



MODERN SLAVERY STATEMENT

This Modern Slavery Statement is made pursuant to the Commonwealth Modern Slavery Act 2018 (the ACT) by Western District Health Service and relates to the financial year 1 July 2024 – 30 June 2025.

Mandatory Criteria 1: Identify the reporting entity

Western District Health Service (ABN 47 616 976 917) is a health service established under Section 181 of the Health Services Act 1988 (Vic).

Mandatory Criteria 2: Describe the structure, operations and supply chains.

Western District Health Service (WDHS) is a leading rural and regional healthcare provider, recognised for delivering a range of quality services, Australia's firsts and internationally led programs. Located in Victoria's Western District, WDHS serves the Southern Grampians Shire, with a population of 16,100 and covering 6,652 square kilometres.

WDHS has campuses located in Hamilton, Peshurst, Coleraine and Merino. In total the health service has 93 acute beds and 174 residential aged care beds.

WDHS provides a wide range of professional specialties including emergency, acute, sub-acute, maternity, residential aged care, allied health, community health, Support at Home Services, administration, finance and extensive support services. The FY 24-25 WDHS Annual Report is available on the WDHS Website www.wdhs.net that provides further detail about the organisation.

WDHS understands that we contribute a key role in combating modern slavery. A core WDHS value is that through our actions, we show accountability. We are accountable to increasing awareness of the risks of slavery, human trafficking and other exploitative activities and taking positive action to eradicate this practice from local and global supply chains.

Health Share Victoria (HSV) is a state-wide procurement organisation that partners with Victorian public health services to procure best value goods and services. HSV works in partnership with public health services to understand their requirements, facilitate large-scale collective tenders and manage common-use contracts on behalf of the state. WDHS purchases the goods and services it needs from the suppliers who are party to HSV collective agreements. As such, it is recognised that HSV has a significant role in health service supply chains.

HSV works with approximately 449 tier-one suppliers and is responsible for more than 65 contracts with a spend value of over \$1.16 billion.

HSV contracts cover a broad range of services, equipment and supplies across a number of categories including ventilators, beds, mattresses, patient trolleys, treatment chairs, hypodermic needles and syringes, gloves, pharmaceutical products, IV fluids, agency labour, catering supplies, laundry and linen services and non-emergency patient transport.

A full list of HSV's sourcing categories can be found at;
<https://healthsharevic.org.au/contracts-and-documents/contracts>.

As a public health service, WDHS benefits from state-wide contracts that have been negotiated by Health Service Victoria (HSV). HSV will undertake activities to investigate whether supply chains were restructured as a result of the significant procurement challenges faced during the pandemic.

WDHS supply chain is a combination of HSV sourcing contracts and other local suppliers. WDHS recognises the extensive nature of our global supply chains may expose us to modern slavery risks.

A recent survey completed by HSV for our organisation focusing on HSV collective purchasing agreements captured details including whether the suppliers operate on a multinational basis, the location/s of their manufacturing facilities, and the industries and sector/s they operate in.

Suppliers were asked which country they have manufacturing facilities in. For purposes of the HSV questionnaire, the countries were grouped in 'Zones' according to country risk. For example, if a supplier manufactures in Australia, they tick the Zone 1 option – very low - as Australia is categorised a very low risk country for modern slavery risk. Note though low risk does not mean no risk.

Below are numbers of WDHS suppliers operating in very low to very high risk countries and industries

Suppliers and location of manufacture

Country Risk Rating	Supplier Count
Zone 1 - Very Low (Australia, Britain, Switzerland, UK)	33
Zone 2 - Low (Greece, Italy, Slovakia)	5
Zone 3 - Medium (Argentina, China, Malaysia, Thailand)	8
Zone 4 - High (Cayman Islands, Venezuela, Mexico)	10
Zone 5 - Very High (Afghanistan, PNG, Philippines)	19
Did not respond/ Does not Agree	15
Totals	90

The following table provides a list of the top five industries HSV collective purchasing agreement suppliers operate in and which supply to your Health Service.

Suppliers by industry of operation

Top 5 – Industry Selection	Supplier Count
Health Care Equipment	19
Health Care Supplies	14
Health Care Equipment & Services	7
Commercial Services & Supplies	5
Pharmaceuticals	5
Totals	50

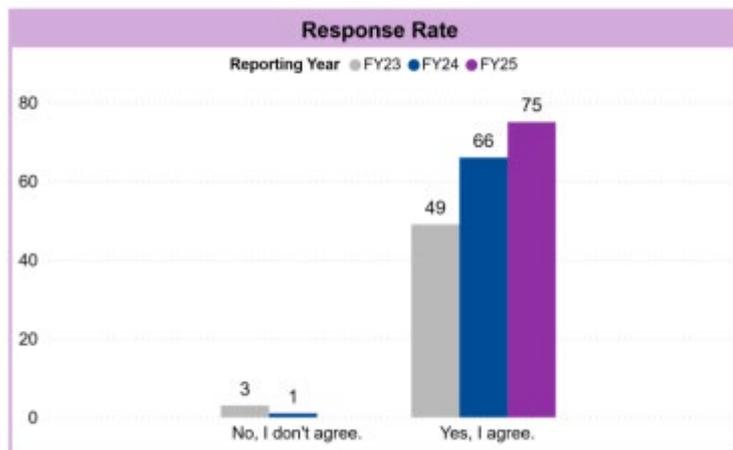
Mandatory Criteria 3: Describe the risks modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity own or controls.

As a health service with a largely skilled workforce, WDHS considers the risk of modern slavery within its direct business operations to be relatively low. In line with a risk-based approach, these risks will be further examined in subsequent reporting periods. WDHS supply chain activities consist of the following procurement approaches to the market:

- Group sourcing activities:
 - HSV led cluster sourcing – collectively led by HSV on behalf of participating health services.
 - HSV led collective purchasing – collectively led by HSV on behalf of participating health services.
 - Health service led cluster sourcing – collaborative procurement by a group of health services, where the lead health service ensures modern slavery requirements.
 - Direct sourcing activities where WDHS directly engages with each supplier on its own.

HSV assisted WDHS with the assessment of modern slavery risk in the supply chains of our Collective Purchasing Agreements. In 2024-25 HSV has provided a support focus to the health service in fostering collaboration between HSV, Health Services and Suppliers to prioritise risk mitigation actions. As a result, HSV rolled out 90 Questionnaires to HSV collective agreement suppliers that were accessed by WDHS for the period FY2024-25. Of the 90 invited suppliers, 75 responded, whilst 15 did not respond.

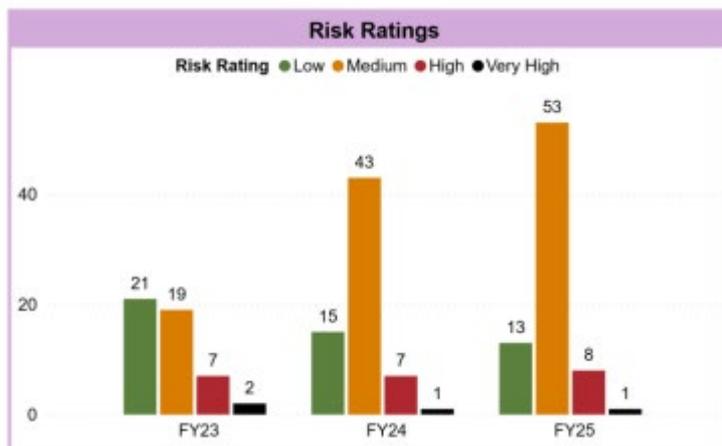
3 Year Response Rate



Supplier risk ratings in percentage terms

Risk Category	Supplier percent in each risk category		
	2023	2024	2025
Very High	4%	1%	1%
High	14%	11%	11%
Medium	39%	65%	71%
Low	43%	23%	17%

Supplier risk ratings (actual numbers)



Low risk rated suppliers reduced by two compared with last year. The increase in the number of medium risk ratings is mainly reflective of the increased response rate. The number of suppliers with a high-risk rating has increased by one from last year, while the number of very high-risk suppliers has not changed. It should be noted that these results do not imply WDHS has caused or contributed to modern slavery practices, but rather, WDHS is linked to risks which exist offshore and in high-risk geographies.

HSV acknowledges that new suppliers come on to HSV collective agreements every year and hence have not previously engaged with our Modern Slavery Program. HSV works with these suppliers more closely as a part of the Program and our focus is to help further their understanding of modern slavery risk and due diligence processes.

For direct sourcing activities, WDHS acknowledges that there is a risk of modern slavery practices, especially upstream within tier two suppliers (manufacturers for our direct tier one suppliers) within the supply chain. We continue to progress in this space to better understand these risks by applying a risk-based approach which allows us to build on our focus and achievements from foundational levels.

Mandatory Criteria Four: 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.

Actions undertaken to date by WDHS include;

- Western District Health Service endorsed its Modern Slavery policy in May 2023.
- The completion and submission of an annual Modern Slavery Statement to the registry.
- Completion of the HSV risk assessment survey and applicable responses for HSV collective purchasing arrangements.
- Supplier Code of Conduct Commitment is included in all RFT & RFQ documents
- Health Share Victoria has invested significantly in initiatives aimed at reducing modern slavery within the Victorian public healthcare sector, including education, training and resource development, which has been of considerable benefit to our health service.

Actions pending finalisation and approval by the health services procurement committee include;

- A short form AND long form supplier questionnaire is being created to assist with determining risk-appropriate modern slavery clauses for inclusion in the contract documents, dependant on the risk assessment rating.
- A modern slavery clause to been incorporated into WDHS's contract template / pathways management system.
- All WDHS procurement committee staff to be provided with training via the ECHO training modules on the HSV website to educate and spread awareness to Health Service procurement staff.

In terms of due diligence, the health services is also considering the introduction of a Modern Slavery Risk Form for all staff to complete if they identify any activities, behaviours, or practices that raise concerns regarding potential modern slavery within the organisation

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

WDHS understands the importance of assessing the effectiveness of actions taken to assess and address modern slavery. However, before measures of effectiveness are implemented, WDHS is first focusing on setting up and enhancing the Modern Slavery Framework and the appropriate tools to capture modern slavery risks.

For FY2025-26, WDHS will work with HSV to risk assess its non HSV suppliers, adopting a risk-based approach to identify suppliers with an annual spend of greater than \$125K to be risk assessed.

This will provide WDHS with modern slavery risk profiles for this cohort of suppliers and a greater understanding of the modern slavery risk in our supply chain. WDHS will seek to engage with any high and very high-risk suppliers identified through this process, providing them with links to resources and online training sources. It is anticipated that as suppliers understand their risks, actions they take will reduce their risk and this will result in improved risk rating in future.

In addition WDHS will endeavour to engage with its staff and suppliers and support understanding of the Modern Slavery Policy through:

1. Modern Slavery Act training and awareness for Procurement and Leadership staff across the organisation in the 2025/2026 period
2. Engagement with our suppliers with training and resources specific to the introduction of the Modern Slavery Policy at WDHS.

Mandatory Criterion Six: Describe the process of consultation with any entities the reporting entity owns or controls

Western District Health Service does not own or control any other entities.

Mandatory Criterion Seven: Any other relevant information

WDHS is committed to maturing our understanding of the Modern Slavery Act and work actively with HSV, our staff and suppliers to embed the learnings and risk management tools into our end-to-end procurement cycle.

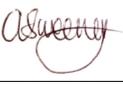
Closing Statement

Western District Health Service is confident that the steps taken this year have continued to build a strong foundation for a robust modern slavery framework. We recognise there is more to do and Western District Health Service is committed to continually improving our approach, partnering with our stakeholders and working to eradicate modern slavery.

The Western District Health Service Board is pleased to see Health Share Victoria taking a leading role in assessing and managing the sector wide risks of Modern Slavery.

This statement was approved by the Board of Western District Health Service on the 6th of January 2026.

Name Ms Anna Sweeney - WDHS Board Chair

Signature  _____