

THE BETHANIE GROUP INC
(ABN 60 992 323 642)

Modern Slavery Statement

FY24



Bethanie

Chair's statement



Bethanie's commitment in addressing Modern Slavery is informed by our belief that all people are equal; uniquely created and loved by God. In a world of human brokenness, Bethanie seeks to be an organisation whose people demonstrate God's love in standing with all people who are vulnerable and at risk of experiencing abuse and exploitation.

For the people who choose to work with us, improved conditions and benefits have been implemented to enhance both financial and wellbeing outcomes. An improved employee wellness program was introduced to augment wholistic wellbeing.

Future development programs and process improvements will continue to boost the employee experience.

Where our suppliers are concerned, audits of both Bethanie's process and supply chain continue to ensure our partners align with our ethos. For our larger contracts, additional scrutiny has been applied.

Outside of our core business, we will continue to advocate for the elimination of this blight on modern society.

This statement was approved by the Bethanie Board on 4th December 2024.¹

Diana Forsyth
Chair

1- See section 16(2)(a) of the Modern Slavery Act 2018 (Cth).

Identify the reporting entity ²

This is Bethanie's Modern Slavery Statement, prepared to meet the requirements of the Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2024 (FY24). Bethanie is a not-for-profit incorporated association pursuant to the Associations Incorporation Act 2015 (WA).



Mission

Our mission is to demonstrate the Love of God by positively changing the way Australians experience ageing - every customer, every family, every community, every day.

Describe the reporting entity's structure, operations and supply chains ³

Bethanie's structure

Bethanie is an incorporated association which operates aged care services in Western Australia and is registered with the Australian Charities and Not-for-profits Commission (ACNC). Bethanie has three subsidiaries, Bethanie Housing Ltd, Bethanie Primary Care Limited and Vacant Beds Limited.

Bethanie has a relationship with the Churches of Christ in Western Australia (CoCWA). CoCWA oversees the direction of the organisation via a Board who decides on policy and gives strategic direction to the Chief Executive.

The appointments of all Bethanie Directors are approved by a Board of Trustees.

2- See section 1(1)(a) of the Modern Slavery Act 2018 (Cth).

3 - See section 16(1)(b) of the Modern Slavery Act 2018 (Cth).

The Bethanie Board is assisted by the following Board Committees, which consist of representatives drawn from both the Board and Executive:

- 1 Services Review
- 2 Audit & Risk Management
- 3 Nominations, Remuneration & Governance
- 4 Business Development

Bethanie’s operations

Bethanie operates its services throughout Western Australia. Bethanie’s business segments include:



Residential Care Services: This segment includes the provision of aged care services in nursing homes and aged care facilities.



Independent Living Unit Services: This segment includes the supply of accommodation in retirement villages and independent living unit villas. The sales of lease for life licences are also included in this segment.



Community Care Services: This segment covers the provision of community aged care service programs which are funded by the State and Commonwealth Governments.



Bethanie Projects: This segment mainly includes the costs associated with building construction supervision.

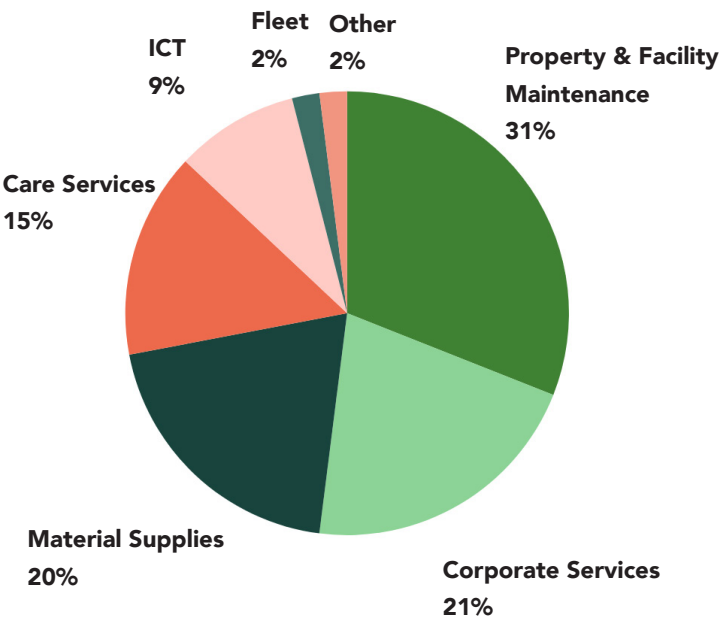


Community Housing: This segment includes the activities associated with the construction of community housing for Bethanie Housing and the provision of community housing for seniors.

Supply chain

Bethanie’s procurement team and stakeholders continue to prioritise its preferred supplier base that supply maintenance, goods, consultancy services and agency staff. Spend with Bethanie’s suppliers remains greater than \$60 million, with approximately 125 preferred (and other) approved suppliers.

Bethanie’s spend is categorised by the Procurement categories below:



Bethanie’s procurement processes are supported by appropriate governance via procurement policies and procedures, along with Bethanie’s Mission Discernment Framework prioritising its mission.

Risks of modern slavery practices in the operations and supply chains facing Bethanie⁴

Bethanie's business areas and Mission has remained similar since its last statement, although a review of spend categories has determined that the greatest risks still appear to be with:

- 1 Construction
- 2 Agency staff
- 3 Cleaning services
- 4 Pharmaceutical products
- 5 Food and grocery
- 6 Cleaning supplies
- 7 Apparel and uniforms

Therefore, the risks of Modern Slavery in Bethanie's operations have not changed significantly, although Bethanie seeks to limit opportunities for Modern Slavery through its on-going actions.

Actions taken by Bethanie to assess and address these risks⁵

Bethanie has further consolidated its approach to limiting opportunities for Modern Slavery in its operations and supply through the actions detailed below during FY24.

Operations

At Bethanie, we are committed to upholding the principles of freedom of association and the right of employees to engage in collective bargaining, whether independently or with the assistance of third parties. Recognising the importance of mitigating the risks of modern slavery, Bethanie places immense value on its people and continuously strives to enhance their experience.

The fundamental human rights of all our people, particularly those who may be vulnerable, are of utmost importance. We maintain a zero-tolerance stance toward discrimination, ensuring that all employees are free from prejudice based on race, culture, gender, sexuality, and other personal characteristics. Our policies provide for:


- **Right to Privacy:** Bethanie safeguards each individual's right to privacy, maintaining confidentiality and protecting personal information in line with our ethical standards and legal requirements.
- **Health and Safety:** We prioritise physical and mental well-being through rigorous safety standards and wellness initiatives, fostering a workplace that supports our team members holistically.
- **Freedom of Expression:** We uphold the right of every employee to express their views openly within our community, ensuring all voices are respected in decisions that impact their work and well-being.

We recognise the unique needs of a diverse workforce, including many team members with English as a second language, students, and individuals unfamiliar with bargaining and workplace change processes. To address potential vulnerabilities and reinforce protections against exploitation, we prioritise:

- **Union Engagement:** By informing and consulting with Unions during bargaining and workplace change processes, we ensure employees have trusted representatives advocating for fair treatment. We provide accessible and clear information to support understanding and engagement throughout these processes.
- **Clear Communication:** Our communication strategies ensure all employees are informed of their rights, benefits, and protections. This includes face-to-face discussions, written resources, and digital tools tailored to diverse needs.

⁴ - See section 16(1)(c) of the Modern Slavery Act 2018 (Cth).

⁵- See section 16(1)(d) of the Modern Slavery Act 2018 (Cth).



Over the past year, Bethanie has implemented new measures to improve employee conditions and benefits, these include:

- **Enhanced Employee Wellness:** Bethanie has improved its employee wellness offerings by introducing a new Employee Assistance Program and launching the Bethanie Be Well Program, designed to support the holistic health of our team members.
- **Enterprise Agreement Negotiations:** Bethanie has commenced negotiations for new enterprise agreements, ensuring its employees have a voice regarding their terms and conditions of employment, minimum rates of pay, and other entitlements. These agreements are aligned with the latest legislative changes to ensure fairness and transparency.
- **Expanded Salary Packaging Options:** Bethanie has enhanced the salary packaging options available to employees, enabling them to maximise their take-home pay.

Looking ahead, over the next 12 months, Bethanie plans to introduce and enhance our people's experience through programs including:

- **Leadership Development Program:** Bethanie is developing and implementing a Leadership Development Program to empower its leaders and foster a culture of growth and excellence.
- **Performance Development and Management Framework:** Bethanie will introduce a comprehensive Performance Development and Management Framework to drive continuous improvement and professional advancement.
- **Enhanced Onboarding Programs:** Bethanie is committed to enhancing our new employee onboarding programs to ensure a seamless and supportive transition for new team members into the Bethanie community.
- **Human Capital Management System:** Bethanie will implement a new Human Capital Management System to streamline HR processes, enhance data-driven decision-making, and improve the overall employee experience.

6 - See section 16(1)(e) of the Modern Slavery Act 2018 (Cth).

Supply Chain

Following on from last year's statement, Bethanie has continued a business as usual (BAU) approach in reviewing supplier information relating to risks of modern slavery. This includes focus and review of recent labour-based contracts to limit the risk of modern slavery.

Other BAU tasks to limit opportunities for modern slavery include:

- Clauses in standard contracts that require actions related to Modern Slavery.
- Modern Slavery information required as part of requests for tender.

Bethanie has also approached suppliers representing >70% of its annual spend for more detail on their actions to reduce modern slavery in their supply chains.

Describe how the reporting entity assesses the effectiveness of these actions ⁶

Bethanie's approach is to create awareness in its supply chain and operations through embedding information in its tenders and contracts, while still confirming with its key suppliers to ensure risks are managed. This combined with enhancing employee conditions and benefits, supports the reduction of opportunities for Modern Slavery in Bethanie's and its partners' operations and supply chains.

Process of consultation with associated entities ⁷

All associated entities have been consulted on Modern Slavery risks and the contents of Bethanie's Modern Slavery Statement FY24. These entities comply with Bethanie processes and policies and report regularly to Bethanie.

7 - See section 16(1)(f) of the Modern Slavery Act 2018 (Cth).

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Bethanie