

## MODERN SLAVERY STATEMENT - 2020

In accordance with the *Modern Slavery Act 2018*, this statement outlines the steps that BlueCross has taken, and is continuing to take, to assess and reduce risks of modern slavery within our business and our supply chain, and our plans for review and improvement.

### INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

BlueCross recognises that it has a responsibility under the Modern Slavery Act to take a strong approach to reject any forms of modern slavery and human trafficking. We are committed to promoting ethical business practices and policies that protect workers from being abused and exploited, both in our own business and our supply chain.

BlueCross is committed to limiting the risk of modern slavery occurring in our business, ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chain.

We expect our employees and our suppliers to share our commitment to help ensure modern slavery does not exist in our business and our supply chain.

### Who we are

A leading private aged care provider, BlueCross has been providing a wide range of aged care services across metropolitan and regional Victoria since 1993.

From residential care to in-home support and respite care, we are committed to helping older people to live the best life possible every day. We currently operate 33 aged care residences in Victoria, supporting more than 2,600 residents and over 1,000 clients living in their own homes. BlueCross is proudly supported by over 4,000 dedicated employees and hundreds of volunteers.

### Our supply chain

We have a relatively simple supply chain. We procure goods and services needed for our business's day-to-day operations from many contracted and preferred suppliers operating in Australia. Our supply chain arrangements include suppliers from the following key areas:

- *Corporate and Operational Procurement*, including goods and services required for the care of our residents living in our homes and for our clients in our home care services, independent living units and day respite centres. The goods and services procured include catering and cleaning, medical goods and equipment, stationery, uniforms, linen, recruitment, staffing including labour hire and information technology; and
- *Capital and Property Works*, including building materials and equipment and construction related services.

Our long-term strategic relationships with key suppliers, provides a stability in our supply chain and procurement processes.

## IDENTIFYING RISKS OF MODERN SLAVERY

During 2020, BlueCross undertook a high level risk assessment of our key suppliers of goods and services. Our review of suppliers focused on the type of goods and services delivered, i.e., uniforms, stationery, agency staff, rather than defined by the annual expenditure.

### Our operations

We believe there is no risk of modern slavery in our directly employed workforce, as the labour market in Australia is highly regulated, strict regulations apply to the nursing and aged care sectors, and the presence of unions who represent employees by negotiating employment conditions.

Our whistleblower policy and procedure details processes and communication pathways for employees, and suppliers, to disclose misconduct in our business and supply chain without recrimination.

### Our supply chain

A significant number of our supplier's operations are based in Australia. We believe these suppliers have a lower risk of modern slavery occurring in their supply chains, as their operations are Australian based, they are required to comply with the Modern Slavery Act within their own supply chains.

However, our procurement activities do include purchasing goods and services from suppliers who provide potentially high risk products, such as, catering and food related products, uniforms, medical equipment, stationery and staffing through nursing agencies.

To establish an initial baseline understanding, for our first year of modern slavery reporting, we mapped out our key suppliers and service providers. This enabled us to undertake a risk assessment of any modern slavery risks, or potential risks, within our supplier's operations and supply chains.

We identified a number of high-risk suppliers who are either located in or source their goods from high risk countries, for example, the procurement of uniforms and bed linen from suppliers who have manufacturing plants overseas.

High risk suppliers were requested to complete a Modern Slavery Supplier Questionnaire. The responses we received from our identified high risk suppliers indicated they have implemented adequate steps to mitigate modern slavery risks, their responses also indicated that their organisations required that their supply chains follow an ethical sourcing policy. The results of the Modern Slavery Supplier Questionnaire did not indicate the need for any further actions at this point in time.

### Our governance framework

BlueCross has a strong corporate governance framework and as part of our commitment to informing our employees and suppliers in modern slavery risks, we undertook a review of our standard procurement agreements and procurement processes to ensure that we have sound governance processes in place to meet our modern slavery compliance.

In summary our review included the following activities:

- Publication of our Modern Slavery Policy;
- Update of our tender documents to include the Modern Slavery Supplier Questionnaire to ensure we identify modern slavery risks early with new suppliers during the procurement process;

- Review of our procurement policy and procedures to ensure inclusion of modern slavery clauses; and
- Update of our standard procurement agreements to include contractual obligations to address modern slavery compliance so that all new suppliers commit to adherence to the new modern slavery requirements.

## FUTURE DEVELOPMENTS

In our upcoming reporting year, we aim to continue to revise and develop our approach to modern slavery compliance to build capacity within our business to monitor and act on modern slavery risks.

### Awareness Raising Program

BlueCross aims to raise awareness and strengthen our understanding of the risk of modern slavery within our business and our supply chain by:

- Employees: Online Education Learning Module - developing an annual online education tool to provide employees information on and their role in eliminating modern slavery in our workplace and our supply chain.
- Suppliers: BlueCross's online contractor induction program (LinkSafe) will be updated to include the following:
  - Pre-qualification section: Modern Slavery Supplier Questionnaire will be uploaded for completion by suppliers; and
  - Supplier employee registration section: introduction of a modern slavery education toolkit that will be completed as part of BlueCross's requirements that all supplier's employees complete the online induction annually.

### Corporate governance

BlueCross will continue to review our policies and procedures to ensure that we have sound governance processes in place to meet our modern slavery compliance requirements.

BlueCross will conduct reviews of policies, such as, our Code of Conduct and Whistleblower, to ensure inclusion of modern slavery clauses to increase employee awareness of the risks of modern slavery in our business and our supply chain.

## BOARD APPROVAL

This statement has been approved by BlueCross's board of directors.

Signed:

Date: 29 March 2021

A handwritten signature in blue ink that reads "Julie Caldecott".

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Dr Julie Caldecott  
Board Chair