



Modern Slavery Statement

1 July 2024 – 30 June 2025



Helping Hand
new aged care

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Helping Hand provides services across many lands, traditionally owned by the Kaurna, Narungga, Ngadjuri, Nukunu, Barngarla, and Peramangk people. Helping Hand acknowledges the Traditional Owners of the land on which we work and provide services. We pay respect to their culture and heritage, and Elders past, present and emerging.

Introduction

Helping Hand Aged Care Incorporated (“Helping Hand”, “we”, “our”) is a not-for-profit aged care, home assistance, retirement living and residential care provider. Helping Hand has been serving the South Australian community for over 70 years and cares for over 7000 South Australians.

Helping Hand prioritises independence, choice, freedom and quality of care for our residents, employees, our community and other key stakeholders. We are guided by our core values of Excellence, Respect, Compassion and Community and our overarching vision of being the most trusted and exceptional partner in aged care and wellbeing services. Our operations are underpinned by our mission to create communities and experiences to enable older people to live their best lives.

During the reporting period, Helping Hand has been expanding its operations and refurbishing existing sites. Our North Adelaide residential aged care site is in the process of refurbishment and has recently entered Stage 2 of this project. We have also expanded our Home Care offerings with the opening of two (2) new allied health hubs for our community.

Ensuring that we have sustainable and ethical supply chains is a priority for Helping Hand which coincides with our commitment to ensure that we achieve and continue to live out our core values and vision in everything that we do.

We do not tolerate any modern slavery practices within our supply chains or operations. In this reporting period, we have focused on:

- maturing our due diligence processes through the expansion of our prospective due diligence framework;
- revisiting our highest risk suppliers to ensure that appropriate due diligence has been completed by these suppliers; and
- expanding our supply chain tracing efforts which has been a continued priority over the last two (2) reporting periods.

We detail this within this modern slavery statement for the reporting period of 1 July 2024 to 30 June 2025. This is our sixth modern slavery statement.

Criteria 1 – Reporting Entity

The reporting entity is Helping Hand Aged Care Incorporated (ABN 19 636 743 675). Helping Hand does not have any subsidiaries that it owns or controls.

Criteria 2 – Structure, Operations and Supply Chains

Structure

Helping Hand operates solely in South Australia with our head office at 34 Molesworth Street, North Adelaide SA 5006.

Helping Hand is a not-for-profit incorporated association and is registered with the Australian Charities and Not-for-Profits Commission (ACNC). Helping Hand does not own or control any other entities.

As a not-for-profit incorporated association, Helping Hand is governed by a board of directors who oversee and evaluate our governance to ensure that we are performing to our highest level, meeting our clients' needs and acting in accordance with our core values and vision. Our executive team is responsible for our overall operations and help us deliver the best possible services for our clients.

We employ 2319 employees, of which 1540 are permanent and 779 are casual, as well as 182 volunteers across more than 20 locations and provide services to over 7,000 clients in their own homes and in ours. We prioritise engaging employees and volunteers with a diverse range of skills and training levels which is reflective of the diverse society that we serve and operate in.

Operations

At Helping Hand, we provide a range of aged care services across South Australia for our clients, which we summarise in the following categories:

Retirement living

Helping Hand has six (6) retirement living communities. We provide services to these communities such as maintenance and gardening services to the retirement living homes.

Residential Care

Eleven (11) of our operating locations offer services such as respite, personal care and nursing, meals, laundry, and cleaning.

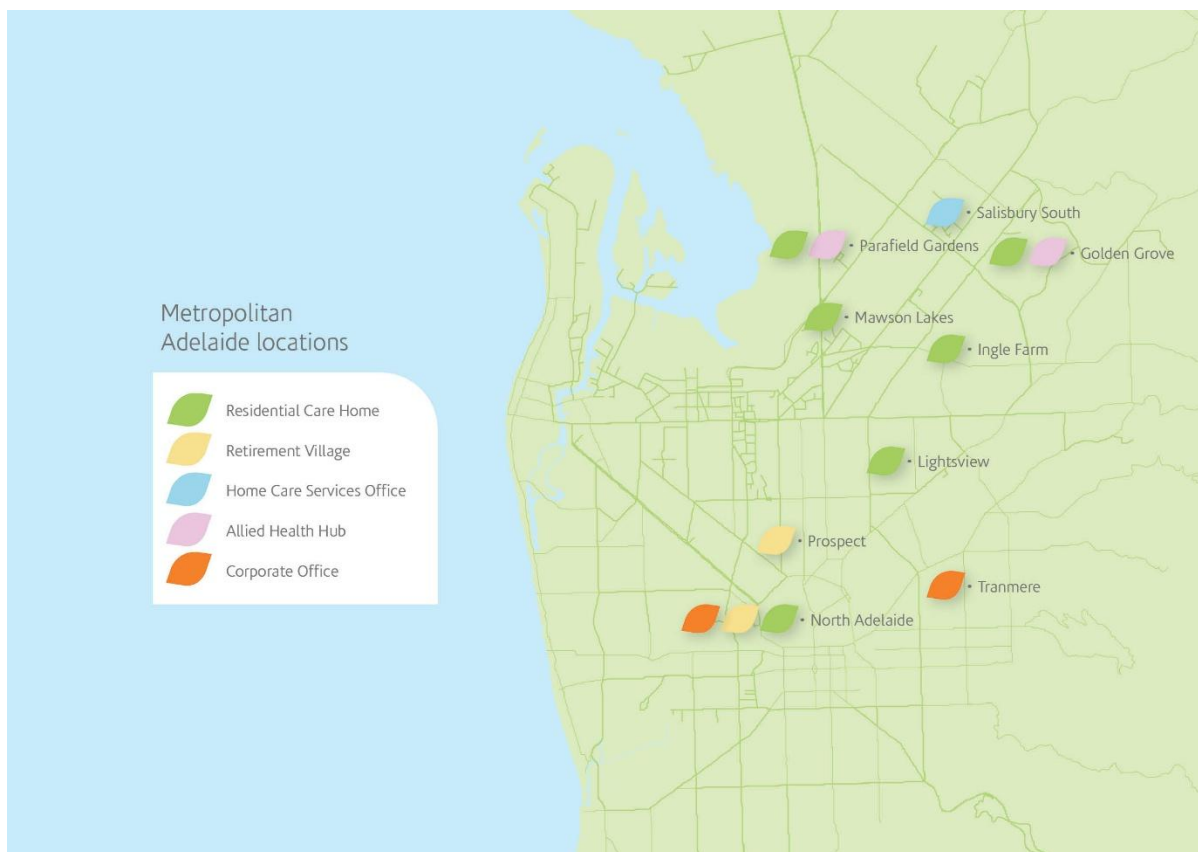
Help at Home

We provide assistance to clients in their own homes across metropolitan Adelaide, the Eyre Peninsula, the Barossa Valley, the Mid North, Lower North, Whyalla, and York Peninsula.

Wellness

Helping Hand also provides wellness services to our clients such as allied health and nursing, social support, and exercise classes.

Our operational locations are as follows:



Our suppliers

Our suppliers¹ are critical to our operations and assist us in carrying out the services described above by either providing goods or services that:

- / are directly used in our client services; or
- / assist our workers in the provision of our client services.

We acknowledge that in many instances there are further tiers in the supply chain than are outlined above due to the complexities of certain supply chains. For example, linen and cotton supply chains often have many more tiers of suppliers due to the complexity of the production of cotton.

We endeavour to maintain long-term and stable relationships with our suppliers. We are proudly South Australian based and endeavour to use local suppliers where possible. However, this is not always possible, particularly if there have been supply chain disruptions or for our regional areas where there may be limited alternatives for suppliers of certain goods and services because of availabilities in the area.

Furthermore, given Helping Hand operates in a complex industry requiring the procurement of a diverse range of products and services, our supply chains are equally complex. Accordingly, interstate and / or international suppliers are required in certain circumstances.

FY25	FY24
1,172 Tier 1 Suppliers	1,054 Tier 1 Suppliers

¹ We define our supply chains as follows: **Tier 1 suppliers** are the suppliers that we directly engage with and enter into contractual arrangements with, **Tier 2 suppliers** are the suppliers that our Tier 1 suppliers engage to supply Helping Hand with goods and services, **Tier 3 suppliers** are the suppliers that our Tier 2 suppliers engage to provide goods and services to the Tier 1 supplier, **raw materials suppliers** are the suppliers that that provide the raw materials that are used up the supply chain to provide goods to Helping Hand.

Our supply chains

Helping Hand requires diverse suppliers to fulfill our services to our clients. We summarise our suppliers into eight (8) broad categories:

Where are our suppliers based?

Helping Hand's Tier 1 suppliers are primarily based in Australia with a small percentage of suppliers operating globally.

As illustrated in the supply chain maps below, the deeper we trace our supply chains, right down to the raw material level, the more global and diverse they become. Across the various tiers, suppliers are located on nearly every continent, creating a truly worldwide network.

Consumables



Administrative services



Professional services



Facility supplier



Electronics



Apparel and laundry



Labour services



Medical



Locations of Tier 1 suppliers²

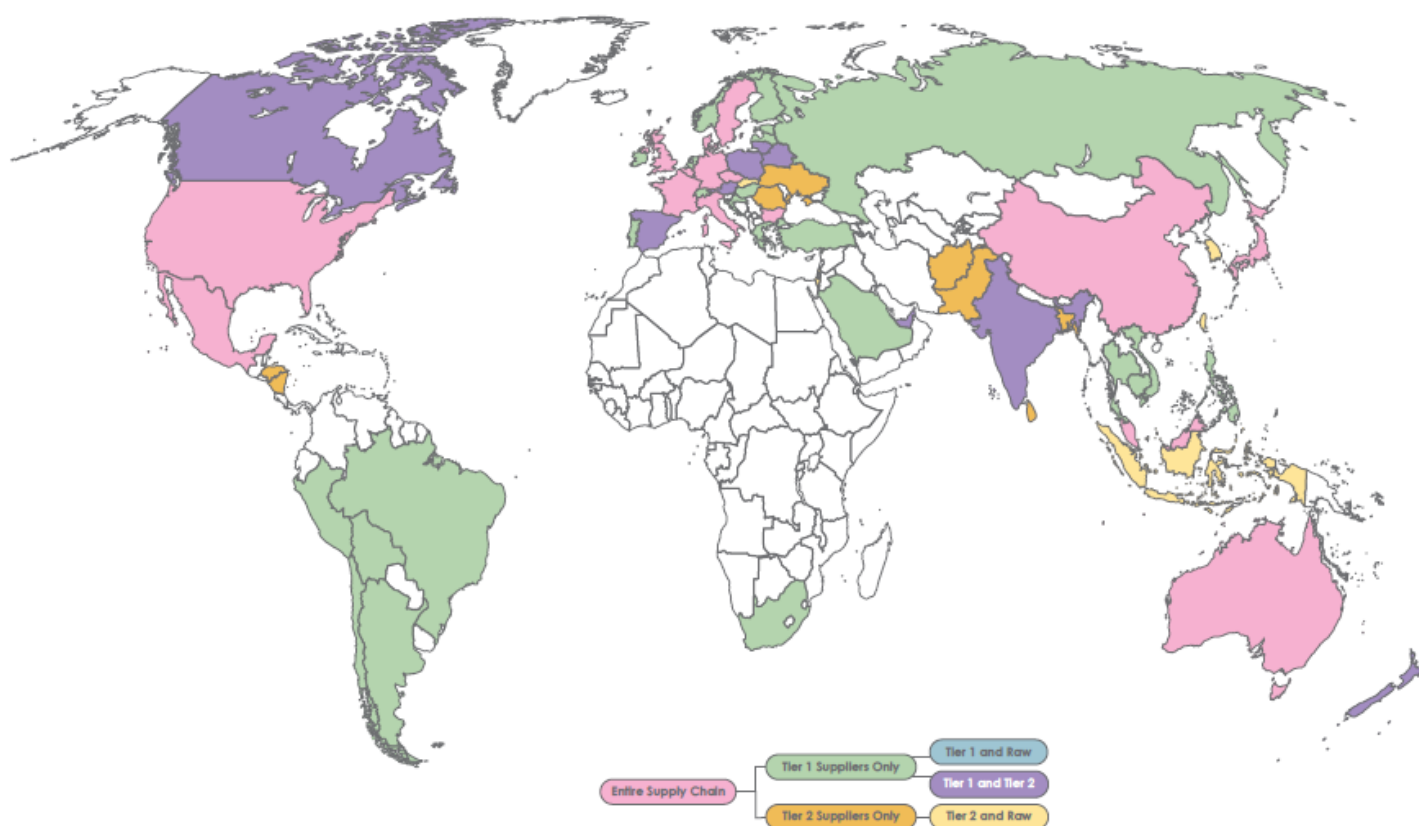
Locations of Tier 1 Suppliers



² Based on Tier 1 suppliers who have provided operating location information to Helping Hand.

Locations of Tier 1, Tier 2 and Raw Materials Suppliers³

Locations of all Helping Hand Suppliers



³ Based operating location data provide to Helping Hand by Tier 1 and Tier 2 suppliers.

Criteria 3 – Risks of Modern Slavery

The assessment of modern slavery risks in our operations and supply chains is a continual undertaking which Helping Hand aims to improve on in each reporting period. Helping Hand responds to changes in risk and the improvement of global risk methodologies and implements these changes into its due diligence and risk frameworks.

The foundation of Helping Hand's modern slavery risk assessments is the UN Guiding Principles on Business and Human Rights ("UNGP's"). The UNGP's are a set of guidelines for entities to use to prevent, address and remedy human rights abuses committed in business operations and supply chains.

A fundamental aspect of the UNGP's is the "cause, contribute to or directly linked to" model which is used to assess the risks of modern slavery and the appropriate course of remedy when an entity either causes, contributes to, or is directly linked to the risk or instance of modern slavery.

Examples of situations where an entity might cause, contribute to, or be directly linked to modern slavery is shown in the table below:

Cause	Modern slavery that an entity causes itself via its activities or omissions results in harm. <i>Example – a supplier that uses forced labour in its operations.</i>
Contribute to	Activities or omissions to facilitate, enable or incentivise harm. <i>Example – engaging a supplier that is unusually low-cost compared to other competitors in the industry which requires the use of child labour to lower the labour cost of production.</i>
Directly linked to	Being linked to harm through products, services, or business relationships <i>Example – engaging a supplier that is later found to exploit workers.</i>

How do we assess risk?

Helping Hand takes a multi-factorial approach to the assessment of risk. One aspect of our supplier due diligence framework is our risk matrix which is used as the first step in assessing the inherent modern slavery risks of our suppliers. This process assesses suppliers against risk factors based on their sector and industry, the product and services provided by the supplier, geographic / jurisdictional risk based on the location of their operations and entity specific risks.

Sector and industry risks

For example, manufacturing plant (higher risk) vs professional services firm (lower risk)

Product and services risks

For example, cleaning services (higher risk) vs professional consulting services (lower risk)

Geographic risks

For example, China (higher risk), and particularly the Xinjiang Uyghur Autonomous Region vs The Netherlands (lower risk)

Entity risks

For example, a small factory (higher risk) vs a national business (lower risk)

The data points in our risk matrix have been developed using the following sources:

- Global Slavery Index
- Corruptions and Perceptions Index
- The ten principles of the UN Global Compact
- The Universal Declaration of Human Rights
- Modern Slavery Act Guidance for Reporting Entities.
- NSW Government Procurement Guidance and Risk Management Framework
- US Department of Labour – List of Goods Produced by Child Labour and Forced Labour

The risk matrix is one aspect of our multi-faceted supplier due diligence framework which is detailed further in Criteria 4.

Operational risks

Helping Hand considers that we have a low risk of modern slavery occurring within our own operations (details of our operations are outlined in Criteria 2).

Helping Hand has strong internal governance structures, supporting our risk profiling of our operations. A key feature of our internal governance structures are our frameworks. This includes an easily accessible grievance mechanism through our *Whistleblower Policy* which is available to all employees, contractors and other “eligible whistleblowers” that work with, and for, Helping Hand. Helping Hand also has other grievance mechanisms for personal employment-related grievances such as our *Workplace Grievance Resolution Procedure*.

Our procurement department, including our procurement manager, are the contact points for employees to report any modern slavery instances and broader notifications, questions or concerns to, which our employees are aware of through our employee modern slavery training and our Modern Slavery Policy.

Helping Hand operates within the aged care industry which is a highly regulated industry with ongoing reporting and disclosure obligations. For example, Helping Hand has ongoing reporting obligations when there are specific changes to key personnel and new whistleblower requirements relating to the provision of aged care services. Compliance with rigorous legislative compliance is part of our business as usual and extends to our modern slavery compliance.

More broadly we adhere to legislative and regulatory requirements which are underpinned by our strong governance structures and policies which uphold protections related to workplace rights, freedom of association and freedom from workplace discrimination.

Helping Hand acknowledges that the use of labour hire, which is relied upon for roles such as nurses and personal carers, is an inherently high-risk aspect of our operations. Labour hire is high risk due to the short-term nature of labour hire use and the lack of oversight over the operations of labour hire entities. Helping Hand engages with reputable labour hire entities and undertakes due diligence on these entities as part of its modern slavery due diligence framework which mitigates some of the risk associated with these entities. Nonetheless, Helping Hand acknowledges the inherent risk associated with these entities and continuously monitors the labour hire entities that it engages.

Therefore, whilst we maintain the position that the risk of modern slavery occurring within our own operations is low, we understand that this is a risk that requires continuous re-evaluation in accordance with our broader, ongoing due diligence approach to ensure that our operational modern slavery risk remains low.

Supply chain risks

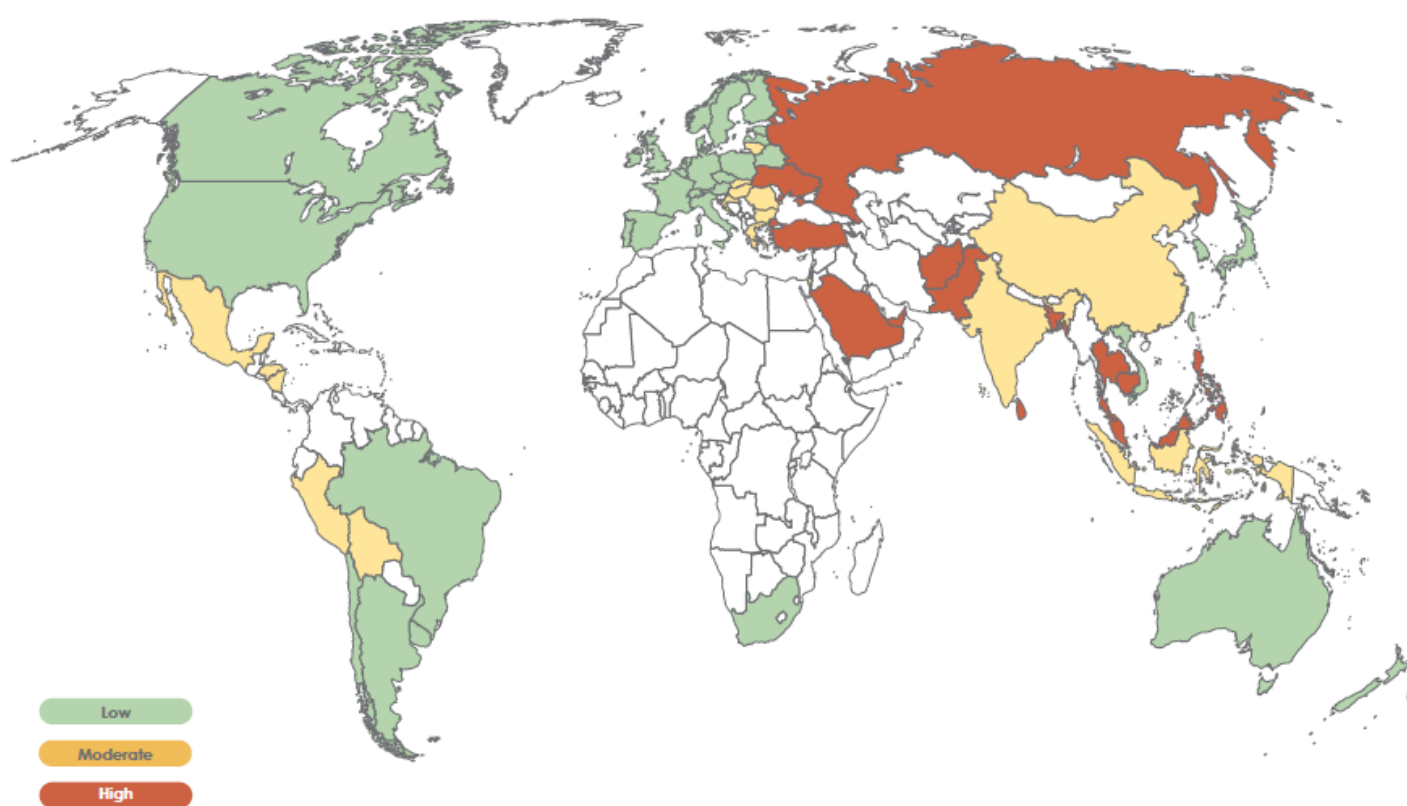
Helping Hand has identified the following key supply chain categories where there are heightened modern slavery risks:

Category	Cause, contribute to, directly linked to Helping Hand	Why is this a risk for Helping Hand?
Consumables (food and beverages, catering and non-perishables)	Directly linked	Specific supply chain risks exist within consumables such as fish and rice which is utilised in providing our services to our residents. Helping Hand is aware of the risk associated with particular consumables and will continue undertaking due diligence on its consumable's suppliers.
Medical suppliers (PPE and medical equipment)	Directly linked	Face masks, single use gloves, gowns, face shields and other PPE have heightened risks of modern slavery, particularly from countries such as Malaysia. Further, the equipment and materials that makes up most medical equipment is manufactured overseas. These overseas jurisdictions heighten the modern slavery risks of these supply chains.
Cleaning and waste disposal	Directly linked	The cleaning and waste disposal industry employs a large number of temporary workers in roles which often have "low skill" requirements. This means that these roles are attractive to migrant workers and low skill workers with limited English who are often financially vulnerable and needing support, meaning that they are more susceptible to modern slavery practices. Helping Hand continues to question suppliers about their employees and whether they use migrant or overseas workers through the modern slavery questionnaire process to have oversight over these specific risk areas. Helping Hand endeavours to engage national, reputable cleaning and waste disposal

Category	Cause, contribute to, directly linked to Helping Hand	Why is this a risk for Helping Hand?
		suppliers to mitigate some of the risk associated with this industry.
Uniforms and Linen	Directly linked	Uniforms and linen carry heightened modern slavery risks due to raw material supply chains such as cotton. Particularly jurisdictions carry heightened modern slavery risks as the source origin of these raw materials such as the Xinjiang Uyghur Autonomous Region in China. An additional factor which contributes to the heightened risks of these supply chains is the complexity of these supply chains and the many suppliers involved in these supply chains, from the raw material extraction and processing of the raw materials into the finished product.

Supply chain risk map

Supply chain risk

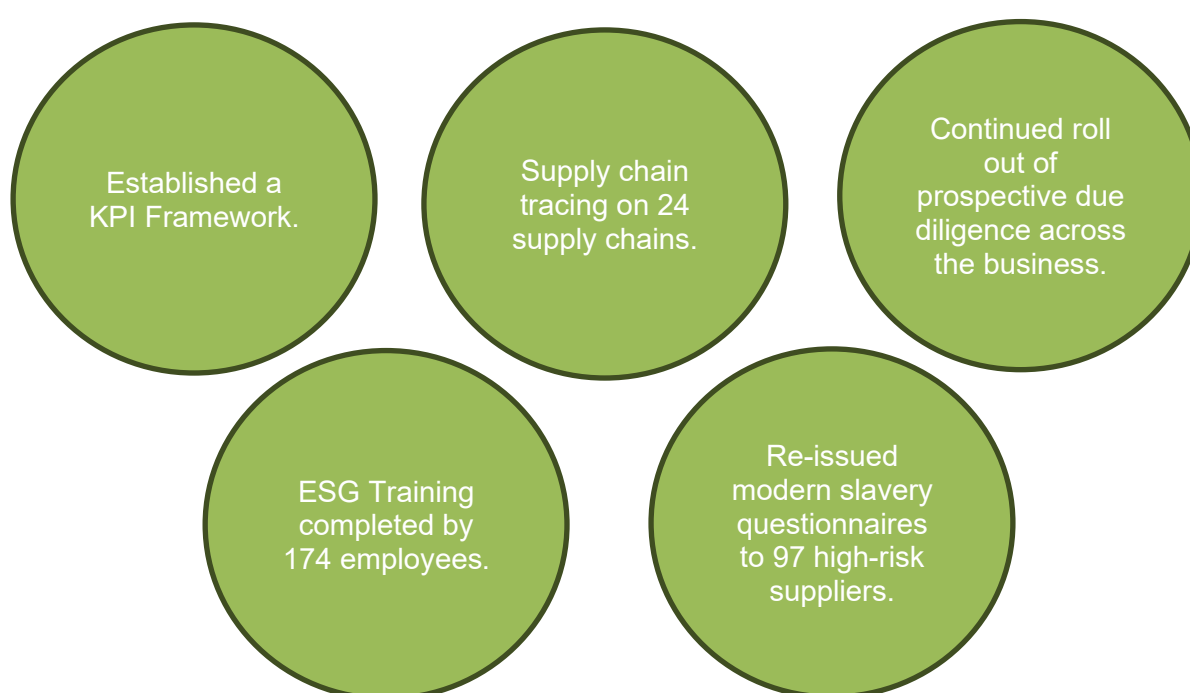


Criteria 4: Actions to Address Modern Slavery

The focus of our modern slavery compliance framework during FY25 has been to

- mature our due diligence processes through the expansion of our prospective due diligence framework;
- revisit our highest risk suppliers to ensure that appropriate due diligence has been completed by these suppliers; and
- expand our supply chain tracing efforts which have been a continued priority over the last two (2) reporting periods.

Summary of actions taken in this reporting period



Guidance and systems

Third party guidance

Helping Hand engages a third-party advisor who assists us with the management and development of our modern slavery compliance framework in each reporting period. Our third-party advisor oversees the process of preparing and implementing an action plan for each reporting period which sets out our goals and action items for the reporting period.

Modern Slavery Portal

Through our third-party advisor, we have continued utilising our Modern Slavery Portal (“**MS Portal**”) which assists us in managing our suppliers, undertaking due diligence on our suppliers, mapping our supply chains and otherwise managing our suppliers.

The MS Portal automates our modern slavery compliance framework through automated risk assessments and notifications. It also allows us to communicate directly with our suppliers, have visibility of when a supplier has opened correspondence or started an action item (for example, knowing when a supplier has started their modern slavery questionnaire) and produce reports and data analytics to manage our supply chain information.

Case study: Prospective Due Diligence & New Supplier Process

During the reporting period, Helping Hand continued promoting its new supplier process. Employees are encouraged to submit a request through our modern slavery compliance portal before engaging a new supplier, so that due diligence can be completed in advance.

Recently, a request was made to use a new equipment supplier, even though Helping Hand already has pre-vetted equipment suppliers that have passed due diligence. The request was not approved, and the employee was referred to the pre-vetted supplier list.

This process helps reduce modern slavery risk in our supply chain and supports the continued use of trusted, pre-approved suppliers.

Governance and oversight

Our modern slavery governance structures

Helping Hand's Procurement Department continues to have ultimate oversight over Helping Hand's modern slavery compliance framework.

The Modern Slavery Project Leader then reports to a member of our Executive who is responsible for and has general oversight over Helping Hand's modern slavery compliance.

Existing Policies and Codes

Helping Hand's Modern Slavery Policy and Supplier Code of Conduct are the foundations of Helping Hand's modern slavery compliance. The Supplier Code of Conduct is discussed further below.

Grievance mechanisms

Helping Hand has various grievance mechanisms available to report grievance and concerns to. An example of this is Helping Hand's whistleblower policy which is available for all employees, volunteers, contractors, suppliers and other eligible whistleblowers to access and use to report grievances and concerns. Helping Hand also has other grievance mechanisms for personal employment-related grievances such as our *Workplace Grievance Resolution Procedure*.

Helping Hand's whistleblower policy is currently being reviewed and updated in light of new requirements to the *Aged Care Act 2024* (Cth). The amended whistleblower policy will be rolled out in the next reporting period. Other reforms to Helping Hand policies, procedures and operations are being rolled out in light of changes to the *Aged Care Act 2024* (Cth) beginning on 1 July 2025.

Supplier Due Diligence

Our due diligence processes

Helping Hand's suppliers and service providers in both Residential Aged Care and Home Care engaged through Procurement undergo due diligence before any engagement takes place (prospective due diligence).

Where services or supplies are arranged outside of Procurement, such as corporate services or marketing-related suppliers these are generally engaged first and later identified through the new vendor report from Finance. Procurement then conducts retrospective due diligence after the supplier has already been used.

While this mixed approach is currently in place, the preference is to complete due diligence for all vendors before engagement wherever possible.

For all suppliers, Helping Hand undertakes the following due diligence steps through our MS Portal:

- ✓ **Independent Screenings:** new suppliers undergo independent due diligence screening through a third-party database called Refinitiv. Independent screenings integrate a layer of risk management into Helping Hand's due diligence which assesses risk beyond modern slavery risk (i.e., other environmental, social and governance (ESG) factors). We screen our suppliers for:
 - Integrity risks (e.g., bribery and corruption).
 - Environmental, Social and Governance Risks (e.g., modern slavery, environmental degradation, and regulatory enforcement).
 - Data and cyber risks (i.e., data security).
 - Operational and quality risks (i.e., product and service quality).
 - Identity risks (i.e., transparency).
 - Financial risks (i.e., financial irregularities).
- ✓ **Risk matrix assessments:** the MS Portal automatically provides a risk assessment of our suppliers using our risk matrix (described further in Criteria 3).
- ✓ **Questionnaires:** the MS Portal automates the distribution and collation of questionnaires to suppliers who meet the due diligence threshold of:
Annual spend of >\$10,000 and assessed as high or moderate risk under the risk screening and risk matrix assessment.

Supplier questionnaires allow Helping Hand to ascertain the current risk profile of the supplier for modern slavery and other ESG risk factors such as environmental and bribery and corruption risk.

These questionnaires are tailored so that Helping Hand can track expectations through specific supply chains. For example, for certain suppliers, we are able to amend the questionnaire to add in questions asking the supplier to provide information about the suppliers that they engage so that Helping Hand can risk assess these supply chains.

The MS Portal also automatically sends reminders to the suppliers to complete this questionnaire at scheduled intervals before and after the due date of the questionnaire (if the questionnaire is not already completed by the supplier as at the due date).

The results of our questionnaires are automatically scored by the MS Portal using a "traffic light system". This traffic light system grades the results as either:

- Green = low risk
- Orange = moderate risk
- Red = high risk
- / **Overall Risk:** the supplier risk ratings from screenings, the risk matrix assessment and the questionnaires are outlined separately within the MS Portal. The MS Portal then calculates the average risk rating based on all of the risk assessments available on the MS Portal and applies that average as the risk rating for that supplier.
- / **Further Due Diligence:** If there are significant risks or non-compliances identified throughout the due diligence processes described above, Helping Hand takes additional steps to identify and remediate the risks or non-compliances identified.

Depending on the supplier, if any non-compliances identified, and the severity of the non-compliances identified, Helping Hand undertakes steps such as issuing:

 - communications to suppliers asking them to clarify an answer to a questionnaire or whether a non-compliance identified has been remediated; and / or
 - tailored questions to the supplier based on the risks identified (for example, if a supplier has specific risks associated with the supply of linen and cotton, Helping Hand can issue a specific questionnaire to the supplier tailored to assessing this risk); and / or
 - issuing modern slavery training to the supplier – modern slavery training is generally issued to suppliers if Helping Hand is not satisfied that the supplier understands and is assessing their modern slavery risk.
- / **Annual Due Diligence:** Helping Hand maintain an ongoing due diligence approach and uses the automations in the MS Portal to ensure that annual due diligence is being undertaken on all suppliers. All suppliers are re-assessed for modern slavery risk annually to assess if their risk profile has changed. Accordingly, their risk rating is continually updated and refreshed.

A part of this ongoing due diligence is the issue of “refresher questionnaires” to suppliers. This asks suppliers to review their previous answers to questionnaires issued and provide any updates to these answers based on any changing circumstances.

Supplier Code of Conduct Declaration

The Supplier Code of Conduct is issued to suppliers through the modern slavery questionnaire, meaning that only suppliers who meet Helping Hand’s due diligence threshold are required to read and agree to abide by the Supplier Code of Conduct as a condition of completion of the questionnaire.

In the reporting period, Helping Hand investigated introducing the Supplier Code of Conduct to its contractor process, meaning that all suppliers will need to review the Supplier Code of Conduct. It is intended to roll this out in the future.

Engagement with high-risk suppliers

During the reporting period, Helping Hand identified that there have been some suppliers with a high inherent risk profile that have not answered the modern slavery questionnaire issued to them in prior reporting periods.

Because these suppliers are considered higher risk due to their industry and location, Helping Hand focused on them by re-issuing questionnaires. In total, 126 questionnaires were sent.

Additional due diligence will be carried out in the next reporting period, which may include providing mandatory training and following up with suppliers who have not engaged with our due diligence process.

Summary of due diligence undertaken during the reporting period

A summary of the due diligence undertaken in the FY25 reporting period is as follows:

Risk screenings and risk matrixing

Tier 1: 1172 suppliers

	Risk rating			
	No Results ⁴	Low	Moderate	High
Risk matrixing	-	42.1%%	22.9%	6.1%
Risk screenings	99.4%	0.5%	0.1%	0%

Tier 2: 60 suppliers

	Risk rating			
	No Results	Low	Moderate	High
Risk matrixing	-	20%	24%	56%
Risk screenings	95%	3%	2%	0%

Tier 3: 2 suppliers

	Risk rating			
	No Results	Low	Moderate	High
Risk matrixing	-	100%	0%	0%
Risk screenings	100%	0%	0%	0%

Questionnaires

Supplier Questionnaires: 126 questionnaires issued.

⁴ "No Results" is in relation to the risk screening process where we have screened a supplier in the screening database and no results have come back during this screening process, meaning that no "hits" or explicit "ESG risks" have been identified during the screening process.

Supply chain tracing

In the last two (2) reporting periods, Helping Hand has conducted significant supply chain tracing exercises across its supply chains and has continued to prioritise this form of supply chain due diligence in this reporting period, issuing 24 supply chain tracing questionnaires.

Helping Hand understands that our risks of modern slavery are increasingly prevalent deeper in our supply chains, particularly for specific supply chains such as for linen and uniforms. Over the last few reporting periods, Helping Hand has made significant progress on this front, gaining visibility over 60 Tier 2 suppliers and 2 Tier 3 suppliers thus far.

Helping Hand targets its high and moderate risk supply chains to undertake supply chain tracing. This will continue to be a priority in the coming reporting periods.

Case study: Supplier due diligence resulting in supplier understanding of modern slavery risk

In the FY2025 reporting period, Helping Hand engaged a maintenance supplier who was assessed as high risk in accordance with our due diligence processes, largely due to the industry in which they operate.

The supplier was issued with a modern slavery questionnaire and initially demonstrated that they did not have an adequate understanding of their modern slavery risk.

Subsequently, Helping Hand issued this supplier with modern slavery training. Upon completion of this training, the supplier indicated that they will be embedding various due diligence procedures such as implementing a Modern Slavery Policy and conducting prospective due diligence on the providers Tier 2 suppliers.

This same supplier was selected to be issued with a Tier 2 tracing questionnaire. The supplier provided Helping Hand with details of their suppliers, enabling Helping Hand to drill down to its Tier 2 suppliers in this supply chain. This demonstrates that Helping Hand's due diligence process have assisted suppliers in gaining maturity and understanding in the modern slavery space.

Training

During the reporting period, Helping Hand developed a revised employee training. The purpose of this training was to ensure that Helping Hand's employees understand Helping Hand's modern slavery compliance, why they conduct due diligence processes on suppliers, and how modern slavery compliance fits within the concept of "ESG". The aim of this training is to be a once off training, with the ability to reissue this to relevant staff if any updates or changes are made.

While supplier-facing employees had previously received modern slavery training modules, the program was extended to a broader group of operational managers to ensure organisation-wide understanding Helping Hand's initiatives in addressing modern slavery. By the end of the FY25 reporting period, 174 employees had completed the training.

Alongside this, Helping Hand maintains an employee modern slavery training module which is sent as needed to staff to increase their education around modern slavery and modern slavery risks for Helping Hand.

Case study: Increased internal awareness of supplier modern slavery risk and Helping Hand's compliance efforts

The IT Department approached the Procurement Department around the process of engaging a new supplier to supply phone cases and other IT accessories to Helping Hand. The IT Department was aware that Helping Hand was moving towards prospective due diligence and wanted to check that it was okay to engage a new supplier from a modern slavery risk perspective.

Prior to engaging the supplier, the supplier was subject to risk screenings and risk matrixing through Helping Hand's due diligence processes to assess the inherent risk of the supplier.

Because of Helping Hand's work to increase internal awareness of Helping Hand's modern slavery compliance, there has been an increase in business engagement in these compliance efforts and an overall increase in understanding of supply chain risk and what this means for Helping Hand.

Updates to Supplier Training Module

During this reporting period, our third-party providers reviewed our supplier modern slavery training and updated the training to reflect Helping Hand's current due diligence processes.

As Helping Hand has matured significantly in its supplier due diligence over the last few reporting periods, the supplier training was updated to reflect this.

Furthermore, Helping Hand has added a link to Helping Hand's supplier modern slavery training at the beginning of the modern slavery questionnaire which requires suppliers to complete the modern slavery training prior to completing the modern slavery questionnaire.

Helping Hand had received some feedback from suppliers that they didn't know what modern slavery was or why they were being asked to complete the modern slavery questionnaire. Having this training readily available for suppliers will ensure that suppliers are aware of Helping Hand's compliance obligations at the outset with the aim of increasing the response rate and the quality of the answers to the modern slavery questionnaire.

Procurement and Contracting

Prospective due diligence framework

Over the last two (2) reporting periods, Helping Hand has been working with our third-party advisors to implement a prospective due diligence framework, whereby all new suppliers will be subject to due diligence prior to being formally engaged by Helping Hand. Prospective due diligence allows us to identify key risks prior to being "directly linked" to the supplier and any potential modern slavery risks associated with the supplier.

In the last reporting period, we rolled out the prospective due diligence framework across a range of test suppliers which helped us make the framework as effective and as streamlined as possible.

In this reporting period, we rolled out this framework more broadly to the Home Care and Residential Departments within Helping Hand, resulting in 146 suppliers in total being put through the prospective due diligence framework.

Case Study: Expansion of prospective due diligence

In the last reporting period, Helping Hand began the rollout of its prospective due diligence framework whereby new suppliers are subject to due diligence prior to being engaged as a supplier by Helping Hand. This was initially rolled out to some test suppliers to ensure that the new workflow and the associated notifications and approvals required were working before this new process was implemented across more suppliers. Due to the business change that this process requires, this has been rolled out gradually across the business.

During this reporting period, this prospective due diligence process was expanded across the Home Care and Residential Departments. This prospective due diligence framework will continue to be rolled out across the business over the next reporting, coinciding with the gradual implementation of our Contactor Management System.

Contracting

Helping Hand's standard Procurement Agreements have modern slavery clauses as standard, boilerplate clauses.

Helping Hand continues to ensure that modern slavery clauses are implemented into all new Helping Hand issued supplier contracts. As existing supplier contracts are renewed, modern slavery clauses are inserted into the contracts.

Continuous Improvement

Action Plan

The action items undertaken during FY25 which are described in this Criteria 4 formed part of an Action Plan which was developed by Helping Hand in conjunction with our third-party advisors. This, in combination with the KPI Framework, drives Helping Hand's modern slavery compliance and actions undertaken throughout the relevant reporting period. Helping Hand will continue to develop an action plan for each reporting period (which is discussed further in Criteria 5).

KPI Framework

Last year, Helping Hand undertook two (2) forms of industry benchmarking. The first form of benchmarking was through the Walk Free Foundations Benchmarking Tool. Helping Hand scored 25 out of 30 compared to an overall industry score in the "Services and Health Care" category of 15 out of 30.⁵ The second form of benchmarking was undertaken by our third-party advisors who assessed Helping Hand against our industry competitors based on an independent benchmarking criteria. This was utilised to develop an action plan for the FY25 reporting period.

One of the action items arising out of this benchmarking process was to consider and develop a KPI Framework. During the reporting period, Helping Hand implemented a KPI Framework which contains a series of targets in the areas of employee training, supplier training and supply chain visibility.

These targets have been implemented to guide our modern slavery compliance progress in future reporting periods and will guide the action items included in our annual action plans going forward. During each reporting period, we will assess our progress against these targets, monitor progress and adjust timelines where required. This is discussed further in Criteria 5.

⁵ Figures for the Walk Free Foundations Benchmarking Tool current as at the FY24 reporting period when the benchmarking assessment was undertaken.

Criteria 5: Effectiveness of Actions

During the FY25 reporting period, we have made significant progress in maturing our due diligence processes by expanding our prospective due diligence framework, as well as revisiting our highest risk suppliers and undertaking actions to fill gaps in due diligence taken on these suppliers. We have also continued to make progress in the area of supply chain tracing and gaining visibility over our Tier 2 and Tier 3 suppliers.

With the implementation of our KPI Framework and our continued efforts to implement an action plan for each reporting period, we continue to take strides in the overall effectiveness of our due diligence processes, the oversight of our supply chains, and our internal governance processes. The KPI Framework has given us an additional methodology to assess the effectiveness of the actions undertaken during each reporting period which will guide the decisions around actions to undertake in future reporting periods.

A summary of the progress made in this reporting period is outlined below:

Focus area for FY25: expanding prospective due diligence, focussing efforts on high-risk suppliers and supply chain tracing.		
Category	Action item	Progress
Training and engagement	Update supplier training modules to reflect Helping Hand due diligence processes.	Completed.
	Rollout of new employee ESG training.	Completed.
Due diligence (including remediation)	Complete mapping exercises on Tier 2 and 3 suppliers identified in the last reporting period.	Completed.
	Undertake due diligence on identified Tier 2 and 3 suppliers.	Completed and ongoing.
	Implementation of prospective due diligence procedures.	Ongoing – gradually rolling out across the business.
	Supplier Code of Conduct included in new supplier onboarding process for all new suppliers.	Ongoing.
	Continue to follow our remediation processes for suppliers that present any modern slavery risks.	Completed and ongoing.
Continuous improvement	Implementation of a KPI Framework.	Completed.

Based on the progress outlined above, Helping Hand is in the process of reviewing progress made towards the KPI's in the KPI Framework and developing an action plan for the FY26 reporting period. Some of the actions that will form part of this action plan are outlined in Criteria 7.

Criteria 6: Consultation

This criterion is not applicable as Helping Hand does not own or control any entities.

Criteria 7: Further Information

Significant progress has been made in this reporting period towards the implementation of a prospective due diligence framework, which will continue to be rolled out across the business through the FY26 reporting period.

Looking forward, in FY26, Helping Hand is aiming to focus on our ongoing due diligence processes and to continue to progress our supply chain tracing efforts.

Category	Action Item
Training and engagement	Review of suppliers that have been issued with modern slavery training.
Modern Slavery Questionnaires	Review of our modern slavery questionnaire and our refresher modern slavery questionnaire to ensure that Helping Hand is collecting the required information from suppliers to assess risk.
Prospective Due Diligence Framework	Continued rollout of the prospective due diligence framework across the business.
Supply Chain Tracing	Expansion of supply chain tracing efforts with a focus of mapping suppliers beyond the Tier 2 level.

In December 2024, the Attorney General's Department issued a response to the statutory review of the Act and has agreed in full, in part, or in principle to 25 out of the 30 recommendations.

This, in combination with the appointment of the Federal Anti-Slavery Commissioner, means that a bill to amend the Act could be introduced during the FY26 reporting period. Helping Hand will continue to monitor any further movements with the proposed changes to the Act and, with the guidance of our third-party providers, will ensure that our modern slavery compliance framework is compliant with any changes made to the Act and accompanying guidance.

Board Approval

This is the sixth modern slavery statement for Helping Hand Aged Care Incorporated and represents the reporting period of 1 July 2024 to 30 June 2025.

Approved by the Helping Hand Aged Care Incorporated Board on 26 August 2025.



A handwritten signature in black ink, appearing to read 'Janet Finlay', with a small dot at the end.

Janet Finlay
Chair