

Healthcare Australia's Modern Slavery Statement FY2023

For reporting period 1st of January 2023 to 31st of
December 2023

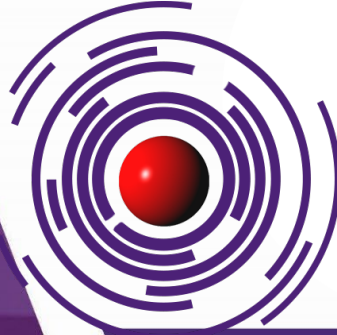


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Modern Slavery Statement FY2023

Introduction

Healthcare Australia (ACN 108 180 589) Modern Slavery Statement (the Statement) is made pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (the Act). This Statement sets out the actions and strategies to identify, assess, and address modern slavery risks across operations and supply chains for the 2023 financial year reporting period, from 1st of January 2023 to 31st of December 2023.

Apollo Holdco Pty Ltd, Healthcare Australia Pty Ltd, and all subsidiaries (together referred to as HCA) is a reporting entity for the purposes of the Act as it is a company that conducts business in Australia with a consolidated revenue of over A\$100 million during the reporting period.

Healthcare Australia is committed to ethical operations, including limiting the risk of modern slavery occurring within its own business, and related supply chains other business relationships.

We consider the definition of modern slavery in line with the Act which may include trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

Overview

HCA is one of Australia's largest healthcare providers and predominately provides clinical and support services in the healthcare industry, including the provision of services supporting community and corporate health.

HCA's principal business activities are:

- Recruitment – HCA places healthcare professionals into private and public hospitals on a short or long term or permanent basis. We also place healthcare professionals in home and residential facilities.
- NDIS and Disability – HCA is a registered NDIS provider and provides customised NDIS support for eligible participants such as nursing and complex care, supported independent living and community services
- Allied Health – HCA provides specialist allied health services in residential aged care, community care and NDIS.
- Aged Care – HCA provides aged care services including home support, nursing & specialist care, family & respite, and social support care.
- Corporate Health Services – HCA provides corporate health programs to workplaces including vaccinations, general health checks and ergonomic assessments.
- Training and Courses – HCA delivers mandatory training, accredited qualifications and continuing professional development online and face-to-face for individuals and organisations.
- Large Health Projects and Programs – HCA develops and delivers large bespoke comprehensive health programs for governments and health organisations.

Supply Chain

Supply chain and modern slavery risks

HCA predominantly supplies health workforces to the Australian Health sector and procures a range of goods and consumables to support the delivery of these services. HCA has assessed these as having a relatively low modern slavery risk exposure through its direct suppliers due to most being Australian organisations, that are required to comply with the Modern Slavery Act. HCA is working on the identification of its suppliers' supply chains.

Supply chain - workforce

HCA predominately provides human resources, with staff costs accounting for 96.2% of total expenditure.

All core business activities are undertaken in Australia and New Zealand, which are considered as low risk for modern slavery occurrences. In addition, several measures are in place which further reduce this risk.

These measures include:

- Vetting – All HCA staff are recruited through HCA's stringent recruitment programs and are vetted through HCA Australia's compliance and competency standards, including all international staff.
- Visa controls – International visa holders are vetted and approved for work in Australia by the Department of Home Affairs to ensure compliance with their visa terms and conditions. HCA ensures that no employees are indentured or restricted and the only restrictions that may exist are imposed by the Department of Home Affairs on visa workers.
- Contracts – All staff are employed under contracts, which are based on awards or industry requirements under the *Fair Work Act 2009*.
- Policies – Working standards and conduct are supported by HCA's Code of Conduct, and HCA's Whistleblower Policy which supports anonymous and protected reporting of any breaches.

Supply chain – other goods and services

Goods make up a minority of HCA's total expenditure (2.1%). This is comprised of operating expenses (1.8%), Consumables (0.2%) and Uniforms (0.1%). The majority being 97.9% of total expenditure is on operating expenses that include Staff, Marketing & Communications, and Facilities.

HCA sources the majority of goods and services from Australian providers and suppliers, with only minimal expenditure being attributed to international marketing spend. This spend is with large reputable multinational corporations.

Risks of Modern Slavery Practices in the Operations and Supply Chains

During the reporting period, the key actions taken to identify assess and address modern slavery risks included:

- Implementation of the supplier screening process. Suppliers categorised in a high-risk industry (electronics, cleaning and clothing), are completing Modern Slavery Supplier Questionnaire as part of their application process. 134 existing suppliers were identified in these high-risk sectors and they have been requested to complete the supplier questionnaire.
- Each potential supplier is questioned on their policies and procedures for the management of modern slavery risks, with responses reviewed and stored by the procurement team.
- Development of Awareness Modern Slavery training module course which will be required to be completed by all HCA suppliers, Senior managers, procurement team and key employees involved in recruitment and engagement of contractors.

Governance

HCA has continued its focus on delivering the highest ethical, safety, clinical and professional standards, and to fully embrace its responsibility as a healthcare provider to address modern slavery risks. HCA maintains an assessment of minimal modern slavery risk within its current operational and service requirements.

Corporate Governance

HCA continues to review and audit policies and procedures to ensure that there are sound governance processes in place to meet modern slavery compliance requirements. HCA conducts reviews of policies, such as our Code of Conduct and Whistleblower, to ensure inclusion of modern slavery clauses to increase employee awareness of the risks of modern slavery in the business and supply chain.

Policy Framework

HCA has a framework for responsible and sustainable governance that is managed through the business's certified Quality System under ISO 9001:2015. HCA's policy framework supports the ethical and responsible operation of the business and endeavors to identify exposures in business operations and supply chains.

Key documents related to the identification and management of modern slavery risks include:

- Code of Conduct
- Whistleblower Policy
- Supply Chain Integrity Policy
- Risk Management Strategy

Summary of actions undertaken

HCA continues to improve the mitigation of modern slavery risks in the supply chain. Over the past two financial years, HCA has been making progress, coordinating different actions across the organisation to address modern slavery risk.

This includes:

- Creation of ESG Committee, where the Modern Slavery improvement plan is part of the meeting agenda.
- Identification of high-risk existing suppliers during the risk screening process.
- Implementation of HCA Supplier Questionnaire.
- Development of Modern Slavery awareness training course.
- Inclusion of modern slavery information in the healthcare workforce induction training module.

Future actions

HCA will continue implementing measures to enhance the management and mitigations of modern slavery risks.

In the future, it is anticipated that these activities will include:

- Creating a supplier code of conduct
- Confirm the countries that suppliers supply products or services from.
- Introducing modern slavery clauses into contract templates

Effectiveness

HCA assess the effectiveness of the risk mitigation actions through the HCA supplier screening process and incident reporting system. There were no reported incidents of modern slavery in FY2023.

We continue our commitment to improve the response to modern slavery risks continuously. Progress of the modern slavery improvement plan is regularly discussed at the ESG Committee. Feedback from the committee members is used to inform decision-making and future activities within the plan.

Consultation

This statement is made pursuant to the Act and constitutes HCA's Modern Slavery statement in respect of the 31 December 2023 financial year. It is approved by the principal governing body of Healthcare Australia, being its Board of Directors.

The related HCA entities all have the same Board of Directors, and therefore Directors of all related entities have been consulted in preparing this Modern Slavery Statement.

Signed,



John Pappalardo
Chief Executive Officer, Healthcare Australia Pty Ltd

Dated: 28/06/2024