

Healthcare Australia's Modern Slavery Statement 2021

Statement of Position

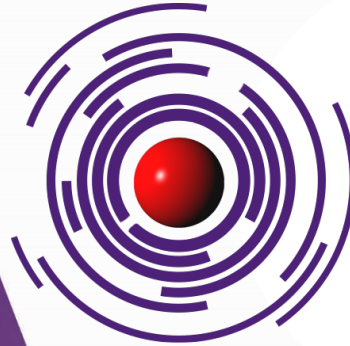


Table of Contents

Introduction	1
Overview of structure and operations	1
Supply chain and modern slavery risks	2
Actions taken to address modern slavery risk	3
Assessment and Effectiveness	4
Consultation	4

Modern Slavery Statement 2021

Introduction

Healthcare Australia (ACN 108 180 589) Modern Slavery Statement (the **Statement**) is made pursuant to the requirements of the *Modern Slavery Act 2018* (C'th) (the **Act**). This Statement sets out the actions and strategies to identify, assess, and address modern slavery risks across operations and supply chains for the 2020 financial year reporting period.

Apollo Holdco Pty Ltd, Healthcare Australia Pty Ltd, and all subsidiaries (together referred to as **HCA**) is a reporting entity for the purposes of the Act as it is a company that conducts business in Australia with a consolidated revenue of over A\$100 million during the reporting period.

Healthcare Australia is committed to ethical operations, including limiting the risk of modern slavery occurring within its own business, and related supply chains other business relationships.

Overview of structure and operations

HCA is one of Australia's largest healthcare providers, connecting healthcare professionals, organisations, and people to provide end-to-end healthcare solutions with 16 offices across Australia and access to over 120,000 health professionals. HCA provides high quality staffing solutions for the healthcare industry, while also offering a wide variety of services aimed at supporting community health and wellbeing. HCA cares for over 35,000 Australians every day and aims to have a positive impact on people's health and wellbeing by providing premium healthcare services across Australia.

HCA's principal business activities are:

- Recruitment – HCA places health care professionals, such as doctors, nurses, midwives and support workers, in private and public hospitals on a short or long term basis. We also place aged care professionals in home and residential facilities
- NDIS and Disability – HCA is a registered NDIS provider and provides customised NDIS support for eligible participants such as nursing and complex care, supported independent living and community services
- Allied Health - HCA is a leading provider of allied health services in Australia and provides specialist allied health services in residential aged care, community care and NDIS
- Aged Care – HCA provides a variety of aged care services including home help, nursing & specialist care, family & respite and out & about
- Corporate Health and Wellbeing – HCA provides corporate health solutions for workplaces including vaccinations, general health checks, ergonomic assessments and now COVID-19 onsite temperature screening
- Training and Courses – HCA delivers mandatory training, accredited qualifications and continuing professional development online and face-to-face for individuals and organisations

Throughout 2020 and 2021, HCA was appointed to support the COVID-19 national response in Australia, including through the vaccination rollout, provision of hotel quarantine services in NSW and Victoria, and supporting agency services nationally for hotel quarantine programs.

Supply chain and modern slavery risks

HCA procures a range of goods and services every year to carry out business functions and a majority of direct suppliers are located in Australia. *Figure 1* details HCA's total procurement spend over the 2020 financial year.

Figure 1: FY20 goods and services, % expenditure

CATEGORY	Share of expenditure %
STAFF	94%
Operational	79%
Administration	15%
OTHER OPERATIONS	4%
Marketing & communications	2%
Facilities & training	2%
PURCHASED GOODS	2%
Operating expenses	1.6%
Consumables	0.3%
Uniforms	0.1%

Supply chain - workforce

HCA provides staff in indirect contexts, (on behalf of a hospital or aged care facility) as well as direct care contexts (for example, providing home care or for NDIS activities). As a consequence, staff costs account for ~94% of total expenditure and staff activities are the single largest category for consideration with regards to modern slavery risk exposure. All core business activities are undertaken in Australia and New Zealand, which are considered as a low risk for modern slavery occurrences.

All HCA staff are recruited through HCA's inhouse recruitment programs and are vetted through HCA Australia's compliance and competency standards, including employees joining HCA from international locations. International Visa holders are vetted and approved for work in Australia by the Department of Home Affairs to ensure compliance with their Visa terms and conditions. HCA ensures that no employees are indentured or restricted and the only restrictions that may exist imposed by the Department of Home Affairs on to Visa workers.

All staff are employed under contracts, which are based on awards or industry rates, and are provided additional loadings and benefits where applicable. Working standards and conduct are supported by HCA's the Code of Conduct, and HCAs' Whistleblower Policy which supports anonymous and protected reporting of any breaches.

Supply chain – other goods and services

Other operations, goods and services comprise a relatively small proportion of HCA's expenditure (approx. 6%). This is comprised of marketing & communications (2%), facilities (1.7%), operating expenses (1.6%), consumables (0.3%), recruitment & training (0.2%) and uniforms (0.01%).

HCA sources the above goods and services from Australian providers and suppliers, with the with exception of a small amount of international marketing spend. As a result, HCA has a low risk to modern slavery exposure in Tier 1 suppliers.

HCA is working to develop a clearer picture of Tier 2 supplier risk (suppliers' suppliers), and of customers' own Tier 1 risks. For example, when providing indirect care, HCA staff are provided with equipment and consumables for use by the contracting party. As such, it is possible that HCA operations may be exposed to modern slavery risks through downstream international suppliers of product such as consumables purchased by HCA from Australian suppliers (2% of total activities), or procured by HCA customers but indirectly provided for use by HCA staff. These occurrences in the supply chain are a small proportion of total activities. Future actions will be taken to increase transparency and mitigants in these areas.

Actions taken to address modern slavery risk

HCA holds itself to the highest ethical, safety, clinical and professional standards. HCA fully embraces its responsibility as a healthcare provider and, more broadly, responsibility to human rights and a sustainable environment. As such, HCA works with employees, contractors and suppliers to effectively identify and manage modern slavery risks within organisation and supply chain.

Policy Framework

HCA has a framework for responsible and sustainable governance that is managed through the businesses certified Quality System under ISO 9001:2015. HCA's policy framework ensures that the business operates in an ethical and responsible manner, and supports endeavors to identify exposures in business operations and supply chains.

Key policies include:

- Code of Conduct
- Whistleblower Policy
- Supply Chain Integrity Policy (which considers modern slavery risks)
- Framework for Responsible and Sustainable Governance
- Risk Management Strategy (describing risk management framework)

Summary of actions

HCA is in the first stages of implementing an updated approach to managing modern slavery risks. To date HCA has:

- Developed and implemented a Supply Chain Integrity Policy
- Developed a template audit to include modern slavery clauses
- Developed a modern slavery supplier questionnaire (in early implementation)
- Developed a risk assessment methodology to assist with supplier due diligence process

Future actions

In expanding the approach to managing modern slavery risks, HCA will:

- Embed modern slavery awareness within HCA Quality Management systems, risk management framework and associated policies
- Develop and implement a Supplier Code of Conduct
- Review contractual reporting requirements to promote a regular and transparent system of reporting in our supply chains, and implement the modern slavery supplier questionnaire for all suppliers
- Measure and assess the supply chain to identify all Tier 1 risks, and Tier 2 risk exposure where possible
- Develop an employee training module on modern slavery to increase employees' awareness of modern slavery risks in HCA's operations and supply chains. This training will be available through e-learning modules and staff induction programs

It is also anticipated that in the next reporting cycle, HCA will also have enhanced visibility through the ability to assess the modern slavery statements provided by a number of HCA's key suppliers.

Assessment and Effectiveness

HCA has a process of continuous improvement as part of its quality systems programs, and will assess the effectiveness of modern slavery risk management by including these risks within the risk model.

As the program expands, the effectiveness of mitigation actions will be measured by considering the following:

- The number of key supplier contracts that have been updated with appropriate modern slavery clauses
- Rates of modern slavery training attendance
- Number of breaches detected and description of actions taken

The effectiveness of these actions will become more evident as we start implementing and measuring the outcomes of the actions identified in *Actions* in FY21 and beyond.

Consultation

This statement is made pursuant to the Act and constitutes HCA's Modern Slavery statement in respect of the 31 December 2021 financial year. It is approved by the principal governing body of Healthcare Australia, being its Board of Directors.

The related HCA entities all have the same Board of Directors, and therefore Directors of all related entities have been consulted with in preparing this Modern Slavery Statement.

Signed,



John Pappalardo

Chief Executive Officer, Healthcare Australia Pty Ltd

Dated: 1/11/2021