

# Modern Slavery Statement

Financial year 24-25

# Introduction

## Acknowledgement of Country

Latrobe Health Services acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of this nation. We proudly recognise Elders past and present as the Traditional Owners and Custodians of the lands on which our operations are located, the Gunaikurnai and Wurundjeri peoples. We are committed to supporting self-determination and envision a future where all Australians embrace Aboriginal and Torres Strait Islander histories, cultures and rights as a central part of our national identity.

## About us

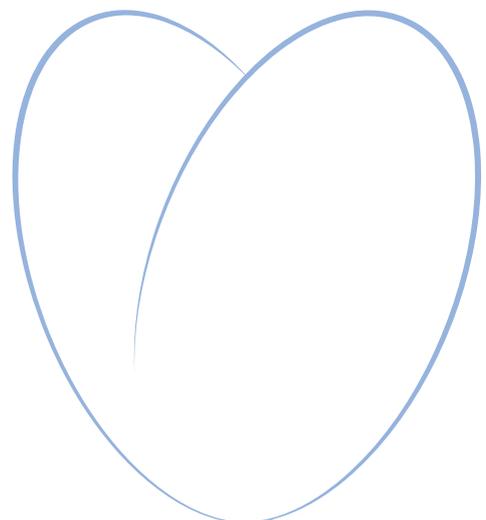
Latrobe Health Services (Latrobe Health) is an Australian-owned not-for-profit registered private health insurer, established in 1950 in the Latrobe Valley, Victoria, with more than 110,000 members across Australia. We pride ourselves on providing quality cover for our members, and exceptional services when our members need us.

Founded in 1950, Latrobe Health was established by power industry workers to provide for the health care needs of residents in the Latrobe Valley, Victoria, and at the time focused on providing medical services such as hospitals and ambulances. Much has changed since 1950, with Latrobe Health now providing hospital and extras coverage for members Australia-wide. However, the spirit of our founders remains.

Latrobe Health is still a regionally focused and based private health insurer that exists to benefit and support its members and the communities in which they live.

We're also proud to invest in our communities. In 1991 we established Maryvale Private Hospital (Maryvale), Gippsland's only private not-for-profit acute medical and surgical hospital. Since its inception, Maryvale has cared for more than 65,000 patients. Today, as a 65-bed hospital, it's a key health hub contributing to education and clinical programs through medical, surgery and consulting services

Our commitment to the region also includes support for community medical clinics and sponsorship of programs aimed at improving access to health services for rural and regional communities.



# A Message from our Board Chair



I am pleased to present Latrobe Health Services' fifth Modern Slavery Statement, which demonstrates our commitment to preventing modern slavery and human trafficking within our operations and supply chain.

The Walk Free Global Slavery Index 2023 reports that nearly 50 million people worldwide are victims of modern slavery. Australia is not immune, with an estimated 41,000 individuals impacted. Latrobe Health recognises its vital role in fostering fair and proper treatment of people across our operations and supply chains.

Latrobe Health acknowledges the existence of modern slavery risks and implements measures to mitigate the concerns. We are committed to continuously enhancing our approach to managing modern slavery risks. Our initiatives include:

- conducting detailed risk assessments of modern slavery risks within our entire supply chain, to create a risk-based categorisation of a supplier base
- embedding due diligence in our procurement processes
- delivering training to all relevant employees
- maintaining transparent reporting on identified risks

We are proud that since our initial statement, we have consistently strengthened our governance and due diligence practices related to modern slavery and raised awareness both internally and externally.

The Latrobe Health Services Board approved this Statement on behalf of Latrobe Health Services and its wholly owned subsidiary Maryvale Private Hospital at its board meeting on 27th November 2025.

A handwritten signature in black ink, appearing to read 'Ormond Pearson'. The signature is fluid and cursive, written over a light grey rectangular background.

Ormond Pearson  
Board Chair

# Introduction



## The Reporting Entity

This Modern Slavery Statement is made on behalf of Latrobe Health Services ABN 94 137 187 010 and its subsidiary, Maryvale Private Hospital ABN 44 007 374 629 in accordance with section 14 of the Commonwealth Modern Slavery Act 2018 (the Act).

It is submitted by Latrobe Health Services on behalf of itself and Maryvale Private Hospital in respect of the period 1 July 2024 to 30 June 2025 (FY25).

For the purpose of this statement, the "Group" or "Latrobe Health" refers to both reporting entities.



# Our Employees



Latrobe Health recognises the important role we play in contributing to our communities. This starts with our commitment to our people, ensuring they work in an environment that is safe, equitable and rewarding.

Latrobe Health recognises that modern slavery risks can arise in employment and recruitment practices. To mitigate these risks we:

- Ensure all recruitment processes are transparent and aligned with ethical standards
- Provide training and awareness to staff overseeing recruitment
- Have in place grievance mechanisms, enabling reporting channels for all employees and contractors to raise concerns confidentially.

## As at 30 June 2025:

Latrobe Health's workforce consisted of 328 people, comprising 127 (39%) full-time, 143 (43%) part-time, 58 (18%) casual and 2 (1%) fixed term full-time employees and contractors. Employees, independent contractors, and casuals are retained directly by Latrobe Health, with limited use of labour hire agencies.

To support 24/7 healthcare service delivery at Maryvale Private Hospital, we employ a mix of part-time and casual staff (30% of the workforce). All employment contracts are in accordance to the relevant legislations.

Latrobe Health employees work in a flexible hybrid working model. Staff work from both our head office in Gippsland, our Melbourne office, and Maryvale Private Hospital in Morwell. A small number of staff work within our Gippsland branch network.

All healthcare practitioners including casual staff at Maryvale Private Hospital are registered and verified by the Australian Health Practitioner Regulation Agency (AHPRA). We do not hire medical staff from overseas without AHPRA registration.



# Our Governance Framework



Our Modern Slavery Policy outlines our commitment to identifying and managing the risks of modern slavery across all entities. This policy is supported by key frameworks including our Employee Codes of Conduct, Supplier Code of Conduct, Risk and Compliance Frameworks and People and Culture Policies.

To deliver best practice governance and ethical behaviour, we have a comprehensive range of additional policies and procedures which ensure that our decisions are made transparently, with integrity, and in compliance with regulatory and legislative requirements. Key policies include the Risk Management Policy, Whistleblower Protection Policy, Diversity, Equity & Inclusion Policy and Working Together Policy.

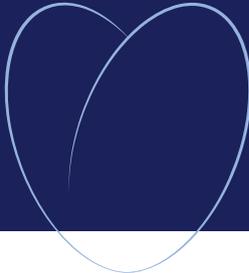
These policies reflect our ongoing commitment to maintaining a safe, fair and inclusive work environment.

## Compliance Training

Our compliance framework includes a robust schedule of compliance training and awareness sessions for our employees. Specific compliance training is mandatory for all relevant employees on an annual basis. Modern Slavery compliance requirements are incorporated within existing mandatory compliance courses for relevant employees. Progress on compliance training and performance measures against our risk culture are reported to the Risk Committee quarterly.



# Structure, Operations & Supply Chains



## Latrobe Health Service’s structure, operations, and supply chains

Although Latrobe Health serves members nationwide, our historical connection to the Latrobe Valley in Victoria remains a key aspect of our identity. This local focus allows us to maintain strong ties with the community and cater to specific regional healthcare needs. Thus, we only operate within Victoria, Australia and take pride in making a regional impact on the communities.

Latrobe Health operates a decentralised procurement and supply chain model. While most procurement transactions are managed by our executives/managers, strategic direction and governance are overseen by the respective Boards.

Latrobe Health takes a risk-based approach to supplier sourcing and engagement. We prioritise resources and actions based on each supplier’s risk profile. This approach allows Latrobe Health to target suppliers and regions where modern slavery risks are statistically higher, using risk indicators to guide supplier audits, contract clauses and compliance/performance monitoring.

This decentralisation is balanced by central oversight by the Chief Risk Officer, Chief Financial Officer and Chief Executive Officer, which ensures that findings and high-risk suppliers are reported and addressed at an organisational level, facilitating a cohesive approach to mitigating modern slavery across our supply chain. Our operations and supply chains are exclusively domestic.

All our Tier 1 suppliers are located in Australia.

**100%**   
Tier 1 suppliers are based in Australia

**\$48m+**   
Total spend across the Group

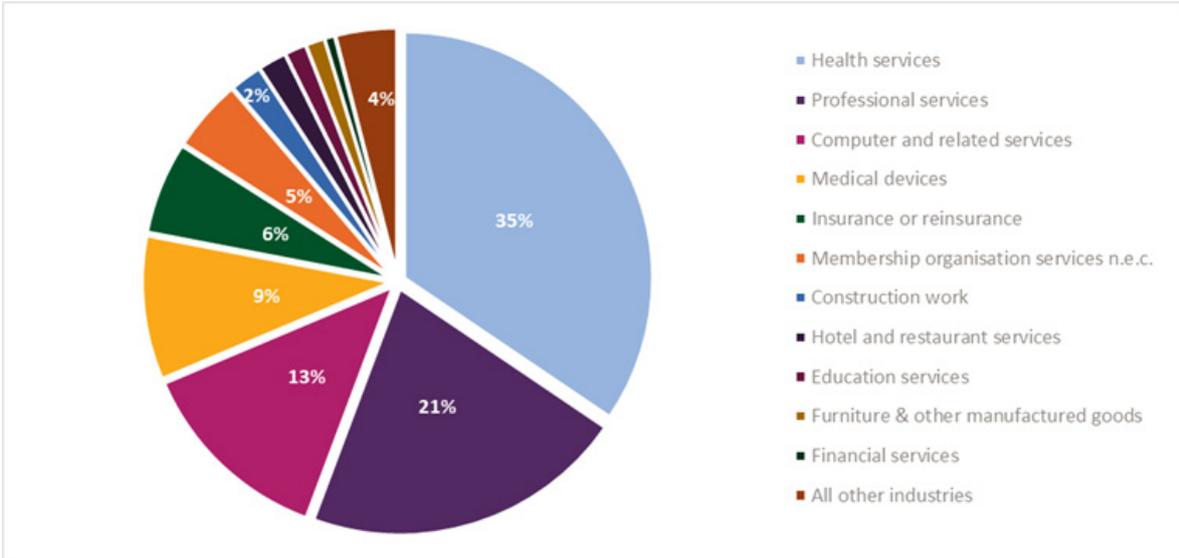
**630+**   
Suppliers and operational partners

# Structure, Operations & Supply Chains

Our primary spending areas include professional and medical services, IT services and infrastructure, medical supplies, and health insurance brokerage.

The top 20 suppliers at the group’s consolidated level operate within these spending categories, and we have maintained long-standing relationships with many of them for over a decade.

**Spend by Category:**

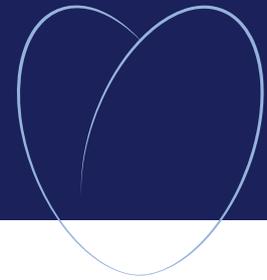


**What we buy:** health services, other business and professional services, retail trade, computer & IT services, medical precision instruments, wholesale trade, restaurant and catering services, construction, education and furniture categories.

**Who we buy from:** We only buy from Australian based Tier 1 suppliers and do not import directly any of our products or services.



# Risks & Actions



## Identifying, Assessing and Addressing Risk

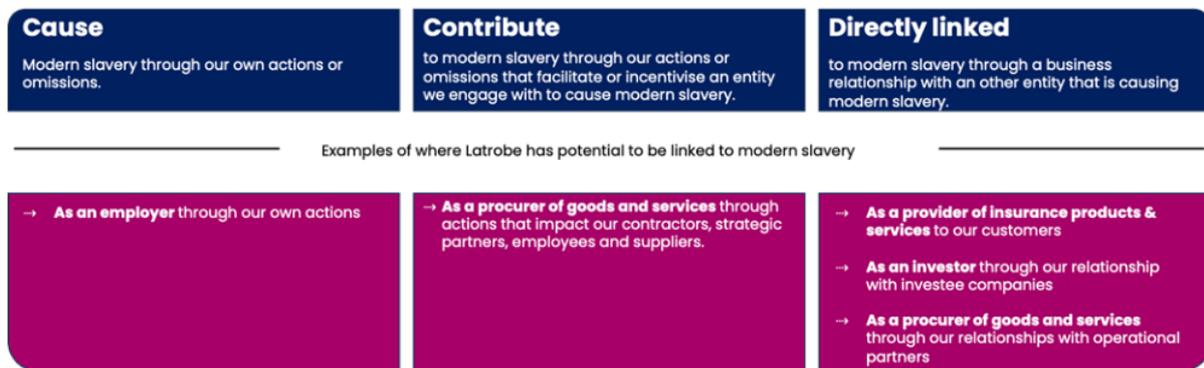
Latrobe Health’s modern slavery risk profile remains at low risk level because we are an Australian-based company, operating in a highly regulated financial services sector, and purchasing predominately from other Australian-based service companies.

No incidences of actual or suspected modern slavery came to our attention during the reporting period.

## Supply chain risk assessment and due diligence

Latrobe Health is committed to identifying possible instances of modern slavery within our supply chains & operations and takes a risk-based approach to managing these risks.

Addressing modern slavery requires a collective effort from everyone within our organisation, from board level to our casual employees. We continue to use the framework below to identify risks that are caused by Latrobe Health, directly linked to Latrobe Health, or for which Latrobe Health contributes.



## Areas of supply chain risk

### Current potential risks as an employer

The Fair Work Act 2009 provides a legal framework governing Australian employment relationship, including the effective enforcement of employment standards. They provide a balanced framework to secure the health and safety of workers and workplaces, including the proactive identification and management of risks to ensure employees are protected against harm to the health, safety and welfare.

Latrobe Health has implemented a comprehensive framework to address modern slavery, including a Whistleblower Protection policy, a Whistleblower Reporting & Response Procedure, an employee code of conduct, a Modern Slavery Policy, and an employee assistance program. These policies provide a platform for raising concerns related to potential modern slavery risks, offering assurance to our stakeholders, employees, and clients of our commitment to combating this issue.

As of June 2024, our entire workforce is domestic, with the majority of employees being Australian citizens or permanent residents. Australia is classified as a low-risk country according to the Walk Free Global Slavery Index 2023.

While our nurse recruitment agencies source AHPRA-registered candidates with full working rights in Australia, we maintain vigilance due to the potential risks associated with nurses originating from countries with higher prevalence of modern slavery.

# Risks & Actions

## Current potential risks as a procurer of goods and services

Through a commitment to develop our understanding and awareness, supplier mapping, and knowledge sharing with industry peers and stakeholders, we have developed a nuanced understanding of modern slavery risks. Our insights have revealed the dynamic nature of these risks, which can shift in response to supply shortages and global economic pressures.

This evolving landscape has influenced our modern slavery management agenda and program, enabling us to effectively monitor our impact and real-time risks. While our stable business activities have not led to significant changes in our modern slavery risk profile, this year we have implemented a third-party risk management platform to enhance scrutiny of our suppliers and gain a deeper understanding of all levels of our supplier tiers.

The platform uses a balanced, global Multi-Regional Input-Output (MRIO) table to perform supply chain mapping, which is regularly updated and draws from the most comprehensive and credible global data inputs.

The synthesis of global economic supply chain data is overlaid, via a proprietary algorithm, with the best available research and estimates of modern slavery incidences at the national and industry levels, including the Walk Free Foundation's Global Slavery Index (last updated in May 2023 ); the International Labour Organisation's Global Estimates of Modern Slavery; official reports published by the United States on International Child Labour, Forced Labour and Human Trafficking, and the database of modern slavery risk factors by country and sector developed internally by our external consultant.

The modern slavery assessment tool provides Latrobe Health with a comprehensive understanding of where potentially elevated areas of risk may be most concentrated in our supply chain

Our procurement & supply chain consolidated risks largely align with the entity-specific risks, primarily concentrated among medical supplies wholesalers, catering companies, cleaning services providers, and nurse recruitment agencies.

Our approach to this analysis is to Tier our Suppliers:

Tier 1: These are direct suppliers of the final product

Tier 2: These are suppliers or subcontractors for our tier 1 suppliers

Tier 3: These are suppliers or subcontractors for our tier 2 suppliers

Tiering suppliers allows us to manage risks, allocate resources, and focus on strategic partnerships more effectively. By categorising suppliers, we can prioritise due diligence activities, ensuring they meet stringent standards and mitigate potential disruptions. This approach enables better resource allocation, with high-tier suppliers receiving focused performance monitoring and support, while lower-tier suppliers are managed more efficiently.

# Risks & Actions

We have identified 12 moderate low risk companies (our highest risk category) following a detailed Tier 1 and 2 supplier analysis:

Risk Category	No of Suppliers
Low	620 companies
Moderate Low	12 companies
Moderate	0 companies
Moderate High	0 companies
High	0 companies

Our Top 10 sectors in Tiers 1 & 2 fall into the following categories:

Spend Category	Moderate low risk
Other businesses & professional services	17%
Textiles	16%
Retail trade services	11%
Wearing apparel	10%
Wholesale trade services	7%
Leather and leather products	4%
Furniture	3%
Electrical machinery & apparatus	3%
Communication equipment	2%
Financial intermediary services	2%

### Annual spend by risk level

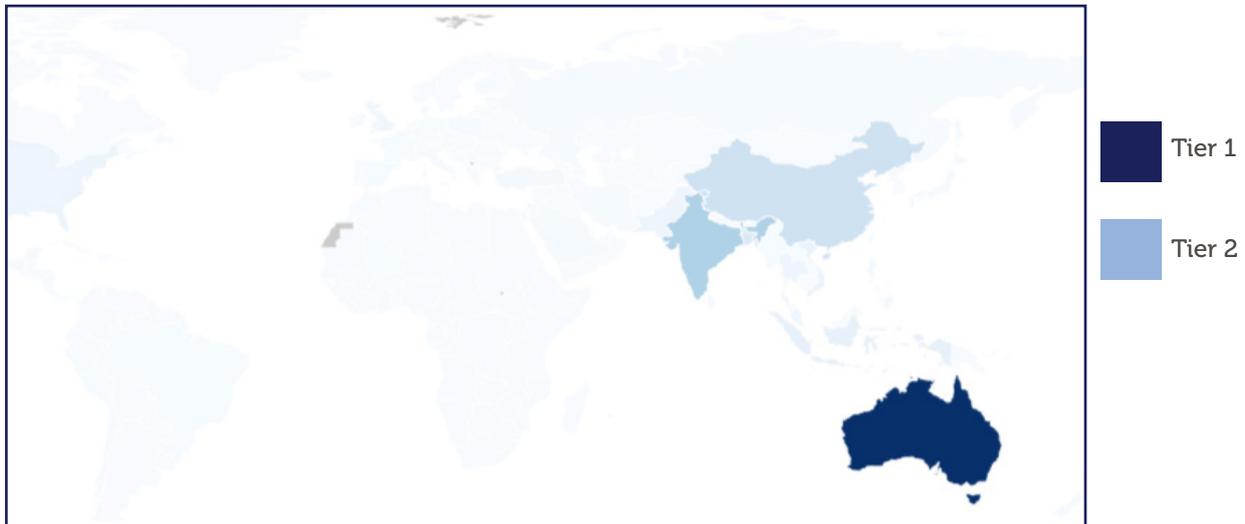
Annual spend (in \$) by risk level



# Risks & Actions

The image below demonstrates that Latrobe Health's Tier 1 suppliers are all sourced through Australia, whilst a small number of Tier 2 suppliers are located outside of Australia.

## Tier 1 & 2 suppliers by location



The risks linked to Tier 2 suppliers relate to the low value medical consumables which are generic commodities. These include but are not limited to tongue depressors, examination gloves, vomit bowls, cotton balls, tourniquets, catheters, patella hammers etc. These medical consumables are so far provided by three key Australian wholesalers which represent approximately 70% of our medical consumable spend.

Despite representing 17% of our spending, prostheses and implants spend are generally considered low risk due to the Tier 2 suppliers' predominantly European & USA locations.

## Current potential risks as an investor & operational partner

Latrobe Health believes that successful long-term investing aligns with supporting enterprises that prioritise sustainable business practices. We integrate material Environmental, Social, and Governance (ESG) factors into our investment processes to effectively manage long-term risks and returns.

Our objective of long-term value creation and investment decisions consider the following:

- Community Impact: Considering the positive or negative effects on communities.
- Environmental Impact Management: Including climate change mitigation and adaptation.
- Human Capital Practices: Focusing on labour practices, diversity, and safety.
- Human Rights Standards: Adhering to international human rights standards.

To further reinforce these principles, Latrobe Health has a Corporate Social Responsibility Policy that advocates sustainable practices.

Over the past year, we have continued to engage with our operational and investment partners, encouraging them to demonstrate their efforts to monitor and reduce modern slavery risks within their operations and supply chains.

During the financial year 2025, our Risk and Investment Committees have not identified any concerns related to potential modern slavery risks.

# Risks & Actions

## How we assess and address those risks

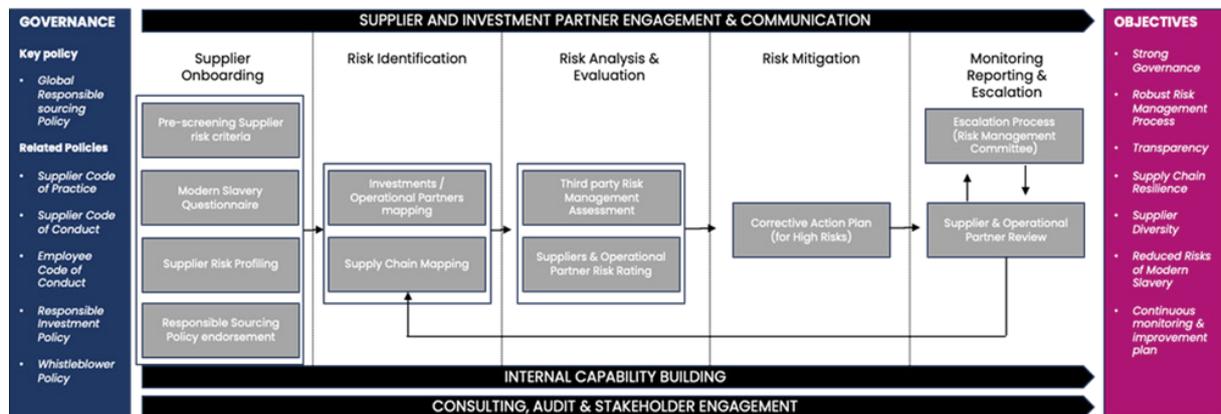
Latrobe Health continues to make steady progress towards our goal of combatting modern slavery.

Our efforts are underpinned by our Core Values and Leadership Principles, which act as a guiding force for our employees and relate to modern slavery eradication and human rights protections.

We take pride in our 3 lines of defense model which helps us identify, assess and address the risks:



To address modern slavery comprehensively, we employ a risk management framework that considers various perspectives and enables ongoing monitoring of high-risk suppliers, investments, and operational partners.



# Risks & Actions

Latrobe Health has integrated modern slavery into its core risk management framework, ensuring robust governance. The Risk Committee, reporting directly to the Board, enables active participation from the executive team and board members in reviewing and addressing modern slavery risks.

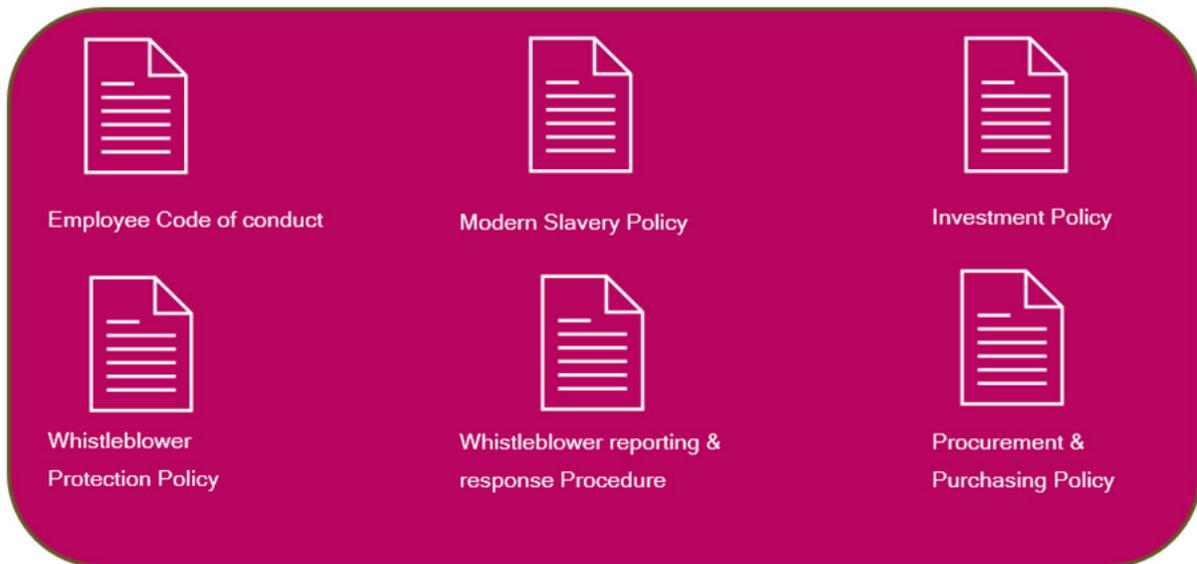
## Board of Directors

- Oversees the overall strategy and direction of the organisation.

## Risk Committee

- Provides oversight and guidance on risk management matters.
- Reports directly to the Board.

Latrobe Health has several policies & procedures in place to manage our risks and opportunities linked to modern slavery. This allows to manage our risks through standards and expectations set for our people and organisations we interact with.



# Assessing the effectiveness of our actions



As part of our commitment to eliminating all forms of modern slavery within our influence & control, we conduct ongoing reviews of the effectiveness of our actions.

### Building our Capability

Build our internal capability in modern slavery risk management and compliance.



### Supplier Check In

We engage suppliers regularly to monitor delivery against committed actions.



### Training and Awareness

We monitor the percentage of our completion of our modern slavery training (100% compliance in FY25).



**Employee Consultations**  
To make sure that access to Employee Assistance Programs & Whistleblowing channels are active & effective..



**Supplier Onboarding**  
We refine the supplier risk level on an ongoing basis, based upon our experience with them & 3<sup>rd</sup> party risk assessments.

Our recent review has highlighted opportunities to enhance our action plan on modern slavery. Specifically, we need to refine our supplier onboarding process and foster greater collaboration with Tier 1 and 2 suppliers.

In addition, the success of our modern slavery training for new staff and key procurement stakeholders underscores its effectiveness. During FY25 we reviewed our modern slavery training and provided a new course as part of our compliance training activities.



# Assessing the effectiveness of our actions

## Supplier Engagement

Latrobe Health continues to evolve its risk-based priority engagement with existing and new suppliers.

We have recently commenced leveraging an external provider's specialist Supplier Platform to distribute a targeted Supplier Self-Assessment Questionnaire and manage supplier responses. We will be able to progressively distribute our Supplier Self-Assessment Questionnaire to existing suppliers which can be identified by Tier or risk level.

For new suppliers, the Questionnaire will be issued to relevant suppliers as part of our supplier onboarding and due diligence processes. This approach encourages an efficient use of resources and promotes consistency across platform participants.

Latrobe Health continues to incorporate provisions in direct supplier contracts that specifically address modern slavery issues. This includes an express requirement for suppliers to notify us of reasonably suspected and known instances of modern slavery in their own supply chains and operations.

Our Supplier Code of Conduct will provide guidance regarding the modern slavery processes at Latrobe Health and our proposed approach to positive supplier engagement and collaboration.

Suppliers will receive a copy of the Supplier Code of Conduct during the onboarding process. The Code of Conduct affirms Latrobe Health's approach of open dialogue about modern slavery risks, working together to reach better outcomes for employees, members, and communities. The Supplier Code of Conduct are planned for full implementation in the next reporting period.

## Our compliance initiatives

Latrobe Health's approach to modern slavery compliance is an evolving and ongoing process of risk assessment and compliance activities that are embedded into business-as-usual day-to-day operations and aims to build on the activities that were reported in our previous Modern Slavery Statements.

Our key exposure to modern slavery risks arises from our sourcing and other third-party dependencies.

The supplier management platform we use across our entire business is supported by our supplier management frameworks, policies, processes, and systems. Our Supplier Code of Conduct continues to be central to the minimum standards we expect from our suppliers in relation to human rights, working conditions and ethical conduct for employees, contractors, and business operations. The supplier management platform provides the enabling technology for the ongoing risk assessment and monitoring our compliance activities.

Our Modern Slavery compliance obligations are monitored by our risk and compliance function and reported to the People and Culture Committee, and respective entity Boards.

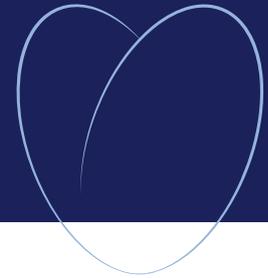
# Assessing the effectiveness of our actions

## Next Steps

In FY2026, we will continue to prioritise three strategic initiatives to combat modern slavery within our supply chains and operations: Governance, Training & Awareness and Due Diligence. These pillars require sustained effort and continue to be the focus.

PILLARS	FOCUS AREA
 <p><b>Governance</b></p>	<ul style="list-style-type: none"> <li>• Through the ESG Working Group establish a structured Modern Slavery action tracker, and regular meeting cadence.</li> <li>• Strengthen our procurement processes and embed Supplier Code of Conduct practices.</li> <li>• Where applicable, incorporate modern slavery into our policy reviews.</li> </ul>
 <p><b>Training &amp; Awareness</b></p>	<ul style="list-style-type: none"> <li>• Continue to raise awareness of modern slavery and human rights with our corporate employees and third parties.</li> <li>• Continue to ensure all required employees undertake modern slavery training and awareness module at least annually.</li> <li>• Actively participate in the PHI Modern Slavery Community of Interest</li> </ul>
 <p><b>Due Diligence</b></p>	<ul style="list-style-type: none"> <li>• 100% due diligence performed against our Tier 1 and 2 suppliers.</li> <li>• Strengthen the supplier onboarding process, including the supplier self-assessment questionnaire to gather information on modern slavery incidents and mitigation strategies.</li> <li>• Fully implement our third-party risk management platform to streamline assessments.</li> <li>• Analyse spend data to assess the top 20 suppliers in terms of their compliance with Modern Slavery legislation.</li> <li>• Establish a monitoring program to review the progress and actions of key suppliers in addressing modern slavery risks.</li> </ul>

# Closing Statement



## Consultation Process & Approval

This statement has been prepared by Latrobe Health in consultation with Maryvale Private Hospital and it has been approved by the Board of Latrobe Health Services on 27 November 2025.

The process of consultation involved:

- review by the Executive Leadership Team, which is comprised of the functional leads with key responsibility for the day-to-day management of the Group
- input via email from the various relevant internal stakeholder groups (including finance, risk and human resources).
- inputs from a consulting firm, specialised in procurement and its associated modern slavery risks.

This statement is made in accordance with section 14 of the Australian Modern Slavery Act 2018 (Cth). It represents the two Reporting Entities' statement on modern slavery for the financial year ended 30 June 2025.

**Ormond Pearson**

**Board Chair**

**27 November 2025**

## MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

### **Principal Governing Body Approval**

This modern slavery statement was approved by the *principal governing body* of

Latrobe Health Services

as defined by the *Modern Slavery Act 2018 (Cth)*<sup>1</sup> (“the Act”) on 11/27/2025

### **Signature of Responsible Member**

This modern slavery statement is signed by a *responsible member* of

Latrobe Health Services Board

as defined by the Act<sup>2</sup>:



Orrmond Pearson

Chair

### **Mandatory criteria**

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	4
b) Describe the reporting entity’s structure, operations and supply chains.	7-8
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	9-12
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	13-14
e) Describe how the reporting entity assesses the effectiveness of these actions.	15-16
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	18
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	5-6

\* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement ‘Do not own or control any other entities’ instead of a page number.

\*\* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity’s principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.



### Keep in touch

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W: [www.latrobehealth.com.au](http://www.latrobehealth.com.au)

A: download the app