

MODERN SLAVERY STATEMENT FY 2024

Plenary Health (NFH) Pty Ltd as trustee
for the Plenary Health (NFH) Unit Trust

Plenary Health (NFH) Holdings Pty Ltd
as trustee for the Plenary Health (NFH)
Holdings Unit Trust



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Introduction

What is Modern Slavery?

“Modern slavery” refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will.

The International Labour Organisation (ILO), Walk Free and the International Organisation for Migration (IOM) assessed, in their most recent Global Estimates of Modern Slavery, that 49.6 million people were living in modern slavery in 2021, which is an increase of 10 million people in comparison to 2016¹. In times of crisis (widespread environmental degradation, assaults on democracy in many countries, a global rollback of women’s rights, the economic and social impacts of the COVID-19 pandemic, increasing and more complex armed conflicts), the world’s most vulnerable people are hit hardest and fastest².

Our Vision

Plenary Health (NFH) is focused on working with the Victorian Government and Western Health to ensure the best health outcomes for the community in Melbourne’s West through the delivery of the new Footscray Hospital. Plenary Health (NFH) conducts its business with high levels

of ethical and professional standards and is committed to recognising and respecting human rights while working on the new Footscray Hospital project.

Plenary Health (NFH) recognises that the nature of its business means that it might be exposed to instances of modern slavery in its supply chains.

We are committed to undertaking further work to improve visibility of our supply chains and to continue to engage with our stakeholders to better collaborate in respecting human rights and to identify and take steps to prevent modern slavery.

Reporting Entities

This joint statement covers:

- ▶ Plenary Health (NFH) Pty Ltd as trustee for the Plenary Health (NFH) Unit Trust; and
- ▶ Plenary Health (NFH) Holdings Pty Ltd as trustee for the Plenary Health (NFH) Holdings Unit Trust (together, **Plenary Health (NFH)**).

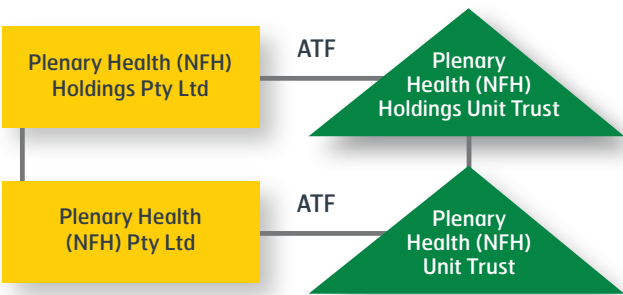
This joint Modern Slavery Statement covers the reporting period of 1 January 2024 to 31 December 2024 for both reporting entities.

Our Structure, Operations and Supply Chains

Our Structure

Plenary Health (NFH) is a special purpose vehicle (SPV) incorporated specifically to deliver and maintain the new Footscray Hospital during a concession period of 25 years (to 2050).

The structure of the SPV is as follows:



The Plenary Health (NFH) shareholders are Plenary and Sojitz.

Our Operations

The Plenary Health (NFH) consortium has been contracted by the Victorian Government, as part of a Public-Private Partnership (PPP), to deliver the \$1.5 billion new Footscray Hospital. As part of this Project, Plenary Health (NFH) will design, construct, finance and maintain the new hospital for 25 years.

The Plenary Health consortium is comprised of Plenary (as project sponsor and investor), Multiplex (as builder), Honeywell and Compass (as the facilities and maintenance managers) and Sojitz Corporation (as investor).

The management of Plenary Health has been contracted to Plenary Asset Management Pty Ltd via a Management Services Deed for the duration of the concession.

The new Footscray Hospital will provide significant community benefits by reducing wait times (across the emergency department, elective surgery and outpatient clinic services), treating more patients and providing better patient outcomes.

Plenary Asset Management Pty Ltd has allocated a management team of nineteen people to Plenary Health (NFH) who are dedicated to the delivery and management of the new Footscray Hospital.

Our Supply Chains

Our major direct (tier 1) suppliers for FY 2024 were:

- ▶ Multiplex Constructions Pty Ltd
- ▶ Compass Group Healthcare Hospitality Services Pty Ltd
- ▶ Honeywell Ltd
- ▶ Plenary Asset Management Pty Ltd

The key tier 1 suppliers that were surveyed and participated in the assessment, operate in many different sectors, with some of the key sectors being:

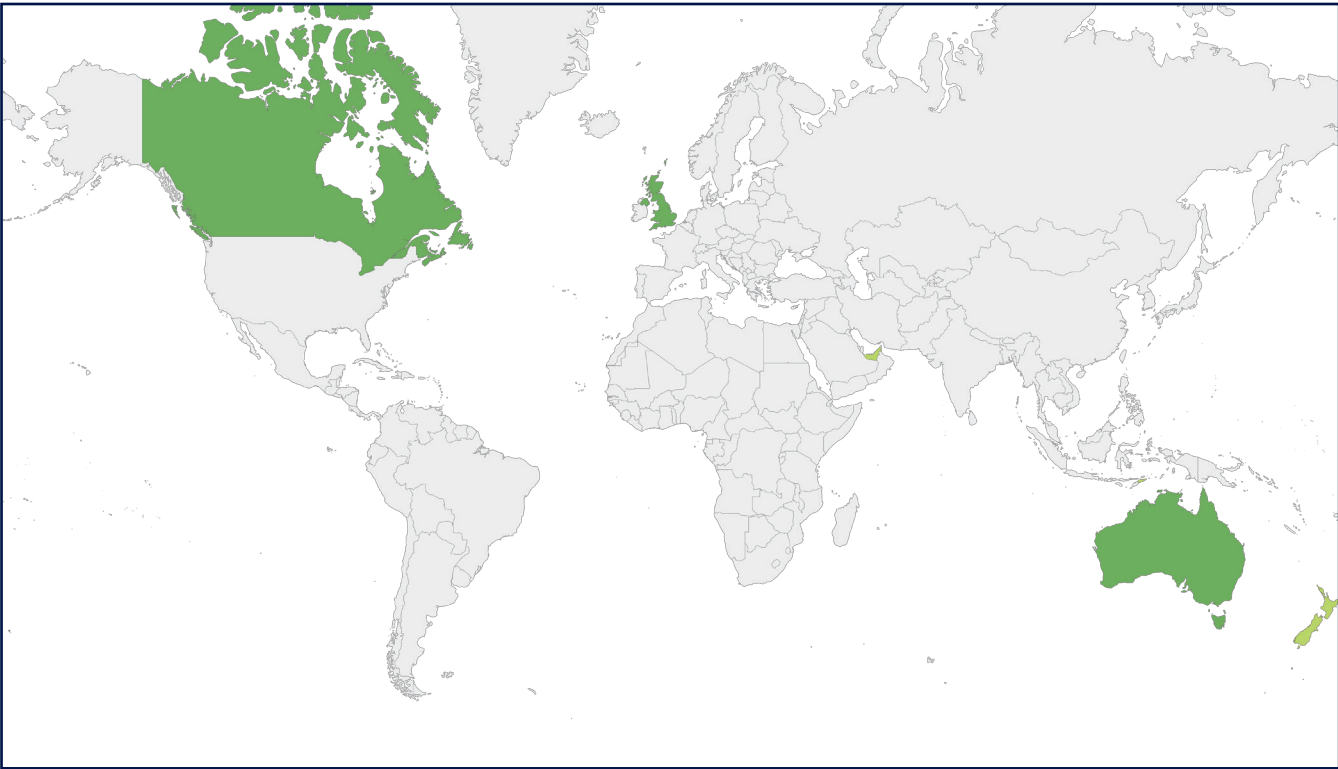
- ▶ Accommodation and food service activities
- ▶ Construction
- ▶ Building services
- ▶ Transportation and storage
- ▶ Professional and scientific services

[1] Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation. Available from: <https://walkfree.org/global-slavery-index/>
[2] Ibid.

Our surveyed suppliers that participated in the assessment, operate in many locations in the world, including:

- ▼ Australia
- ▼ Canada
- ▼ New Zealand
- ▼ United Arab Emirates
- ▼ United Kingdom of Great Britain and Northern Ireland
- ▼ Singapore

For the context of modern slavery, the below map has been overlaid with the colour tier system of the Trafficking in Persons Report, from tier 1 (dark green) where minimum standards are met to tier 3 (orange) where governments are not yet making significant efforts to meet minimum standards³.



Risk of Modern Slavery Practices in Our Operations and Supply Chains and in the Operations and Supply Chains of the Entities Which We Own or Control

Our Operations

As part of our analysis to consider the risk of modern slavery practices in our supply chains, we referred to resources such as the Global Slavery Index 2023⁴, materials and information on risks of modern slavery produced by the International Labour Organization and the Property, Construction & Modern Slavery report⁵.

We also sought external advice and considered relevant risks of modern slavery practices by reference to a range of intersecting factors such as the risk in the property and construction sector, business activities, labour force structure and social, political and environmental conditions in the countries in which we and our suppliers operate.

Consistent with our approach in FY2023, we used a third-party tool, the iPro Modern Slavery Assessment Tool (**iPro Modern Slavery Assessment Tool – MSAT**), to assess modern slavery risks in our supply chain. We requested iPRO to send out a questionnaire and conduct a bulk assessment of our key tier 1 suppliers. We included more tier 1 suppliers in the survey than last year and had a response rate of 66.7%, which is considered a positive rate of engagement.

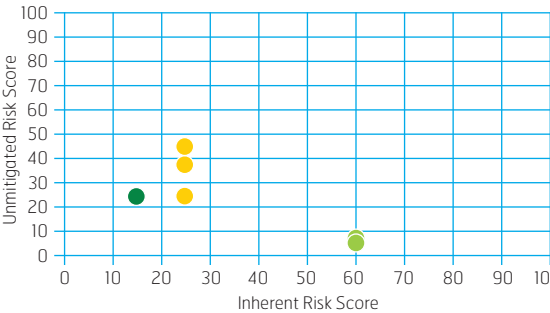
In 2024, Plenary Health (NFH)’s operations still mainly involved delivery activities, consisting of design management and further site works.

The D&C contractor is an Australian-based entity who has an obligation to comply with all relevant Australian legislation. The D&C contractor subcontracts all design and construction works as it operates on a subcontractor model.

Subcontractors are all Australian-based entities, who need to comply with local legislation, which ensures a safe working environment for staff working on the new Footscray Hospital. Plenary Health (NFH) therefore considers the risk of modern slavery across its operations to be relatively low.

The iPro Modern Slavery Assessment Tool (MSAT) that was used to assess modern slavery risks in our supply chain, supported this assessment that none of the key participating suppliers had a high risk of modern slavery.

Risk categories	% of suppliers per risk category
● Low-Risk (No inherent risk)	16.7%
● Low-Risk (Adequate risk control)	33.3%
● Medium-Risk (Partial risk control)	50 %
● High-Risk (Inadequate risk control)	0%
● High Risk (High levels of inherent risk)	0%



[3] https://www.unodc.org/documents/data-and-analysis/glotip/2022/GLOTIP_2022_web.pdf

[4] Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation. Available from: <https://walkfree.org/global-slavery-index/>

[5] KPMG, Australian Human Rights Commission, *Property, construction & modern slavery – Practical responses for managing risk to people*

Our Supply Chains

Our suppliers operate, produce, and source across several/ different sectors. Some of these sectors can be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward⁶.

The below graphics show the high-risk sectors of operation, production, and sourcing for our surveyed participating suppliers. The numbers in the following graphics describe how many assessed suppliers are in the corresponding sectors.

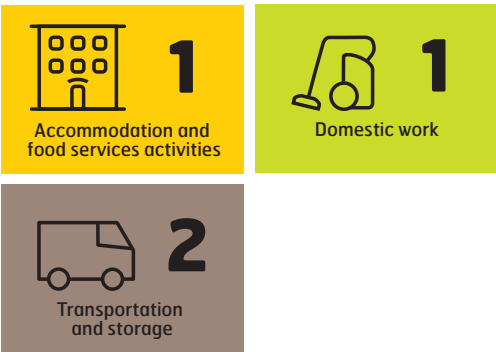
High-risk sectors of operation



Production of goods in high-risk sectors



Sourcing goods in high-risk sectors



Some countries or regions where our suppliers operate, as well as some goods produced and sourced by our suppliers, can be described as high-risk due to the possibility of a link to modern slavery practices. The tier 1 suppliers that participated in the assessment do not have a high risk for incidences of modern slavery.

Actions Taken by Plenary Health (NFH) to Assess and Address Modern Slavery Risks, Including Due Diligence and Remediation Processes

Assess

As set out above, Plenary Health (NFH) used the iPro Modern Slavery Assessment Tool again, to assess modern slavery risks in our supply chain.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned one of the following risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

The self-assessment questionnaire completed by the selected suppliers allowed us to determine the appropriate risk category of the modern slavery risk for each supplier.

The Inherent Risk Score was determined by evaluating the risks inherent to a supplier’s operations, production and sourcing. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the iPro Modern Slavery Assessment Tool (MSAT).

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier’s Unmitigated Risk Score determined

whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

Address

The surveyed suppliers that completed the self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment. The action items were also aggregated, giving Plenary Health (NFH) a focused view of the most impactful actions that could be taken by suppliers across the supply chain. Some examples of actions that some of our suppliers could undertake to further mitigate their Unmitigated Risk Score are e.g. the implementation of a vulnerability assessment policy, continual modern slavery risk identification and assessment process for their business operations, etc.

Plenary Health (NFH) aims to continue working with its suppliers and the further supply chain to ensure continued awareness of risks of modern slavery and will check in with its supply chain to see whether any of the suggested action items from the assessment have or will be implemented in the future.

We are not aware of any allegations of modern slavery in the Plenary Health (NFH) supply chain during the reporting period.

[6] ILO and UNICEF, 2021

Remediation Processes

Plenary Health (NFH) is committed to investigating any report of potential incidences of modern slavery occurring anywhere in our operations or supply chains.

In line with our vision and values we confirm that we would take all appropriate steps to rectify any confirmed incidences of modern

slavery in our operations or supply chains. We would work collaboratively with our suppliers and, if necessary, their suppliers, to achieve these goals. If, for any reason, progress in this regard was not possible, we would take steps to sever the connections to the offending supplier or sub-supplier.

Assessing the Effectiveness of Actions Taken to Assess and Address Modern Slavery Risks

In 2024, we have assessed selected key suppliers against two risk scores:

- ▼ Inherent Risk Score
- ▼ Unmitigated Risk Score

Plenary Health (NFH) is provided with an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level.

We aim to continuously improve on these KPI's.

As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score by introducing relevant policies and procedures.

We also measure the effectiveness of our engagement with suppliers and will continue

to encourage participation in our assessment programme to better identify and mitigate modern slavery risks in our supply chain. As part of our continuous improvement efforts, we included more suppliers in our campaign for FY2024. The Inherent Risk Score was slightly lower than last year's Inherent Risk Score which is reflective of the countries, regions, sectors and high-risk goods part of their operations, production or supply chain. The Unmitigated Risk Score is slightly higher than last year, but is reflective of the fact that, on average, our suppliers have partial risk controls in place.

Aggregated Supply Chain Risk Scores	
Inherent Risk Score	35 / 100
Unmitigated Risk Score	30.7 / 100

Consultation

Plenary Health (NFH)'s structure is set out earlier in this Statement.

The relevant Plenary Health (NFH) entities are integrated and have the same Company Secretary. Their legal, finance and corporate affairs functions have all been involved in the preparation of this Modern Slavery Statement and have provided relevant information which is included in this Statement.

Additional Information

We are committed to working to improve our assessment and addressing of modern slavery risks and will continue to engage on awareness for modern slavery risks with current stakeholders during 2025.

This will allow Plenary Health (NFH) to better assess and address:

- ▼ further supply chain risks based on the findings from the previously implemented measures;
- ▼ engagement with suppliers on actions to further reduce their risk of incidences of modern slavery;
- ▼ the possibility of partnering with industry groups;
- ▼ the possibility to include suppliers from lower in the supply chain in the assessment campaign; and
- ▼ potential inclusion of modern slavery clauses in new contracts with relevant stakeholders to ensure Plenary Health (NFH) has sufficient leverage to influence stakeholders.

Approval

This joint Modern Slavery Statement is made in accordance with section 14 of the *Modern Slavery Act 2018* (Cth).

This statement was prepared by Plenary Health (NFH) Pty Ltd (as trustee of the Plenary Health (NFH) Unit Trust and Plenary Health (NFH) Holdings Pty Ltd (as trustee of the Plenary Health (NFH) Holdings Unit Trust).

This statement has been approved by the Board of Directors of both Plenary Health (NFH) Pty Ltd and Plenary Health (NFH) Holdings Pty Ltd.



Signed for and on behalf of Plenary Health (NFH) Unit Trust and Plenary Health (NFH) Holdings Unit Trust

Kelvyn Lavelle
Chair

Plenary Health (NFH) Pty Ltd (as trustee of the Plenary Health (NFH) Unit Trust)

Plenary Health (NFH) Holdings Pty Ltd (as trustee of the Plenary Health (NFH) Holdings Unit Trust).

