

Zenitas Healthcare

Modern Slavery Statement

FY23

This statement has been published in accordance with Part 2 of the Modern Slavery Act (Cth) 2018 (**Act**).

It sets out the steps taken by the Zenitas Healthcare group of companies during the financial year ending 30 June 2023 to prevent caused, contributed or directly linked modern slavery practices in its business and supply chain.

This statement has been approved by the Board of Guardian Alphabet Holdco Pty Ltd on 29 November 2023 in their capacity as principal governing body of the Zenitas Healthcare group of companies.

Signed:

A handwritten signature in black ink, appearing to read 'R. Koczkar', written in a cursive style.

Robert Koczkar, Director of Guardian Alphabet Holdco Pty Ltd

Table of Contents

1.0	Statement from our CEO	P3
2.0	Structure, Business and Supply Chains	P4
3.0	Operations and Supply Chain Risks	P5
4.0	Modern Slavery Response Strategies	P8
5.0	Assessment and Reporting	P9
6.0	Consultation	P9
7.0	Other Relevant Information	P10
8.0	Annexure 1	P11

1. Statement from our CEO

I am pleased to share Zenitas Healthcare's fourth Modern Slavery statement.

Zenitas continues to be committed to contribute to eliminating the problem of modern slavery practices, as crimes that affect communities and individuals across the globe.

We remain wholly opposed to any abuses of a person's freedoms in our direct operations, our indirect operations and our supply chains.

We also expect our people, partners and suppliers to share our commitment to eradicating modern slavery practices.

Over the past 12 months we have made progress to further develop our processes, expand our action plan and implement controls within our operations now that we better understand our modern slavery risk. We continue to recognise that ongoing effort is required to further progress towards our commitment of eliminating modern slavery risks across our business

Our mission at Zenitas is to enable people to live healthier, happier and more independent lives. As part of our mission, we will continue to promote and embed human rights, and take clear and purposeful action to oppose modern slavery.

Antonia Albanese

CEO | Zenitas Healthcare

2. Structure, Business and Supply Chains

Modern Slavery Reporting Criteria One and Two: Identify the reporting entity and describe its structure, operations and supply chains

2.1 About Zenitas Healthcare

For completeness and compliance with the Modern Slavery Act, where our structure, operations and supply chains have remained the same since the last reporting period, we have re-stated the same information in this Statement.

Zenitas Healthcare was incorporated in 2016 and forms part of a group of private companies that provide a wide range of healthcare services across Australia. It operates two customer focused healthcare businesses that deliver aged and disability care, accommodation and allied health care services, namely Plena Healthcare and Claro Aged Care and Disability Services.

The ultimate holding company of the Zenitas Healthcare group of companies is Guardian Alphabet Holdco Pty Ltd. This statement is made jointly by Guardian Alphabet Holdco Pty Ltd and the other entities within the Zenitas Healthcare group of companies that are reporting entities for the purposes of the Act (identified in **Annexure 1**). In preparing this statement, we have considered the operations of the wholly owned subsidiaries of the Zenitas Healthcare group of companies.

Preventing and addressing involvement in modern slavery is central to our values and our commitment to running a safe, responsible, and sustainable business.

See our [website](#) for more information about Zenitas and what we do.

2.2 Our Operating Model

Zenitas Healthcare manages its two businesses from our offices in Melbourne and Adelaide. Services are delivered in private homes, residential aged care facilities and community settings across Australia.

Plena Healthcare

Plena Healthcare provides allied health services to elderly people and people living with disability in their homes and residential aged care facilities across Australia.

Plena offers a full suite of allied health services including physiotherapy, occupational therapy, podiatry, speech therapy, and dietetic services.

Claro Aged Care and Disability Services

Claro Aged Care and Disability Services provides quality support services to people living with disability and elderly people to live more independent lives.

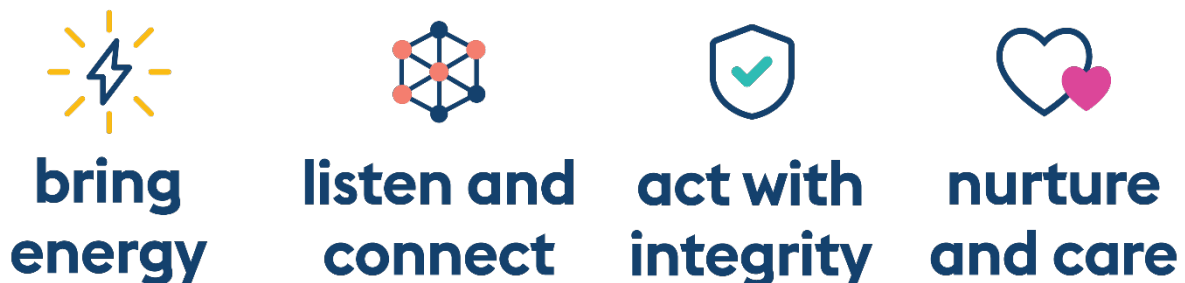
Support services are delivered in specialist disability accommodation and community settings across Australia.

2.3 Our People

Zenitas contracts and employs approximately 1800 support workers and 750 allied health professionals. Our large workforce means we have a diversity of skills and experience to draw upon, reflecting the needs of the customers that we serve.

As our organisation serves the community, we have the highest standards when it comes to our safety and conduct. We ensure that all staff and contractors who have or are likely to have access to our customers, undergo rigorous safety screening and training.

We also acknowledge the inherent supply chain risk in a large and distributed workforce, which is addressed in our Action Plan below. Respecting human rights, including the right to be free from slavery, is inherent in our recently refreshed values of:



3. Operations and Supply Chain Risk

Modern Slavery Reporting Criteria Three: Describe the risks of modern slavery practices in the operations and supply chain in the reporting entity and any entities it owns or controls

3.1 Our Operations

Our operation includes a workforce of circa 2,500 directly employed workers, small number of contracted workers in Australia and 7 contracted workers in the Philippines. Most of our workforce are support workers and allied health professionals who deliver healthcare and support services to customer in their homes and the community. Our enabling and corporate functions such as human resources, recruitment, finance and IT are run from our offices in Melbourne and Adelaide.

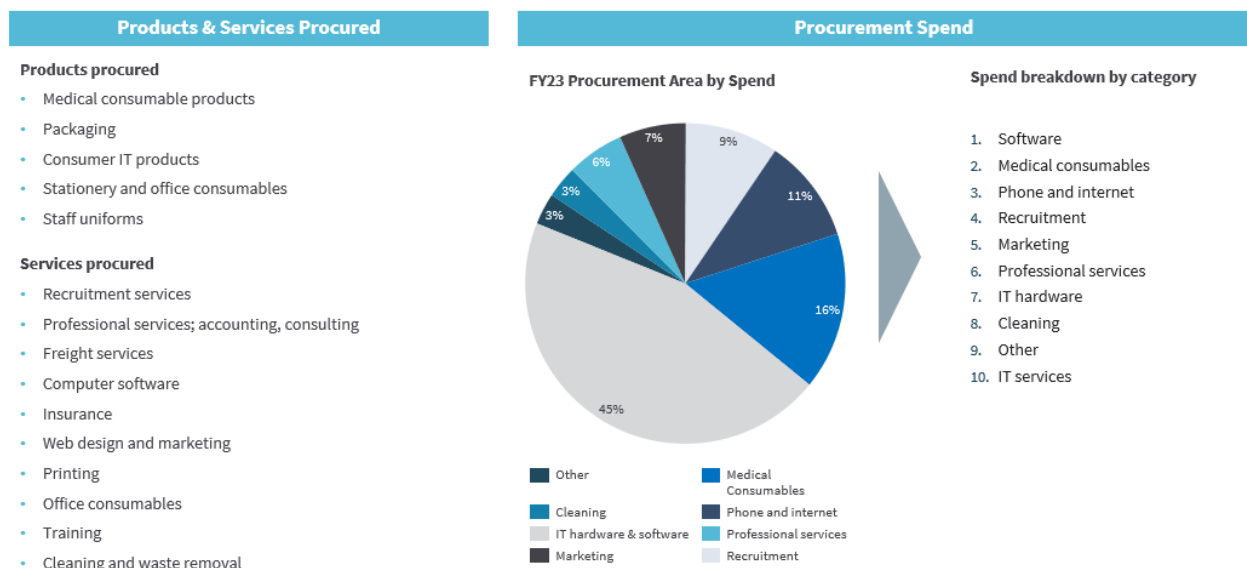
3.2 Our Supply Chain

Zenitas' supply chain is centred around providing healthcare staff to aged and disability care and community settings. Goods and services are sourced from tier one suppliers based in Australia and can be broadly grouped as follows:

- health and administration services including medical consumables such as personal protective equipment
- engagement and procurement of workforce
- information technology hardware and software

- cleaning products and waste management
- local construction of specialised dwellings
- stationery and printing supplies

The largest spend areas in Zenitas’ supply chain are IT hardware and software (45%), medical consumables (16%) and phone and internet (11%). Below is a snapshot of other consumables within our supply chain and the portion they account for.



3.3 Modern Slavery Risks Identified

We applied the Modern Slavery Act’s definition of modern slavery to our operations and supply chain risk assessment which is a situation of exploitation that a person cannot refuse or leave because of threat, violence, deception, abuse of power or other forms of coercion. Modern slavery practices include human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

Also relevant to identifying modern slavery risks for FY23 is the risk audit conducted in FY20. Our supply chains and operational activities have remained relatively unchanged to date, therefore conclusions were drawn based on the FY20 review and FY22 refresh as reliable and applicable sources of our current modern slavery risk management position.

Operations

The FY20 review considered Zenitas and its controlled entities operations and supply chains activities to decipher any risk caused, contributed, or directly linked to modern slavery practices. We discovered that the use of outsourced cleaning and labour hire services, procurement of medical supplies and direct hire of low skilled labour were our main exposure areas to modern slavery risks. The modern slavery practices that could be linked here include servitude, deceptive recruitment for labour or services, debt bondage and forced labour.

Supply Chain

Factors considered when ascertaining modern slavery risks in our supply chains were geographical location, sourced products and services, our business model and vulnerable populations involved. Within these four domains, we found that our supply chain could potentially be linked to deceptive recruitment for labour or service practices, forced labour, debt bondage and servitude.

Geography

Our operational activities primarily occur in Australia with the exception of 7 outsourced contractors based in the Philippines. Australia is considered a low-risk country where human rights violations are concerned because its laws are centred around respecting human and workers' rights. The Philippines presents greater risk for potential human rights and worker right violations due to more instances of poorly enforced national laws and corruption therefore offshore workers may be exposed to forced labour, deceptive recruitment, and labour practice for instance.

Product and services

Services involve placing staff into aged and disability homes and the community. As a provider of healthcare services there is low risk in operations.

Zenitas engages cleaning companies to service its offices. The cleaning services industry in Australia is considered high risk due to high number of past violations and large number of migrant contract-based workers in this industry. Further, there is a lack of transparency about hiring practices which can lead to violation of worker's rights/entitlements.

Business Model

Considering our operations are focused on healthcare delivery, we understand that the highest modern slavery risk sits within the procurement of medical goods. Zenitas procures medical goods to support its customers but also procures electronic hardware and PPE (Personal Protective Equipment) to facilitate business operations. The manufacture of medical goods is a known high-risk area for potential exploitation and human rights violations. The unprecedented surge in demand for medical goods during COVID-19 has only exacerbated the risk of forced labour issues in the Asia-Pacific region, particularly in Malaysia as a glove manufacturer was found to have used forced labour. We currently do not have traceability into downstream supply chains of medical goods or electronic hardware, however, are in the process of implementing certain measures to ensure responsible sourcing.

Vulnerable Populations

Zenitas employs many low skilled and migrant/and or non-English speaking workers as aged and disability carers. Such workers are susceptible to exploitation because they may not be fully aware of their legal rights and entitlements. Because we directly hire workers and have established labour policies and practices consistent with Australian laws however, the risk of such exploitations occurring are considered low risk.

Risks associated with the four domains identified above have been considered and responses included in a detailed action plan which was developed for FY21 and updated for FY22 and FY23.

4. Modern Slavery Response Strategies

Modern Slavery Reporting Criteria Four: Describe the actions taken by the reporting entity (and any entities it owns or controls) to assess and address these risks, including due diligence and remediation processes

Response to Modern Slavery Risks

As a business operating in the healthcare industry, we are conscious that modern slavery risks can arise in certain areas of the sector, particularly in areas such as disability and aged care provision, as well as in the manufacturing of healthcare equipment and IT.

Our modern slavery and corporate responsibility frameworks have underlying policies and procedures such as the Whistle Blower Policy, Protected Disclosure Policy and Procedure, Feedback Management Procedure, Zenitas Code of Conduct and Supplier Code of Practice (Supplier Code) that consider these risks associated with the healthcare industry.

Over FY23, we have made progress in implementing these policies and FY23 actions to minimise our modern slavery impact. We committed to:

- reviving our Responsibility, Inclusion and Diversity Committee,
- reviewing supply chains and labour hire arrangements, and
- embedding the Supplier Code and Modern Slavery provisions in supplier agreements where possible.

In response to our commitments, we reinstated our first Corporate Social Responsibility Committee (formerly known as the Responsibility, Inclusion and Diversity Committee) meeting in March 2023 to consult relevant stakeholders on all issues relating to corporate and social responsibility and will continue these meetings as part of our FY24 action plan.

Similarly, our procurement and legal teams collaborate to ensure our due diligence process involves actively negotiating for the use of modern slavery and supplier code provisions in supplier contracts where feasible. Where negotiating such a clause in standard contracts for instance is unachievable, suppliers receive a copy of our supplier code outlining our approach to corporate social responsibility and the standards expected of our suppliers and tier two supply chains.

Other actions taken to address modern slavery risks involved incorporating the Speak Up and whistle blower information into the Zenitas brand and marketing material to encourage reporting and disclosure of poor behaviour and exploring due diligence strategies for sourcing goods and services.

The whistle blower hotline was introduced in March 2023 and received 28 disclosures spanning across potential issues of fraud and corruption, breach of policy, workplace health and safety, welfare concerns, bullying and harassment and fraud and corruption.

Sourcing goods and services responsibly is addressed in our FY24 action plan.

5. Assessment and Reporting

Modern Slavery Reporting Criteria Five: Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address Modern Slavery risks

5.1 Assessment of effectiveness of actions being taken

Zenitas is committed to remediation where we have caused or contributed to human rights harm such as modern slavery. Where there is a direct link to harm in our operations and supply chain, we recognise that we may choose to play a role in remediating these incidents.

For this reporting period, we measured how effective our modern slavery risks were identified and mitigated by cross-referencing response activities to the action plan. While this approach produced some evidence of responsiveness and progress, we aim to use key performance indicators (KPIs) for preciseness and improved progress tracking in future. KPIs will apply across the six key focus areas of:

- governance and policy,
- roles and accountabilities,
- due diligence,
- supply chain management,
- training and awareness; and
- grievance and remediation.

We will explore the use of KPIs such as completion rates of modern slavery awareness training, percentage of supplier contracts with modern slavery and supplier code provisions, percentage of whistle blower reports and number of supplier questionnaires completed. We will continue to re-evaluate how effective our modern slavery response strategies and actions are over subsequent reporting periods for continuous improvement.

6. Consultation

Modern Slavery Reporting Criteria Six: Describe the process of consultation with any entities the reporting entity owns

The FY23 modern slavery statement was prepared with input from quality & risk, operations, legal, marketing & communications and the human resource functions. Consultation involved reviewing and circulating the tailored modern slavery risk assessment report of Zenitas' supply chain and operations for data verification and improvement input. The Corporate Social Responsibility Committee also play a role in overseeing consultation processes when devising our responses to modern slavery practices.

Support in development of both the action plan and this statement has been provided by resources from both equity partner businesses.

7. Other Relevant Information

Modern Slavery Reporting Criteria Seven: Describe any other information that the reporting entity, or the entity giving the statement, considers relevant

We have participated in workshops with our suppliers and partners, such as Residential Aged Care Providers and Recruiters, to ensure we are addressing modern slavery risk from various perspectives, as well as collaborating and learning from each other's experiences.

Over the coming year, we will continue to set clear expectations to support our employees and suppliers to be alert to involvement in Modern Slavery.

Annexure 1

The following entities within the Zenitas Healthcare group of companies are reporting entities for the purposes of the Act:

- Guardian Alphabet Holdco Pty Ltd
- Guardian Alphabet Midco Pty Ltd
- Guardian Alphabet Pty Ltd
- Zenitas Healthcare Pty Ltd

The wholly owned subsidiaries of Zenitas Healthcare Pty Ltd comprise:

- Zenitas St Kilda Pty Ltd
- Claro Employee Services Pty Ltd (formerly known as Zenitas Medical Trusco Pty Ltd)
- Modern Medical Administration Unit Trust
- Zenitas Medical (WA) Unit Trust
- Comrec Australia Pty Ltd
- Claro Care Holdings Pty Ltd (formerly known as Zenitas Home Care Pty Ltd)
- Claro Disability Services Pty Ltd (formerly known as Australian Home Care Services Pty Ltd)
- Healthcare at Home Australia Pty Ltd
- Claro Aged Care Pty Ltd (formerly known as AHC Care Services Pty Ltd)
- Accommodation & Care Solutions Holdings Pty Ltd
- Accommodation & Care Solutions Pty Ltd
- Rehabilitation Care Solutions Pty Ltd
- Zenitas Caring Choice Pty Ltd
- Rehabilitation Care Solutions Pty Ltd
- Plena Healthcare Holdings Pty Ltd (formerly known as Dimple Group Holdings Pty Ltd)
- Dimple Podiatry Pty Ltd
- Dimple Dietetics Pty Ltd
- Dimple Consulting Pty Ltd
- Dimple Physiotherapy Pty Ltd
- Transform Wellbeing Pty Ltd
- Transform Care Pty Ltd
- Loqui Pty Ltd
- Murto Pty Ltd
- Grantley No. 10 Pty Ltd