



MODERN SLAVERY STATEMENT

GMHBA LIMITED FY21



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The Australian Border Force - Modern Slavery Statement Annexure

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of

GMHBA Limited

as defined by the *Modern Slavery Act 2018 (Cth)*¹ ("the Act") on 12/15/2021

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of

GMHBA Limited Board

as defined by the Act²:



Claire Higgins

Chair

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	4
b) Describe the reporting entity's structure, operations and supply chains.	5
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	6
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	7
e) Describe how the reporting entity assesses the effectiveness of these actions.	11
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	12
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	12

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

GMHBA's commitment towards eradicating modern slavery

As part of our core Values, GMHBA is committed to upholding the highest standard when it comes to ethical responsibilities, which includes the Board endorsing a Group Whistle-blower Policy and approval of a Code of Conduct which sets out the ethical standards that are expected of all our Directors, Management, and employees.

Our Supplier Statement sets out our expectation that suppliers will comply with all applicable laws and demonstrate their respect for, and protection of, the fundamental human and labour rights of workers. This statement is made available on our website and to all new suppliers at the time of onboarding and to existing suppliers as part of our annual modern slavery due diligence process.

This statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) and sets out the steps taken by GMHBA Group and its wholly owned subsidiaries, to address modern slavery and human trafficking risks in our business and supply chains for the period 1 July 2020 to 30 June 2021.

This is GMHBA Group's second annual statement in line with the Act. It outlines the actions taken to detect modern slavery risks within our operation and supply chains and ensure we have in place the most appropriate responses to any risks identified, as a part of our due diligence process.

1. Criteria 1.0 Identify the reporting entity

For the purposes of this statement the reporting entity is GMHBA Limited, ABN 98004417092. In assessing the risks of modern slavery that may exist within our supply chain, the following entities have been included within GMHBA Group:

- GMHBA Limited;
- GMHBA Armstrong Creek Unit Trust (wholly owned subsidiary).

Excluded from the scope of this statement includes other entities a part of the GMHBA Group which include health.com.au Pty Ltd (HEA), GMHBA Services Pty Ltd (GSPL), and two other subsidiaries that we had a joint venture in place with during the reporting period. To protect their anonymity, they will be referenced to as 'ABC' and '123' here on out. A table has been provided below with additional rationale for their exclusion from the statement.

Subsidiary	Rationale for exclusion
HEA and GSPL:	Ceased operation as of 30 June 2021 and GMHBA Group has opted not to engage any of HEA's suppliers connected to this entity moving forward. Therefore, we have elected not to invite either of these entities suppliers to participate in our due diligence process, on the basis that these entities are being wound up.
ABC (de-identified)	This Trust is controlled by GMHBA Group for accounting purposes, and as such is deemed to be a subsidiary. Although this entity does not meet the legislative reporting threshold, the entity was invited to participate in the development of this statement during the consultation process, as outlined under Criteria six.
123 (de-identified)	During the reporting period, GMHBA had a Joint venture in place with another entity whereby we had joint control of 123 under accounting standards. Although this entity does not meet the legislative reporting threshold, the entity was invited to participate in the development of this statement during the consultation process, as outlined under Criteria six.

All suppliers relating to the four subsidiaries outlined above, have not been included as a part of this year's due diligence process, but all four were consulted with during the development of this statement and this further detail relating to this consultation process is outlined underneath Criteria 6.

2. Criteria 2.0 Describe the reporting entity's structure, operations and supply chains

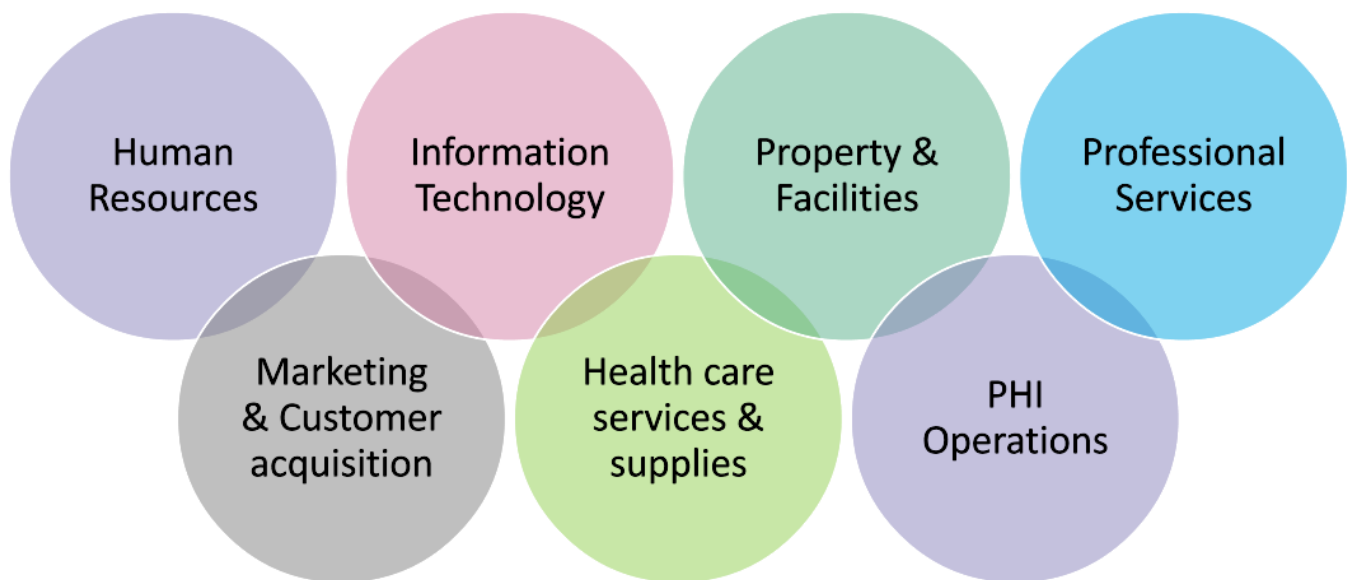
Our Structure

GMHBA Limited is an Australian Not-for-Profit public company limited by guarantee, that provides Private Health Insurance (PHI) and health services to over 351,000 people across our two distinct brands: GMHBA Health Insurance and Frank Health Insurance. We are proud to have over 440 employees based in Victoria.

As our services continue to diversify, we remain committed to operating our health insurance and health services lawfully and ethically, and in only working with suppliers that are aligned to our values as outlined within our Supplier Statement. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour.

Our Operations and Supply Chain

GMHBA's main operations consist of the provision of private health insurance and health services to our members and community. Our major categories across our operations and supply chains include:



Our scope for GMHBA Limited's assessment of procurement in FY2021 involved **608** direct suppliers with a total spend of approximately **\$59m**. Our target group for FY21 relates to **46** suppliers. From this group, **20 of the 46** suppliers were identified as have goods or services that are procured outside of Australia. A broader review over future years will include our operational supply chains which will extend to hospital, medical and ancillary providers (Tier 2). Further detail on GMHBA's approach to addressing modern slavery risk in its supply chain is provided under Criteria 4 of this statement

As an insurer, GMHBA has significant levels of invested funds across a range of investment classes, as well as local and international equities. Such investments are managed by our Investment Portfolio Manager, JBWere and further details can be found in our Annual Report.

The Year that was

Impacts of COVID-19 on our supply chains

To date there has been no material impact on GMHBA's operation and supply chains, however the pandemic has impacted responses from our supply chains to modern slavery risks via our Self-Assessment Questionnaire (SAQ). This has resulted in additional engagement and education to support our suppliers in meeting their requirement.

Other impacts

1. Change in line of accountability from Risk & Compliance to Finance & Corporate Service. This decision was made to enable the Risk and Compliance team to provide independent oversight as the 2nd Line of Defence, to review our modern slavery risk profile and report material risks. To assist this review process, a bi-annual meeting has been established to enable Risk & Compliance the opportunity to provide independent insight across the due diligence process;
2. Priorities for the business drew on key resources to deliver on two initiatives internally taking away our ability to target a larger number of suppliers, because we needed to limit our impact on the broader business; and
3. Implementation and successful roll-out of I365 software.

Case Study – Impact of COVID-19

Many challenges were experienced by businesses, across various industries, due to the impact of COVID-19. One example of this, that we experienced here within GMHBA, was the ability for functions to be able to perform as usual. For example, during our year-end reporting preparations, our financial reporting team seized the opportunity of the pandemic, to adapt the way we do things and engage with our service providers, in different ways, whereby new technology platforms were utilised, in order to replicate the face-to-face engagement that would have usually been conducted all whilst working from home. In this instance, we worked alongside one of our long-standing suppliers, QRS, who are an external audit provider, who operate within the diversified financials sub-sector across the globe to make this positive change occur.

3. Criteria 3.0 Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

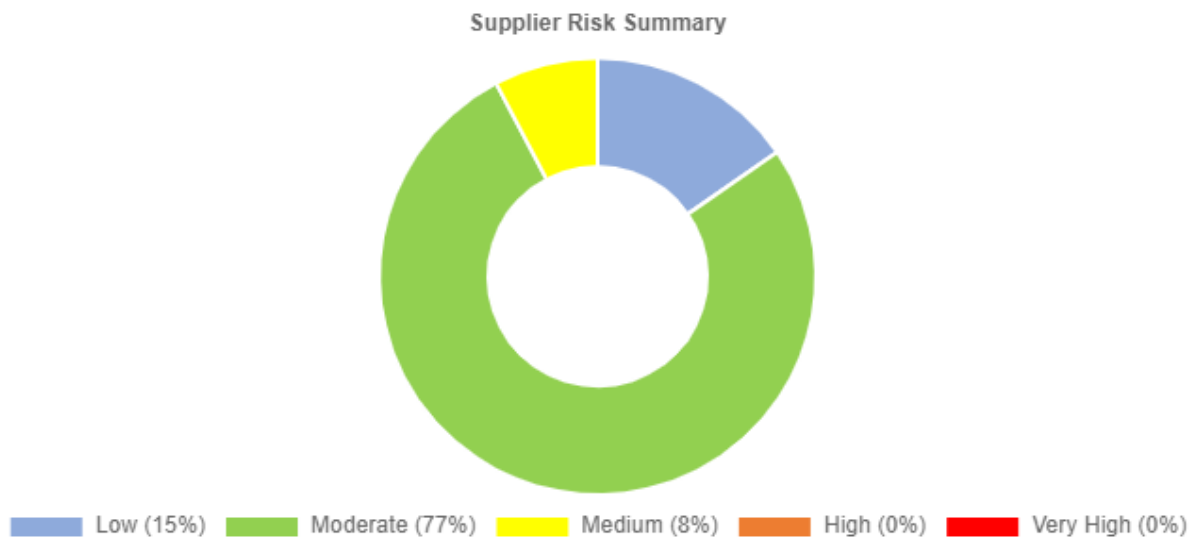
We acknowledge that the risks of modern slavery may be heightened in some supply chains and operations due to the geographical location of suppliers, areas of operation, and the source of materials used in products supplied. In particular, materials like laptops, computers and mobile phones sourced from China have been identified as product's whose production carries with it a heightened risk of modern slavery. We acknowledge that, we lack visibility in some of the products or services that we procure which come from overseas markets and these carry with it, additional risks of modern slavery especially in our secondary levels of our chain of suppliers (Tier 2) and we are not yet aware of the magnitude of risk that this may involve, but we are committed to evolving our practices to reach this space in the coming years ahead. We are also a part of the Private Health Insurance Community of Interest Group (PHI Col) who are currently initiating conversations with Australian Health Service Alliance (AHSa), to develop and design a way for us to tackle this on an industry level.

Relationship owners from both GMHBA and health.com.au initially assessed key risk factors against direct suppliers to understand those that may pose a greater modern slavery risk. These factors are described in more detail below:

- **Industry Sector** (and Subsector) – the Global Industry Classification Standard (GICS) taxonomy was adopted as a way of classifying sectors and sub-sectors that is consistent with global classification standards, and overlaid with risk ratings;
- **Countries of operation** (geographical location) – the Global Slavery Index (GSI) was sourced to determine risk ratings for each country considering governance issues, lack of basic needs, inequality, disenfranchised groups and effects of conflict;
- **Product** (goods or services) – highest risk countries producing products with a higher exposure were identified and overlaid as part of the risk assessment; and
- **Overall Spend** (during financial year) – overall spend was overlaid against suppliers, to determine any additional layer of risk as well as influence suppliers hold to assist with remediation strategies.

Following these assessments, we identified several areas of heightened risk within our supply chain which included the outsourcing of services such as, call centre services, health care supplies (such as eye-frames and lens) being distributed from places like Italy, France and Germany, information services operating out of countries like China and India and professional services utilising offshore processing centres.

Overall, as a result of our assessments, we have **not** identified any material risk of modern slavery practices in our supply chains. A high-level view of our residual risk assessments has been provided below using our new cloud-based software system, I365:



4. **Criteria 4.0** Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

Overall, GMHBA has actively engaged and consulted with all companies we own or control in the development of this statement. During the reporting period this statement covers, we also liaised and coordinated with the entities we own or control or possessed joint control of, during the development of this statement, including those who may not be required to report. During this consultation period, we discussed details of the Modern Slavery Act 2018's reporting requirements; providing information on the actions we intend to take to address these requirements and providing relevant materials and ongoing updates.

GMHBA continues to apply a targeted, risk-based approach when assessing and addressing risks of modern slavery within our operation and supply chains. This approach is consistent with the '*United Nations Guiding Principles on Business and Human rights*' and ensures that we focus our actions on high-risk areas. GMHBA is also committed towards applying a lens of 'continuous improvement' in our year-on-year efforts.

Our focus this year has been to build a strong foundation to identify, assess and support suppliers in developing appropriate remediation plans for any modern slavery risks or practices that have been identified. Uplift activities for FY21 include:

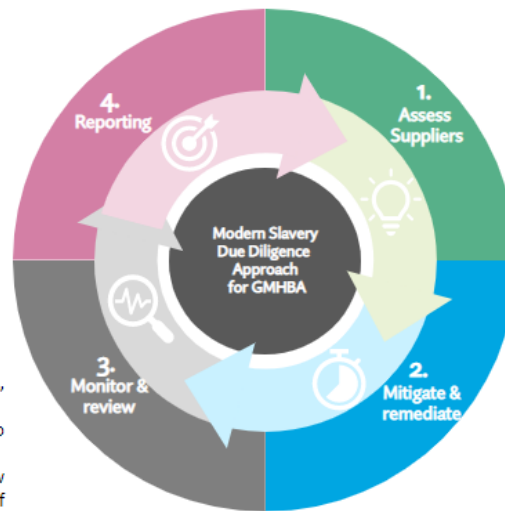
1. Engagement with our Board, Executive Group and Senior Leadership Team (SLT) and key internal stakeholders to:
 - a. Educate and increase awareness and accountability;
 - b. Leverage existing relationships to increase supplier engagement levels; and
 - c. Understand the customer journey for our suppliers.
2. Increased participation in the PHI Col to align our shared and mutual interest in relation to industry supplier consultation and tool development;
3. Communication with The Australian Border Force (ABF), to facilitate an uplift in engagement levels within the industry, increase understanding around the legislation and obtain clear guidance from the ABF around specific areas of interest; and
4. Implement cloud-based software solution Informed 365 (I365) to create internal efficiencies, by automating some of our processes.

Due Diligence Approach

We have undertaken a targeted, risk-based approach to assessing and addressing modern slavery risks in our operation and supply chains. To assist this process, we have applied a four-step methodology to manage our modern slavery risks as seen below:

Four-step methodology

- Detailed risk assessment reports provided to relationship owners
- Risk profiling and remediation reporting
- Annual reporting obligations



- Monitor & review the effectiveness, of modern slavery processes
- Processes are defined and continue to be embedded into operating rhythm
- Independent oversight and review process in place with 2nd Line of Defence, to review our modern slavery risk profile and report material risks

- Due diligence on operations and supply chains
- Perform inherent risk rating
- Assess modern slavery risk factors including consideration towards the following:
 - Industry sector (and sub-sector)
 - Country/s of operation (geographical location)
 - Product (goods or services)
 - Overall spend (during reporting period)
- Prioritise according to targeted risk based approach
- Invite 'High' risk suppliers to complete SAQ
- Capture key trends and action relevant insights from SAQ's
- Adopt appropriate strategies for addressing any modern slavery risks identified during due diligence process
- Apply continuous improvement towards building our understanding and capabilities, improving our policies and processes, and enhancing our engagement with suppliers
- Develop and implement remediation processes to address modern slavery risks including grievance mechanisms

Due Diligence Process Improvement

Over the last year we have made the following improvements to our due diligence process:

- Inclusion of modern slavery clauses into new and existing contracts;
- Inviting new suppliers to engage in the due diligence process, as part of our onboarding process;
- Reviewed and updated the overall due diligence process and supporting documentation;
- Increasing the number of suppliers, we invite to participate in our due diligence process (FY20 = 30, FY21 = 46) in which build on our supply chain profile
- Consultation with key internal stakeholders to further embed our due diligence process;
- Increase supplier response rate by identifying potential barriers that may impact participation levels and provide other solutions;
- Creating two central action registers in which to monitor the commitments we make to ABF and the remediation plans we put in place with our suppliers, year-on-year.
- Collaborate with PHI CoI to automate additional processes within I365 in the near future, in particular around remediation plans
- Increase employees understanding and awareness of modern slavery through learning module – we expect to reach a 100% participation rate before the end of 2021; and
- Educate suppliers by providing access to key documents and supporting material including:
 - GMHBA's Supplier Statement
 - Frequently Asked Questions Fact Sheet and
 - Copies of the GSI risk matrix pertaining to high-risk countries and industries.

Case Study – Inclusion of modern slavery clauses within new or revised contracts

A strategy that we are trying to implement here at GMHBA, is the inclusion of modern slavery clauses within new or revised contracts. We recently took the opportunity to have modern slavery clauses considered and included into the contract, when our partnership with supplier TUV was recently revised. Whilst in the negotiation period a part of these discussions, our relationship owners sought out the modern slavery team for guidance as to what should be included and why. After an internal assessment was made, the decision was made as to which clauses would be put forward to TUV with intended rationale. These clauses were then communicated to TUV for their consideration, which were shortly thereafter accepted and included. TUV's head office is based within Australia and are an information technology business that provide software services to private health insurance funds across Australia

1. Assess Suppliers

Risk assessment

To commence the due diligence process, we performed a risk assessment of **339** suppliers (including suppliers identified within the 2020 reporting period) to understand which suppliers may pose a greater modern slavery risk.

Target group identification and prioritisation

After performing an initial assessment of our Tier 1 suppliers, GMHBA identified 46 suppliers to target as a part of our due diligence process. The suppliers targeted, demonstrate a cross-section of our business, with suppliers operating on and offshore. In identifying this target group, the following thresholds were applied:

1. All suppliers with an inherent risk of 'High'
2. All suppliers with an inherent risk rating of 'Medium' and an annual spend greater than \$100K in the reporting period.

Supplier assessment across GMHBA's direct supply chain



Self-Assessment Questionnaire (SAQ)

Following on from the strong foundation that we established in the first year of our reporting round, we continued to utilise our vendor SAQ, when inviting our target group of suppliers to participate in our due diligence process.

The questionnaire covers eight key risk areas as outlined below:

1. **Supplier details** - to assist us in confirming the details collected as a part of the initial inherent risk rating.
2. **Modern slavery understanding & commitment** - designed to give us an understanding of any commitments the supplier may have in regard to human rights.
3. **Policies & procedures** - helps us to understand what policies & procedures the supplier may have in place to reduce the risk of modern slavery occurring within their operation and supply chains.
4. **Supply chain management** - helps us understand how well they know their supply chain and any measures they may have in place to reduce modern slavery risk among their supply chain.
5. **Ethical recruitment** - helps us to understand the nature of the supplier's workforce including how they recruit to identify any potential risks of modern slavery within their recruitment approach.
6. **Human rights & modern slavery** - relates to the 8 types of serious exploitation defined as modern slavery within the Modern Slavery Act. They allow us to understand whether any supplier's practices may create the potential risk of modern slavery within their business.
7. **Due diligence/Remediation** - allows us to understand what processes the supplier may have in place to help address and remediate any risk or incidents of modern slavery within their business.
8. **Education & training** - allows us to understand whether the supplier has any education or training in place to help employees identify and understand modern slavery risks within their business or supply chain.

Case Study – Testing process improvement, utilising new cloud-based software solution

We hold a strong relationship with Supplier EFG. They are a multi-national accounting firm who provide professional services within the diversified financials sub-sector and operate on a global scale. After improving our process, to issue a survey invitation to our suppliers using our new cloud-based software solution, we invited one of our senior leaders and their point of contact from EFG whom we have a close relationship with, to test out this process. By doing this, we were able to further refine the process and remove any impediments identified before rolling the solution out, to the broader business and supply chain.

2. Mitigate & remediate

We have developed a range of strategies for managing the modern slavery risks identified throughout our due diligence process. These strategies are targeted towards building upon our understanding and capabilities, continuously improving our policies and processes, and enhancing engagement levels with our suppliers. Key items completed in FY2021 are as follows:

1. Active engagement with our industry peers to discuss themes and trends from operation and supply chains, understanding best practice, sharing learnings to over-come barriers and explore potential future opportunities of collaboration;
2. Increase understanding and capability of our SLT to effectively manage suppliers
3. Continuous improvement upon current processes including defined policy and procedures;
4. Review of the Whistle-blower policy and external grievance mechanism (FairCall) we have in place in February 2021. This mechanism allows our broader GMHBA family a confidential avenue to report concerns or suspected reports or breaches of modern slavery or human rights risks within our supply chain, in an anonymous manner. This in turn also supports our remediation processes. At this time, no protected disclosures had been made internally or to FairCall in the 12 months leading up to this;
5. Procurement management including the inclusion of modern slavery clauses within new or revised contract agreements.

3. Monitor & review

During our second year of reporting, we have continued to work towards embedding our modern slavery processes and practices within the business, including the automation of some of these processes. To ensure we have a continuous improvement approach to compliance with the Act, we have continued to focus our efforts in growing in maturity, in accordance with our modern slavery maturity model, which will ensure we are enhancing our processes over time to have the right effect on addressing modern slavery with our suppliers. An update on our maturity model will be addressed as a part of Criteria 5. As we mature, our processes, risk assessments, monitoring and risk profiling will continue to be managed by our Finance and Corporate Services team, with the Risk and Compliance team providing oversight and challenge as the 2nd Line of Defence.

Case Study – Supplier collaboration through due diligence process

One of our key relationships is with Supplier XYZ who manufactures, distributes and sells health care supplies. XYZ head office is based in Australia, with manufacturing plants located all over the world. We prioritised working with XYZ given our strategic relationship with them in supporting our Optical business's and the ability for their operations team within Australia to assist both us and them through piloting our modern slavery risk assessment framework. Key risk factors were also overlaid against XYZ's profile, providing us with an inherent risk rating and allowing us to subsequently identify them as one of our potential higher risk suppliers. XYZ were initially provided with both our Supplier Statement explaining the expectations we have of them to comply with all applicable laws, and an outline of our approach to identifying modern slavery risks. We asked in the first instance that they complete our supplier Self-Assessment Questionnaire (SAQ) to understand what they were currently doing to manage the risk of modern slavery. We adopted a collaborative approach with XYZ and based on the responses received, we were able to clearly establish a baseline from which we will be able to continue to engage with XYZ on how they are enhancing and addressing modern slavery risk through continuous improvement. Relationship owners will continue to monitor XYZ with a focus on continuous improvement.

4. Reporting

In accordance with our modern slavery maturity model, we will continue to work towards, developing robust reporting to create awareness, transparency and alignment of our highest modern slavery risks including providing greater visibility of these risks at a Board and Executive level. Within this reporting period, all SAQ responses have been assessed and overall risks discussed with the relevant SLT members, informing our modern slavery risk profile for FY21. Although none of our

SAQ's have been received with a risk rating of 'High' or above, to assist our learnings, we have captured some key risk trends that seem to be emerging within our supply chain. These key patterns of behaviour include:

- Misclassification of inherent risk rating based on country of operation due to insufficient data
- High levels of procurement of health care supplies, examples: frames and lenses for our eye care practices
- Suppliers not obliged to report under the Act, which means their understanding of modern slavery is limited and their engagement levels low within our due diligence process
- Suppliers not publicly committing towards combatting modern slavery
- Suppliers not having adequate procedures and policies in place
- Suppliers not having adequate formal risk assessment process in place to support identification of modern slavery risks
- Suppliers' high utilisation of sub-contracting or third-party recruitment companies
- Suppliers not having a grievance mechanism in place
- Suppliers not providing education or training for their own staff

5. Criteria 5.0 Describe how the reporting entity assesses the effectiveness of these actions

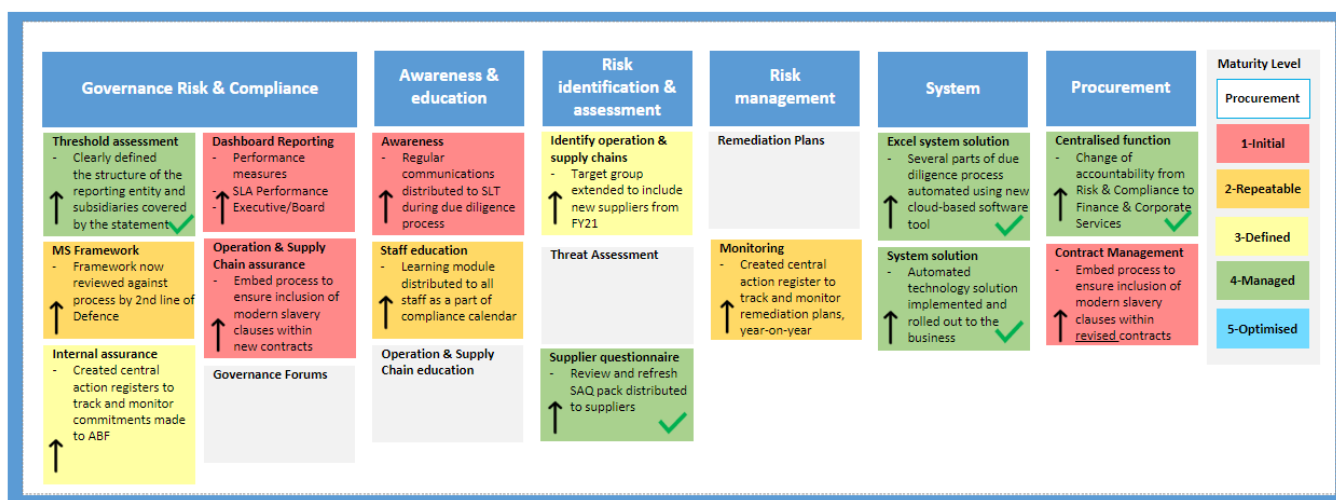
We are monitoring the effectiveness of our processes and procedures to address the modern slavery risks that our business causes, contributes to, or is directly linked to, in line with the UN Guiding Principles. We will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions and outcomes, partnering with suppliers and other external partners, and undertaking regular internal governance and external assurance processes. Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery. Per the 'Guidance for Reporting Entities' issued by the ABF, GMHBA will look to continually improve and build on our response each reporting period.

During our first reporting period, we were still in the initial stages of embedding our modern slavery processes and practices within the business. Last reporting period, we created a modern slavery maturity model, to ensure that we are enhancing our processes over time. Over the last year, we have matured our processes, risk assessments, monitoring, risk profiling and created a central repository managed by Finance & Corporate Services and continue to ensure we apply a continuous improvement approach to compliance with the Act. We have also continued to build our modern slavery maturity target model, as below:

What we achieved during FY21

MATURITY TARGET MODEL

WHAT WE ACHIEVED IN FY21



Legend

- ✓ Maturity target achieved
- ↑ Improvements made on prior year

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement.

6. Criteria 6.0 Describe the process of consultation with any entities the reporting entity owns or controls

During the reporting period this statement covers, we actively engaged and consulted with all companies we own or control or have joint control of, during the development of this statement as outlined in the response above for Criteria one. We discussed details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

To elaborate on the above, in the development of this statement we consulted with representatives from the follow teams and areas:

- We spoke over email and on the phone with outgoing members of the finance team within **HEA** and **GPSL**
- We liaised face-to-face with team members from finance representing GMHBA Armstrong Creek U/T and Health Services who also work within GMHBA
- We liaised with key personnel from **ABC** over email, in which to offer the entity an invitation to participate in the development of this statement. This entity was co-operative with us but did not feel they could add any valuable contribution to the development of our Statement given they are not required to report, and their understanding of modern slavery is limited. At this time, we took the opportunity to provide ABC with additional information about modern slavery in order increase their understanding.
- We liaised with key personnel from **123** over email, in which to offer the entity an invitation to participate in the development of this statement. The entity was co-operative with us, but did not feel as though they had anything valuable to contribute towards the development of our Statement, given we no longer possess joint control of this entity, and they are not required to report

7. Criteria 7.0 Provide any other relevant information

We acknowledge to combat modern slavery, and eradicate it, in its entirety from our broader supply chains, will require dedication and a consistent effort year on year. Delivering on this undertaking will take a concerted effort by GMHBA, our suppliers, our staff and health fund peers, supported by cross-industry collaborations.

Looking ahead

FY2022		
Area of focus	Aim	Activity
Building our understanding and capabilities	Further educate and support suppliers in understanding their requirements	We are currently collaborating with the ABF & PHI Col with plans to host and arrange an education and training session targeted towards the PHI industries supply chain
Enhance engagement with suppliers	Capture customer journey for suppliers through due diligence to streamline process	Create a decision tree relating to potential pathways a supplier may take whilst completing their SAQ and mitigating the barriers that may be impacting participation levels
Process Improvement	Ensure modern slavery is captured as a part of overall compliance calendar activities	Uplift our Compliance Obligations Framework once Risk & Compliance have finished upgrading their reporting platform
	Expand ability to capture human rights and modern slavery breaches	Expand our Incident Management processes
	Establish clear guidelines for SLT to follow when a threat response is identified	Develop guidance on remediation actions to support relationship owners in addressing modern slavery risks and establish reporting rhythm to ensure the

		Board and Executive Group can manage risks identified effectively
	Automate stages of the due diligence process:	Initial discussions commenced (internal and external)
FY2023		
Building our understanding and capabilities	Increase awareness of modern slavery within vendor management lifecycle	Establish internal working group comprised of key stakeholders
	Establish and define Key Performance Indicators (KPI's) in relation to modern slavery internally	Define qualitative and quantitative indicators for assessing the effectiveness of our actions to assess and address modern slavery risks.
Enhance engagement with suppliers	Assess risks that may exist within our hospital, medial and ancillary (Tier 2).	Continue to assess risks within our operation and supply chains, expanding the scope to include our hospital, medial and ancillary
	Increase effectiveness of Grievance mechanisms in accordance with United Nations expectations	Understand effectiveness of what's currently in place, consider current advice coming out of Global Compact, Network Australia, improve mechanism to align with UNGPs' effectiveness criteria and remove any accessibility barriers, if they exist

We are proud of the work we have achieved during this last reporting period, to prevent modern slavery and any inadvertent involvement we may have across our business and supply chains. There is more to do, but we are always looking to continuously improve the ways we do things to eliminate modern slavery, always in partnership with others, knowing that no one can do so on their own.

This statement was approved by the Board of GMHBA Limited on 15 December 2021. The Board of GMHBA Limited approved this statement on behalf of the other entities covered by the statement, which include GMHBA Armstrong Creek U/T, Health Services, and the ceasing of operations of HEA, GSPL. All procurement for these entities was undertaken through GMHBA Limited. Criteria six within this statement outlines how GMHBA Limited consulted with ABC and 123, during the development of this statement.

This statement is signed by Claire Higgins in her role as the Chair of GMHBA Limited on 15 December 2021.

Signed:



Claire Higgins
Chair
GMHBA Limited
15 December 2021