



Modern Slavery Policy

Vitura Health Limited

ABN 59 629 071 594

(Company)

1. Purpose of policy

Vitura Health Limited (herein the 'Company') is committed to limiting the risk of modern slavery practices in Company business and supply chain. This policy supports the Company's commitment and underpins our modern slavery statement.

2. Scope of policy

This policy applies to all subsidiaries of Vitura and all personnel of the Company including employees, Directors, labour hire contractors, independent contractors, other representatives of the Company, and businesses in our supply chain.

Requirements related to the Modern Slavery Act 2018 (Cth) may be included in specific business contracts or may be included in the policy. All relevant parties are expected to comply.

Non-compliance with this policy may lead to contract termination or the end of the Company's business relationship with a related company such as a supplier, or in the case of employees may lead to disciplinary action, up to and including dismissal.

3. What is modern slavery?

Modern slavery is depriving a person of freedom for commercial gain and in violation of fundamental human rights.

It describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery involves serious exploitation, not sub-standard working conditions or the underpayment of personnel, although this may be unlawful for other reasons.

Modern slavery can take many forms including:

- slavery - owning a person, trading in slaves or financing slave trading (human trafficking);

- forced labour - forcing a person to work by coercion or threats (and servitude is when that person's freedom is significantly restricted)

- forced marriage - a marriage without free and full consent (e.g., due to lack of understanding or duress/coercion);

- debt bondage - a person works to pay off a large debt, for an unlimited time or where the value of the work is not applied to the debt;

- deceptive recruiting - a recruiter charges a fee for the job offer, confiscates identity documents, deceives a person about personal freedom or their ability to leave the job; and

- child labour - not always unlawful but not tolerated by the Company when it involves exploiting children, depriving them of education, making them work in unsafe working environments.

Modern slavery can be complex and multi-faceted and can be difficult to spot.

4. What are indicators of modern slavery practices?

Modern slavery indicators may include where a person:

- (a) is not in possession of their own passport, ID or travel documents;
- (b) is acting as though they are being instructed or coached by someone else;
- (c) allows others to speak for them when spoken to directly;
- (d) is dropped off and collected from work;
- (e) is withdrawn or appears frightened, or to have physical indicators of slavery, such as injuries;
- (f) unable to contact friends or family freely;
- (g) has limited social interaction or contact with people outside their immediate environment;
- (h) story contains obvious errors;
- (i) acts with hostility or have difficulty in concentrating due to trauma;
- (j) has few possessions;
- (k) has little or no control over their finances or no access to a bank account, or they are being significantly overcharged for their accommodation; and
- (l) is living in a very poorly maintained and overcrowded place.

These indicators are not exhaustive and do not necessarily mean there are modern slavery practices. Sometimes there may be other reasons or circumstances that indicate that something is not right.

5. Why does the Company want to limit risks of modern slavery practices?

Limiting modern slavery practices makes good business sense, protecting our workers and our reputation.

It also supports us in assessing and addressing modern slavery risks, as required by modern slavery legislation

6. What are the Company's responsibilities?

The Company endeavours to:

- (a) prepare a modern slavery statement as required by Australian law;
- (b) identify and address modern slavery risks in our business and supply chain; and take steps to raise awareness of modern slavery risks, including by having this policy.

7. What are our stakeholder's responsibilities?

All personnel must take reasonable steps to ensure the Company and supply chain is free of modern slavery practices.

Regardless of seniority or the nature of the business relationship, all personnel must pay close attention to the high-risk areas identified in our Modern Slavery Statement, particularly supply chain and outsourcing in jurisdictions without adequate safeguards.

Some areas of the Company are likely to have more exposure than others, including procurement and supplier on-boarding, people and culture, finance, legal, technology and leadership.

Examples of specific responsibilities include:

- (a) participating in all training, including in this policy
- (b) leading by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc., to ensure we know who is working for us;
- (c) remaining alert to indicators of slavery (see above);
- (d) using only approved contracts which include modern slavery clauses; and
- (e) obeying Company instructions regarding modern slavery.

Turning a blind eye is unacceptable and if you reasonably suspect there may be modern slavery practices evident, reporting is mandatory.

8. How to report slavery concerns?

If a reasonably held suspicion of modern slavery practices is raised or made evident, personnel should raise concerns immediately to the Company's Legal department who will decide a course of action and provide any further advice.

If there is immediate danger call the Police (Triple Zero 000) - do not tackle a situation on your own as dangerous criminals can be behind modern slavery and human trafficking.

Not all victims want to be helped and sometimes, reporting a suspected trafficking case puts the potential victim at risk, so it is important that unless there is immediate danger, you discuss your concerns first with Legal before taking further action.

Remain vigilant - awareness and actions may stop someone from being exploited or abused.

9. Policy review

The Company Board of Directors is responsible for this policy and will review reports of material slavery concerns.

This policy may be amended, replaced or removed. The published current version will be on the Vitura Company website / Corporate Governance.

May 2025