

Goulburn Valley Health Modern Slavery Statement

Modern Slavery is a term used to describe serious exploitation. Modern Slavery can occur in every industry and sector and has severe consequences for victims. Modern Slavery also distorts global markets, undercuts responsible business and can pose significant legal and reputational risks.

Goulburn Valley (GV) Health recognises the importance of combating modern slavery, a crime that affects communities and individuals across the globe. This Modern Slavery Statement is made pursuant to the Commonwealth Modern Slavery Act 2018 (The Act) by GV Health and relates to the financial year 1 July 2023 to 30 June 2024 (Reporting Period).

Mandatory Criteria 1 and 2: Identify the reporting entity and describe its structure, operations and supply chains.

Goulburn Valley Health (GV Health) is a Regional Public Hospital and Health Service for the Hume Region of Victoria, established under section 181 of the Health Services Act (Vic 1988) with main campuses located at Shepparton, Tatura, Euroa and Rushworth. The main campus in Shepparton is the major acute referral hospital for the sub region. Additional sites are also located in Shepparton, Seymour, Benalla, Cobram, Echuca and Wodonga. There have been several key changes in GV Health's organisational structure in the Reporting Period including the appointment of a new Chief Finance Officer and Chief Corporate Affairs Officer.

GV Health provides surgical, medical, paediatric, obstetrics and gynaecology, intensive care and psychiatry services as well as extended care and regional services. GV Health has an internal Information Technology unit which is supported under a service agreement with Hume Region Health Alliance for technical support region wide. With the exception of several local arrangements, GV Health purchasing is conducted predominantly through HealthShare Victoria (HSV).

HSV is a Australian public entity established in 2001 under the Victorian Health Services Act 1988 (the Act.). HSV partners with Victoria's public health services to understand their requirements, facilitate large scale collective tenders, and in collaboration with suppliers, deliver enhanced health outcomes for all Victorians. GV Health procures goods and services from the suppliers who are party to HSV collective agreements and hence HSV has a significant role in GV Health's health service supply chains.

Mandatory Criteria 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls

The Act requires businesses and other entities operating in Australia with annual consolidated revenue of \$100 million or more to make annual public reports (Modern Slavery Statements) on their actions to assess and address modern slavery risks in their domestic and global operations and supply chains. Modern Slavery Statements must address the following seven mandatory criteria:

1. Identify the reporting entity.
2. The reporting entity's structure, operations, and supply chains.
3. Modern slavery risks in the reporting entity's operations and supply chains, including in the operations and supply chains of any entities it owns or controls (subsidiary entities).
4. Actions the reporting entity has taken, and any of its subsidiary entities have taken, to assess and address those modern slavery risks, including due diligence and remediation processes.
5. How the reporting entity assesses the effectiveness of those actions.
6. The process of consultation with subsidiary entities in preparing the Modern Slavery Statement.
7. Any other information the reporting entity considers relevant.

As GV Health's major supplier HSV is a statewide procurement organisation that partners with Victorian public health services to procure best value goods and services. Recognising the considerable risk of modern slavery in the sourcing of such supplies and equipment, GV Health is reliant on HSV to assist as part of its purchasing risk minimisation strategy.

As a health service with a largely skilled workforce, GV Health considers its risk of modern slavery within its direct business operations to be relatively low. However, GV Health has undertaken a targeted, risk-based approach to assessing modern slavery risks within its employment service and supply chain operations. GV Health has strengthened its employment practices in order to minimise or eliminate slavery in the workplace. GV Health acknowledges that the extensive nature of its supply chains may expose it to modern slavery risk, and has continued to engage with HSV to help it identify the general risks of modern slavery that may be present.

GV Health recognises it may be exposed to a number of modern slavery risks due to the diversity of products and services sourced, and the associated geographic locations, industries and regulatory systems further down those supply chains. HSV has identified some of the general risk areas present in GV Health's supply chain which include:

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| • Health care supplies | High |
| • Health care equipment | High |
| • Health care equipment and supplies | High |
| • Health care distributors | Very High |
| • Health care providers and services | High |

These factors can be considered 'global' factors to the extent that they are not capable of being readily influenced or changed by the supplier. Whilst significant in terms of the degree of modern slavery risk a supplier may be exposed to, and the corresponding risk rating, these factors overall have limited impact on the risk rating due to the HSV methodology.

Mandatory Criteria 4: Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.

GV Health continues to engage with HSV to understand and apply actions HSV has undertaken to assess and address the modern slavery risks in its supply chains. While GV Health's Executive and Directors recognise that its supply services may have links to risks in offshore high-risk geographies, to our knowledge, GV Health has not directly caused or contributed to modern slavery practice.

HSV has established a modern slavery program of work to support GV Health and other Victorian health services to address modern slavery risks in their operations and supply chains. The program encompasses health service education and support, supplier engagement, due diligence and remediation, amongst other activities. As part of this process, HSV requested the very high and high risk suppliers to provide a copy of their modern slavery policies for review and feedback. Of the 2 very high and 14 high risk suppliers approached, 9 suppliers provided their modern slavery policy, and were given feedback.

HSV upholds the Australian Government's position on modern slavery. HSV has updated its purchasing policy to include a statement on combatting modern slavery in health supply chains and capturing allegations of modern slavery practice(s) in its remit of complaints management, enabling the development of remediation processes. The purchasing policies outline HSV's position on procurement governance and activities, including its response to Government policy.

GV Health is compliant with the HSV purchasing policies. As part of its due diligence, GV Health has included a modern slavery clause in its Market approach – Social Planning, Invitation to Supply (ITS), and Contract documentation to ensure prospective suppliers acknowledge their responsibility to health services that are reporting entities pursuant to the Act. "Elimination of modern slavery" clauses are also incorporated into GV Health recruitment and training processes.

As well as specific modern slavery provisions, suppliers wishing to conduct business with GV Health are required to commit to meet the Supplier Code of Conduct. Under the Supplier Code of Conduct, large suppliers are expected to proactively identify, address, and where required by legislation, report on risk of modern slavery practices in their business operations and supply chains.

In addition to these activities, HSV has facilitated training workshops for health services on modern slavery practices and the requirements of the Act. This is an opportunity for key GV Health personnel to remain informed of current slavery risks within the various supply chains.

Mandatory Criteria 5: Describe how the reporting entity assesses the effectiveness of actions taken to assess and address modern slavery risks.

GV Health continues to engage with HSV to understand the effectiveness of the assessments they have conducted. GV Health recognises the importance of this activity and has introduced assessment mechanisms such as its Market Approach process contained in its social procurement planning tool.

The tool provides purchasing guidelines under the following categories:

1. What kind of activity are you undertaking? (quote or tender).
2. What is the total value over the life of the contract (excluding options to renew or extend).
3. Determine social procurement requirements which include modern slavery guidelines.
4. Suitability of organisational priority social and/or sustainable procurement objectives.
5. Suitability of other social and/or sustainable procurement objectives; and,
6. Amend corresponding documents to reflect the social and/or sustainable objectives and outcomes for this procurement activity.

HSV has introduced several interactive mechanisms for monitoring the effectiveness of the actions it has taken to date that GV health staff have attended. The results of attendee surveys are used to measure the success of engagement programs, inform future HSV workshop content and identify potential gaps in training.

HSV offers social procurement learning modules through the ECHO learning management system. Completing the eLearning Foundational module equips purchasing managers with a basic understanding of social procurement and the Framework requirements. GV Health has linked this training process within its social procurement tool 'Market Approach' which is available entity wide.

Mandatory Criteria 6: Describe the process with any entities GV Health owns or controls.

GV Health does have a controlling interest of 14% in Hume Rural Health Alliance (HRHA). The procurement practices of HRHA comply with those of GV Health as financial and procurement services are delivered for HRHA by GV Health.

Mandatory Criteria 7: Any other relevant information.

GV Health's procurement processes include consistent repeated reminders for purchases to be actioned by HSV sanctioned contractors. GV Health contracted purchases fall into this category and are therefore considered low risk. All new contractors are required to agree to GV Health's position on modern slavery throughout their supply chain for the life of the contract.

GV Health monitors HSV advice and where applicable utilises relevant parts of the HSV toolkit to assist with meeting the requirements under the Act. The toolkit contains:

- A modern slavery plan to support the implementation of the governance structures, policies, processes and risk registers needed to underpin a successful modern slavery framework;
- Advice on implementing a modern slavery policy;
- A modern slavery risk register to capture and address the key modern slavery risks that a health service might cause, contribute or be directly linked to;

- A modern slavery risk assessment tool, including advice on modern slavery risk assessments, supplier questionnaires for ITS due diligence and incumbent suppliers and advice on how to interpret questionnaire results;
- A modern slavery fact sheet to facilitate staff training; and
- Supplier contract considerations, including the addition of modern slavery clauses in contracts.

The implementation of the HSV toolkit supports GV Health with its due diligence to minimise risk.

Closing Statement

GV Health is confident that ongoing steps taken in the Reporting Period continue to build on the strong foundations of a robust modern slavery risk framework. Consistent with GV Health's broader commitment to continuous improvement, we acknowledge ongoing opportunities to improve existing practices, and remain committed to partnering with our stakeholders in working to eradicate modern slavery.

This statement was approved by the Board of GV Health on 10 December 2024.

Name: Michael Delahunty

Position: Board Chair

Signature: 