

Slavery Statement





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Chief Executive Officer's message

On behalf of the Board and the Executive Leadership Team, I am proud to present the Modern Slavery Statement (Statement) of InvoCare Limited ABN 42 096 437 393 (InvoCare) and its subsidiaries for the reporting period 1 January 2022 to 31 December 2022 (FY22).

This Statement reflects our continued commitment to upholding high standards of ethics and integrity and our enduring commitment to better understanding and improving our actions regarding the social and ethical challenges associated with our business.

Our commitment to Environmental, Social and Governance (ESG) goals has continued through FY22, cementing the foundations of our Sustainability Strategy, the results of which have been outlined in our Sustainability Report. Our long-term commitment to understanding the full scope of InvoCare's impact has continued to provide us with valued insights, ensuring our targets and goals for our core sustainability areas – People, Place and Planet - are realistic and achievable.



The Board, along with the Executive Leadership Team, has broadened and deepened our engagement with ESG issues generally in the business and our commitment to better understand and combat modern slavery.

With a distinct focus on our procurement practices and our supply chains, we have developed a Supplier Code of Conduct, conducted a supply chain mapping exercise aided by a third-party ESG data provider and undertaken due diligence on higher-risk suppliers. These efforts support our ongoing commitment to mitigating modern slavery in our operations and supply chains.

This Statement illustrates our evolving approach to mitigate and minimise modern slavery risk. We have collaborated with specialists in the area to better refine and improve our response to the risk of human rights violations in our operations and our supply chains. This Statement will outline the work undertaken by our team in greater detail.

The Board and Executive Leadership Team are confident in the ongoing progress within the modern slavery space as part of our broader multi-year Sustainability Strategy to ensure better results for our 'People, Place and Planet'.

This Statement was reviewed and approved by the Board of InvoCare on 19 June 2023 for lodgement in accordance with the requirements of the Modern Slavery Act 2018 (Cth) (the Act) and I am signing on behalf of the Board as the Responsible Member (as defined in the Act).



Our long-term commitment to understanding the full scope of InvoCare's impact has continued to provide us with valued insights, ensuring our targets and goals for our core sustainability areas – People, Place and Planet - are realistic and achievable.



Olivier Chretien Managing Director & Chief Executive Officer

FY22 in review



Our business

Identified reporting entities postacquisition of William Matthews Funerals

Described our structure, our operations and supply chains



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people

Conducted our second annual 'Your Say' employee engagement survey

Implementation ofleadership development strategies and the Health First Initiative



Our places

Reviewed operations across Australia, New Zealand and Singapore to better understand potential exposure of modern slavery risk



Our sustainable leadership

Published FY22 Sustainability Report

Executed 'People, Place, Planet' initiatives across our Sustainability Strategic Plan

Commenced workon assessing our Green House Gas emissions



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Undertook a comprehensive supply chain mapping process in partnership with FairSupply Analytics

Initiated the implementation of an Ethical Sourcing Policy, a Supplier Code of Conduct and template supplier contracts



response

Undertook disciplined discretionary cost control to minimise the impact of inflationary pressures on our operations and supply chains

Reviewed and revised our recruitment, onboarding and training measures to assist new employees hired to supplement our workforce

Continued to uphold COVID-19 health and safety procedures



Our structure and operations

InvoCare is an Australian public company (**ASX: IVC**) and is a reporting entity under s 5(1) of the Modern Slavery Act 2018 *(Cth)* (the '**Act**').

InvoCare Australia Pty Limited ABN 22 060 060 031 is a direct subsidiary of InvoCare and is also a reporting entity under s 5(1) of the Act.

In FY22, InvoCare acquired William Matthews Funerals as a bolt-on to our pre-existing businesses. The company was fully integrated into our corporate structure and as such, the principal trading subsidiaries of the InvoCare consolidated group as at the end of FY22 remained:

Name of Subsidiary	Country of Incorporation
InvoCare Australia Pty Limited	Australia
Bledisloe Australia Pty Limited	Australia
InvoCare PetCare Pty Limited	Australia
Family PetCare Pty Limited	Australia
InvoCare New Zealand Limited	New Zealand
Singapore Casket Company (Private) Limited	Singapore

This Statement is presented on a consolidated basis and InvoCare is reporting on behalf of the consolidated group.

Across our group we operate four key business segments within Australia:

- Funeral Services including
 Related Funeral Service Offerings
- O Cemeteries & Crematoria
- O Pet Cremations

We also have two international business segments comprising our funeral service operations outside of Australia: New Zealand and Singapore.

Funeral services including related Funeral Service offerings

We continue to be the leading provider of funeral services in Australia with a diverse footprint of over 230 locations. We operate under three national brands: White Lady, Simplicity and Value Cremations and 40+ regional and local brands, and our team of 1,300 helped deliver over 39,000 funerals for Australian families in FY22.

Our National Brands





Our structure and operations

continued

We offer a number of funeral-related services that include: products, support, and assistance when planning a funeral as well as prepaid funeral services. The following brands help supplement and support our funeral services:



Cemeteries & crematoria

InvoCare is a leading independent operator of cemeteries and crematoria with circa 340 employees, overseeing 15 cemeteries and memorial parks in New South Wales and Queensland, spanning nearly 300 hectares of open space and a network of over 20 cremators.

The business conducted nearly 3,000 burials and over 22,000 cremations in FY22 with the parks and facilities also utilised for funeral services, memorials and community events.





Pet cremations

InvoCare's pet cremation business was established in 2019 and is Australia's only national pet cremation business. Operating from 16 locations across five states, our team of more than 200 employees provided over 99,000 private cremations in FY22.

The business uses state-of-the-art tracking technology to provide assurances to grieving families and veterinary clinics as to what stage of the cremation process their pet is in.











International operations

Beyond our Australian operations, InvoCare is a leading provider of funeral and related services in New Zealand and Singapore.

New Zealand

Within New Zealand, InvoCare operates 45 locations, 19 brands and has over 200 employees, forming a key part of our business operations.







Workforce

	Full-time	Part-time	Casual	Contingent
Australia	1502	191	229	238
New Zealand	201	41	14	16
Singapore	62	-	-	-

As at 31 December 2022, InvoCare employed approximately 2,500 people across our operations in Australia, New Zealand and Singapore. The majority of our new headcount in FY22 were full-time hires in Australia and New Zealand.

We source a portion of our workforce using reputable employment agencies. Understanding the modern slavery risks posed by the predatory practices of certain recruiters, InvoCare undertakes due diligence on our major employment agency partners to ensure their practices are in line with our commitment to human rights before engaging with them.

In FY22, InvoCare improved our talent acquisition processes and onboarding programs. We launched our new Learning Management System to further build the capabilities of our employees and ensure they are well-equipped to navigate their roles within InvoCare.

We work to ensure that all our employees are appropriately remunerated and are aware of our suite of policies including the Code of Conduct, which has distinct safeguards against modern slavery risk, and the Whistleblower Policy, which provides them with means of reporting unethical conduct.



Australia

Within Australia, there were approximately 2,160 team members employed as at the end of FY22, representing over 85% of our global workforce. Close to half of our employees are subject to enterprise bargaining agreements. The majority of our team members in Australia are in professional or managerial roles or are semi-skilled tradespeople. Given the relative lack of unskilled labourers within our direct operations as well as Australian labour laws, there is a low risk of modern slavery within our direct operations in Australia.

New Zealand

Within New Zealand, there was a total of 272 team members employed as at the end of FY22. Our New Zealand employees are subject to the labour laws of the jurisdiction and are mostly comprised of tradespeople, professionals and tertiary-qualified workers, limiting the risk of modern slavery in our New Zealand operations.

Singapore

Our overseas operation in Singapore employed a total of 62 team members on a full-time basis as at the end of FY22. The entirety of our Singapore team is comprised of tertiary-qualified individuals, business professionals or semi-skilled tradespeople. The attributes of this workforce limit InvoCare's risk exposure in our Singaporean operations as a large proportion of modern slavery risk in the region is concentrated in unskilled workers.

Group-wide

InvoCare conducted our second annual 'Your Say' employment engagement survey, recording a significant increase in our response rate to 76% of all employees. The engagement survey provides key insights into the wellbeing of our employees and ensures the ongoing satisfaction of our people, recording an increase of 8% in positive employee sentiment (engagement) from last year.

The results of our engagement survey demonstrate our employees have a positive sentiment and confidence in working at InvoCare, indicating the success of our ongoing improvements to ensure employee wellbeing.

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Identifying risks of modern slavery practices

For this reporting period, InvoCare engaged with FairSupply Analytics (FairSupply) (a third-party software-as-a-service provider), to map out our supply chain to the tenth tier. The approach included utilising FairSupply's proprietary technology to link global trade flow data through multi-regional input-output tables with InvoCare's unique supplier spend data.

The comprehensive supply chain enables InvoCare to identify the inputs from various industries across different countries.

This provides users with insight into which tier of our supply chain mapping that modern slavery risk presents itself and how much of our spending is connected with that risk.



Suppliers

O InvoCare Supplier spend data

Global trade data mapping supply chains

Filters Invocare supplier spend data

Supply Chain mapping to 10th tier

Quantitative metrics estimating number of slaves

Overview

Geographic risk

The majority of InvoCare's suppliers are in Australia, indicating a low level of geographic risk of modern slavery due to the comparatively effective regulatory framework of Australia. The combination of strong labour laws and rigorous regulatory oversight have resulted in a low estimated instance of modern slavery per capita in Australia, according to the Walk Free Foundation's Global Slavery Index and, accordingly, our first-tier direct suppliers in Australia present low operational risk.

However, our modern slavery risk grows to the extent our suppliers source products and services from other geographies. The Asia region has been identified as having an elevated level of modern slavery risk with the International Labor Organization's Global Estimates of Modern Slavery indicating that Asia has the highest instance of modern slavery on a volume basis.

FairSupply's analysis of our comprehensive supply chain estimated the highest theoretical risk incurrence of modern slavery occurs in the second and third tier of our supply chain wherein the majority of the total theorised slaves are estimated to be existing.

However, in light of this identified risk of modern slavery occurring deeper in our supply chain, we have enacted several revisions to our supplier contracting, including the Supplier Code of Conduct and amendments to our template supplier contracts. These policies and procedures are outlined further in the section below.

The largest proportion of InvoCare's modern slavery riskexposure in the year was related to the procurement of granite, coffins, caskets, flowers and cleaning services. This aligns with the due diligence exercises conducted in our FY21 Modern Slavery Statement which we have refreshed for this reporting period, aided with open data sources and the expertise of advisors working in the modern slavery space.

This assists InvoCare to determine if we are potentially causing, contributing or are linked to a modern slavery risk in our supply chain and establish our leverage to direct, negotiate or question purchasing decisions and to help drive our actions to mitigate our risk.

The result of this analysis is a key metric that estimates the number of theoretical slaves existing within each supplier's respective supply chain, with the ability to trace through to the tenth tier (that being the suppliers of their suppliers and so on).

For our analysis, the spend data provided to FairSupply was representative of our spend for the first half of FY22. However, the risks associated with our spending and with our suppliers have been extrapolated to cover 2022 in its entirety. Cognisant that the amounts inputted may not reflect the full annualised amount, we analysed the modern slavery risk on a per million dollars spent with each supplier.

Additionally, the analysis covers direct suppliers to InvoCare's Australian entities and does not include our international subsidiaries.



Identifying risks of modern slavery practices continued

Industry analysis

Granite

InvoCare sources and procures granite for monuments and headstones as part of our funeral services and burials. Granite-related suppliers constituted approximately 5% of our spend in FY22.

A large proportion of the world's granite is produced in regions that have been identified by international organisations and NGOs as having an elevated risk of modern slavery, such as India. The quarries in which granite is mined and processed around the world have increased instances of exploitative practices such as child labour, debt bondage, forced labour and deceptive recruiting.

Our direct Australian suppliers of granite headstones and memorial pieces are locally-based craftspeople that require a high degree of skill and training in their trade. This combined with the relatively low risk of labour exploitation within Australia ensures that our domestic suppliers in this industry can prevent the exploitation of workers in their direct operations.

Overall, granite-related suppliers carry a comparatively higher risk of modern slavery than other supplier types.

Coffin and casket procurement

The procurement of coffins and caskets forms an integral part of InvoCare's business operations, and a significant part of our supplier spend data in Australia constituting approximately 7% of our total spend for FY22.

This industry sources a large proportion of raw materials to manufacture and produce coffins including timber, textiles and metals. Whilst the suppliers that we source from in Australia are locally based, much of the natural timber is locally harvested and these suppliers largely employ skilled tradespeople and craftspeople, they present an increased risk in their respective supply chains.

The raw materials associated with this industry have been associated with regions that have been reported as involving labour exploitation by international organisations and nongovernment organisations (NGOs). Lumber yards, mining of minerals and ores to be produced into metals and the farming, processing and manufacture of textiles are heavily at-risk of forced labour, slavery and servitude.

In FY22, InvoCare assessed our key suppliers within the coffin and casket procurement space by reviewing their ESG capabilities and risks. InvoCare has also worked with key suppliers in the industry to implement key ESG compliance measures, including meeting modern slavery requirements.

Flowers

A key component of our operations is the procurement of flowers for display during funeral services. InvoCare sources from local suppliers of flowers who are subject to the labour laws of the jurisdiction in which they reside.

Flowers make up approximately 3% of our supplier spend data for FY22.

The high degree of unskilled labour, seasonal or casual labour prevalent within the flower industry both locally and overseas elevates the potential for exploitation. Additionally, the farming, cultivation and collection of flowers overseas largely occur in regions with a lack of regulatory oversight and enforcement, which further elevates the risk of modern slavery practices.

Despite these broad industry factors, the FairSupply analysis indicates that a comparatively low amount of modern slavery risk is attributable to our spend with suppliers in this industry.

Cleaning services

InvoCare procures services from cleaning companies to assist with the maintenance of our large network of storefronts, offices, shared services and other properties.

Cleaning services carry a risk of modern slavery practices due to the nature of the work and the lack of oversight afforded to employees. The prevalence of unskilled, temporary or unseasonal labour that is generally comprised of migrant workers leads to the risk of exploitation.

Cleaning and maintenance services procured represent approximately 7% of our total expenditure for FY22.

Conclusion

The results of our updated analysis present key insights into the risk profile of our supply chain in terms of industry-related risk. Given the identified risk factor incurred in our procurement of granite, coffins, caskets, flowers and cleaning services, InvoCare continues to focus on mitigating and managing these areas of risk.



Identifying risks of modern slavery practices continued

Top 20

To better understand our largest suppliers, we undertook a desktop due diligence exercise on our top 20 suppliers in terms of dollars spent. The industries in which they operated largely related to the manufacturing of coffins and caskets, the procurement of IT services, flowers, monument makers, burial services, other professional services, and recruitment agencies to supplement our employees.

The top 20 suppliers constituted 33% of our total expenditure for last year. Given the relatively large share of our total spend and risk concentrated within these top 20 suppliers, we endeavoured to better understand their approach to modern slavery risk.

Of the 20 suppliers, we noted that 17 did not incur high levels of modern slavery risk with their direct suppliers. The three suppliers, which incurred a higher risk of modern slavery with their direct suppliers, operated in industries relating to flowers, granite (already addressed) and printed news media, which incurs modern slavery risk in the publication of newspapers and other periodicals due to the procurement of paper and paper products.

The estimates of modern slavery risk further along the supply chain strongly indicate that InvoCare is not causing nor contributing to modern slavery risk but rather, is linked to potentially risky suppliers deeper in the supply chain. The further in the supply chain that this risk is arising indicates that our ability to influence such procurement decisions at that tier is diminished.

Overall, a review of our top 20 suppliers in conjunction with the broader insights gathered from the mapping process presents a preliminary view that the majority of our supplier spend is not connected to modern slavery with our direct suppliers, nor their respective suppliers, but presents itself in suppliers in the third or fourth tier.

Summary

The results of our inaugural supply chain mapping exercise have presented InvoCare with valuable insights into our modern slavery risk profile. With the majority of our modern slavery risk being incurred in lower tiers of our supply chain, InvoCare is somewhat limited in our ability to influence procurement decisions and leverage change.

The mapping exercise demonstrated a concentration of risk in particular industries that form our expenditure with suppliers.





Policies and procedures

- O Audit, Risk and Compliance Charter
- O Code of Conduct
- O People, Culture and Remuneration Charter
- O Corporate Social Responsibility Policy
- O Sustainability Report
- O Whistleblower Policy

A key part of our approach to mitigating modern slavery risk in our operations is a robust corporate governance framework and management oversight. Our suite of policies and procedures is made available throughout our business and we require our employees to adhere to the guidelines in our documentation.

These policies and procedures help us embed social and human rights principles in our company and ensure that our people are appropriately aware of our commitment to mitigating modern slavery and their part in upholding that commitment.

In FY22, we have implemented some key policies and procedures to help build our response to modern slavery risk in our supply chain with the implementation of a Supplier Code of Conduct, a corresponding Supplier Attestation, and an Ethical Sourcing Policy to help our employees make responsible and informed procurement decisions.

Audit, Risk and Compliance Charter

InvoCare's Audit, Risk and Compliance Committee undertakes several roles and responsibilities concerning managing InvoCare's risk and ensuring its ongoing compliance with the law.

The Charter provides the Committee with the relevant powers to investigate, audit and remediate any potential risk identified within the business, including but not limited to modern slavery risk within InvoCare's operations and supply chains.

Code of Conduct

In FY22, InvoCare's Code of Conduct was amended to better engage our employees. We require all InvoCare employees to undertake training in our Code of Conduct. Our independent contractors, sales agents, consultants, and distributors are similarly required to comply with key aspects of the Code of Conduct.

The Code of Conduct provides principle-based guidance to help our employees make the right decisions and encourages them to speak up should they have concerns regarding the business.

The Code of Conduct encourages employees to report breaches of the Code and also provides options and avenues whereby employees may report any concerns that contradict the Code of Conduct, empowering them to take the appropriate steps should they observe any behaviour that is unethical or inhumane.

People, Culture & Remuneration Charter

The People, Culture and Remuneration (PCR) Charter sets out the role, responsibilities, composition, operation and authority of the PCR Committee.

The PCR Committee guides the Board in fostering a positive corporate culture, providing oversight on issues relating to the fair compensation of our employees and ensuring legal and regulatory compliance regarding remuneration.

Corporate Social Responsibility Policy

InvoCare's Corporate Social Responsibility (CSR) Policy provides a high-level overview of InvoCare's ongoing commitment to conducting business in a manner that is responsible and ethical. A core element of our CSR Policy is the requirement that our employees are appropriately remunerated and are provided with a safe and fair workplace that is based on mutual respect.

Sustainability Report

InvoCare's Sustainability Report is a key document that is updated annually, including outlining the importance of human rights to all our stakeholders.

Our Sustainability Report for FY22 outlines the steps that we have taken to mitigate our modern slavery risk and sets out the actions that we intend to take in the future to further improve our response.

The Sustainability Report is a key document that broadly disseminates our response to modern slavery continuously and outlines our goals for the upcoming year to our employees, investors and partners.

Whistleblower Policy

InvoCare's Whistleblower Policy was refreshed during the reporting period and continues to promote avenues by which employees, their families, officers and contractors can report any conduct that is contrary to InvoCare's Code of Conduct and, more broadly, any activity that is dishonest or unethical.

The Whistleblower Policy outlines that reports can be made anonymously without fear of reprisals and, where possible, anonymous reports will be investigated to the same extent to which a public report would be investigated.

During the 2022 reporting period, no reports were made that related to modern slavery risks or actual occurrences of modern slavery.



Actions taken to assess and address modern slavery

continued

Training and education

In collaboration with experts within the modern slavery space, InvoCare has developed training and education materials that provide employees with an understanding of modern slavery, its impact and how to appropriately identify modern slavery risk indicators within our day-to-day operations.

In FY22, InvoCare conducted anti-modern slavery training for a cohort of our employees who have responsibility for procuring products and services.

Procurement and Supply Chains

In FY22, InvoCare has undertaken the first steps of engaging our suppliers to proactively address modern slavery risk in our supply chain.

Ethical Sourcing Policy

A key portion of our modern slavery risk profile is the procurement of goods and services from our direct suppliers. We have implemented an Ethical Sourcing Policy, that aligns with our Code of Conduct, to empower our employees to make informed decisions when choosing to engage suppliers or prospective suppliers.

The Policy requires our employees to understand and consider numerous factors that are most relevant to our key modern slavery risk areas before making a procurement decision, and to read the Policy in conjunction with our Code of Conduct and the Supplier Code of Conduct before engaging a new supplier.

Supplier Code of Conduct

Our newly formed Supplier Code of Conduct presents our approach towards engaging our suppliers and ensuring that our partners:

- Are compliant with local, national and other applicable laws and regulations
- Are held to the same high standards that invocare strives to achieve
- o Uphold invocare's values of people, place and planet
- o Operate transparently and honestly
- Are committed to engaging with invocare to remediate issues (if any)
- Are committed to ethical behaviour, integrity in their business practices and respect for individuals and the environment

Supplier Attestations

The Supplier Attestation provides an additional layer of assurance for InvoCare in that suppliers or prospective suppliers actively confirm that they have read and will abide by the Supplier Code of Conduct.

Audits

As set out in our Sustainability Report, we are committing to modern slavery audits of five key suppliers, the results of which will be included in our next modern slavery statement.

The audits provide key information regarding how our key suppliers operate their businesses and will provide insight into whether their values align with InvoCare's high standards of business and our commitment to the upholding of human rights.

Request for Information

InvoCare has continued to engage with key suppliers within our at-risk industries and has issued requests for information relating to their operations and supply chains.

These collaborative efforts to better understand our suppliers will be expanded on in the next reporting period to provide a more holistic view of our supply chain and the steps our suppliers are undertaking to mitigate the risk of modern slavery.

Supplier contracts

InvoCare has instituted several key supplier agreement templates outlining the terms and conditions of our engagement with partners to procure goods and services. In 2022, InvoCare has implemented key modern slavery-related terms in these supplier agreements, including requiring the supplier to respond to InvoCare's reasonable requests for information concerning modern slavery due diligence and to notify InvoCare if they become aware of any actual, suspected or anticipated modern slavery-related practices in its operations and supply chains.

The updated supplier contracts communicate our commitment to mitigating modern slavery risk and provide an avenue for InvoCare to engage with suppliers collaboratively to identify, mitigate or otherwise prevent modern slavery practices.

O Assessing the effectiveness of our actions

InvoCare's analysis of our operations and supply chains indicates a low level of modern slavery risk within our direct operations and our direct suppliers.

The inaugural FairSupply analysis provided key insights into the source of modern slavery risk in our comprehensive supply chain and has established metrics from which InvoCare can undertake further action and measure year-on-year changes.

During this reporting period, the FairSupply analysis was conducted, a revision of our industry-specific due diligence was undertaken, and a number of policies and procedures were enacted to improve InvoCare's abilities to identify, mitigate and minimise modern slavery risk. Previous actions set out in the FY21 Statement have been achieved and we will continue to expand and monitor the progress of these initiatives.

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Consultation

Geopolitical events / COVID-19 impact

The consultation process undertaken by InvoCare concerning our business relied upon the collaboration of various leaders of our business units. The use of collaborative discussions, and requests for information to the various businesses that form InvoCare, under the oversight of the Executive Leadership Team, has provided a comprehensive and holistic understanding of our modern slavery risk exposure.

InvoCare's procurement team consulted extensively with our Funeral Services business throughout 2022 to better understand the risks associated with coffins and caskets procurement and engaged with our Facilities division to better understand procurement risk within the space.

The consultation process culminated in the publication of this Statement and covers the full breadth of our operations and supply chains, both locally and internationally across all our business units.

As the world transitions into a state of normalcy, there has been continued disruptions to our operations and our approach to modern slavery.

The continuing labour constraints caused by the COVID pandemic and governmental responses have diminished access to experienced casual labour and have led to difficulty in hiring for vacant roles

Inflationary pressures have also led to some increases in our product lines and in our supply chain, such as coffins, however InvoCare has undertaken disciplined discretionary cost control to mitigate the effect of these pressures.

During FY22, InvoCare's COVID-19 health and safety protocols remained in place to ensure our ongoing operation and the safety of our people, clients, suppliers, and contractors. With our infectious disease procedures and our COVID-19 Taskforce continuing to ensure our enduring investment in remote working and audio-visual streaming capabilities, InvoCare will maintain our efforts to mitigate the effect of these continuing geopolitical events on our operations.



Future steps

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InvoCare remains committed to mitigating modern slavery risk in our operations and supply chains as part of our wider ESG policy.

As such, in FY23 InvoCare will endeavour to:

- Establish an enterprise-wide Modern Slavery
 Working Group which will develop a strategic plan
 to address modern slavery risks and respond to
 regulatory change
- o Continue to implement our Supplier Code of Conduct across the supply chain
- o Expand the scope of our training and education to all employees



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