

This Modern Slavery Statement is submitted on behalf of Homestyle Aged Care under section 13 of the Modern Slavery Act 2018 (Cth)(MSA) to cover the reporting period from 1 July 2021 to 30 June 2022
This statement extends to the activities and operations of Homestyle and its controlled entities
Homestyle is committed to operating responsibly and establishing and adhering to the highest ethical standards. This is Homestyle's first Modern Slavery Statement.
November 2022



In accordance with the Modern Slavery Act 2018, this statement outlines the steps that Homestyle Aged Care 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. Homestyle 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. Homestyle 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, Homestyle provides aged care services across metropolitan and regional Victoria. We are committed to helping older people to live the best life possible every day. Every Homestyle Aged Care team member is committed to our responsibility by ensuring that their passion, experience and understanding make residents feel secure, safe, respected and cared for. We are strongly committed to principles of fairness, equity and human rights. We believe we have a shared responsibility to contribute to positive social change both locally and globally.

Homestyle is governed by a board of directors and the CEO, supported by the Executive Team, is responsible for the day to day management and operations of the organisation.

The principal activity of the company's operations in Australia is the provision of residential aged care. Care is provided in the facilities listed below which are located across Victoria:

1. Belmont Grange, Grovedale
2. Clarendon Grange, Bayswater
3. Ferndale Gardens, Bayswater
4. Green Gables, Epping
5. Kensington Grange, Leopold
6. Langford Grange, Cranbourne
7. Melville Grange, Berwick
8. Point Cook Manor, Point Cook
9. Rowville Manor, Rowville
10. Sea Views Manor, Ocean Grove
11. Sunset Views Manor, Tarneit

OPERATIONS

Our operations are solely based in Australia where the labour market is highly regulated and protected through the presence of unions representing employees and legislated employee protections which are actively enforced by the Fair Work Ombudsman. Based on this we believe there is no risk of modern slavery in our directly employed workforce or staff from nursing agencies which are based in Australia.

PROCUREMENT

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. This includes catering and cleaning, medical goods and equipment, stationery, uniforms, linen, recruitment, staffing including labour hire and information technology;
- ❖ 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.

We acknowledge potential risks that our operations pose and will take actions, through extensive data analysis, in order to address any potential risks. Suppliers will be reviewed to identify those whose operations or supply chains are deemed high risk due to their geographic locations. These suppliers will then be requested to complete a Modern Slavery Supplier Survey.

FUTURE ACTIONS

As part of our commitment to ensure our future purchasing spend is from ethical, compliant suppliers, Homestyle will create and distribute a supplier survey to understand the risks new suppliers may pose. This survey will cover both suppliers and manufacturers across all geographic locations. This will start to lay the foundations of our anti-modern slavery program, opening dialogue with our suppliers and initiating surveys to understand the maturity of approach to modern slavery within its supplier base. This survey will form part of our supplier induction process. This will enable greater due diligence and engagement with higher risk suppliers to ensure that Homestyle is able to influence anti-modern slavery practices in the highest impact areas of its supplier base through supplier agreements and other direct engagement.

Anti-modern slavery clauses will be developed and embedded into supplier contracts. Actions that will be taken to assess and address risks will include:

- ❖ Embedding anti-modern slavery clauses into all new supplier contracts;
- ❖ Conducting modern slavery surveys and obtaining responses from new suppliers;
- ❖ Reviewing and identifying high risk suppliers in our current supplier base;
- ❖ Engaging with an experienced consultancy firm, if required, to assist in completing an upgrade of our existing procurement policy and procedure suite.

The survey and consequent data analysis, will be in addition to existing due diligence, governance and risk management measures, including:

- A Financial Delegation Policy and Framework governing procurement authority to ensure appropriate management oversight over supplier selection and management;
- Processes for supplier onboarding and the approval of new suppliers;
- Consolidating and improving the management of our suppliers which, in combination with the financial delegation policy and formal approval gates, ensures that there is greater scrutiny over supplier selection.

The survey questions and response template, which will be distributed digitally to identified suppliers on an annual basis, will be as follows:

Part A: Your company/organisation/business details

Organization name:			
Organization number (ABN/ACN or foreign equivalent)			
Organization address (headquarters)			
Parent company			
Contracting entity details and locations			
Contracting entity name:			
Description of goods, materials and/or services provided:			
Address of facility, site or operation location:			
Details of representative to contact for further information			
Name:			
Position in organization:			
Email address:			
Phone number:			
Worker information¹	Female	Male	Total
Total number of workers			
Total number of permanent workers			
Total number of seasonal or contract workers or other-wise in non-permanent employment			
Total number of workers provided through agencies, labor hire companies or brokers			
Additional documentation			
Is your organization subject to the <i>Modern Slavery Act 2018</i> (Cth) or equivalent State / Territory or international legislation?	Yes/No		
If YES, have you submitted a Modern Slavery Statement or equivalent for the relevant reporting period under that legislation?			
Auditing history			
Provide the date and details of any responsible sourcing audits or certifications (including social, ethical or environmental) conducted, and locations they relate to.	<p>Please provide details of the audit, including:</p> <ul style="list-style-type: none"> • whether it was an independent or internal audit • the date of each audit • locations the audit related to <p>If you require more space, please attach as separate document.</p>		
Certification schemes			

¹ Workers refers to any individual (irrespective of whether they are employed directly, indirectly, temporarily or permanently) providing the applicable goods, materials or services for or on behalf of the Contracting Entity, at the time of completing the questionnaire.

Provide the details of any responsible sourcing third-party certification schemes including SMETA, ETI or other ISO standard or other relevant inspections, including the dates of certifications.	Please provide details and the date of certification schemes. If you require more space, please attach as separate document.
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Part B: Modern slavery risk factor self-assessment

General modern slavery response	Yes	No	Please describe
1. Does your organization have policies and processes to identify, investigate and remedy the risk and any instances of modern slavery within your organization? (e.g. Supplier Code of Conduct, Human Rights Policy, Whistleblowing Policy, Complaints Management System)			If yes, please provide details of, or copies of the policies and compliance processes.
2. Does your organization have a person or team responsible for overseeing modern slavery risks that arise in relation to the goods/services that you deliver?			If yes, please describe the role and responsibility of that person/team.
3. Do you provide training to your employees on modern slavery risk?			
Supply chain management			
4. Does your organization perform screening or due diligence checks of prospective suppliers to assess the risks of modern slavery or other human rights harms that may occur in its operations and supply chains?			If yes, please describe how your organization performs this screening. If no, does your organization plan to introduce measures to screen prospective suppliers for modern slavery risks in future?
5. Does your organization require your suppliers to conduct due diligence for modern slavery risks on their suppliers?			
6. Does your organization or major suppliers operate or have operations in any countries identified as high risk for Modern Slavery, including: Bangladesh, China, Democratic Republic of Congo, Ethiopia, India,			If yes, please list which countries.
Supply chain management			
Myanmar, Nigeria, Pakistan, Russia, Thailand?			

<p>7. Does your organization produce or provide goods/services that are known to have a high Modern Slavery risk factor? For instance: agriculture; construction; electronics and electrical products; extractives/mining and basic metal production; fishing and aquaculture; forestry; healthcare; hospitality; housekeeping/facilities operations, textile and apparel manufacturing; transportation and warehousing security; security; cleaning; traffic control.</p>			<p>If yes, please describe what goods or services your organization produces or provides.</p>
<p>8. Have you had any instances of known or suspected Modern Slavery in your supply chain, or claims or adverse media attention in relation to human rights practices within your supply chain?</p>			<p>If yes, please describe what action your organization takes.</p>
<p>8. Do you have any additional controls or other due diligence activities to respond to modern slavery in your supply chain?</p>			
<p>Employment conditions and workplace environment</p>			
<p>8. Are workers required to lodge any 'security deposits' (this could include financial or personal property) or pay any recruitment fees?</p>			<p>If yes, please describe the circumstances for the payments.</p>
<p>9. Are any original identity related documents of workers (e.g. passports, birth certificates, national identity cards) retained?</p>			<p>If yes, please explain why.</p>
<p>10. Does your organization deduct wages, impose monetary fines, and/or withhold pay or pay entitlements of workers?</p>			<p>If yes, please explain why.</p>
<p>Employment conditions and workplace environment</p>			
<p>11. Are workers paid their legal pay entitlements (including superannuation), on time and provided with pay slips clearly showing how wages have been calculated and details of any tax or other deductions?</p>			<p>If not, please explain why not.</p>

12. Are all workers provided with a written contract in a language they understand, where terms of employment including wage rates and hours of work are clear?			If not, please explain why not.
13. Where accommodation is provided to workers (for example, dormitories, hostels or other forms of shared accommodation), are regular checks conducted to ensure that the living conditions are adequate and meet legal requirements (for example, fire safety, space, temperature, lighting, sanitary facilities, privacy, ventilation).			If not, please explain why not.
14. Where accommodation is provided, are workers free to leave at will?			If not, why not?
15. Are workers free to lawfully resign their employment without restriction or penalty?			If not, why not?
16. Do workers have a complaints mechanism to anonymously raise concerns related to labor conditions or workplace grievances and access appropriate remedy?			If yes, please explain how you monitor and remedy concerns.

We will incorporate the information into our code of conduct and ensure continual training and awareness amongst our staff.

Homestyle makes this Statement in accordance with section 13 of the Modern Slavery Act 2018 (Cth). This Modern Slavery Statement was considered and approved by the Homestyle Board on 15 December 2022.

The Homestyle Board is Homestyle's Principal Governing Body under the MSA.

Signed on 15 December 2022 at 269 Centre Road, Bentleigh VIC 3204 by Jonathon Hewitt (Director)


