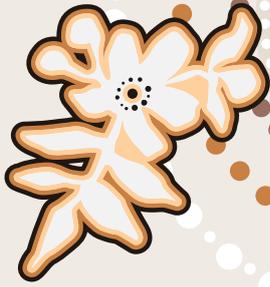


# MODERN SLAVERY STATEMENT

Financial year 2022/2023

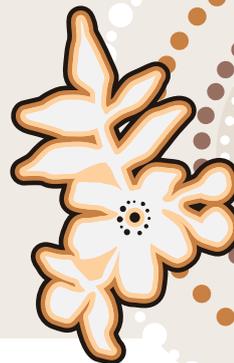




## ACKNOWLEDGEMENT OF COUNTRY

Feros Care acknowledges all Aboriginal and Torres Strait Islander people as the First Nations peoples and we recognise their culture, history and connection to the land, sea, and sky. We acknowledge the Traditional Custodians of the lands on which we live and work. We pay our respects to Elders past and present. We extend that respect to our Aboriginal and Torres Strait Islander staff, clients, participants, residents, partners and stakeholders.

*Danny Eastwood*



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## INTRODUCTION

At Feros Care, we are a purpose-driven charity to enhance the lives of individuals within our care and the broader community. As a not-for-profit people care organisation, our mission is to enable healthier, happier and more connected individuals in our community. We understand the critical importance of human rights and ethical practices in everything we do.

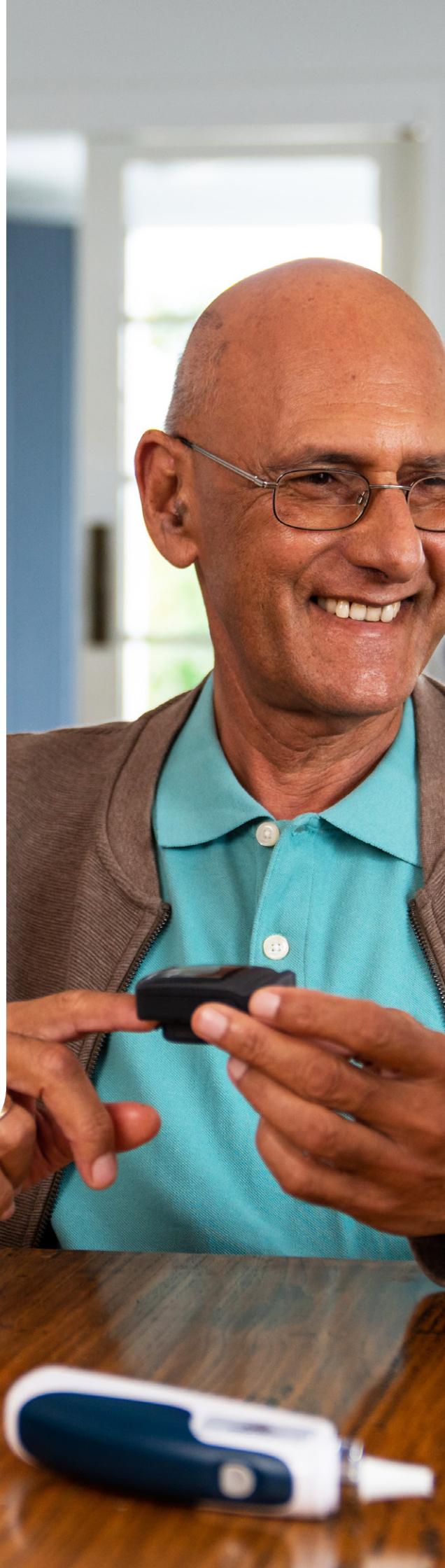
This Modern Slavery statement for FY 22/23 is for the legal entities of Feros Care, Wommin Bay Hostels and Aspire4Life. reflects our commitment to eradicating modern slavery in all its forms and our determination to uphold the highest standards of ethical conduct throughout our operations.

In the pages that follow, we will provide a comprehensive overview of our efforts to combat modern slavery within our organisation and supply chains. This includes the steps we have taken to assess and mitigate potential risks, the policies and procedures we have put in place, and our ongoing improvements to fostering a culture of integrity and human rights awareness.

*Jason*



**Jason Bingham**  
Chair, Feros Care



## ABOUT FEROS CARE

We're Feros Care. And what we care most about is helping people live healthier, happier, better-connected lives. For over 30 years, we've been making it happen, both for older Australians and people living with disability.

Our aged care and disability support services can help in many ways, whether it's through home care, residential and respite care, clever technology to make life easier, assistance in accessing community activities, coordination of local NDIS services, or one of our growing number of allied health and wellness solutions.

As an organisation, we pride ourselves on innovation. We anticipate the future and set ourselves ambitious goals so that we can not only meet customer and client needs but exceed all expectations.

Our sister human services organisation, Aspire4Life, tailor inclusive planning, assessment and case management services which have the needs of the individual at their core and are delivered with respect and understanding.

## OUR CORE VALUES



### GAME CHANGERS

#### **Innovators not imitators.**

We are the powerhouse of reinvention. We reframe perceptions and challenge conventions.



### CULTURE SHAPERS

#### **Together we thrive.**

We bring our "A" game every day. We work to build a great culture and communities where everyone matters.



### DREAM MAKERS

#### **Powered by possibility.**

We create a place where our customers' wildest vision of what's possible comes to life.



### VIBRANT CREATORS

#### **Positive and playful.**

We don't fit in, we stand out. Our energy is electric, our people are passionate and our purpose is real.



### KINDNESS CHAMPIONS

#### **Commitment to exceptional care.**

We give our time, energy, integrity and knowledge, but above all we give our hearts.

## ABOUT ASPIRE4LIFE



Feros Care has a sister organisation, Aspire4Life.

Aspire4Life is a not-for-profit, human services organisation providing bespoke solutions which have the needs of the individual at their core. The organisations tailors inclusive planning, assessment and case management services which are delivered with respect and understanding.

Aspire4Life partner with government organisations and other like-minded leaders in the community to deliver a number of programs, including My Aged Care Regional Assessment Services, the Department of Veteran Affairs Home Care Assessment Agency program and the Department of Health Community Visitors Scheme.

### Our Difference

To achieve a future that is rich in connection, happiness and purpose, we try to do things differently.

### We dream big

Everyone has the right to dream big. We encourage each person we work with to envision the way their life could be and to see a more purposeful future for themselves. Then we help put a plan in place to transform their futures – and we share the journey with them to offer our support every step of the way.

### We understand the value of kindness

We have the care factor. Whether it's taking time to sit and listen to the details of a person's day, reassuring a carer facing a difficult decision or checking that a business partner received a report they

were waiting on. It's about living our ethos – to respect and nurture all our relationships and to go above and beyond the call of duty.

### We find the right group

We are all here for the same reason – to make connections and foster relationships which enhance lives. To allow these connections to flourish we create safe spaces where all beliefs, cultures, religions and genders are equally supported and where genuine collaboration can occur in a natural and organic way.

### We ask 'why not?'

If a method or idea hasn't been explored before we ask – why not? We embrace change, technology and creative solutions which push boundaries to find a better outcome, better care and a better quality of life. We develop and implement world-class logistics and systems which free up our human resources to allow for better personal connections.

### We create vibrant connections

When you love what you do it shows. That's why every interaction we have is built on positivity, enthusiasm and a natural curiosity which underpins everything we do. We thrive on the energy of mutually rewarding relationships – and our drive to do our collective best to improve the lives of others.



**Peter Smales**  
Chair, Aspire4Life

# POLICIES

Our Commitment to assessing, mitigating and eliminating all risks of modern slavery is upheld by our commitment to strong governance in promotion of human rights through our frameworks, policies and procedures. These include but are not limited to:

- **Modern Slavery Policy:** specifically addresses the commitment to eradicating all forms of modern slavery and indicates the required conduct expected of all workers.
- **Risk Management Framework:** both Feros Care and Aspire4Life adopt a strong risk-based approach to operational and supply chain risk management planning, decision-making and observance of compliance obligations. Modern Slavery Risk is also reviewed and monitored through Executive, leadership, and board risk management systems.
- **Code of Conduct:** outlines the expected behaviour and conduct of employees. Aligned to Aged Care Act and the principles of social, ethical and human rights expectations and the values of each organisation. The code of conduct underpins behaviours demonstrating highest respect for human dignity and rights.
- **Whistle Blower Protection policy:** supports all stakeholders to observe the highest standards of good governance and ethical conduct and to feel supported while safely disclosing matters which may be inconsistent with modern slavery laws. An external Ethics & Integrity hotline for the purposes of whistleblower escalation is also in place which is accessible to employees and volunteers.
- **Recruitment Policies:** describe our practices and verification processes which also require adherence to Codes of Conduct, compliance with relevant legislation and regulations and policies.
- **Corporate Policies:** A suite of corporate policies underpin responsible financial management practices which align with our strategic priorities of economic, social, environmental and operational sustainability. Particularly our ethical management principles which prohibit our participation in activities that denigrate personal dignity, human rights or exploit others financially and/or damage human health.
- **Procurement Policy:** provide for socially responsible and ethical procurement practices. Procedures and systems are being updated to improve collection and recording of data to improve due diligence activities and remediation practices to manage modern slavery risks.
- **Supplier Code of Conduct:** outlines our expectations that all suppliers will act in a manner consistent with social responsibility sustainable and ethical practices and that these are adopted through their supply chains. This will be released January 2024.

Compliance with our policies and procedures is proactively monitored through our Executive and Governance leadership teams with regular oversight assurance activities in place. Modern Slavery is also managed directly through our Modern Slavery Working Group which reports both to Executive leadership and the Board via our Finance, Risk, Audit and Compliance Committee.

# FEROS CARE OPERATIONS



**34,122**

Australians service by Feros Care Feros Care



**946**

Team members



**551**

Feros Care volunteers

## Overview

### Community Aged Care



**255,963**

Services delivered



**328,245**

Service hours

### Residential Aged Care



**33**

Respite residents



**238**

Total residents



**85**

Resident average age

### Local Area Coordination



**11,804**

Plan reviews



**1,932**

First plans



**13,736**

Plans submitted



**2,718**

Vulnerable check-ins submitted



**19,733**

Hours spent on information, community linkages and capacity building projects

# ASPIRE4LIFE OPERATIONS



**130**

Aspire4Life  
team members

## Overview



**86,380**

Instances of  
service



**38,228**

Support plan  
reviews



**98.5%**

of people feel their  
beliefs and values are  
respected by assessors



**91%**

of team members believe  
Aspire4Life is a “truly  
great place to work”



# OUR SUPPLY CHAINS

## Our spend across the business

Feros Care engages with a total of 2,170 suppliers. The spend allocation by business division is broken down in the graph below.



# MODERN SLAVERY RISKS

Practices which constitute modern slavery include trafficking persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour.

Last year was our first reporting period where the organisation met the threshold requirements to report. Feros Care has assessed our policies, processes, and systems to determine how we may meaningfully and proactively identify, assess, and mitigate against modern slavery risk. As a result, new systems and data management technology has been and continues to be implemented which will enhance our abilities in this regard. Our Modern Slavery Working Group also works to identify and mitigate risks and ensure education throughout business areas.

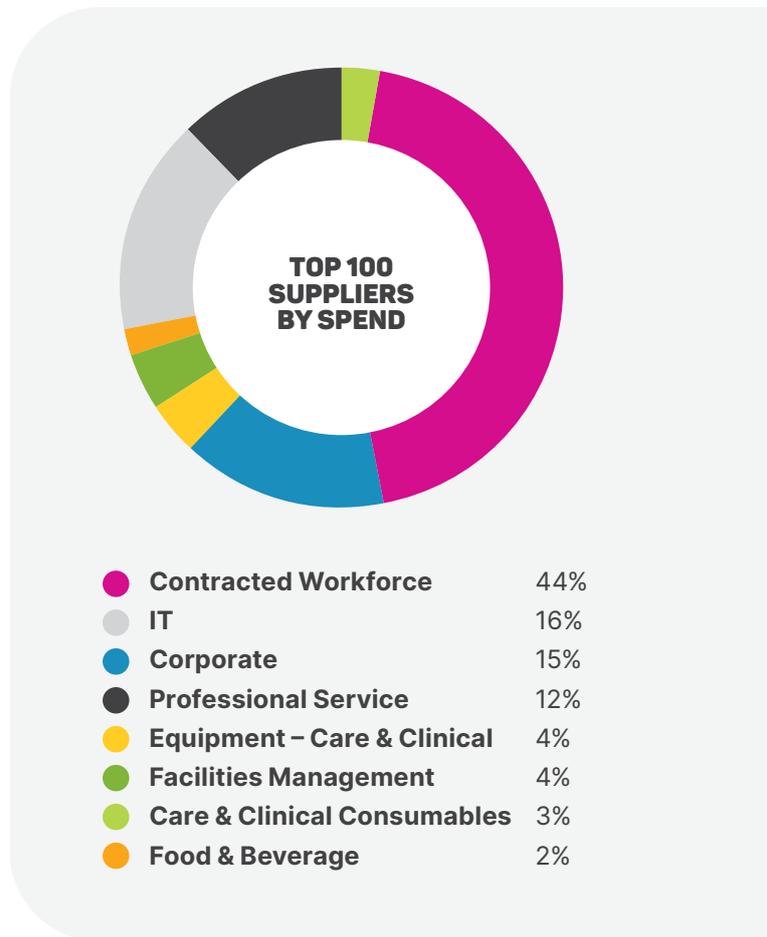
## Identified risk areas

Through our risk assessment processes it has been identified that the high-risk spend categories are clinical and care equipment, clinical and care consumables, food and beverage and information and technology (IT). These categories equate to only 25% of our annual spend with the top 100 suppliers.

We have performed a risk assessment of our top 100 suppliers using indicators such as geography and business governance. Of those 100 suppliers we identified, a small number have a supply chain from countries that are unknown to the organisation. Research was conducted on those suppliers to determine whether they had themselves produced a Modern Slavery Report and had in place strong human rights governance – which they did. Subsequently, we have identified that our top 100 suppliers currently pose a low risk of modern slavery. As a result, in the next financial year we will turn our attention to the remainder of our suppliers, such as smaller

companies that do not currently meet the statutory thresholds for modern slavery reporting. With new data management and procurement software in place we will be able to more accurately and efficiently capture the data that is required in order to perform these risk assessments.

Feros Care has again assessed there is minimal risk of modern slavery in our directly employed workforce. This is due to the existing protections and regulations in the Fair Work Act that apply to the assessment, aged care and disability support sectors, along with the presence of unions who represent employees by negotiating employment conditions. The same protections and regulations are also applicable to our preferred service partners and contractors who operate in these sectors, further reducing any risk.



# DUE DILIGENCE AND REMEDIATION

## Operational due diligence

In the last 12 months we have revised and developed our compliance management in relation to modern slavery. We have built capacity within the organisation to monitor and act on modern slavery risk by establishing a modern slavery working group comprised of representatives from relevant service delivery and support functions that report to both the executive leadership and the board through the Finance Risk, Audit and Compliance Committee. We monitor modern slavery identification and risk through our risk management frameworks. We are in the final stage of implementing enterprise-wide procurement software and systems that will allow us to capture data more accurately and with more detail.

## Supply chain due diligence

With the imminent full implementation of our enterprise-wide procurement software and systems, Feros care is committed to ongoing efforts aimed at risk mitigation within our supply chain. We will achieve this by incorporating contractual provisions aligning with modern slavery laws into our supply agreements and contracts.

We will regularly assess our existing and renewed supply agreements and contracts. As part of this review, we will include specific clauses that clearly outline Feros Cares' stance on modern slavery and the requirement for suppliers to adhere to these principles. This includes both low value, low risk and moderate to high value and or risk agreements and contracts.

We will establish a system to identify the risk levels of our suppliers based on their

spend percentage and categorised spend areas, including sub-categories. This categorisation will be facilitated through our procurement software.

High risk suppliers will be monitored on an ongoing basis by our procurement team to ensure they adhere to our position on modern slavery and are held accountable to their commitments for eradicating modern slavery.

We are developing and refining a comprehensive set of compliance checks for potential new suppliers. These checks will involve an in-depth evaluation of their service model, policies related to Environmental, Social, and Governance (ESG) matters, as well as measures in place to responsibly combat modern slavery. Additionally, we will assess their sub-contracting practices, conflicts of interest, financial stability, and their approach to workplace health and safety.

Additionally, we intend to communicate with our entire supply chain an abridged version of our Modern Slavery statement outlining our position on modern slavery and supporting laws along with internal personnel communications regarding Feros Cares zero tolerance and commitment not condoning, supporting, or contributing either directly or indirectly to modern slavery.

We will work to continually improve the way we assess our suppliers and mitigate our risk looking for opportunities to work along with our supply partners in seeking new ways to identify and manage any potential risks within our supply chain whilst amending our policies, procedures and organisational communications to suit.

## Grievances and remediation processes

Compliance with our policies and procedures and remediation measures are proactively monitored through our Executive and Governance leadership teams with regular oversight assurance activities in place. Modern Slavery is also managed directly through our Modern Slavery Working Group which reports both to Executive leadership and the Board via our Finance, Risk, Audit and Compliance Committee.

An external Ethics & Integrity hotline for the purposes of whistleblower escalation is also in place which is accessible to employees, volunteers and their relatives, dependents, or spouse.

## Organisational awareness

Feros Care's code of conduct and relevant policies establish and embed a set of expected behaviours aligned to the prevention of Modern Slavery. Feros Care has issued communication as an awareness piece on this important objective.



At Feros Care, we have a zero-tolerance approach to Modern Slavery and are committed to not condoning, supporting or contributing, either directly or indirectly, to Modern Slavery in our operations and supply chain. In accordance with the Modern Slavery Act 2018, Feros Care now meets the threshold requirement for Modern Day Slavery Reporting.

Modern Slavery is an umbrella term that includes practices like slavery, servitude, human trafficking and forced labour. It is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another's personal or commercial gain.

To demonstrate our commitment, we are progressing the following:

- Regularly review supplier agreements
- Conduct risk assessments on high risk category suppliers to determine their suitability and potentially source other supplier options
- Hold our suppliers accountable to Feros Care's supplier code of conduct and will not knowingly engage suppliers that do not align with our position on enforcing basic human rights

Should you have any concerns, or you are made aware of any concerns relating to Modern Slavery, please direct these to Feros Care's Integrity Officer. Any disclosures are kept confidential as per the Whistle Blower Protection Policy.

# CONCLUSION AND SIGNATORIES

We are dedicated to eradicating modern slavery in all its forms and will continue in our determination to uphold the highest standards of ethical conduct throughout our operations.

The Board of Feros Care has consulted with the Executive Leadership and endorses the approach and activities taken by the organisation in order to mitigate against any risks of modern day slavery. This statement has been prepared by the Executive and the Board have consulted with the Executive and will continue to consult with the Executive in relation to the organisation's activities to identify modern day slavery risks and eliminate modern day slavery practices.

The Board of Aspire4Life has consulted with its Managing Director and the Executive leadership of Feros Care and endorses the approach and activities taken by the organisation in order to mitigate against risk of modern day slavery and eliminate modern day slavery practices. This statement has been prepared by the Executive of Feros Care who has consulted with the Managing Director of Aspire4Life and the Board of Aspire4Life. The Board of Aspire 4 Life acknowledges that it will continue to consult with its Managing Director and the Executive of Feros Care in relation to the organisation's activities it is taking to identify modern day slavery risks and eliminate modern day slavery practices.

Signed on behalf of the Executive of Feros Care  
**Karen Crouch, CEO**

Signature:  \_\_\_\_\_ Date: **19 December 2023**

Signed on behalf of the Board of Feros Care  
**Jason Bingham, Chair of Feros Care Board**

Signature:  \_\_\_\_\_ Date: **19 December 2023**

Signed on behalf of Aspire4Life  
**Michael Scurrah, General Manager**

Signature:  \_\_\_\_\_ Date: **20 October 2023**

Signed on behalf of the Board of Aspire4Life  
**Peter Smales, Chair of Board of Aspire4Life**

Signature:  \_\_\_\_\_ Date: **20 October 2023**



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