



Myhealth Modern Slavery Statement FY24

A. Introduction

This is a Modern Slavery Statement under section 13 of the *Modern Slavery Act 2018* (Cth) (**the Act**) made in respect of Myhealth Medical Holdings (ACN 611 390 688) (**MMH**) and its wholly owned subsidiaries detailed below:

- Myhealth Management Pty Ltd (ACN 600 425 027) (**MMC**)
- Myhealth Medical Group Pty Ltd (ACN 160 321 693) (**MMG**)
- Myhealth Services Pty Ltd (ACN 620 199 082) (**Services**)

During FY24, MH Solutions Investments Pty Ltd a wholly owned subsidiary of Medibank Health Solution Pty Ltd (**Medibank**), increased its interest in MMH to 90%. Myhealth collaborated with Medibank during FY24 to determine that Myhealth will prepare a separate Modern Slavery Statement. Both the Medibank and Myhealth statements will be published between 1 July 2024 and 31 Dec 2024.

As Myhealth is a controlled entity of Medibank, this Modern Slavery Statement is to be read in conjunction with the Medibank Modern Slavery Statement in regard to all matters reported. During FY25, Medibank and Myhealth will collaborate on actions to align our modern slavery program maturity and aspirations.

In an effort to demonstrate our ongoing commitment to ethical practices, we have included our wholly owned subsidiary companies in our Modern Slavery Statement. Myhealth believes that addressing the issue collectively across the entire corporate structure is a proactive measure in alignment with our commitment to eradicating modern slavery in all its forms.

This statement is submitted by Myhealth Medical Holdings on behalf of itself and each of its subsidiaries in respect of the reporting period 1 July 2023 to 30 June 2024.

We have consulted with all our wholly owned subsidiaries in the development of this Modern Slavery Statement. This collaborative effort ensures a unified approach across our organisation in identifying and mitigating modern slavery risks, reflecting our commitment to addressing this critical issue effectively.

For the purpose of this statement any references to 'Myhealth' or 'the Company' refer to MMH and all three wholly owned subsidiaries.



The Board of Directors of Myhealth has approved this statement on behalf of itself and the other reporting entities covered by the statement and has authorised it to be signed by the Chief Executive Officer, Dr Hadrian Lee.

Dr Hadrian Lee

Dr Hadrian Lee

Chief Executive Officer

B. Structure, Operations & Supply Chains

i) The Company's Structure

Myhealth is an Australian company with its registered office and headquarters located in Sydney. We strive to provide a healthcare community where everyone can thrive. Our vision at Myhealth is to facilitate access to medical centres in convenient locations that provide the best care, in an inclusive environment.

The first Myhealth Medical Centre opened in 2007, founded by a group of dedicated General Practitioners. We continue to be a doctor-owned, doctor-led, and doctor-run business, focused on providing patients with access to the highest quality care, by supporting doctors to be at their best.

Myhealth is now one of the largest medical centre operators in Australia, with over 100 clinics across New South Wales, Queensland and Victoria that facilitate access to healthcare services to more than 3 million patients annually.

The Myhealth and its wholly owned subsidiaries are listed below.

The reporting entities covered by this statement are MMH, MMC, MMG and Services. Myhealth is including its wholly owned subsidiaries as a proactive measure to show our commitment to eradicating modern slavery in all its forms.

Myhealth Medical Holdings ACN 611 390 688 (MMH)

Myhealth Medical Group ACN 160 321 693 (MMG)

Myhealth Management ACN 600 425 027 (MMC)

Myhealth Services ACN 620 199 082 (Services)

Figure 1.

ii) Operations

Myhealth is Australia's fastest-growing medical centre group, encompassing 106 clinics across the country and employing a workforce of approximately 1,179 employees. We provide facilities and services to more than 993 independent general practitioners and 270 independent allied health professionals to provide access to comprehensive healthcare services.

The facilities and services we provide to our independent GPs include the provision of premises, facilities management, nurses, reception staff, practice managers, practice management software, administrative and financial services, IT support, and other non-medical services such as the provision of medical consumables.



We also facilitate access to pathology collection, and other allied health services within many medical centres by offering facilities via lease or licence agreements to these providers.

Myhealth Medical Holdings (MMH) Operations

<i>Myhealth Medical Group (MMG)</i>	MMG owns a majority proportion of the majority of the Myhealth Clinics, and Myhealth Management.
<i>Myhealth Management Pty Ltd (MMC)</i>	Myhealth Management is the supporting management entity for the clinics in the Myhealth Group. IT services, Finance services, Operational services and administrative services are all provided to the clinics from Myhealth Management. MMC also owns the majority of a minority of the Myhealth Clinics.
<i>Myhealth Services Pty Ltd (Services)</i>	Services is wholly owned by MMH and is MMH’s employment entity that encompasses our workforce of 1,179 employees. This encompasses our management team at Support Centre as well as our team on the ground. This includes area managers, practice managers, registered nurses and medical receptionists.



iii) Supply Chain

Our team at Myhealth is committed to ethical and sustainable practices when engaging with the goods and services of suppliers. Our supply chain consists of a range of suppliers, from medical equipment suppliers to office equipment to clothing wholesalers. Due to Myhealth’s business model and operations processes, we generally engage with the following services:

- Medical Supplies
- Marketing & Advertising
- Cleaning Services
- IT - Software & Hardware Maintenance Services
- Office Equipment
- Recruitment Services
- Repairs and Maintenance Services

Figure 2 demonstrates, engagement with each type of vendor, service, and supplier.

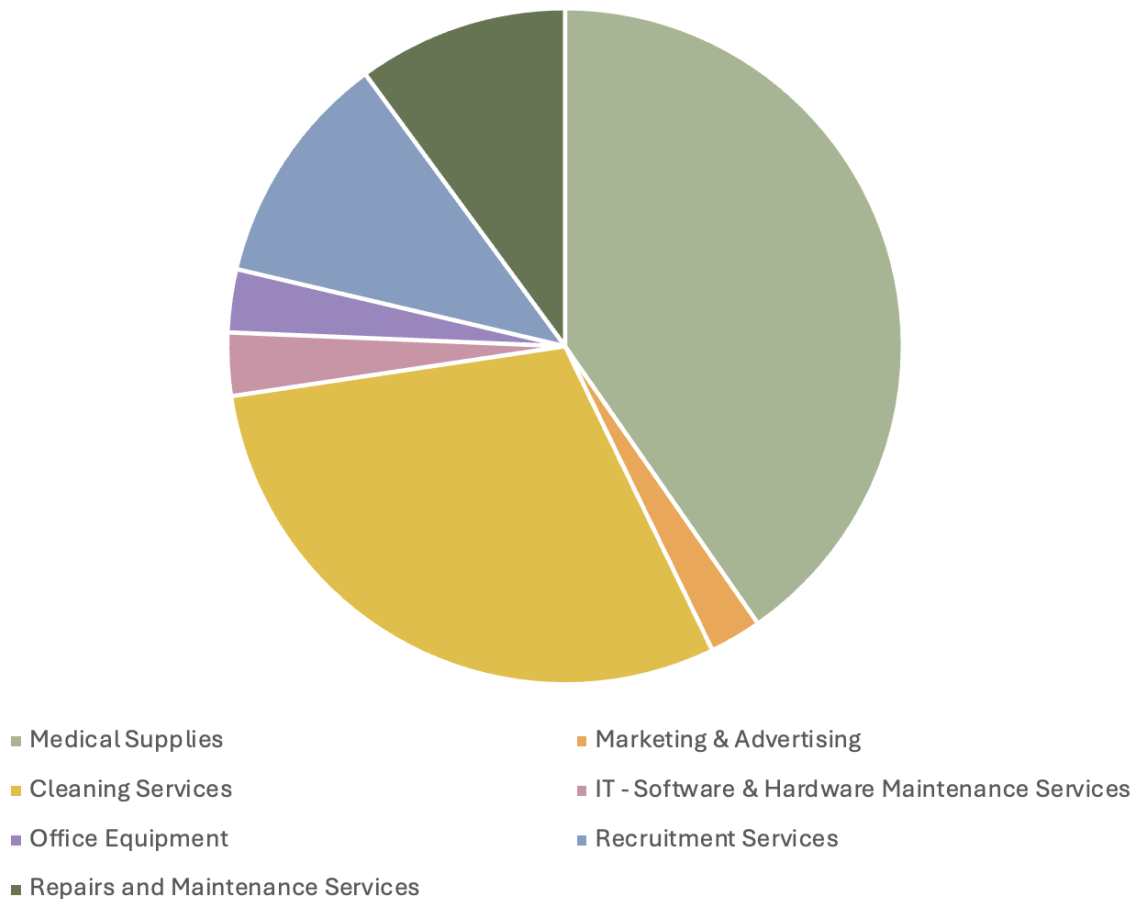


Figure 2



C. Modern Slavery Risks

Modern Slavery refers to situations of serious exploitation, in which coercion, threats or deception are used to exploit victims and deprive them of their freedoms. This encompasses practices such as servitude, slavery, forced labour, forced marriage, child labour, debt bondage and more. Myhealth believes this as an abhorrent practice and does not tolerate the violation of human rights law.

We recognise that Myhealth has an important role to play in identifying and managing the risk of modern slavery throughout the entirety of our business, workforce, and supply chains. Myhealth supports the use of socially responsible, ethical, transparent, and legislatively compliant practices in carrying out our activities and recognise that ongoing vigilance and effort will be required to eliminate the risks of modern slavery in our operations and supply chains.

Myhealth is committed to combatting modern slavery through a continuous improvement approach. This approach involves proactively assessing and addressing modern slavery risks within our business. During FY23, Myhealth undertook internal and external risk assessments in order to identify the focus areas for a continuous improvement approach.

Myhealth utilises this risk-based approach to identify and address high risks of modern slavery within our business for a more efficient use of our resources. Our internal and external assessments in FY23 identified a large gap in the education and awareness of our internal stakeholders and employees. In order to combat modern slavery efficiently, Myhealth has largely focused its resources on improving its employees' education and awareness of modern slavery.

i) Operational risks

During FY23, Myhealth identified a higher risk when engaging with third-party contractors and introduced the below measures to assess and mitigate the potential for unfair employment practices:

- Third-party contractors are required to acknowledge, review and comply with the Myhealth modern slavery *Code of Conduct*.
- Newly drafted modern slavery contract clauses are available for the business to incorporate into third-party contracts in the absence of any clauses.

In FY24, Myhealth has continued to utilise the above methods in order to ensure that our third-party contractors are evaluated prior to engagement. During FY24, we saw an increase in the number of suppliers who returned executed *Code of Conducts*. Based on internal surveys conducted in FY24, we discovered that our contract clauses initiative was largely underutilized across the business, primarily due to a lack of awareness and insufficient training. During FY24, Myhealth sought to address this issue by enhancing awareness, education and training.



ii) Supply chain risks

We recognise that there are several suppliers, vendors, and services within Myhealth's supply chain which may be at high risk of modern slavery. The following suppliers continue to represent Myhealth's top four areas of risk that are likely to occur according to the type of Supplier.

- **Cleaning and Security Services** generally pose a significant risk of modern slavery practices due to the prevalence of labour hire arrangements, both formal and informal. These employees are known to be likely to subject to harsh working conditions.
- **Uniform and Personal Protective Equipment Suppliers** are also within a sector that has known modern slavery risks. Uniform and clothing suppliers possess potential high risk of forced labour as many suppliers are susceptible to practices that reflect sweatshops.
- **Construction sector and major projects** have a high risk of modern slavery practices particularly, as there is a prevalence of migrant labour in the construction industry. This risk must be addressed as there is a lack of visibility over the supply chains and our business model has a high reliance on agencies and subcontracted labour.
- **Suppliers based outside Australia** are a specific risk to modern slavery as some of our suppliers are based in the Philippines.

D. Our Actions

In order to adequately address potential modern slavery risks within our organisations, Myhealth has taken a risk-based approach. During FY23, we conducted risk assessments that assisted in the identification and prioritisation of high risks within our business.

These assessments paved our actions for FY24 which largely focused on the education and awareness of internal stakeholders and employees. Our internal assessments highlighted that approximately 30% of our employees desired training and education on modern slavery.

i) Education and Awareness

- **Training Module:** Having identified that our resources need to be redirected towards our internal stakeholders before we address our external risks, we implemented a Modern Slavery Training Module. After testing different forms of training such as training days, drop-in sessions and communications, Myhealth implemented a training module through Sentrient in June 2024. This training now forms a part of our mandatory onboarding training for new employees.
- **Pulse Survey:** We have also implemented biannual communications that spread awareness of modern slavery risks throughout the organisation and foster a greater understanding of modern slavery risks and ethical considerations. These surveys simply provide a reminder to look out and report modern slavery risks as well as capture the impact and effectiveness of our current initiatives.



- **Risk Framework:** We have incorporated modern slavery risks into our risk framework at Myhealth, allowing employees and internal stakeholders to report any modern slavery incidents that they may encounter when engaging with a supplier or a vendor or in their day-to-day tasks.
- **Trades List:** We have introduced a 'Live Suggested Trade List' that captures a list of suppliers and vendors. For the upcoming reporting period, our goal is to refine this into a list of suppliers who have undergone comprehensive evaluation in respect of modern slavery risks. This approach will intend to establish a controlled method, ensuring that our clinics engage only with suppliers who demonstrate a commitment to fair workers' rights, equitable compensation, and safe working environments. The intended goal of this *Live Suggested Trade List* is to strengthen education and awareness, promote greater consistency across our clinics and mitigate the risk of engaging with businesses that do not align with modern slavery prevention practices.

ii) Myhealth Policy Implementation and Ongoing Initiatives

- While a specific policy or procedure has yet to be finalised, we are continuing to work towards establishing a policy in the coming FY25 reporting period.
- Myhealth continues to issue its *Modern Slavery Code of Conduct* to all its suppliers. The *Code of Conduct* requires suppliers to acknowledge and agree to conduct business through ethical modern slavery prevention practices. This seeks to target the gaps between our level of risk and those suppliers that do not have any measures in place to address modern slavery. Among other things, our Code of Conduct requires suppliers who sign the code, to maintain accurate and up-to-date records regarding their workforce, thus ensuring transparency between Myhealth and our suppliers. In the next reporting period, Myhealth intends to consider a consistent approach when interacting with suppliers, particularly those who may refuse to sign our *Code of Conduct*.
- We continue to utilise our *Vendor Form*, which was introduced in FY23, for the onboarding of new suppliers into our operations and supply chain. This requires all new suppliers to acknowledge and review our *Code of Conduct* which addresses future gaps within our supply chain. Additionally, we ask that suppliers implement adequate training for their employees to raise awareness of modern slavery risks.
- During FY23, we introduced standard modern slavery contract clauses for the business to incorporate into third party contracts. The aim of these clauses is to ensure third party vendors or suppliers affirm their commitment to preventing modern slavery, promote ethical practices and uphold the principles of human rights within their respective operations and supply chains. Myhealth continues to utilise these contract clauses whilst we work on education and awareness aspect of our FY24 actions.



- Myhealth has grievance mechanisms in place to foster a culture of open communication and transparency and we continue to actively encourage employees to voice concerns about anything that they perceive as ‘not right’. We have completed a review and update to our *Whistleblower Policy* to ensure the protection and well-being of our staff who wish to speak up about their concerns.

E. Assessing our Actions

We are committed to the ongoing assessment and monitoring of our performance to continually improve the effectiveness of our measures against modern slavery. At Myhealth, we believe this commitment will strengthen our protection of human rights.

In order to track the impact and effectiveness of our actions, Myhealth continues to work with both internal and external stakeholders to address the likely ongoing and changing nature of modern slavery risks to the business. During FY24, Myhealth conducted pulse surveys throughout the year to capture the feedback of internal stakeholders and assess the effectiveness of our measures. The results are illustrated below.

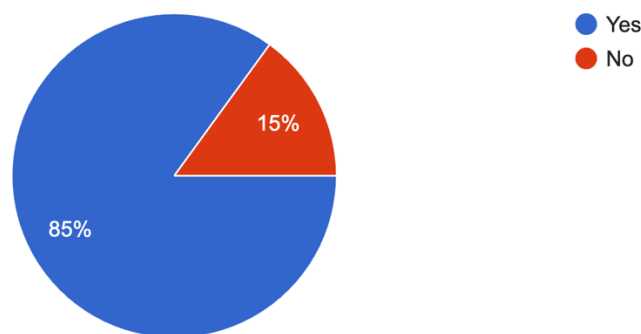


Figure 3: Approximately over 85% of the employees who complete the mandatory Modern Slavery Training Module found it that it increased their knowledge of the topic

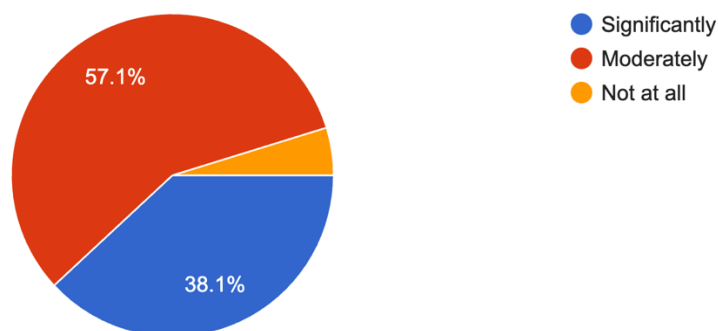


Figure 4: Approximately over 96% of our employees found that their knowledge and understanding of modern slavery increased in the past year.

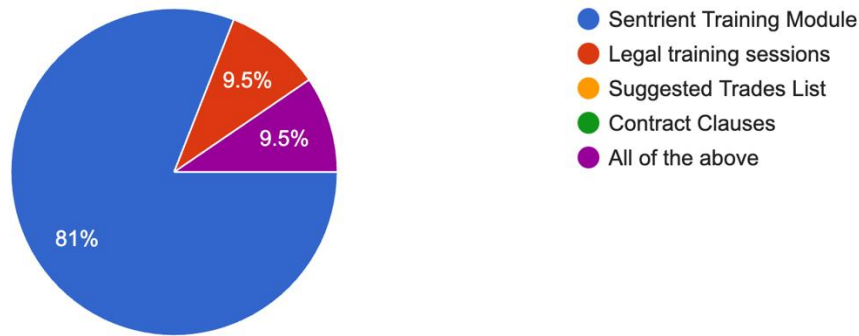


Figure 5: A majority of our employees found that our Modern Slavery Training Module was the most impactful and helpful in increasing their knowledge and understanding of modern slavery.

These surveys revealed that our *Live Suggested Trades List* requires further development and that our education and awareness initiatives have positively impacted our employees' knowledge and understanding of modern slavery. Much of the feedback collated in our pulse surveys highlighted that the clinics on the grounds require more education and upskill in order to utilise the *Contract Clauses*. Our internal assessments highlighted that a majority of our employees were not educated or aware of our FY23 initiatives. Having incorporated a risk-based and a continuous improvement-based approach, Myhealth has directed much of our FY4 efforts to educating, training and promoting awareness within our business in order to effectively tackle modern slavery risks.

F. Consultation

Myhealth places a significant emphasis on the importance of taking reasonable steps to ensure that entities wholly owned by our organisation are actively engaged in addressing modern slavery risks and implementing appropriate actions. On a regular basis, the Clinical Governance, Operations, Employment, Finance and Legal teams will take reasonable steps to ensure appropriate and ongoing management of modern slavery risks. For instance, by instigating regular review of our existing incident reporting framework to identify opportunities for uplift and review. Myhealth has a risk management framework in place which is responsible for assessing, managing, and reporting any risks within the business.

G. Ongoing Steps

Myhealth does not tolerate modern slavery practices including slavery, forced labour or human trafficking in any form and expects its suppliers to adhere to the same standards. As such we will continue publishing annual Modern Slavery Statements under section 14 of the Act.

At Myhealth, we are committed to combatting modern slavery through a continuous improvement approach that focuses on proactively assessing and addressing risks. This may involve internal and external risk assessments in addition to policy or procedure development and implementation. Our risk-based approach prioritises high risk areas of modern slavery for more efficient use of our resources.



In FY25 Myhealth will focus on key areas that will enable it to continually improve and positively influence the eradication of modern slavery in its supply chain and operations. Our primary areas of concentration and focus are detailed below. Having largely focused on education, training and awareness this year, Myhealth intends to focus on the below areas for the coming reporting period.

FY25 Focus areas

<i>Due Diligence</i>	<ul style="list-style-type: none"> • Create greater consistency in respect of due diligence practices on suppliers and business partners. • Enhance risk assessment practices associated with various business activities • Implement risk mitigation strategies to address identified vulnerabilities. • Consider conducting compliance assessments with suppliers who have signed our <i>Code of Conduct</i>.
<i>Education and Awareness</i>	<ul style="list-style-type: none"> • Continue to educate our workforce and suppliers about modern slavery risks and indicators. In particular, focus on suppliers who demonstrate low maturity in relation to modern slavery. • Consider whether we need to establish further training programs to raise awareness and understanding. For example, to increase active use of Myhealth’s standard modern slavery clause in its supply agreements. • Continue to encourage employees to report any concerns related to modern slavery. • Continue to foster a culture of responsibility and ethical conduct within the organisation.
<i>Governance</i>	<ul style="list-style-type: none"> • Consider modern slavery policy and procedure development and implementation • Align board reporting practices to updated risk profile