



Ashford Hospital
Flinders Private Hospital
The Memorial Hospital

Modern Slavery Statement

1 January 2025 to 31 December 2025

Reporting Criteria 1: Reporting Entity

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) in respect of Adelaide Community Healthcare Alliance Incorporated (ABN 99 367 793 956) and its wholly owned subsidiary, ACHA FPH Property Pty Ltd (ABN 13 068 752 214), both not-for-profit entities, consolidated and trading as “ACHA” (ACHA).

This Modern Slavery Statement is submitted by ACHA in respect of the 12-month period ending 31 December 2025.

Reporting Criteria 2: Structure, Operations and Supply Chains

Overview

ACHA is a community-based and not-for-profit private hospital group in South Australia.

ACHA is a reporting entity for the purposes of the Act, having met the reporting threshold in the Reporting Period. Annual reporting information about ACHA is available from the Australian Charities and Not-for-profits Commission (ACNC).

ACHA has a contractual agreement with Healthscope Operations Pty Ltd (Healthscope) that sees ACHA retain responsibility for strategic direction and governance while Healthscope (**Manager**) takes care of the daily management of operations.

This means the Manager enters contracts on behalf of ACHA for the majority of goods and services required for the operation of the ACHA hospitals. The Manager acquires goods and services on behalf of ACHA where there is a clear nexus between the goods or services provided under the contract and the operations conducted at the ACHA hospital.

Due to the nature of the management relationship between Manager and ACHA, the Manager provides ACHA with:

- All material contracts entered into on behalf of ACHA as part of the Manager’s procurement activities, at the end of every financial year; and
- A copy of the Manager’s Modern Slavery Statement.

During the reporting period, the Manager underwent significant organisational change, including receivership. As a result, their operational priorities were focused on maintaining critical business continuity, patient care, and essential governance processes.

All services provided by the Manager to ACHA under the terms of the contractual agreement, continued as normal during the reporting period.

Our people are known for achieving exceptional clinical outcomes, transparent public reporting and positive patient feedback that leads the industry. No matter the role, every day our people make a difference to the lives of our patients and their families and it is a privilege to be part of their care.

ACHA is a values-driven organisation and insists that its employees go beyond just complying with laws, regulations and with basic standards of personal conduct. We understand that creating a culture for employees to develop, work safely and thrive, has a profound impact on our business, our patients, their families and our doctors. Along with our Manager, ACHA is committed to identifying and addressing the risk of modern slavery within our operations and supply chains. As both a purchaser and provider of services, we recognise our responsibility to take meaningful steps to prevent modern slavery practices including slavery, forced labour, and involuntary servitude is understood. This aligns with our core values and ethical foundations.

We take safety seriously. It underpins our values and reflects our commitment to protecting ourselves and those around us. At ACHA we proactively identify and address unsafe conditions and not accepting injury as part of working at ACHA. We are truly committed to creating a safe workplace for everyone, because we care.

ACHA's business and operations

ACHA is an Association, incorporated under the *Associations Incorporation Act 1985 (SA)* and governed by a Board of six Directors in accordance with its Constitution.

ACHA is registered as a charity by the Australian Charities and Not-for-profits Commission (ACNC) and as an income tax exempt charitable entity under Subdivision 50B of the Income Tax Assessment Act 1997.

ACHA's operations are comprised of:

- Ashford Hospital, complemented by an Emergency Service
- Flinders Private Hospital
- The Memorial Hospital

ACHA's corporate office is located at 1 Flinders Drive, Bedford Park, SA 5042.

ACHA provides a wide range of high quality healthcare services through its collection of acute medical, rehabilitation, surgical and obstetric hospitals. We engage a broad range of highly skilled professionals to deliver these services, as employees, contractors, doctors and partners.

ACHA employees 2,550 people treats in excess of 75,000 patients per year, delivers more than 1,200 babies and performs over 55,000 episodes of care.

A subsidiary of ACHA, ACHA FPH Property Pty Ltd, was established for the development of Flinders Private Hospital, for the purpose of fulfilling the requirements of the Flinders Medical Centre Private Development Project. It is managed by a board of three Directors (who are also Directors of ACHA) in accordance with its Constitution. It is registered as a charity and as an income tax exempt charitable entity under Subdivision 50B of the Income Tax Assessment Act 1997.

Also included in this Statement is the ACHA Foundation Incorporated, a small charity with annual revenue usually less than \$100k. It has two common Directors with ACHA, uses the same policies and procedures and accesses shared suppliers.

Supply chain

ACHA's relationship with Healthscope provides access to, and support for, a range of operational and corporate management functions. To that end, the Manager has developed a comprehensive approach to achieving Modern Slavery Act compliance, which has been reviewed and evaluated by the ACHA Board to be both appropriate and applicable to ACHA operations and its supply chain.

ACHA's supply chain includes a diverse range of local and international suppliers, with most relationships managed directly through formal commercial agreements undertaken by the Manager. The goods and services procured span from local contingent labour and travel services to corporate office supplies and critical medical consumables.

The largest areas of expenditure are clinical equipment and medical materials, which are sourced by the Manager's centralised procurement team. This team comprises dedicated professionals who are required to complete the Manager's Employee Code of Conduct training, as well as specific training on modern slavery risks, including the Australian Government's *Modern Slavery in Public Procurement* module provided by the Attorney-General's Department.

Reporting Criteria 3: Risk of Modern Slavery Practices in our operations and supply chains

ACHA is committed to supporting all efforts to stop modern slavery.

ACHA's operations are solely based within Australia and the Manager's primary operations are also based in Australia, where the risk of direct involvement in modern slavery practices is considered low. Greater risk may arise within extended supply chains, particularly those involving international sourcing.

Suppliers for ACHA and the Manager span both domestic and international markets and include manufacturers, distributors, labour agencies, brokers, consultants, and other service providers.

Key spend categories include:

- **Clinical products and equipment** – such as prostheses, medical consumables, surgical equipment, instruments, and pharmaceuticals
- **Utilities** – including gas and electricity
- **Indirect Corporate spend** – such as IT contractors, professional services, software licences, and hardware
- **Facilities management** – such as maintenance, security and fire protection services
- **Site services** – including contingent labour, cleaning, catering, waste and linen services and biomedical engineering
- **Corporate services** – such as travel and entertainment

The Manager has identified potential modern slavery risks in certain supply categories, particularly where goods are manufactured or distributed in higher-risk jurisdictions, including China, Hong Kong, Taiwan, Malaysia, Pakistan, and India.

The Manager also monitors guidance issued by the Anti-Slavery Commissioner regarding high-risk domestic sectors, including cleaning and food services, and incorporates these considerations into the risk assessment framework, including the use of targeted supplier declarations where appropriate.

The most significant risk relates to limited transparency of second and third-tier suppliers—commonly referred to as “downstream” suppliers—where modern slavery practices may be more prevalent and difficult to detect.

In addition, the Manager recognises that, without consistent modern slavery-specific training and awareness for all staff, there is a risk that indicators of modern slavery may not be identified or escalated in a timely manner by employees or suppliers.

Accordingly, the Manager has identified the following primary risk areas:

1. Direct engagement with suppliers operating in higher-risk countries; and
2. Indirect exposure through downstream supply chains visibility remains limited.

In addition to risks identified within the Manager's and ACHA's supply chain, the following risk relates to internal capability and readiness to effectively identify and manage modern slavery risks.

- Limited awareness or training, which may impact the consistent identification and escalation of modern slavery risks.

Reporting Criteria 4: Assessing and addressing modern slavery risks

Internal Policies and Practices

The Manager operates under an Enterprise Risk Management Framework overseen by their Audit, Risk & Compliance Committee. This framework, underpinned by their Risk Management Policy, supports the identification and management of enterprise-wide risks, including modern slavery. The ACHA Board has also endorsed an ACHA Risk Management Policy.

The Manager's Procurement team, with oversight and support provided by their legal function, has operational responsibility for managing modern slavery risk.

ACHA and the Manager are committed to upholding our Employee Codes of Conduct, which reflect our core values and the ethical expectations of the broader community. Both Codes explicitly prohibits all forms of modern slavery and applies to employees, contractors, subcontractors, consultants, Visiting Medical Officers and agency staff.

The Code promotes ethical conduct, a respectful and safe workplace, awareness of the consequences of breaches, and accountability for upholding our values.

The Employee Code of Conduct is supported by a comprehensive suite of corporate policies and procedures applicable to all ACHA facilities and staff. This includes a robust Whistleblower Policy, which provides access to a Toll-Free Ethics Hotline, an internal Whistleblower Protection Officer, and a structured response framework to address reported concerns.

To support awareness and compliance, ACHA (along with the Manager) deliver mandatory eLearning modules, including online training module for the Employee Code of Conduct, to ensure employees understand and apply these expectations in their roles.

Supplier Code of Conduct

The Manager also maintains a Supplier Code of Conduct, which outlines expectations of ethical business practices and compliance with modern slavery laws. Suppliers are required to operate lawfully, act with integrity, and take reasonable steps to ensure their supply chains are free from modern slavery. Suppliers are expected to cascade these standards and address identified risks.

Access to the Manager's Supplier Code of Conduct is publicly accessible via the Manager's website: <https://healthscope.com.au/internal-pages/sustainability>

Actions Taken

The Manager (& ACHA) applies a continuous improvement approach—*Plan, Do, Check, Act*—to its modern slavery response.

Policy changes implemented by the Manager are, in the main, subsequently adopted by ACHA for their policies. During the reporting period, as stated previously, Healthscope underwent significant organisational change, including receivership. As a result, the Manager continued to rely on its existing policies, frameworks and processes to assess and address modern slavery risks within its operations and supply chains. This included embedding modern slavery considerations into supplier onboarding and contracting processes, with 48 supplier agreements executed during the period incorporating standard modern slavery provisions that require suppliers to comply with applicable modern slavery laws, take reasonable steps to address risks within their own supply chains, and notify the Manager of any actual or suspected modern slavery incidents.

ACHA (and the Manager's) procurement policies and procedures support the identification and management of third-party risks, including modern slavery, and are applied on a risk-based basis. Suppliers are also required to complete an extensive Due Diligence Questionnaire covering WHS, anti-bribery and corruption, and modern slavery. These existing mechanisms and processes continue to support the management of modern slavery risks, particularly those associated with higher-risk jurisdictions and reduced visibility within downstream supply chains. The Manager recognises the importance of ongoing enhancement of its modern slavery risk management approach, including supplier engagement and targeted awareness activities, as organisational priorities stabilise.

Reporting Criteria 5: Evaluating effectiveness and looking ahead

ACHA and the Manager recognises the importance of continual improvement in efforts to combat modern slavery.

The Manager continues to refine and strengthen its modern slavery risk management approach and has identified that awareness and understanding of modern slavery indicators remain key factors in the effective identification and escalation of risks. While ethical conduct and compliance expectations are supported through existing policies and training, the Manager recognises that targeted, modern slavery specific awareness initiatives would further strengthen its ability to detect and respond to potential risks within its operations and supply chains.

While progress has been made across policy, training and due diligence in prior reporting periods, the Manager recognises the need to continue enhancing internal response protocols as their organisational priorities stabilise.

In the current reporting period, the Manager's progress was limited for several priorities identified in the previous reporting period due to the Manager's organisation changes. The Manager has carried forward these commitments as priorities for the next reporting period.

Key Focus Areas for the Next Reporting Period:

Consistent with the commitment to continuous improvement, key areas of focus for the Manager in the next reporting period include:

- Continued audit and review of selected suppliers operating in higher-risk jurisdictions or supply categories;
- Consideration of the development of a standalone Modern Slavery Policy, subject to executive endorsement;
- Ongoing review of relevant corporate and procurement policies to strengthen guidance for employees in identifying and escalating modern slavery risks;

- Evaluation and refinement of procurement led supplier due diligence processes to support greater consistency and risk-based application; and
- Increased employee engagement and targeted modern slavery awareness and training initiatives, in partnership with People & Culture, particularly for roles involved in procurement, supplier management and contract oversight.

To support improved monitoring and accountability, the Manager intends to implement measurable indicators over time, including coverage of modern slavery training for relevant employee cohorts and the proportion of critical suppliers subject to due diligence assessment.

Oversight of these initiatives will be maintained through the Manager's Audit & Risk Committee, with regular reporting to their Executive Leadership Team. Updates will be presented to the ACHA leadership team on a periodic basis as determined by the business.

Termination of Contractual Agreement between ACHA and the Manager:

The ACHA Board has determined that the contractual agreement with the Manager will be terminated with the formal process for the transition of services commencing during the 2026 reporting period.

By mid-2027 this extensive and complex process is expected to be completed. At this time ACHA will be fully responsible for the management of modern slavery within the organisation.

During the 2026 reporting period, groundwork will commence to ensure ACHA's frameworks, policies and processes to assess and address modern slavery risks within our supply chains and operations remain robust to fulfill our commitment to combat modern slavery.

Reporting Criteria 6 & 7: Consultation, endorsement and other matters

During the reporting period this statement covers, ACHA consulted with its Manager, Healthscope, and the Directors of ACHA FPH Property Pty Ltd and the ACHA Foundation in the development of this Statement.

The Manager also consulted with the Directors of their owned and controlled entities plus input from their key internal stakeholders, including Procurement, Operations, and Legal through targeted consultation and management review.

The ACHA Board of Directors has approved this statement on behalf of ACHA and the entities it owns or controls, and has authorised it to be signed by the Chairman.



Tony Johnson

ACHA Board Chairman

17 June 2026