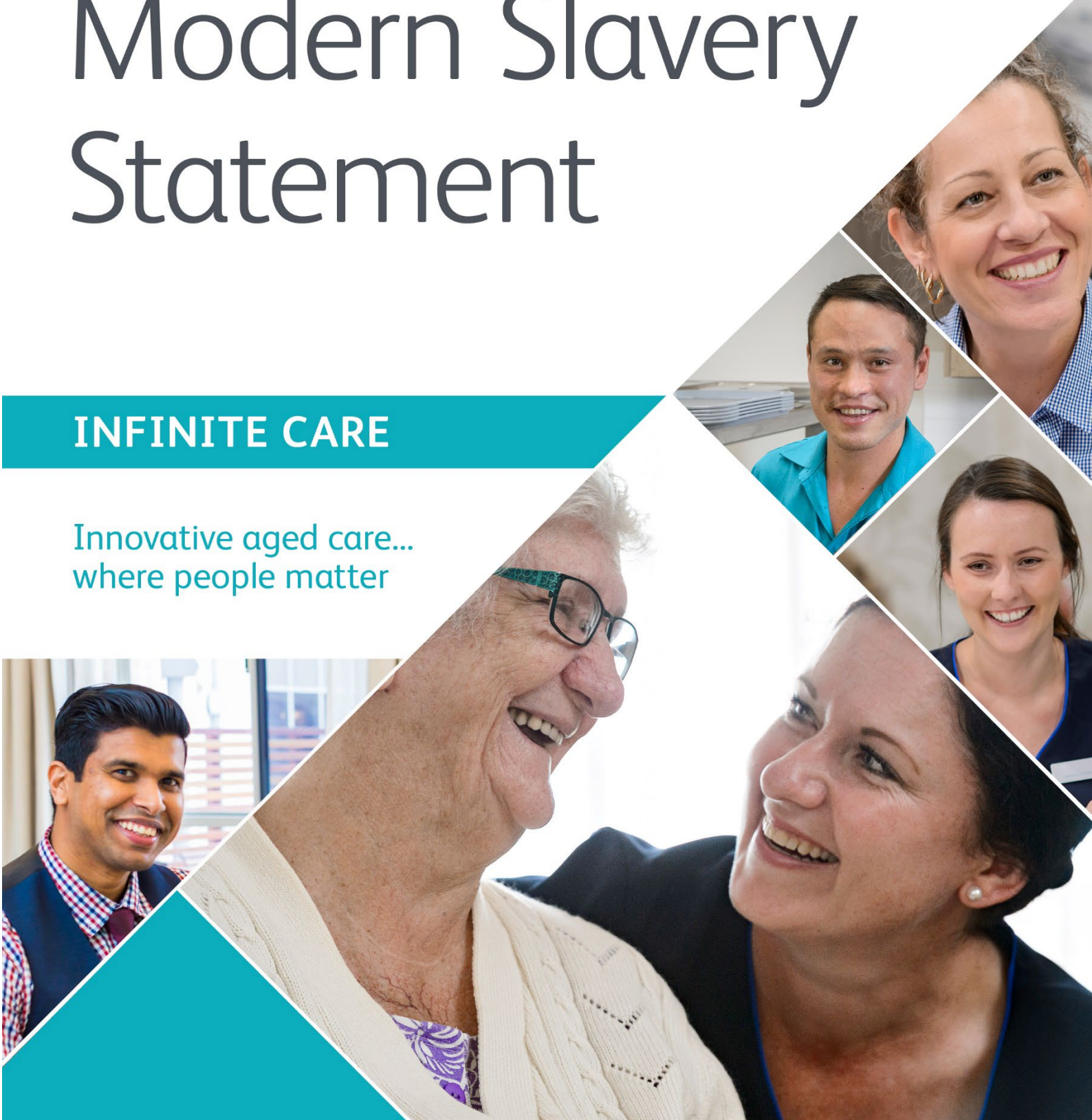


# Modern Slavery Statement

INFINITE CARE

Innovative aged care...  
where people matter



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## Introduction

Infinite Care is an Australian residential aged care provider delivering quality aged care to the elderly.

This Modern Slavery Statement is submitted as a joint statement in accordance with the *Modern Slavery Act 2018* (Cth) for the FY 2022/23 reporting period. It is submitted by Infinite Australia Aged Care Holdings Pty Ltd and its related entities together form the Infinite Care Group (Infinite Care, we, us). This Statement sets out the actions we have taken, and continue to take, to reduce the risk of modern slavery occurring without our business or supply chains.

Infinite Care has worked to ensure the right policies are in place to reduce the risk of modern slavery in our supply chain and will continue to work closely with our suppliers to identify any risks.

We understand that eradicating modern slavery is a gradual process, yet our dedication to enhancing and cultivating effective measures for detecting, overseeing, addressing, and reporting on modern slavery remains steady.

### 1. Reporting entity

This statement is made on behalf of the reporting entity, Infinite Australia Aged Care Holdings Pty Ltd ACN 621 313 826.

All Infinite Care's companies are Australian proprietary companies based and operating in Australia only.

#### 1.1 Our commitment

We are committed to preventing slavery, bribery, and trafficking within our operations and supply chain. We are actively taking steps to tackle modern slavery as outlined in this statement.

This statement sets out the actions we have taken to understand potential modern slavery risks related to our business, and to implement steps to prevent slavery, bribery and human trafficking during the 2022/23 financial year.

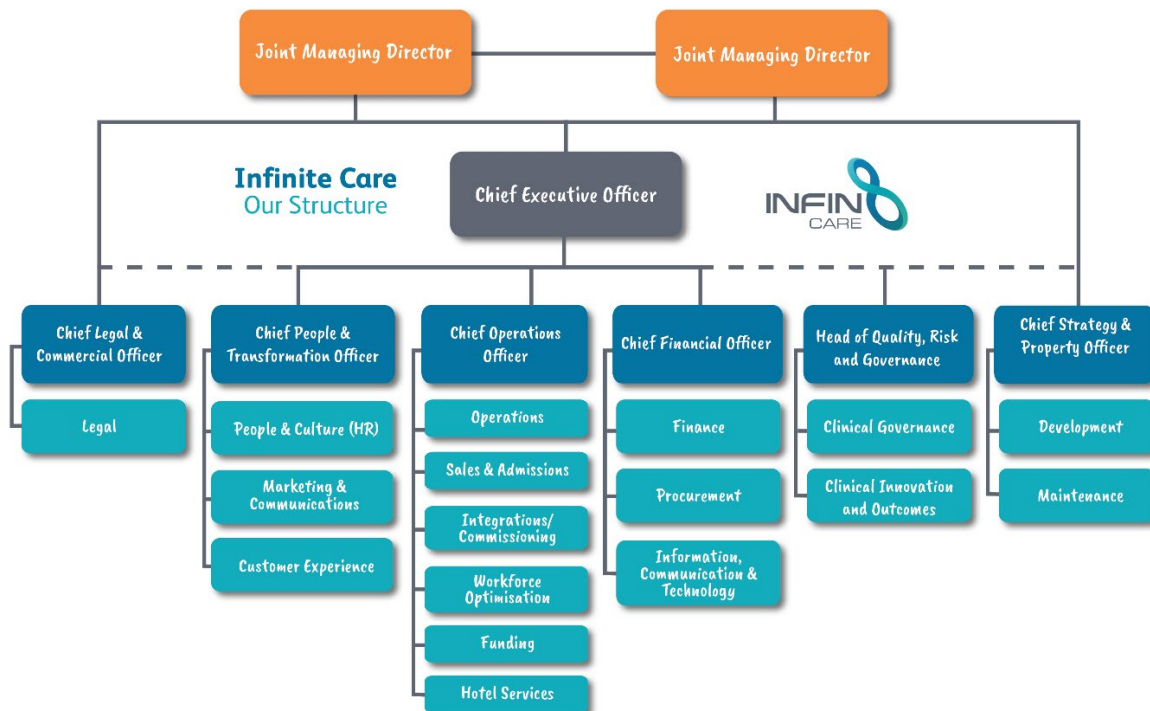
### 2. Our business

#### 1.1 Structure

Infinite Care is a company incorporated in Australia. During the 2022/23 financial year, Infinite Care's services were delivered through 17 residential aged care service across Queensland, South Australia and New South Wales.

#### 1.2 Organisational Chart

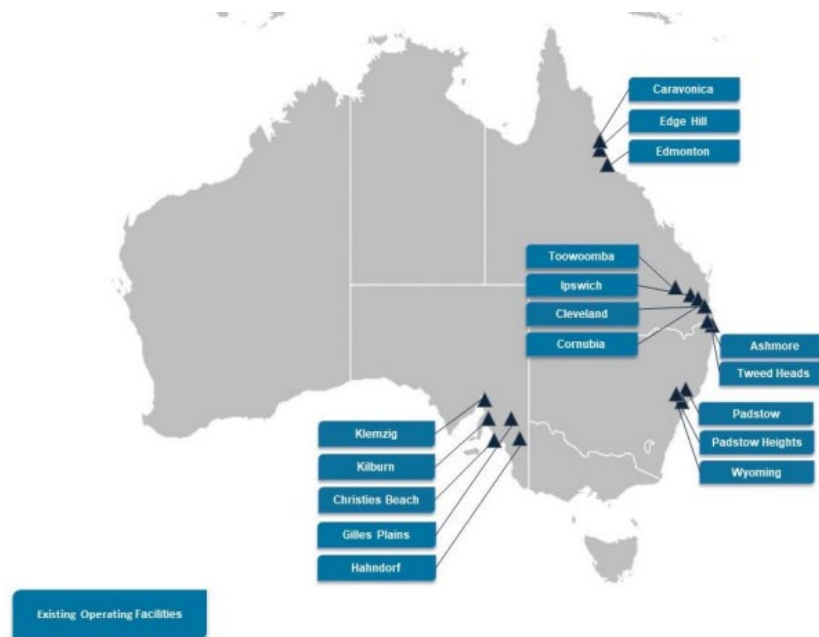
Our Executive Leadership Team oversees Infinite Care's strategic intent, and delivers on Infinite Care's vision to be an Australian leader and innovator of residential aged care.



### 1.3 Operations

Infinite Care is a private residential aged care provider, caring for approximately 2,000 residents across seventeen (17) operational residential care services in Queensland, New South Wales and South Australia.

The Business Support Centre located at Bundall, Queensland and Regional Support teams in Far North Queensland, New South Wales and South Australia, provide many centralised services to support facility operations and ensure that innovation projects are always being progress.



## 1.4 Our values

Infinite Care have defined six (6) core values that form the basis of all services and policies.



### DIVERSITY

We are openhearted and open-minded. We give, and foster deep respect for our residents and members of our team. We understand that everyone is different and we accommodate that in how we communicate and interact with each other. We do not judge.



### COMPASSION

People matter to us. We are attentive, supportive and encouraging to our residents and to each other. We understand that to be compassionate we need to sometimes talk less, ask good questions and listen deeply to our residents and each other.



### ACCOUNTABILITY

We influence outcomes through our leadership. We take action. We learn by doing. We will band together when things don't work out and treat failure as a learning experience. We will use it as an opportunity to mentor others and our team to grow to enable us to provide improved care to our residents.



### EXCELLENCE

Service excellence is paramount in all our actions. We will be creative and innovative, challenge the status quo and follow new untraveled paths in how we run and build our business. We aim to be visionaries in aged care; we test boundaries and don't accept the status quo. We work to a higher purpose of customer service towards our residents and each other.



### INTEGRITY

We don't just talk about it – we deliver. We do what we say we will do and make care decisions in the best interests of the residents that we serve. We remain open hearted and open minded in all we do. Like our residents, we each allow ourselves to be vulnerable, honest and transparent.



### EMPOWERMENT

If something needs to happen we know and understand that we are each empowered to take action. We recognise potential in our teams, nurture them to do the best they can in their roles, we give them the space to find their own feet and encourage them to be champions of change.

## 1.5 Our supply chains

Infinite Care procures a broad range of goods and services across the business to support its operations. Infinite Care's supplier base is diverse, ranging from large multi-national organisations through to sole traders delivering site-specific services. We have established long-term relationships with key strategic suppliers, all of whom are located in Australia.

After completing an extensive review, Infinite Care believes considers the inherent risk of modern slavery in this supply chain is low.

## 3. Risks of modern slavery

### 3.1 Identified risk areas

#### Operations

All Infinite Care companies are registered and operating in Australia only. Infinite Care provides a range of services to residents, where consumer and clinical choice is often a factor in procurement decision making. As a result, we recognise the possible risk of modern slavery in our operations and supply chain. We worked to proactively identify and mitigate these risks through a program outlined in this statement.

#### Our people

Our workforce is recruited and employed in Australia. Our team members are employed directly by us and recruited by us through online, media and print promotions and advertisements, as well as recruitment agencies and word of mouth and referrals.

The aged care labour market is experiencing substantial shortages, which are expected to increase with the introduction of new regulation mandating minimum registered nurse care time per resident and 24/7 registered nurse presence. This has already caused a number of challenges to our recruitment. We have seen an increase in the use of temporary staff sources by us from labour hire agencies in 2022, to ensure our residents receive the required care. Most of the agency staff sourced by us are skilled nursing staff with legal rights to work in Australia, and all agency staff are sourced in Australia through licensed Australian agencies.

Infinite Care's internal recruitment processes include thorough background checks on each applicant, which include right to work in Australia checks.

Infinite Care is an approved standard business sponsor with the Department of Home Affairs and sponsors a number of overseas workers.

### 3.2 Self-assessment questionnaire

Infinite Care's Procurement Team requested 43 of our top suppliers of goods and services (including contingent labour) to respond to modern slavery risk assessments requesting confirmation of the following:

- how much visibility your organisation has over your supply chain?;
- does their organisation have policies in place to deal with Modern Slavery?;
- does their organisation have a person or team responsible for overseeing modern slavery risks?;
- does their organisation perform screening of all prospective suppliers to assess the risks of modern slavery or other human rights harms that may occur in their operations and supply chains?; and
- does their organisation engage in any other due diligence activities to identify, prevent and mitigate risks specific to modern slavery in their operations and supply chains?

A 95% response rate was received and reviewed for compliance. Additional due diligence will be performed on any supplier assessed as high-risk.

#### LOW RISK:

No further action is taken and the supplier is subject to ongoing monitoring for any changes that may impact the risk rating.

#### MEDIUM RISK:

Infinite Care Procurement reviews the factors that have contributed to the moderate risk rating and considers the extent of further actions that may be required in response to those factors.

#### HIGH RISK:

Infinite Care facilitates a discussion with the supplier to agree on actions (where necessary) in order to address the risk. Infinite Care will evaluate feedback from the supplier in relation to addressing those actions. Actions will include providing awareness of the Modern Slavery Act and advising the supplier of Infinite Care's Modern Slavery Policy and the requirement for all suppliers to adhere.

For this period (FY23) Infinite Care has not identified any instances of modern slavery existing in its supply chain.

### **3.3 Monitoring the supply chain for modern slavery risk**

During the reporting period, the Procurement Team monitors international news for instances of modern slavery that may impact our supply chain via our direct suppliers or via the sub-contractors to our suppliers.

As at the time this report was submitted, Infinite Care is not aware of instances of modern slavery that may impact our supply chain via our direct suppliers or via the sub-contractors to our suppliers.

We recognise that COVID-19 has increased modern slavery risks in some supply chains. Demands for Personal Protective Equipment (including masks, gloves and gowns) and RAT tests remain high. We continue to assess and address additional risks without our own aged care supply chains caused by COVID-19.

Our approach remains a targeted risk-based approach consistent with the United Nations Guiding Principles on Business and Human Rights, with a focus on high-risk suppliers with less mature slavery risk governance and management capabilities, where we feel we have greater ability to drive change, mitigate risks and impact human rights.

## **4. Our Actions**

### **4.1 General commitment**

- We will conduct regular risk assessments to identify and evaluate the risk of modern slavery within our operations and supply chain.
- Appropriate mitigation measures will be implemented to prevent and address these risks effectively.
- Continuously review our approach to due diligence in modern slavery risk management, encouraging our supply base to improve their risk management programs.

- Where considered appropriate, conduct further due diligence s of high-risk suppliers.

## 4.2 Our policy framework

Infinite Care has a comprehensive set of policies and procedures that articulate our values, ways of working and expectations of our team and suppliers. This policy framework ensures that our team members and suppliers clearly understand our expectations. These policies and procedures are regularly reviewed and updated.

The following policies are those that are most relevant to preventing modern slavery in our supply chains:

Policy	Purpose
<b>Modern Slavery Policy</b>	Infinite Care maintains a Modern Slavery Policy that explicitly address modern slavery risks, reporting mechanisms, and guidelines for compliance.
<b>Whistleblower Policy</b>	Outlines the available avenues for workers, suppliers, contractors, and their family to report or disclose any concerns they may have relating to reportable misconduct
<b>Employee Handbook</b>	The Employee Handbook applies to all Infinite Care staff, including all types of employees and contractors. The handbook is provided to ensure employees understand and comply with their employment obligations and the organisation’s business rules at all times.
<b>Code of Conduct</b>	The Code of Conduct (“Code”) is a statement of how our organisation and team will conduct ourselves in providing the highest levels of clinical care and services to our residents, engaging with stakeholders, and interacting with our colleagues. Our Code applies to all staff (including contractors and consultants), students and volunteers in every location.
<b>Feedback and Complaint Management</b>	Provides Infinite Care’s clear and consistent approach to feedback and complaints handling.

## 4.3 Due Diligence

Infinite Care has recognised the importance of evaluating and risk assessing current and prospective suppliers for modern slavery risk.

## 4.4 Updates to contracts

Infinite Care incorporates positive obligations on new suppliers in supply contracts in respect of Modern Slavery.



## 5. Assessment

### 5.1 Conducting internal audits

Infinite Care reviews the effectiveness of our policy and procedure relating to modern slavery. This includes assessing if policies and procedures have served their purpose in the day-to-day aspects of the organisation. Policies and procedures will be updated as required.

### 5.2 Top spend audit

Infinite Care will review its suppliers with whom we spend the highest amount annually.

### 5.2 Supplier questionnaire

Infinite Care will provide to certain suppliers a self-assessment questionnaire development and delivery to top suppliers. Upon receipt a review and assessment occurs, the results are then maintained on a Modern Slavery Risk Register.

## 6. Action plan

The following action plan has been established for the FY 2023/24 reporting period.

Element	Action
Education and training	In the FY 2023/24 reporting period we intend to provide education and training to new team members of the Procurement and Legal teams, as well as extending the training to key purchasing decision makers in ICT, Property, Operations, Hotel Services and People and Culture.
Supplier engagement	Modern slavery engagement discussions to continue with suppliers to improve their understanding and knowledge of our expectations and practical application of modern slavery risk assessments.
Due diligence	Increasing due diligence and risk assessment in supplier selection and supplier management programs and maintaining supplier selection and evaluation practices to reflect modern slavery requirements.
Supplier questionnaire	Utilising the supplier self-assessment questionnaire to provide a more in-depth view of our highest risk suppliers.
Risk assessment	Review our modern slavery risk assessment tools monitoring our spend and ensure we are mitigating modern slavery risks.

## 7. Consultation process

All entities within the Infinite Care group have been fully consulted in this process.

## 8. Relevant information

Infinite Care is committed to addressing modern slavery in our organisation and supply chains. We will continue to expand our due diligence processes with our direct suppliers, who are most likely to present potential risks in modern slavery.

There is no further information to report.

## Board Approval

The Board of Directors of Infinite Australia Aged Care Holdings Pty Ltd approved this revised Modern Slavery Statement on 28 March 2024.

This Modern Slavery Statement is signed by Christopher Stride and Anthony Partridge in their role as Joint Managing Directors of Infinite Australia Aged Care Holdings Pty Ltd.

*Christopher Stride*

*Anthony Partridge*

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Christopher Stride  
Joint Managing Director

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Anthony Partridge  
Joint Managing Director

Dated: 4 April 2024