managers and procurement officers on the effectiveness of our modern slavery training launched in FY23;
  - new suppliers continued to be mapped against the Global Slavery Index 2023.

#### 8. Next Steps and forward commitments

The following are our forward commitments for FY25 with a comparison against our completed achievements for FY24:

FY24 Achievements	FY25 Commitments
Conducted a deep dive into suppliers of Cleaners - Delivered a deep dive questionnaire to all cleaner procurement companies including confirming cleaners were paid under the award, and governance documents were in place (findings on #p11-12 of Statement)	Assess findings of cleaner deep dive and support improvement - Work with cleaner procurement company to support / encourage implementing improvements in their business predominately in the form of governance framework and award compliance
<b>Commenced deep dive in medical consumables with Team Medical</b> Feam Medical engaged <u>Ethixbase</u> to support their analysis of Modern Slavery risks - Surveys sent our top 50 suppliers of medical consumables for Medical <u>Centres</u>	Deep dive into the procurement and supply chain of Medical consumables - Verify country / location of production of key suppliers - Rank risk of supplier - Confirm framework of modern slavery governance for high-risk suppliers - Assess results and determine any required next steps
<ul> <li>Developed a Remediation Plan</li> <li>Process if Modern Slavery found in supply chain which is appropriate &amp; proportionate and takes in account our influence over the relevant supplier</li> <li>E.g. Rehabilitation, Restitution &amp; Preventative remedies (e.g. action plans, external audits etc</li> </ul>	Implement Remediation Plan - Conduct training for procurement team and key suppliers on our remediation plar
Reviewed effectiveness of Modern Slavery Training Conducted a survey of executives, senior managers and procurement officers on how effective they found the Modern Slavery training Learnings will be used to improve our training and ensure training goals remain relevant and are being achieved.	Update training with learnings from survey on effectiveness of training conducted in FY24 - Ensure learnings from effectiveness survey are used to improve training where required
Continue to map suppliers' supply chains & identify <u>risks</u> against the Global Slavery Index 2023 - To align with Global Slavery Index 2023	Continue to map suppliers' supply chains & identify risks against the Globa Slavery Index 2023 - To align with Global Slavery Index 2023



## 9. Consultation between Owned & Joint Reporting Entities

All ForHealth Group entities are wholly owned subsidiaries of Limestone Holdco Pty Ltd ACN 639 416 667. Further, all ForHealth entities have largely common directors and company secretaries and from a supply chain perspective they operate as one common entity.

The Modern Slavery Committee is responsible for consulting with all ForHealth Group entities. For the Relevant Period, the membership of the Modern Slavery Committee was Melinda Harrison, General Counsel, Saheba Kaur, Senior Legal Counsel and Tamim Rahman, Senior Legal Counsel. The Modern Slavery Committee consulted with all Group entities as part of their function.

Further, when determining high risk suppliers, the Modern Slavery Committee considered suppliers of each Group entity and ranked them according to the Modern Slavery Matrix set out in **Annexure A**. Accordingly, modern slavery risks have been appropriately identified, assessed and addressed and each entity has been consulted and is aware of their required actions.

#### **10. Board Approval**

This Statement has been prepared by the Modern Slavery Committee in accordance with section 14 of the *Modern Slavery Act 2018 (Cth)* in consultation with each of the ForHealth Group subsidiaries and has been reviewed and approved by Board of Directors of Limestone Holdco Pty Ltd on 30 October 2024.

Andrew Cohen Director / CEO Limestone Holdco Pty Ltd Dated: 30 October 2024



## Annexure A – Modern Slavery Risk Matrix

## Risk matrix assessing unmitigated modern slavery risks

Low risk Some risk



		Likelihood assessed by country					
This risk assessment reviews the categories		Low	Minor	Moderate	Major	High	
of s slav cou	pend by their likelihood to have modern very in their supply chain based on the ntry where they operate or source ds and the industry they are in	Australia Norway Scandinavia Sweden Austria Germany Belgium Denmark United Kingdom Ireland Singapore Finland Japan	Croatia Albania Japan Argentina Brazil	Mexico PNG Peru Vietnam Ecuador Colombia Turkey Guyana Hong Kong USA Honduras Vietnam	Venezuela Indonesia Sudan Belarus DRC Macedonia Chad Turkmenistan Somalia Russia Taiwan Vietnam Thailand Malaysia	Philippines UAE Cambodia India The Central African Republic Pakistan PNG China North Korea Bangladesh North Korea Afghanistan Malaysia	
L.	Highly likely         There is a high likelihood of modern slavery         in these industries. Examples include:         • Cocoa       Fishing         • Rice       Diamonds         • Textiles       Palm Oil         • PPE       Coffee         • Electronics	Facility Management (Aust) Cleaning (Aust) IT Software (Singapore/ Japan) IT Hardware (Singapore/Japan)	Coffee (Brazil) Dental Consumables (Japan)	Medical & Dental PPE (including gloves) (HK) Coffee (Colombia) IT Hardware (USA)	Uniforms (Vietnam) Medical PPE (Thailand)	Uniforms (India, China, Bangladesh) IT Hardware (India) IT Hardware (China/ Malaysia) Medical & Dental PPE including gloves (Malaysia & China)	
Likelihood assessed by industry	Likely There is likely to be a risk of modern slavery. Examples include: • Timber Construction • Sugarcane Wheat • Gold Rice • Tobacco Corn	Construction Services (Aust) Print service (Aust)		IT Software (USA)	IT So <del>ft</del> ware (Indonesia/ Thailand)	IT Software (India/ China)	
	Possible It is possible there is a risk of modern slavery. Examples include: Agriculture Manufacturing Shipping / transport	Waste Dental Consumables (Europe) Dental equipment (Europe, Japan)	Dental lab services (HK)	Medical Consumables (not PPE) Dental Consumables (not PPE) (USA) Dental equipment (USA)		Dental lab services (China) Medical Consumables (China) Dental equipment (China) Stationery (China)	
	Unlikely It is unlikely there will be a risk of modern slavery. Examples include: • Professional services	Dental lab services (Aust)				Offshore Accounting (Philippines) Professional services such as IT Support (India)	

Footnote: Based from the Global Slavery Index 2023