



The Bethanie Group Inc
Modern Slavery Statement FY21

ABN 60 992 323 648



Bethanie
You're among friends



Identify the reporting entity ¹

This is The Bethanie Group Inc's (60 992 323 648) (Bethanie) Modern Slavery Statement, prepared to meet the requirements of the Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2021 (FY2021). Bethanie is a not-for-profit incorporated association, incorporated under the Associations Incorporation Act 2015 (WA).

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

Chairman's Statement

Bethanie is proud to release its second Modern Slavery Statement. Bethanie's values support an environment that protects human rights, encourages development, and supports improvement. The emphasis on Modern Slavery prevention is aligned with Bethanie's ethos, meaning prevention of Modern Slavery is naturally important to us.

Since its first modern slavery statement, Bethanie has further developed its understanding of Modern Slavery, actively collecting, and reviewing information to prevent Modern Slavery within its operations and supply chains. Bethanie's progress has seen it take key steps to improve its understanding, approach, and increase actions. Importantly, including reviews of modern slavery information within its business processes, is leading to improved awareness across our organisation and supplier base.

We will continue on this path during the next year ensuring Modern Slavery awareness increases within our organisation and with our supply partners, as awareness will support prevention.

This statement was approved by the Board of The Bethanie Group Inc on 6th December 2021.[^]

Peter Gibbons
Chairman

[^]See section 16(2)(a) of the Modern Slavery Act 2018 (Cth).

Bethanie



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.



Vision

Our vision is to enhance the ageing experience of over 1 million Australians by 2030.



Values

Justice | Integrity | Stewardship | Compassion | Respect

Describe the reporting entity's structure, operations, and supply chains ²

Our 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 a single subsidiary, Bethanie Housing Ltd (BHL). BHL is a public company incorporated in Australia. Like Bethanie, it is registered with the ACNC.

Bethanie has a relationship with the Churches of Christ in Western Australia. The church oversees the direction of the organisation via a Board who decide on policy and give strategic direction to the Chief Executive.

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

- Services Review.
- Audit & Risk Management.
- Nominations, Remuneration & Governance; and
- Business Development.

Our Operations

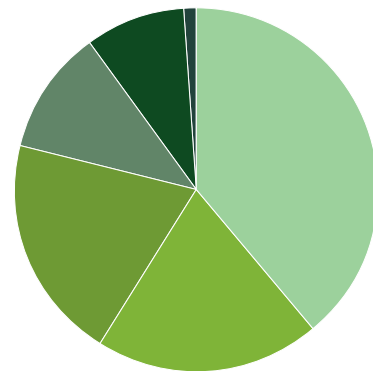
Bethanie operates its services throughout Western Australia, with the vision of Enriching the ageing experience of over 1 million Australians by 2030. Bethanie's business segments include:

- **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 activities of 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.

Our Supply Chain

Bethanie spent over \$50 Million with suppliers last year across six key categories including with over 150 contracted suppliers. When considering Bethanie's supply chain, its spend is broadly classified across these Procurement categories.



Property and Facility Management - 39%

Material Supplies - 20%

Corporate Services - 20%

Care Services - 11%

ICT - 9%

Fleet and Transport - 1%

Bethanie continues to develop its procurement capability through its Procurement Team who have worked to develop relationships with key stakeholders and collaborative procurement activities that further develop partnerships with its preferred suppliers.

Bethanie's Procurement Policy and Procedures continue to guide its procurement practices in conjunction with other Bethanie related policies and procedures. Importantly, Bethanie's Mission Discernment Framework continues to keep our overarching Mission front of mind, along with an expectation that our people will act ethically when engaging with suppliers.

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

Risks of modern slavery practices in the operations and supply chains of facing Bethanie³

The risks identified through Bethanie's initial Modern Slavery statement still apply:

Sector risks

Some Bethanie contractors operate in industries or sectors which are regarded as of particular risk for the presence of modern slavery, namely construction, agency staff and cleaning services.

Goods and product risks

Bethanie procures some goods and services which are generally regarded as linked to modern slavery practices, including pharmaceutical products, food and grocery, cleaning supplies, apparel, and uniforms.

As our approach and actions, detailed in this statement, are continuing to develop it is hoped that Bethanie is lowering opportunities for Modern Slavery in its supply chains. Although it is recognised that risks may be deep within those supply chains.

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

Actions taken by Bethanie to assess and address these risks⁴

Bethanie continues to develop its approach to addressing risks using the assessment process from the foundations of its FY2020 statement. Our approaches and actions undertaken during FY2021 assess and address Modern Slavery risk include:

- Developed a supplier code of conduct.
- Continued use of contracts that require supplier actions related to Modern Slavery.
- Developed a Modern Slavery process for its tender process. Allowing us to obtain supplier statements or further information from tenderers.
- A review of the Modern Slavery status for key suppliers totalling 38% of Bethanie's direct supplier spend.

The majority of Bethanie's employees continue to be covered by collective agreements, which provide minimum pay rates and other entitlements over and above the legislative minimum in Australia. The remaining employees are engaged under individual agreements, which similarly provide additional entitlements. We are committed to freedom of association and the ability for employees to collectively bargain, with or without third party involvement.

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

Describe how the reporting entity assesses the effectiveness of these actions⁵

Through its approach and actions, Bethanie continues to recognise the importance of managing and mitigating risks of Modern Slavery in its operations and supply chain. Increasing the awareness of our staff and suppliers ensures that Modern Slavery remains part of their decision-making process. As Bethanie further develops its approach, it is expected that the emphasis will increase over time and that Modern Slavery risks may decrease through that awareness.

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

Process of consultation with associated entities⁶

The Board for BHL is made up of members of the Bethanie Board and an independent housing-specific board member. BHL complies with Bethanie processes and policies and reports regularly to Bethanie.

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



Bethanie

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