

Modern Slavery Statement

2025–2026



About this Document

This Modern Slavery Statement is made pursuant to the Commonwealth Modern Slavery Act 2018 (the Act) by Albury Wodonga Health (AWH) and relates to the financial year 1 July 2025 to 30 June 2026.

Mandatory Criteria 1 & 2:

Identify the reporting entity and describe its structure, operations, and supply chains.

Albury Wodonga Health (ABN 31 569 743 618) is an Australian health service established under section 181 of the Health Services Act 1988 (Vic).



Other services:

- Range of community based residential facilities and community health centres.
- Care delivered across Northeast Victoria and Southern NSW.
- The Albury Wodonga Health Board of Directors is made up of nine members, of which 45% are female.

Albury Wodonga Health's annual report can be found at: **AWH Annual Report 24/25**

Health Share Victoria (HSV) is a state-wide procurement organisation that partners with Victorian public health services to source goods and services that deliver best-value outcomes.

HSV works collaboratively with health services to understand their operational needs, facilitate large-scale collective tenders, and manage common-use contracts on behalf of the state. In fulfilling this role, HSV is committed to ethical sourcing practices and actively works to identify, prevent, and mitigate risks of modern slavery across its procurement activities and supply chains.

Albury Wodonga Health sources the goods and services required to support its operations from a diverse range of suppliers, many of whom are engaged through collective agreements facilitated by Health Share Victoria (HSV).

Given HSV's central role in coordinating procurement across Victorian public health services, it is recognised as a key stakeholder in the health sector's supply chains. Albury Wodonga Health acknowledges this shared responsibility and works in alignment with HSV to uphold ethical sourcing standards and mitigate the risk of modern slavery within its procurement activities.

A full list of HSV's sourcing categories can be found at **Contracts and documents » HealthShare Victoria**.

The breakdown of Albury Wodonga Health's spend :

Warehouse items:



69% of purchase through HSV contractual arrangements – including schedule 1 and schedule 2 item

31% of purchases through non-HSV contractual arrangements.

Non-warehouse purchases:



57% of purchases through HSV contractual arrangements.

43% of purchases through non-HSV contractual arrangements

During the 2025–26 reporting period, Albury Wodonga Health engaged with approximately 1,800 suppliers across a diverse range of goods and services. These included warehouse-managed medical consumables as well as non-warehouse items such as ventilators, beds, mattresses, patient trolleys, treatment chairs, pharmaceutical products, intravenous fluids, and catering supplies.

The organisation also procured essential services including agency labour, laundry and linen services, and non-emergency patient transport. Additionally, non-warehouse procurement extended to utilities and professional services, such as electricity providers, legal counsel, and consultancy firms.

Albury Wodonga Health acknowledges the complexity and breadth of its supply chain and remains committed to identifying and addressing potential risks of modern slavery through robust procurement practices and supplier engagement.

Albury Wodonga Health and Health Share Victoria (HSV) acknowledge the ongoing and evolving risks of modern slavery within the global healthcare supply chain.

With an estimated 104 million people employed in the healthcare sector worldwide, many goods, such as patient clothing, uniforms, textiles, gloves, and footwear, are manufactured in regions where labour protections may be weak, unenforced, or absent. This can result in vulnerable workers being subjected to exploitative conditions with limited avenues for redress.

In Australia, increasing life expectancy and an ageing population continue to drive demand for healthcare goods and services, further expanding the complexity of supply chains and heightening exposure to modern slavery risks. Sectors such as outsourced labour, manufacturing, and logistics remain particularly vulnerable.

In 2025, businesses across the healthcare sector are navigating heightened expectations around ethical sourcing and human rights due diligence, while balancing financial sustainability.

Albury Wodonga Health remains committed to working with HSV and its supplier network to strengthen transparency, uphold human rights, and mitigate modern slavery risks through responsible procurement practices.

Mandatory Criteria 3:

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity own or controls.

Under the Modern Slavery Act 2018, the primary focus of Albury Wodonga Health during the 2025–26 reporting period was to conduct supplier risk assessments within Health Share Victoria (HSV) Collective Purchasing Agreements. This objective was successfully achieved, enabling the organisation to better understand and address potential modern slavery risks within its indirect supply chain.

Looking ahead to the next reporting period, Albury Wodonga Health will build on this foundation by working collaboratively with HSV and the health service's direct suppliers to identify and implement targeted mitigation strategies. This will include fostering stronger partnerships with suppliers to promote transparency, encourage ethical sourcing practices, and actively address modern slavery risks across all tiers of the supply chain.

In the upcoming reporting period Albury Wodonga Health will engage directly with its top 30 suppliers based on spend data, as well as any additional suppliers identified as potentially high-risk, to assess their exposure to modern slavery within their own supply chains. This process will involve conducting individual risk assessments for each supplier and prioritising engagement with those assessed as high or very high risk.

Albury Wodonga Health will support these suppliers by raising awareness of modern slavery risks and directing them to relevant training and guidance materials available through Health Share Victoria's supplier resource page. This targeted approach reflects the organisation's commitment to proactive risk

management and continuous improvement in ethical procurement practices.

The risk assessment will be split into two sections:

- 1. Supplier details** – questions regarding the supplier's details such as organisational structure, manufacturing location/s, industry sector, etc. These address criteria one, two and three under the Act. The responses in this section attract a twenty per cent (20%) weighting to the overall risk rating of the supplier.
- 2. Modern slavery risks** – questions which specifically focus on the supplier's response to modern slavery risks, actions taken, etc. These questions address criteria four and five under the Act and accounted for a weighting of eighty per cent (80%) of the overall risk rating of the supplier.

It has been evident in working with suppliers that whilst suppliers want to work collaboratively on reducing human rights impacts of modern slavery this does require greater efforts, understanding and commitment. HSV will continue to focus on assisting suppliers with their response to modern slavery in the coming years through the Community of Learning sessions for health services along with supplier engagement sessions, which will focus on areas such as introductory supply chain mapping and processes providing remedies to allegations of Modern Slavery.

Albury Wodonga Health confirms that it has not caused or contributed to modern slavery practices. However, the organisation acknowledges that it may be linked to modern slavery risks through its supply chains, particularly in offshore and high-risk geographies.

For suppliers assessed as high or very high risk, Albury Wodonga Health will provide support by promoting awareness of modern slavery issues and directing them to relevant training and guidance resources available through HSV's supplier resource page.

The preliminary supplier risk evaluation will consider factors such as the prevalence of modern slavery in the supplier's operating regions and the inherent risks associated with their supply chain model. This type of assessment provides a foundational understanding of the potential exposure to modern slavery risks across the supplier base.

For example, suppliers categorised as "very high risk" may lack formal training on modern slavery policies for staff and subcontractors, have limited visibility into their supply chains, and may not intend to implement prequalification processes for their own suppliers. In contrast, suppliers assessed as "low risk" typically demonstrate stronger governance, including comprehensive training programs, transparent supply chain oversight, and established ethical sourcing protocols.

Albury Wodonga Health has adopted a targeted, risk-based approach to assessing modern slavery risks within its operations and supply chains. This approach has enabled the organisation to focus on areas of elevated risk and implement appropriate mitigation strategies.

Given its predominantly skilled workforce, Albury Wodonga Health considers the risk of modern slavery within its direct business operations to be relatively low. However, in line with its risk-based methodology, these risks will continue to be monitored and further examined in future reporting periods.

The organisation acknowledges that the extensive nature of global supply chains may expose it to modern slavery risks, particularly in offshore and high-risk geographies. With Health Share Victoria (HSV) playing a significant role in Albury Wodonga Health's procurement activities, HSV has supported the identification of general modern slavery risks across shared supply chains.

Albury Wodonga Health may be exposed to a range of modern slavery risks due to the diversity of products and services sourced through both HSV and its own procurement channels. These risks are influenced by factors such as geographic location, industry sector, and the strength of regulatory frameworks further down the supply chain.

Some of the general areas of modern slavery risk present within Albury Wodonga Health's supply chain include:

- Labour practices in offshore manufacturing facilities, particularly in regions such as South-East Asia;
- Labour conditions associated with the sourcing of raw materials, including cotton and rubber; and
- Industry-specific risks linked to sectors such as textiles, electronics, catering, security, and cleaning services.

In addition to general supply chain risks, Albury Wodonga Health and Health Share Victoria (HSV) have identified several high-risk areas that are particularly relevant to the healthcare sector. These include:

- Labour practices in offshore manufacturing facilities, especially in regions with limited enforcement of labour protections;
- Sourcing of raw materials, such as cotton and rubber, which are often associated with exploitative labour conditions;
- Industry-specific risks in sectors commonly engaged by healthcare providers, including textiles, electronics, catering, security, and cleaning services.

These areas have been prioritised for further assessment and engagement, recognising their elevated exposure to modern slavery risks due to complex global supply chains and varying regulatory environments.

Given the complexity of global healthcare supply chains, Albury Wodonga Health will continue to enhance and refine its risk assessment methodology to improve visibility into high-risk areas across Victorian health supply chains. This ongoing improvement will support more targeted mitigation strategies and strengthen the organisation's ability to identify and respond to modern slavery risks effectively.

Key implementation and monitoring activities will include:

- Reviewing and updating assessment criteria to reflect emerging risk indicators and sector-specific vulnerabilities.
- Integrating supplier feedback to ensure the assessment tool remains practical, relevant, and aligned with industry expectations.
- Collaborating with Health Share Victoria (HSV) to ensure consistency and alignment across shared procurement frameworks.
- Tracking supplier engagement and response rates to monitor the effectiveness of the assessment process and identify areas for improvement.
- Reporting outcomes and insights to internal stakeholders to inform procurement decisions and guide future mitigation strategies.

These refinements will support a more targeted and data-driven approach to modern slavery risk management, ensuring Albury Wodonga Health remains proactive and accountable in its ethical sourcing practices.

Mandatory Criteria 4:

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

Albury Wodonga Health recognises the importance of continuous improvement in assessing and addressing modern slavery risks within its supply chain. As part of its broader risk management strategy, the organisation will continue to implement targeted training initiatives to build internal capability and awareness.

Modern slavery training will be delivered to key personnel across the organisation, including Board Members, the Chief Executive Officer, the Executive Leadership Team, the Procurement and Supply Chain team, and contract managers overseeing high-risk service areas.

This training will focus on:

- Understanding modern slavery risks and indicators;
- Roles and responsibilities under the Modern Slavery Act 2018
- Ethical procurement practices and supplier engagement;
- Use of HSV's supplier resources and risk assessment tools.

Training outcomes will be monitored through participation tracking, feedback collection, and periodic reviews to ensure content remains relevant and effective. This initiative supports Albury Wodonga Health's commitment to embedding a culture of ethical awareness and accountability across all levels of the organisation.

HSV has established a modern slavery program of work and appointed a Supply Chain Risk Manager to implement the program and support Victorian health services to address modern slavery risks in their operations and supply chains. The program encompasses health service education and support, supplier engagement, due diligence and remediation, amongst other activities.

The number of suppliers who have a policy in place regarding modern slavery has increased from 86 in 2023 to 105 in 2024, representing an increase of 22% over this period. Over the three years from 2022 to 2024, there is an increase of 32 suppliers having a modern slavery policy in place. Compared with the previous periods, suppliers with a system in place to monitor compliance increased year on year, reflecting a continued improvement over the three years to governance by suppliers as regards the effectiveness of their policies.

AWH have dedicated roles within the Procurement and Supply Chain Department who are responsible for overseeing modern slavery risk; pre-screening of prospective suppliers for modern slavery risk; whether the supplier conducts its own risk assessments of suppliers in its supply chains, and supplier visibility over its own supply chain. Due diligence actions include asking the prospective suppliers questions about their modern slavery risk including supplier assessments at the evaluation stage of assessment.

The number of suppliers who now have a dedicated role or team member to oversee modern slavery risk within their organisation has increased from 89 in 2023 to 97 in 2024. This means 87% of suppliers responding to this question has a team or members in place to oversee modern slavery. Total numbers over the three years also increased, from 79 to 97 suppliers saying they do have a team or team member to oversee modern slavery.

The number of suppliers who have stated that they have remedy/action plans in place to respond to allegations of modern slavery has increased from 62 in 2023 to 99 in 2024 representing an increase of 60% over this period.

Over the three years from 2022 to 2024 there has been an increase overall of 37 suppliers who have processes in place to respond to allegations of modern slavery. This is a positive outcome given the increasing regulatory responsibilities expected on suppliers.

Remedial action plans provide a clear framework for organisations, their staff, and suppliers—and most importantly, any affected individuals—to understand how allegations of modern slavery will be addressed and resolved within the supplier's operations or supply chain.

Albury Wodonga Health is committed to upholding the Australian Government's position on modern slavery. This commitment is reflected in the organisation's Procurement Policy, which now includes provisions addressing modern slavery risks in health supply chains and incorporates mechanisms for managing related complaints and remediation processes. The policy outlines AWH's approach to procurement governance and its alignment with government expectations.

To strengthen due diligence, AWH has embedded a modern slavery clause in its Invitation to Supply (ITS) documentation and selected contracts, requiring suppliers to acknowledge their responsibilities under the Modern Slavery Act 2018.

In addition, suppliers must commit to the Supplier Code of Conduct, which sets expectations for identifying, addressing, and—where required—reporting modern slavery risks within their operations and supply chains.

To strengthen its due diligence approach, AWH is working towards a consistent procurement and supply chain management framework by:

- Assessing incumbent suppliers using tailored modern slavery risk questionnaires;
- Managing remediation actions arising from due diligence findings;
- Mapping tier one suppliers and their associated risk profiles.

AWH will also encourage its top 30 suppliers to complete HSV's online modern slavery training to build awareness and capability. In parallel, Health Share Victoria (HSV) has engaged all very high, high, and medium-risk contracted suppliers, providing tools and resources to support the development of modern slavery risk management systems.

AWH has actively participated in HSV-led initiatives, including one-on-one sessions focused on risk mitigation and five out of eight community of learning presentations. These sessions covered key topics such as:

- Demonstrating progress on modern slavery risk mitigation;
- HSV's supplier risk assessment framework;
- Trends in modern slavery statements; and
- Guidance on preparing and drafting modern slavery statements.

HSV also reinforced its expectations under Collective Purchasing Agreements and the Victorian Government Supplier Code of Conduct, requiring suppliers to actively address modern slavery risks within their operations and supply chains.

Mandatory Criteria 5:

Describe how the reporting entity assesses the effectiveness of actions taken to assess and address modern slavery risks.

Albury Wodonga Health recognises the importance of implementing robust assessment mechanisms to better understand and manage modern slavery risks. These mechanisms will be introduced during the FY2025–26 reporting period. In the interim, AWH has actively engaged with Health Share Victoria (HSV) to review and learn from the effectiveness of HSV's existing supplier assessments

HSV has engaged with all its suppliers but focused on those who obtained a high to very-high risk rating. HSV provided them with information on the free supplier resources available, both publicly and on HSV supplier's web page, and directed them to the free online modern slavery training resources on HSV's Modern Slavery supplier web page.

In percentage terms, there has been an increase to suppliers who are categorised as having 'medium' risk of modern slavery within their supply chains and operations. Correspondingly we have seen a marginal decrease in suppliers with a risk rating of 'high' and a significant decrease in suppliers rated 'low' due perhaps to a greater understanding of modern slavery risk and a recognition of the actions that can be taken, and which suppliers are yet to undertake.

Continuing education measures, such as suppliers offering training to others outside of their own organisation and undertaking efforts to support employees and surrounding communities assist with raising awareness, and potentially identifying and reporting the occurrence of modern slavery, all contributes to a greater understanding and maturity of modern slavery risk.

HSV has introduced supplier engagement information sessions, with strong attendances recorded for the sessions so far. Many suppliers have encouraged others within their organisation to also register and attend sessions. The sessions aim to develop understanding of modern slavery risks and the different stages of the journey of increasing awareness of modern slavery in supply chains and operations.

In 2023–24, AWH staff attended a number of HSV Community of Learning sessions. Community of Learning topics over the last period included:

- Last minute tips for reporting;
- 2023 supplier risk assessment results;
- Sector focus on the freight industry;
- KPI's for effectiveness; and,
- What a good statement looks like.

Health Share Victoria (HSV) has implemented several mechanisms to monitor the effectiveness of its modern slavery initiatives. Representatives from mandated health services attending training sessions periodically complete self-assessment surveys aligned with the requirements of the Modern Slavery Act 2018. The results are used to evaluate the impact of engagement activities, refine future workshop content, and identify gaps in training and awareness.

As part of the recent supplier risk assessment initiative, a total of 139 suppliers were invited to complete the questionnaire. HSV received 111 responses, resulting in a response rate of 80%.

This is a strong level of engagement and provides a solid foundation for our risk analysis moving forward. Our suppliers are gaining a better understanding of modern slavery risk and this is being reflected in their ability to respond to certain questions in a positive way, indicating that some actions have been taken.

HSV's senior leadership has taken ownership of the modern slavery program, with progress regularly reviewed and discussed at senior committee meetings to ensure strategic oversight and accountability.

Mandatory Criteria 6:

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

Albury Wodonga Health does not own or control any other entities.

Mandatory Criteria 7:

Any other relevant information.

HSV plans to further increase its engagement with suppliers, including providing supplier sessions on supply chain mapping. HSV will also continue to request modern slavery policies, with medium suppliers also to be included in the current reporting period. HSV will provide feedback and over time the quality of modern slavery policies assessed is expected to improve.

Additionally, HSV has implemented the supplier Mandatory Minimum Standards which includes the requirement that suppliers undertake annual risk assessments and formalises expectations HSV has of its suppliers when supplying to Victoria's public health services.

To support the implementation of the Act within the health service, Albury Wodonga Health will use the toolkit developed by HSV to assist with meeting the requirements under the Act. The toolkit contains:

A modern slavery plan to support the implementation of the governance structures, policies, processes, and risk registers needed to underpin a successful modern slavery framework.

- Advice on implementing a modern slavery policy.
- A modern slavery risk register to capture and address the key modern slavery risks that a health service might cause, contribute, or be directly linked to.
- A modern slavery risk assessment tool, including advice on modern slavery risk assessments, supplier questionnaires for ITS due diligence and incumbent suppliers and advice on how to interpret questionnaire results.; and
- A modern slavery fact sheet to facilitate staff training.

The rollout and implementation of the toolkit will support Albury Wodonga Health to conduct our own risk assessment, due diligence, and remediation activities.

In addition to existing initiatives, Albury Wodonga Health has established a Procurement & Contract Management Governance Committee, which plays a critical role in strengthening the organisation's approach to ethical sourcing and risk mitigation. This Committee serves as a key governance mechanism, ensuring that procurement practices align with broader organisational values and legislative obligations, particularly in relation to Modern Slavery.

Recognising the significant impact that modern slavery can have on vulnerable populations and supply chains, the Committee has formally integrated this issue into its Annual Workplan. Furthermore, modern slavery is designated as a standing agenda item at each meeting, ensuring ongoing visibility, accountability, and strategic focus. This consistent attention enables the Committee to monitor emerging risks, review supplier practices, and promote awareness across departments.

By embedding modern slavery considerations into its governance framework, Albury Wodonga Health demonstrates a proactive commitment to ethical procurement and continuous improvement. This approach not only supports compliance with the Modern Slavery Act 2018 but also contributes to a more informed and socially responsible health service.

Closing Statement

Albury Wodonga Health is dedicated to upholding the highest ethical standards in all aspects of our supply chain. We recognise that modern slavery, in all its forms, is a violation of human rights and a serious issue that affects communities globally. Albury Wodonga Health remains vigilant in our efforts to eliminate modern slavery and will continue to report on our progress annually. Together, we can contribute to a healthcare environment that respects and upholds the dignity and rights of all individuals.

This statement was approved by the Board of Albury Wodonga Health on:

30 October 2025

Date



Jonathan Green
Board Chairperson