

Modern Slavery Statement

1 JULY 2022 - 30 JUNE 2023

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Chef Manager

Introduction

Eldercare Australia Ltd (“**Eldercare**”, “**we**”, “**our**”, “**us**”) is one of South Australia’s leading aged care and retirement living providers. We place our residents and our local community at the heart of everything that we do and we base our governance decisions around benefiting our residents and the local community around us.

Eldercare does not tolerate modern slavery practices. We take genuine steps to identify and mitigate any risks of modern slavery in our operations and supply chains. This goes to the heart of our core values of *Respect, Accountability and Connection* and is aligned with our Corporate Social Responsibility Strategy.

This is our fourth modern slavery statement. This statement is for the reporting period from 1 July 2022 to 30 June 2023 and addresses the mandatory requirements outlined in section 16 the *Modern Slavery Act 2018* (Cth) (“**Act**”).

In this reporting period, our focus was on undertaking supply chain tracing projects on specific, high-risk supply chains whilst continuing to develop and mature our robust due diligence processes and procedures.

We set out these achievements in this modern slavery statement.

Reporting Entity | Eldercare Australia Ltd

Australian Business Number | 63 758 127 271

Head Office | 247 Fullarton Road, Eastwood South Australia 5063

Website | <https://www.eldercare.net.au>

What is modern slavery?

Modern slavery is defined in the Act as the “serious exploitation” of people. This includes exploitation in the form of:

- *Trafficking in persons¹ – use of violence, threats and / or coercion to transport, recruit or harbour people to exploit them.*
- *Slavery and servitude – any work or services that people are forced to do against their will and under the threat of punishment.*
- *Forced marriage - when a person is married against their will and cannot leave that marriage.*
- *Debt bondage – forcing people to work to pay off debts, resulting in the loss of control over both their employment conditions and debt.*
- *Deceptive recruiting for labour or services - victims are tricked into working where they are paid little or nothing and cannot leave because of debt or confiscation of identity documents.*
- *Worst forms of child labour² - the exploitation of children for commercial gain, including child trafficking, child marriage, child labour and child soldiers.*

Risk indicators, whilst not modern slavery explicitly, can be indicators of an environment which could escalate to modern slavery or be an indication of modern slavery practices. Examples of risk indicators include excessive overtime, underpayment, health and safety contraventions and inadequate personal protective equipment (PPE) being provided to workers. Eldercare takes these indicators seriously and aims to investigate, substantiate and remediate indicators found within its supply chains.

¹Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, New York 15 November 2000 [2005] ATS 27.

²Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, Geneva 17 June 1999 ([2007] ATS 38).

About Us

Eldercare has been caring for elderly South Australians since 1959. The wellbeing of our residents is central to everything that we do and is the centrepiece of our operational and governance decisions.

Eldercare operates in a highly regulated industry and accordingly we train and support our staff to ensure that we provide consistent quality care to our residents. We are values-driven, and we aim to deliver peace of mind with our care.

We strive every day to maintain the ‘heart’ in our organisation while balancing this with adequately responding to a rigorous and evolving regulatory framework. We continue to prioritise modern slavery compliance and our role as a reporting entity to identify, remediate and report on modern slavery risks found in our organisation and supply chains.

Our modern slavery compliance framework aligns with our core values of respect, accountability and connection and allows us to ensure that there is respect, accountability, and connection in our broader community and through our supply chains. Our operations and decision making are designed to maintain the heart of our organisation whilst also complying with the rigorous and continuously changing compliance landscape that comes with the aged care and retirement living industry.

Our Values

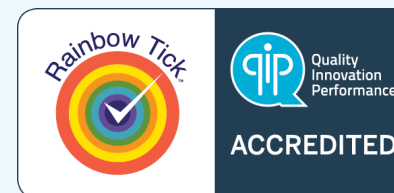
Respect	Accountability	Connection
We protect the dignity, rights and values of individuals	We are all responsible for working safely and with integrity	We develop vibrant and supportive relationships based on warmth and generosity
		

White Ribbon Workplace

We are very proud to have been Rainbow Tick Accredited for the quality and performance of our LGBTIQI inclusivity program and to have White Ribbon Workplace Accreditation for our efforts towards ending violence against women. We want to create a community that is safe and inclusive for our staff, our residents, their families and the broader community and ensure that they feel safe, welcome and cared for.

Rainbow Tick Accredited

Eldercare is a Rainbow Tick accredited organisation and is the first South Australian residential aged care provider to receive accreditation.



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Reporting Entity

This Modern Slavery Statement is made by Eldercare Australia Ltd ABN 63 758 127 271.

Eldercare does not have any subsidiaries and does not own or control any other entities.



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Structure, Operations and Supply Chains

Structure

Eldercare is a not-for-profit organisation and is registered with the Australian Charities and Not-for-profits Commission. Eldercare is solely based in South Australia with its headquarters at 247 Fullarton Road, Eastwood SA 5063.

We are governed by a Board which oversees our governance and compliance obligations. Our executive team lead the day-to-day operations of Eldercare.

Operations

Eldercare has been operating as an aged care provider for 64 years and cares for more than 1,000 residents across our 13 aged care homes across South Australia. Eldercare employs 1750 staff and has over 250 volunteers who support us and are vital to our operations. If required, Eldercare engages labour hire entities to assist with staff shortages (for example nurses and personal carers).

In addition to our aged care homes, we support the community by providing:

- 200 independent living units across our 12 retirement villages; and
- Allied health services which assist over 300 clients at our day therapy centre.

The wide range of services that we provide means that we can support and serve our community in a variety of ways, which helps to ensure that retirees and those needing support can come to us for support in various stages of their retirement and supported living journeys.

In this reporting period, a new residential aged care home at Goodwood has been under construction, combining cutting-edge infrastructure, spacious living areas, and a holistic model of care. Eldercare Goodwood aims to create a nurturing and enriching environment where residents can thrive and maintain their wellbeing. Our new Goodwood site has been designed with environmental sustainability front of mind and we anticipate a 6 star Green Star rating for the building as a result of the inclusion of many environmentally conscious features including solar panels, rainwater and storm water collection, high quality insulation and double glazing.

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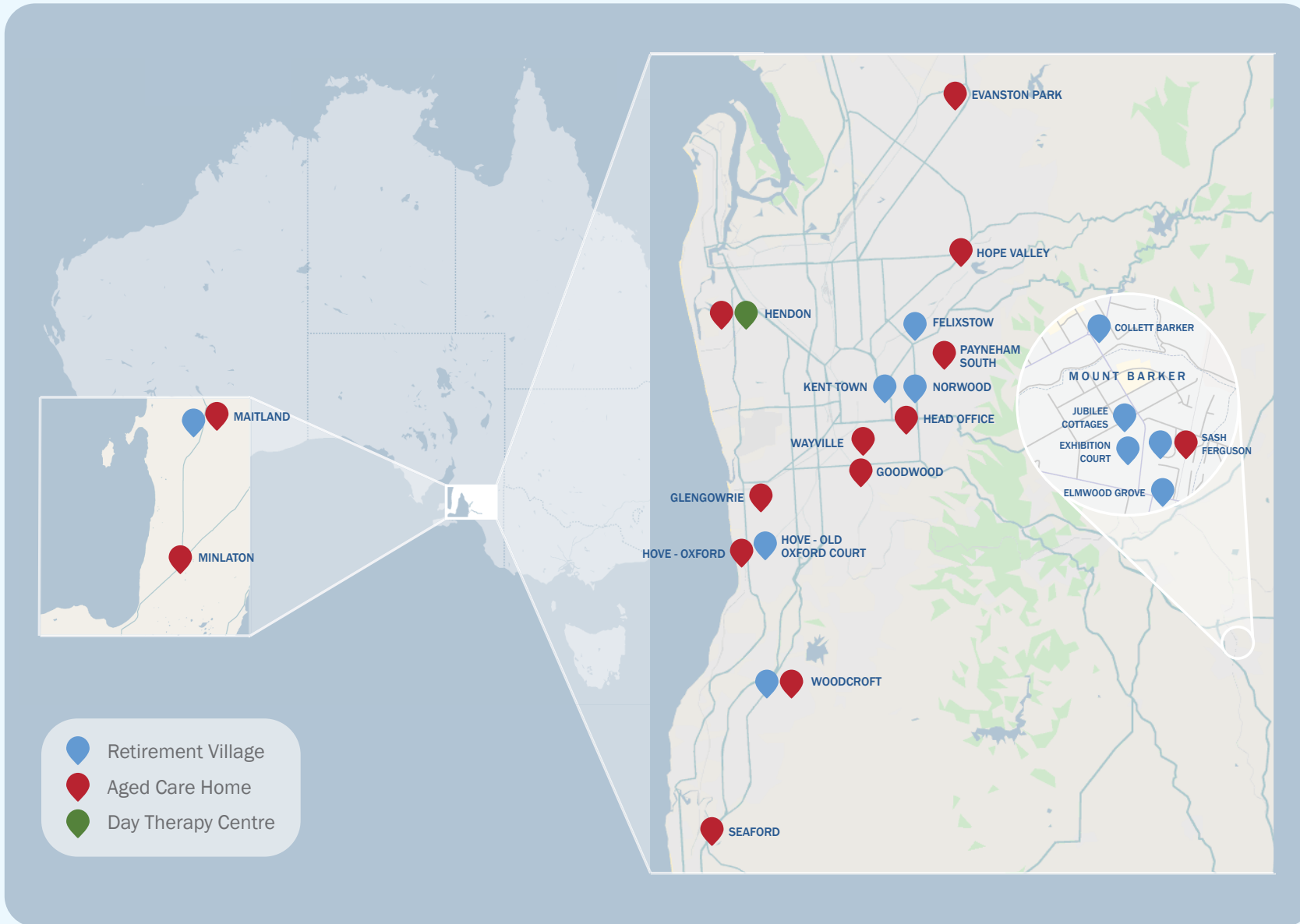
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Locations of Eldercare Sites



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Suppliers

Our suppliers are vital to our operations and maintaining our high quality of care. We continue to engage with suppliers that are focused on quality and are industry leaders in their respective sectors. Eldercare is proudly based in South Australia and strives to engage local suppliers to support the local economy and community.

In accordance with our due diligence threshold, Eldercare has engaged with 155 suppliers during this reporting period.³

We prefer to engage long-term suppliers and minimise one-off engagements with suppliers where possible. We define a “long-term supplier” as a supplier who we have engaged with 3 years or more. In FY23, 48% of our total suppliers were long-term suppliers.

Supply Chains

We engage a wide variety of suppliers across our operations to enable us to deliver our quality services to our residents. Broadly, our suppliers can be categorised as either:

1. Providing goods and services relating to the provision of direct care to residents

2. Providing goods and services supporting the provision of direct care to residents

³Eldercare has maintained the due diligence spend threshold of \$10,000 as reported on in previous modern slavery statements.

Our suppliers who provide goods and services related to the provision of direct care to our residents assist us in providing:

 **Care Services**

Nurses, personal care workers, allied health professionals, medical consumables, pharmaceuticals, direct care related support equipment and personal protective equipment.


 **Hospitality**

Food, cleaning, laundry, linen, consumables and hospitality labour.

 **Wellbeing**

Chaplaincy, lifestyle activities, events, entertainment, hairdressing, beauty therapy and massage.

Our suppliers who provide goods and services which assist us in providing ancillary support functions to the business are in the following areas:

 **Business administration**

Professional and administrative services, consultancy, IT, insurance and head office support.

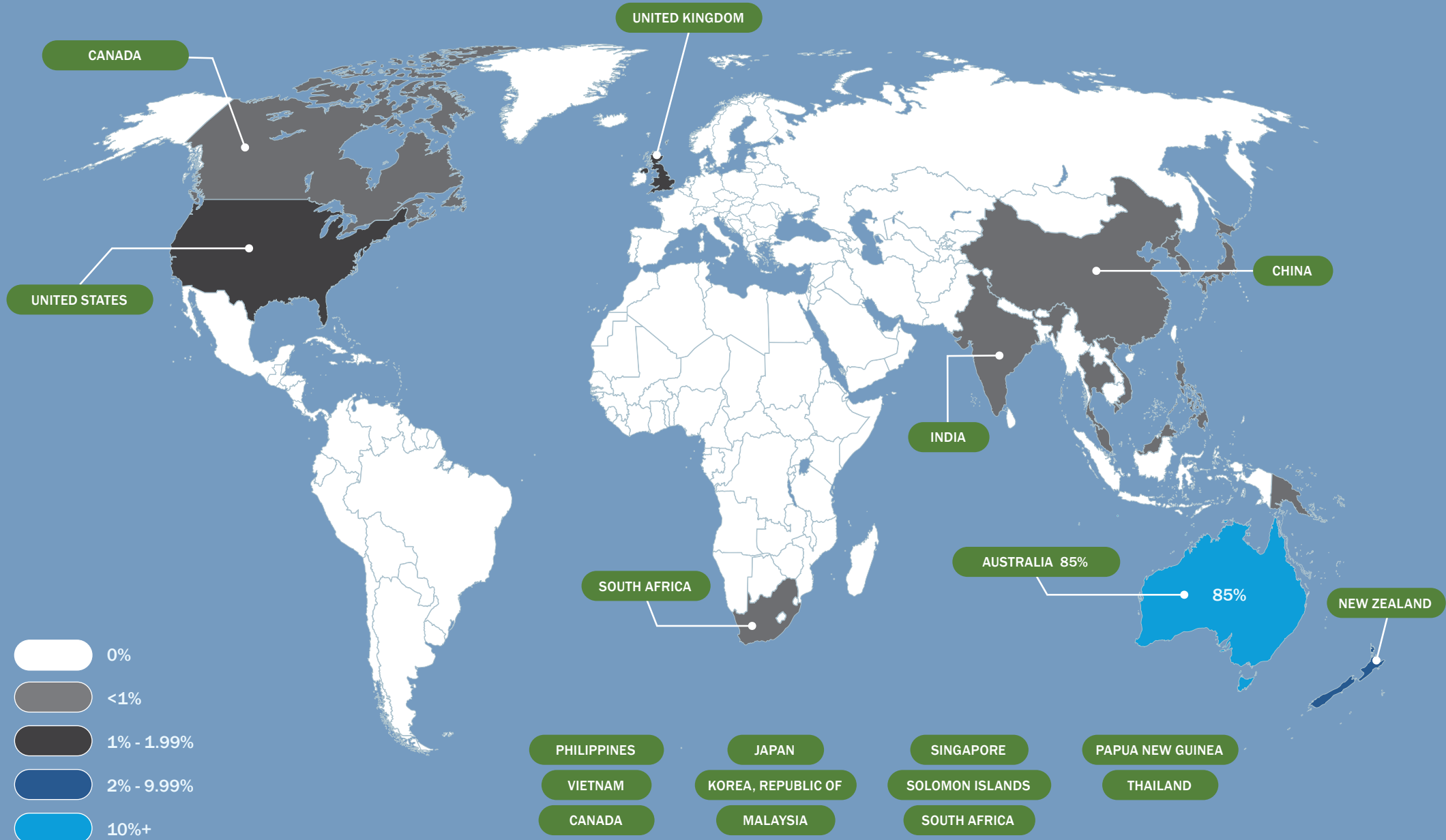
 **Property services**

Utilities, maintenance to buildings and equipment, building projects and refurbishments.

Tier 1 Suppliers Operating Locations

Tier 1 Supplier: Immediate Eldercare Supplier

In the reporting period Eldercare continued to undertake detailed analysis regarding its tier 1 suppliers. The following map identifies the key locations of our tier 1 suppliers.

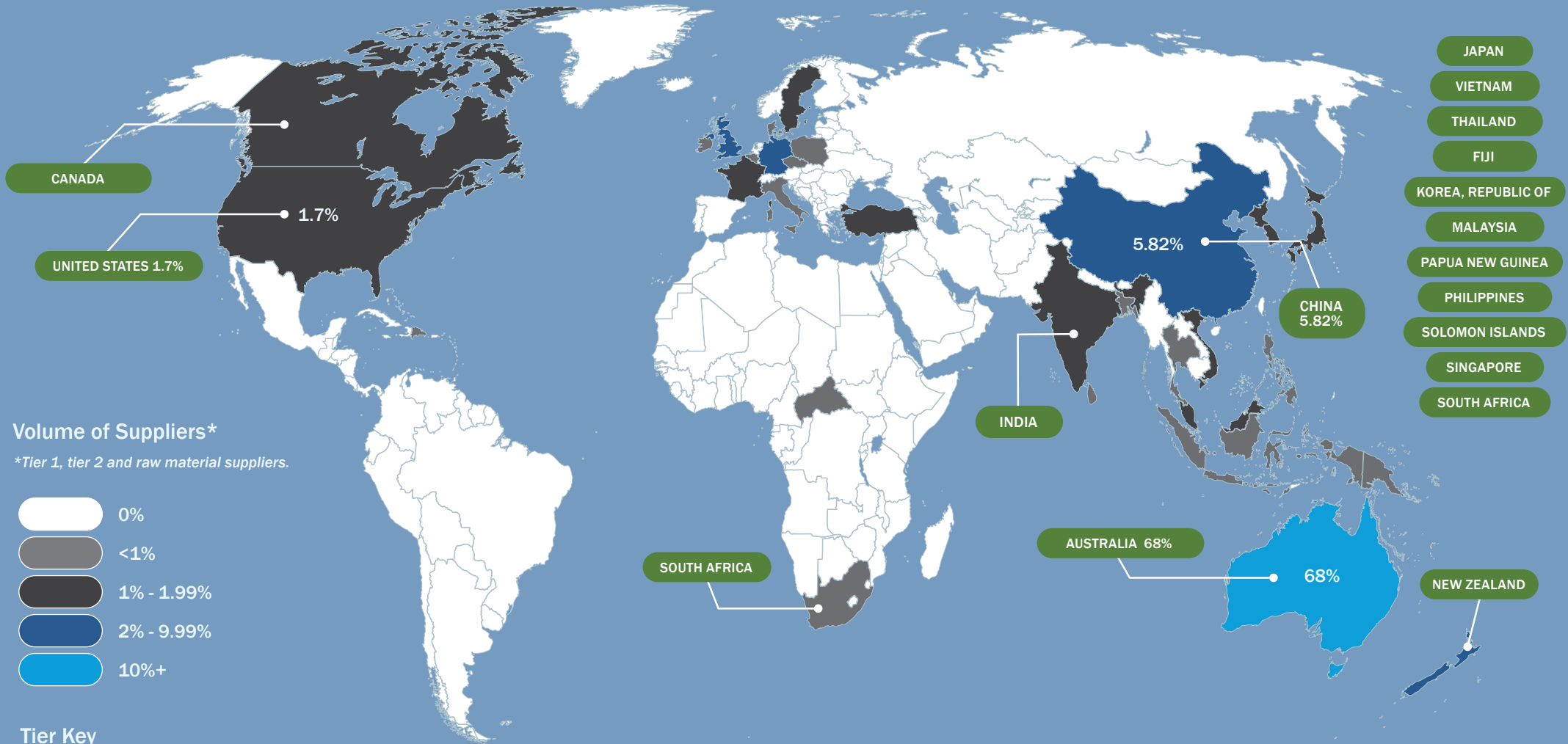


Tier 1, Tier 2 & Raw Material Suppliers

Tier 2 Supplier: Direct Supplier to Eldercare's Tier 1 Suppliers

Raw Material Supplier: Organisations that work with input materials to manufacture products for Eldercare's suppliers (deeper within Eldercare's supply chains)

In the reporting period Eldercare continued to undertake detailed analysis regarding its tier 1 suppliers and continued to look deeper into its supply chains beyond tier 1. The following map identifies the key locations of our suppliers and also closer analysis of suppliers deeper within our supply chains.



Risks of Modern Slavery

Assessment of modern slavery risks in our operations and supply chains is a continual undertaking which Eldercare seeks to improve in each reporting period in response to newly identified risks.

The “cause, contribute to and directly linked to” framework from the United Nations Guiding Principles on Business and Human Rights guides our risk assessment. This involves assessing modern slavery risks associated with our operations and supply chains and whether Eldercare could be deemed to cause, contribute to or be directly linked to any modern slavery incidences or risks.

Cause

Modern slavery that an entity causes itself via its activities or omissions that results in harm.
Example – employing migrant workers and withholding their passport and other identity documentation.

Contribute to

Activities or omissions to facilitate, enable or incentivise harm.
Example – purchaser engages a supplier and places unreasonably short lead times on the supplier leading to significant overtime and underpayment issues.

Directly linked to

Being linked to harm through products, services or business relationships.
Example – engaging a supplier that is later discovered to have child workers.


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We use the “cause, contribute to and directly linked to” model in conjunction with our risk matrix to comprehensively assess modern slavery risks.

Our risk matrix has been developed in accordance with the Global Slavery Index, the ten (10) principles of the United National Global Compact, the Universal Declaration of Human rights and the Guidance for Reporting Entities issued by the Australian Government for compliance with the Act.

Our risk matrix assesses suppliers against various risk factors such as:

- 1. Geographic risks** – specific risks associated with that country or region.
For example, the Xinjiang Uyghur Autonomous Region, China.
- 2. Product and services risk** - specific risks associated with that product / service.
For example, linen and cotton carry a high modern slavery risk.
- 3. Entity risks** – specific risks associated with that entity.
For example, the risk associated with a small, isolated factory (higher risk) vs a larger multi-national firm (lower risk).
- 4. Sector and industry risks** – specific risks associated with that particular sector or industry.
For example, cleaning services is a higher-risk sector than the accounting services sector.

Our operational risks

Eldercare is an entity solely operating in South Australia. We operate in a highly regulated industry (being the aged care industry) and have strong internal governance and leadership driving our operations. Accordingly, we consider that we have a low risk of modern slavery occurring in our own operations (the specific details of such are outlined in Criteria 2).

Our strong internal governance is supported by our comprehensive policy and procedure frameworks and our compliance with local laws and requirements.

For example, Eldercare:

- pays all employees in accordance with Australian laws and requirements;
- has comprehensive grievance mechanisms in place for reporting concerns or grievances, such as a Whistleblower Policy to allow eligible whistleblowers to report eligible disclosures;
- supports all employees through employee assistance frameworks; and
- has a robust training framework. For example, we undertake specific training on modern slavery (discussed further in Criteria 4).

We acknowledge that despite being an entity that operates solely in South Australia and is seemingly shielded from the effects of modern slavery, we are not immune to its effects and risks. Modern slavery is an issue that permeates all businesses irrespective of their location.


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Case Study 1: Labour Hire

The use of sub contractors or labour hire agencies carries a heightened modern slavery risk. This is due to risk factors associated with the industry such as the lack of visibility over the employment contracts with the workers, the heightened vulnerabilities for those workers (particularly those who are in unskilled sectors) and the short-term nature of these employment arrangements.

The use of labour hire is often required in the aged care sector to fulfill short term staff shortages. For example, we use labour hire for various roles such as kitchen hands, cleaners, nurses and personal carers. Whilst labour hire has increased modern slavery risks, we have undertaken due diligence on our labour hire providers and ensure that we pay our labour hire in accordance with legislated rates. We will continue to undertake due diligence on our labour hire arrangements.

Our supply chain risks

Eldercare assesses that its risks of modern slavery are most likely to present in its supply chains, particularly deeper in its supply chains. To manage this risk, Eldercare's Corporate Services Executive is responsible for the management of Eldercare's modern slavery compliance framework which then facilitates direct oversight and reporting to Eldercare's board. Eldercare's Procurement and Contracts Manager continues to manage our modern slavery compliance framework and is supported by their team to drive and develop our modern slavery compliance framework.

Eldercare has a centralised procurement function which allows for robust oversight over our procurement and contracting. Centralised procurement means that Eldercare directly works with suppliers to identify risks early in the engagement process with suppliers. Furthermore, centralised procurement allows us to have control and set our business standards directly to our suppliers.

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Eldercare assesses that the categories of suppliers where modern slavery risks are heightened (in accordance with the “cause, contribute to and directly linked to” framework) are as follows:

Sector	Risk
<p>LINEN</p>	<p><i>Risk for Eldercare: Directly linked</i></p> <p>Cotton is a key raw material that is required to fulfill Eldercare’s services (for example, for linen and uniforms).</p> <p>Cotton is a known high risk raw material for modern slavery; however, this risk has been heightened since the identification of forced labour camps in the Xinjiang Uyghur Autonomous Region (“Xinjiang”) in China. Manufacture and process of raw materials such as cotton, polysilicon and tomatoes have been identified as high risk commodities.</p> <p>Eldercare has implemented, and will continue to implement, steps to identify and mitigate risk associated with cotton and linen as it seeks to gain oversight and visibility over its supply chains.</p>
<p>MEDICAL SUPPLIERS (PERSONAL PROTECTIVE EQUIPMENT (“PPE”) AND MEDICAL EQUIPMENT</p>	<p><i>Risk for Eldercare: Directly linked</i></p> <p>PPE has been a high-risk sector, particularly since the supply chain impacts of the COVID-19 pandemic. There were sourcing issues in the pandemic which increased the risk of forced labour.</p> <p>For example, there has been extensive media coverage regarding modern slavery in Malaysia with the production of single use gloves. This is a risk that Eldercare continues to monitor closely and considers this as an ongoing risk factor.</p>

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Sector	Risk
<p style="text-align: center;">CLEANING</p>	<p><i>Risk for Eldercare: Directly linked</i></p> <p>The cleaning industry has always carried a heightened modern slavery risk because of the following risk factors pertinent in this industry:</p> <ul style="list-style-type: none"> • volume of migrant workers; and • deceptive recruiting practices such as debt bondage are commonly used in this industry.
<p style="text-align: center;">CONSUMABLES</p>	<p><i>Risk for Eldercare: Directly linked</i></p> <p>Specific risks have been identified with food sources such as fish, cocoa, rice and coffee. In this reporting period, there have been significant supply chain disruptions which have impacted the ability to trace the origins of food sources. For example, due to shortages, we identified that suppliers have been replacing local, Australian goods with international alternatives which have complicated due diligence and supply chain tracing efforts.</p> <p>Eldercare continuously re-evaluates and monitors risks associated with these consumables and is continuing to undertake steps to penetrate deeper into our supply chains where these risks are likely to be particularly prevalent. We have undertaken specific steps to address the risks associated with our food suppliers in this reporting period, which are further outlined in Criteria 4 below.</p>

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Sector

CONSTRUCTION

Risk

Risk for Eldercare: Directly linked

The construction industry generally carries heightened modern slavery risks due to systemic:

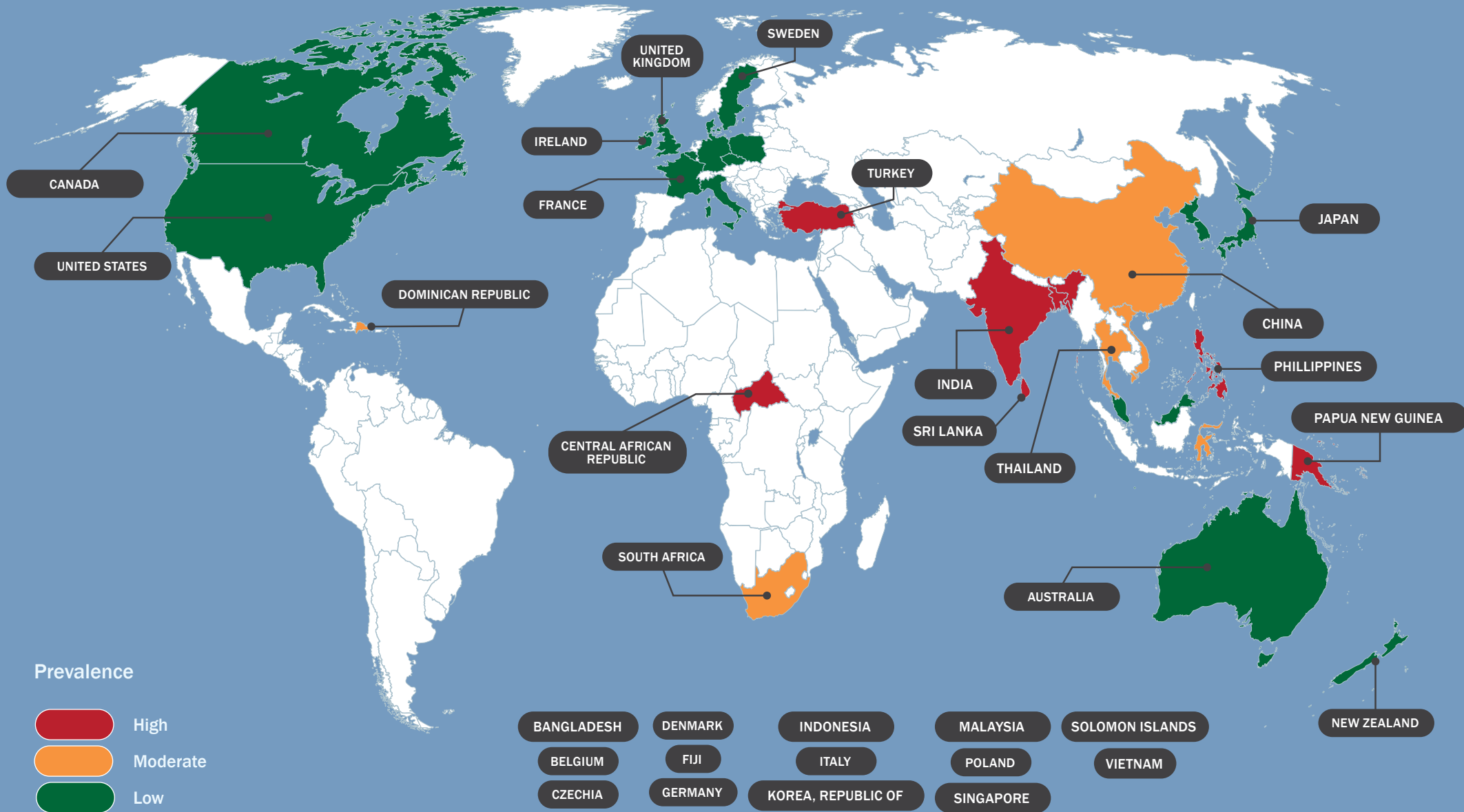
- overtime;
- hazardous working conditions (i.e., working with dangerous machinery and materials); and
- explicit instances of modern slavery such as forced labour and child labour.

Certain raw materials within the construction industry also carry heightened modern slavery risks, such as bricks, lime and cement materials.

Solar panels have recently been identified as a commodity carrying a high risk of modern slavery. Polysilicon is a key component of solar panels, the large majority of which comes from Xinjiang. Accordingly, a large proportion of the worlds solar panel supplies have been linked to Xinjiang. Eldercare has undertaken due diligence on its solar panel suppliers and will continue to prioritise due diligence on this high-risk commodity.

Modern Slavery Risk

This map demonstrates prevalence of modern slavery (in accordance with the Global Slavery Index) in our supply chains. This includes prevalence deeper in Eldercare's supply chains capturing tier 2 and raw material locations.





Actions taken to address modern slavery risk

In this reporting period, Eldercare has continued to undertake significant and progressive actions to address the risks of modern slavery occurring in its supply chains and operations.

A key part of this has been undertaking specific supply chain tracing exercises for high-risk suppliers and other designated projects to address key modern slavery risks within Eldercare's supply chains.

A summary of the actions undertaken in this reporting period are as follows:

1. Continued engagement of external expertise to guide our modern slavery compliance framework and use of the modern slavery compliance portal ("Portal").
2. Continuing modern slavery as a key internal governance priority.
3. Review of existing employee modern slavery training for amendment and implementation in the next reporting period whilst continuing to train relevant employees.
4. Specific review of our food suppliers in light of supply chain disruptions.
5. Supply chain training exercises on certain high-risk linen and cotton suppliers.
6. Undertake supply chain tracing by mapping known Tier 2 suppliers to Tier 1 suppliers.
7. Continue ordinary due diligence, including issuance of refresher questionnaires.
8. Expand supplier questionnaire to include broader ESG risks (for example, environmental risks).

Third party guidance and use of Portal

Our third-party adviser assists us in developing and maintaining our modern slavery compliance framework. Alongside our third-party adviser, we create, implement, and evaluate our modern slavery actions for each reporting period.

Our Portal streamlines our supplier management and due diligence. The Portal has helped automate our due diligence by automatically assessing our suppliers against our risk matrix and updating the suppliers risk score when further due diligence is undertaken. The Portal is automated to follow our supplier due diligence workflow, which is outlined in the workflow diagram on the next page.

Supplier Due Diligence Workflow

New Suppliers

- ↳ New supplier added to platform
- ↳ Initial risk assessment and screening
 - If supplier annual spend is above \$10K**
 - ↳ Issue supplier modern slavery questionnaire via platform
 - ↳ Review questionnaire and action relevant remediation
- ↳ Finalise new supplier

Ongoing Due Diligence

- ↳ Repeat risk assessment and screening
 - If questionnaire completed 12 months prior**
 - ↳ Issue supplier refresher questionnaire via platform
 - ↳ Review refresher questionnaire and action deeper supply chain due diligence
- ↳ Finalise refresher due diligence

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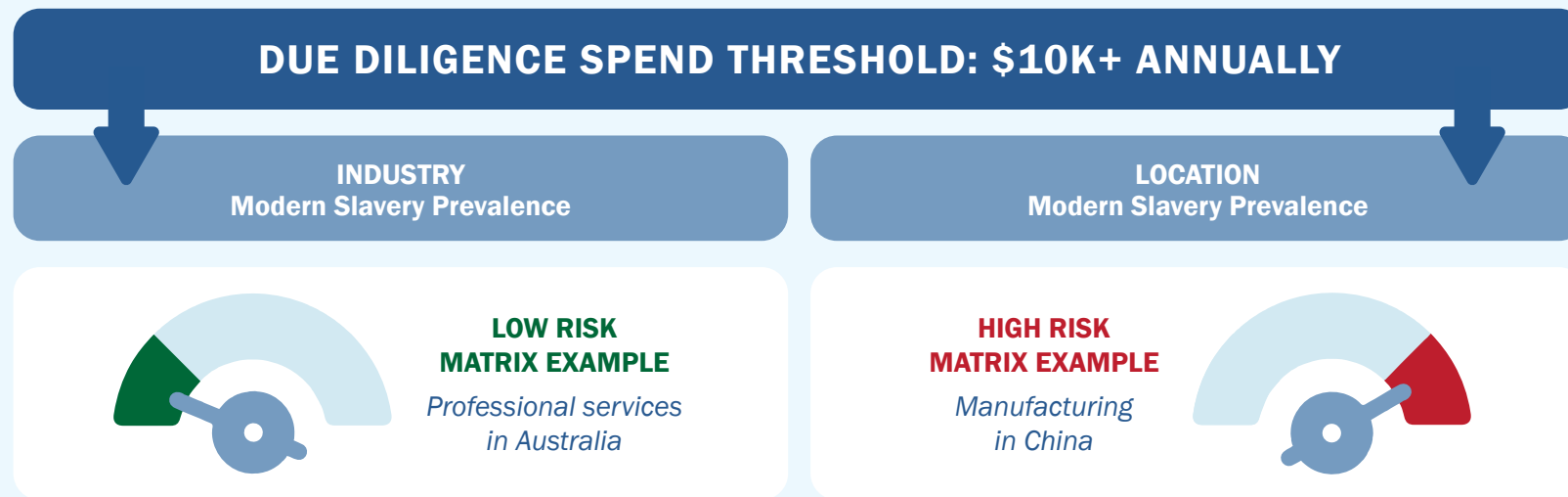
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The specific due diligence processes are outlined in detail below:

Step 1 – Risk assessment:

The Portal will automatically assess suppliers against our risk matrix. The risk matrix assesses the supplier based on their location, industry and the predicted annual spend on the supplier. Our risk matrix is outlined below.



Step 2: Screenings:

All new suppliers are screened through a risk and compliance tool called Refinitiv. This assesses suppliers for risk in broader ESG factors beyond modern slavery risk, including:

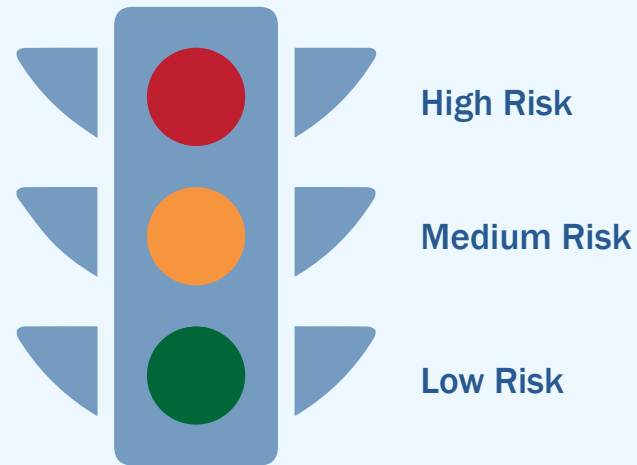
- Integrity risks - for example, bribery and corruption.
- Environmental, Social and Governance Risks - for example, modern slavery and environmental risks.
- Data and cyber risks.
- Operational and quality risks.
- Identity risks – for example, transparency risks.
- Financial risks.

Step 3 – Questionnaire:

Questionnaires are issued to suppliers automatically via the Portal. Questionnaires help us to ascertain the current risk profile of the supplier through tailored questionnaires so that our expectations can be tracked through specific supply chains.

As outlined further below, this year Eldercare have undertaken specific supply chain tracing projects on some of its linen suppliers. Through this process, Eldercare has issued specific questionnaires to linen suppliers to assist in tracing these high-risk supply chains.

The Portal scores the results of the questionnaire using a traffic light system. Green means low risk; orange means medium risk and red means high-risk.



Step 4 – Auditing

Site audits are undertaken on suppliers where there is a heightened risk assessment of modern slavery associated with that supplier. In addition to the high modern slavery risk associated with that supplier, we opt to undertake site audits where:

- a. The answers to modern slavery questionnaires require further due diligence. This could occur in situations where, for example:
 - inconsistent answers were provided within the questionnaire, suggesting that broader operational inconsistencies may be evident;
 - the supplier discloses that they source materials from high-risk locations for modern slavery; and / or
 - the supplier does not provide adequate information through the questionnaire.
- b. It may also be that the supplier operates in a high-risk sector which Eldercare chooses to target as part of its supply chain tracing programs.

For example, as outlined in Case Study 4, one of our employees who is trained to undertake site audits undertook a site audit of one of our linen suppliers.

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Case Study 2 - Updates to employees

Our Procurement Manager and our Corporate Services Executive sends updates to key stakeholders on key updates in modern slavery compliance. For example, when the Baptist World Aid 2022 Ethical Fashion Report was released, they sent an update to key people within our organisation noting what is outlined in the report and how this relates back to Eldercare's ongoing efforts under our modern slavery compliance program.

This is an example of Eldercare's ongoing effort to educate staff and make our modern slavery compliance relevant for people within our organisation. This then helps with our internal modern slavery compliance by ensuring that employees have an understanding of what modern slavery is, what we are doing in this space and why we are doing what we are doing.



Prioritisation of modern slavery as a key internal governance risk

We have continued the focus of creating employee, supplier and broader stakeholder buy-in to our modern slavery compliance efforts in this reporting period.

Modern slavery remains to be a key agenda item in board meetings, internal risk meetings and broader business reviews and therefore internally is a key governance priority.

Eldercare discusses modern slavery within its supplier meetings as a fixed agenda. This ensures that we update suppliers on key expectations, refresh their knowledge on modern slavery and helps us determine if aspects of their service or the relevant supply chains warrants reassessment.

Review of employee modern slavery training

Our modern slavery training outlines:

- what modern slavery is;
- risk factors and indicators of modern slavery; and
- the reporting requirements under the Act.

Initially, this training was rolled out to management as well as to key staff that engage with suppliers and the broader procurement process.

It was important to prioritise these individuals within our organisation as key individuals involved in the execution of our modern slavery compliance framework, in particular staff involved in the procurement and supplier onboarding processes and ongoing supplier due diligence.

We have now expanded the scope of employees that are trained beyond those in management and those who engage with suppliers and the purchasing process. It is important that more people in our organisation are aware of our compliance requirements and what we are doing so that there is employee buy in to this process.

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For those employees who have completed the modern slavery training, this training is refreshed annually to ensure that these employees are up to date on the requirements of the Act and why Eldercare has to comply with the Act.

Our third-party advisers reviewed our training and identified areas which could be expanded on in the next reporting period.

Additional training regarding Eldercare’s policy and procedure framework and overarching modern slavery compliance framework (including reporting mechanisms available) will be developed in the next reporting period to complement our existing training to ensure that our staff are aware of what Eldercare is doing to comply with the requirements of the Act and mitigate modern slavery risks within its operations and supply chains.

Review of food suppliers

Eldercare has always prioritised sourcing Australian and specifically South Australian produce used within its operations. However, through discussions with one of our suppliers, we discovered that due to stock shortages, they had been replacing local, Australian goods which have been out of stock, with internationally sourced alternatives. This has been an issue that we have been faced with since the start of 2023.

There are inherent risks associated with acquiring certain foods from certain jurisdictions. For example, the following foods are deemed to be high risk commodities from these specific countries:

HIGH RISK FOOD COMMODITIES	
FOOD	COUNTRY
FISH	Ghana, Indonesia, Thailand, Brazil, Cambodia, Yemen, Vietnam, Uganda, Thailand, Taiwan, Tanzania, Indonesia, Kenya, Paraguay, Philippines, Peru
TOMATOES	Xinjiang, China, Argentina, Dominican Republic, Ethiopia, Kenya, Paraguay
TEA	India, Rwanda, Uganda, Vietnam, Tanzania, Malawi, Kenya

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In conjunction with advice from our third-party advisers, we were able to evaluate the equivalent products that we were being sent from overseas vendors for modern slavery risk and make informed choices as to whether we accept these overseas products or whether we attempt to source these products from an alternative provider. In addition to this, we engaged in direct conversations with our suppliers to ensure that what we were sourcing was local, Australian produce, emphasising our priority to source local produce.

Case Study 3 - Food Supplier

Through conversations with a food supplier, we discovered that due to stock shortages, they had replaced certain local, Australian goods with internationally sourced alternatives. This prompted Eldercare to issue the supplier with a tailored supplier questionnaire which asked for details about where they sourced their fish, rice, cocoa, coffee, milk, honey and horticulture suppliers.

The results indicated that the supplier imported some seafood from Thailand, Taiwan, Vietnam and other high-risk countries. As part of the questionnaire, we asked the supplier about the measures that they have in place to ensure that the seafood is sourced free from human rights violations. The supplier answered that they have checks and audits for food safety and modern slavery compliance prior to engaging their suppliers.

Eldercare has established purchasing oversight in place to control and measure how our goods are sourced, these include a fixed basket of core products, a percentage target sourcing Australian products and regular due diligence and direct conversations with our suppliers to identify if the source location of some goods have changed.



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Supply chain tracing of high-risk linen and cotton suppliers


As outlined in Criteria 3 above, linen and cotton is a key high risk commodity for modern slavery that is heavily relied upon in Eldercare's operations (and the aged care industry more generally).

In response to this heightened risk, in this reporting period Eldercare prioritised a deep dive into our linen suppliers to undertake a specific supply chain tracing project. The purpose of the supply chain tracing is to map the supply chains and identify any modern slavery risks that may present deeper in these supply chains.

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Case Study 4 - Linen supplier

A key linen supplier was identified which supplies Eldercare with linen and the broader aged care industry. This supplier had been issued a modern slavery questionnaire in 2022. However, based on the high risk of modern slavery identified with the supplier based on product and industry risks, Eldercare prepared a tailored questionnaire with additional questions for the supplier to answer. These additional questions targeted specific activities such as:

- bleaching and cleaning processes that the supplier undertakes; and
- manufacturing suppliers that the supplier engages to fulfill its orders to Eldercare.

Specific risks were identified with the location of the Tier 2 manufacturing suppliers that the supplier engaged to fulfill its orders to Eldercare. For example, some of the Tier 2 manufacturing suppliers were based in Pakistan, India and Bangladesh which carry location-based risk factors for modern slavery. A further questionnaire was issued asking for specific details of their Tier 2 manufacturing suppliers (i.e., entity name and contact details) to enable Eldercare to be able to undertake a supply chain tracing exercise and undertake further due diligence on these Tier 2 manufacturing suppliers.

Eldercare also undertook an onsite audit of the factory in which the supplier operates to properly ascertain the direct modern slavery risks associated with the supplier in its direct operations. All employees undertake WHS training which includes training on the use of PPE. The building and machinery in the supplier's factory satisfied all safety questions and all workers were above the age of 18. We were also satisfied that the supplier pays their employees in accordance with their enterprise agreement as they are reviewed each quarter for the working hours, wages and benefits provided to each employee. Accordingly, the results of this site audit mitigated concerns for modern slavery risk with the supplier in its direct operations.

Eldercare will continue this supply chain tracing exercise into the next reporting entity so that it has further oversight and visibility over this supply chain so that any modern slavery risks are identified and mitigated accordingly.



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Issuing of further questions to existing Tier 1 suppliers to obtain deeper supply chain risk analysis

In addition to the specific supply chain tracing exercise undertaken above, we have issued further questions to specific high-risk Tier 1 suppliers to gain further oversight over their supply chains. Additional questionnaires were issued to these suppliers which asked them to provide the details of their suppliers that they engage to be able to fulfill their services and obligations to Eldercare (our Tier 2 suppliers).

Through this process, Eldercare has been able to gain further insight into the modern slavery risks deeper within its supply chains. This is important particularly with high-risk suppliers as the most pertinent risks are more likely to be found deeper within the supply chain which Eldercare does not have direct control or visibility over.

This has allowed us to link Tier 2 suppliers to our Tier 1 suppliers and continue to develop a comprehensive map of our various supply chains.

Continued due diligence on existing suppliers and sending annual refresher questions

As outlined above, a key part of our due diligence framework is our continuous due diligence approach. Our suppliers are regularly re-assessed for modern slavery risk to ensure that their overall risk rating in the Portal is updated.

For example, we issue refresher questionnaires annually to our suppliers which asks them to review their previous answers and provide updates to these answers based on any significant circumstance changes which may change their previous responses.

Broader due diligence on suppliers can also be undertaken. For example, specific questions can be added to the refresher questionnaires where specific information is sought from that particular supplier. An example of this is for a supplier to be picked for a specific supply chain tracing project, they are then asked questions about the suppliers and manufacturers that they engage to fulfill their services and obligations to Eldercare as outlined above.

Expand supplier questionnaire to include broader ESG risks (for example, environmental risks).

Through the Portal, there is an opportunity to be able to assess our suppliers for broader ESG risks, beyond the modern slavery risks currently assessed. ESG stands for environmental, social and governance and looks at improving the long term value of an organisation by assessing risks within the E, S and G.

Through our screening process, we screen for ESG risks such as any environmental risks, any sanctions and international legal action against the relevant supplier and any bribery and corruption risks.

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Eldercare acknowledges that broader ESG risks can indicate, and may increase the prevalence of, modern slavery risk within suppliers so expanding due diligence to assess these risks goes to Eldercare's efforts to mitigate its overall modern slavery risk.

To expand the incorporation of broader ESG factors into our due diligence processes, Eldercare has begun developing an expanded supplier questionnaire which includes questions under the following categories:

- Employment (i.e., ensuring that suppliers comply with relevant employment laws, provide employees with formal employment contracts and offer appropriate leave)
- Environment (i.e., assessing whether the supplier has contravened any environmental laws and has appropriate governance mechanisms in place in relation to the environment)
- Bribery and corruption (i.e., assessing appropriate bribery and corruption risks and internal governance mechanisms)
- Cyber security (i.e., ensuring the supplier has appropriate IT and security procedures in place and assessing vulnerabilities).

The expanded supplier questionnaires will be rolled out in the next reporting period. This will allow Eldercare to have a broader oversight of supplier risk over a more diverse range of ESG factors.

Contracting

All supplier contracts, order terms and conditions and our contractor compliance systems contained a robust and detailed modern slavery clause. This clause:

- sets out our expectations with suppliers regarding modern slavery; and
- includes a requirement for our suppliers to report to us any instances of modern slavery in their organisation and supply chains.

All new contracts, agreements and terms and conditions are required to contain a modern slavery contract clause and all existing agreements are amended to include the modern slavery clause as they come up for renewal or extension.

Where it is assessed that the modern slavery risk associated with the relevant third party is heightened, Eldercare may prepare or request a more robust, comprehensive modern slavery clause to be inserted into the relevant agreement.

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Furthermore, all contractors are engaged through a specialised contractor compliance system. This requires all contractors to agree to a modern slavery statement which requires that the contractors agree to comply with:

- the Act and all applicable laws and regulations and all other applicable laws in relation to modern slavery;
- comply with Eldercare’s policies, procedures and the Supplier Code of Conduct;
- take reasonable steps to ensure that there is no modern slavery evident in the contractors operations.

Additionally, through this contractor system, all contractors must view and agree to abide by our Supplier Code of Conduct.

Continuation of supplier training

In the FY21 reporting period, Eldercare launched an interactive modern slavery training module for suppliers. We have continued to issue this to suppliers in the current reporting period and will continue to do so in future reporting periods.

We undertake regular meetings with key suppliers where modern slavery is a key agenda item to ensure that suppliers are continually reminded of how seriously we take our modern slavery compliance and our obligations as a reporting entity to identify and mitigate modern slavery risks within our operations and supply chains.

Education is critical to ensure that suppliers (particularly those that are high risk) understand what modern slavery is, what the risks are for modern slavery and what they can do to reduce these risks. Accordingly, Eldercare will continue to use and issue this training in future reporting periods and ensure that it is up to date with relevant legislative requirements and external guidance that is issued.

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Eldercare
Tony
Hospitality Assistant

Assessing effectiveness of actions

The overarching purpose of the actions undertaken in this reporting period was to focus efforts on assessing and addressing the modern slavery risks associated with specific supply chains whilst continuing to undertake robust due diligence for all Eldercare suppliers.

At the beginning of the reporting period, we set ourselves some key action items to meet and achieve throughout the reporting period. A summary of our action items and what we have achieved is outlined as follows:

ACTION ITEMS FY22	
ITEM	PROGRESS
Review current employee modern slavery training and rollout to broader staff members.	Completed – further rollout of new training regarding Eldercare’s internal policies and procedures and reporting requirements in the next reporting period.
Supply chain tracing project for high-risk linen and cotton suppliers	Completed – further tracing and due diligence to be undertaken in the next reporting period.
Identify high-risk new suppliers and undertake supply chain tracing	Completed – further due diligence to be undertaken in next reporting period.
Supply chain mapping	Underway and ongoing.
Refresher questionnaires	Underway and ongoing.
Ongoing due diligence	Underway and ongoing.

In the last reporting period, we undertook a benchmarking exercise which assisted us in developing our action plan for this reporting period. After the success of that process, we again engaged our third-party advisers to undertake a similar benchmarking exercise.

This process involved our third-party advisers analysing the FY22 Modern Slavery Statements of some of our industry competitors and benchmarking us against the initiatives undertaken by our competitors. In this process, our third-party advisers developed benchmarking questions based on the mandatory reporting requirements of the Act, what is required to be undertaken to comply with the mandatory reporting requirements and broader initiatives that contribute to having a robust modern slavery compliance framework.

As well as considering the results of the benchmarking process, our third-party advisers consider external guidance and reports (for example, the Broken Promises Report issued by the Human Rights Law Centre) to analyse trends and broader areas of improvement across reporting entities as detailed in these reports.

Based on the results of the benchmarking process, our third-party advisers prepared a report which outlined:

- where Eldercare ranks in comparison to its competitors in terms of overall compliance with the reporting requirements of the Act; and
- areas of improvement for Eldercare (particularly in supplier due diligence processes).

This process helps Eldercare to prepare an action plan for the next reporting period (in this case, for FY24). Some key areas that Eldercare are looking to focus on in the next reporting period to improve the effectiveness of our processes and procedures are:

- streamlining our approach to due diligence, involving a review of our due diligence thresholds and the difference between a spend vs risk approach to due diligence.
- reviewing our supplier data, including the number of suppliers undertaking due diligence and the response rate to questionnaires; and
- expanding our due diligence approach beyond modern slavery to broader ESG considerations.


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Consultation

This criterion is not relevant to Eldercare as Eldercare does not have any subsidiaries and does not own or control any other entities.




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Looking forward

Significant actions were undertaken by Eldercare during this reporting period to continue to mature its modern slavery compliance framework, particularly with regard to addressing specific modern slavery risks identified in high-risk suppliers.

In the next reporting period, we are looking to undertake the following action items:

1. Develop a KPI framework to assess our modern slavery program against each year.
2. Roll-out our expanded supplier questionnaire.
3. Undertake a review of our procurement cycle to assess where broader controls can be implementing to assist in mitigating modern slavery risk.
4. Reviewing and expanding modern slavery training to include responsible procurement training in light of the procurement cycle review.
5. Continue ongoing due diligence.
6. Undertake further Tier 2 supply chain tracing projects.
7. Incorporate a broader whole of business ESG framework, which will encompass our existing modern slavery compliance framework.

A Review Paper outlining the proposed amendments to the Act was released on 25 May 2023. The proposed changes that are most relevant to Eldercare as an existing reporting entity are:

- Positive obligation to undertake due diligence.
- Financial penalties for non-compliance with the Act.
- Listing of high-risk countries, regions, products, suppliers and supply chains.
- Addition of new mandatory reporting criteria.
- Extension of the definition of “modern slavery” to include worker exploitation.
- Oversight of the Act by the Anti-Slavery Commissioner.
- Additional options for submission of Modern Slavery Statements.

Eldercare are keeping a close eye on the proposed changes to the Act and are working with our third-party advisors to ensure that we are prepared for compliance with the above amendments.

Alongside the above action items and monitoring progress on the proposed amendments to the Act, Eldercare will continue to constantly assess and evolve our modern slavery compliance framework based on any changing circumstances to reduce the risk of modern slavery occurring in our operations and supply chains. This pragmatic approach demonstrates our dedication to developing our modern slavery compliance framework and upholding our purpose of Respect, Accountability and Connection.


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Thank you

We acknowledge the Kaurna people as the traditional custodians of the land that encompasses Adelaide, including Eldercare. We pay respects to the Elders past and present and recognise that their cultural and heritage beliefs are important to them and us today.

This statement was reviewed and approved by the Eldercare Board on 24 October 2023.



Professor Justin Beilby, Board Chair,
Eldercare Australia Ltd

