

Modern Slavery Statement 2020

Contents

| | |
|---|---|
| Introduction | 1 |
| Our Business and Supply Chains | 1 |
| Our operations and supply chains risk | 3 |
| Risk mitigation and remediation | 3 |
| Assessment and Reporting | 4 |
| Consultation | 5 |

Introduction

This is the St John WA Group’s Modern Slavery Statement (**Statement**) made in accordance with the Australian *Modern Slavery Act 2018* (Cth) (**Act**). It outlines the steps the Group have taken for the period 1 July 2019 to 30 June 2020 (**Reporting Period**) to identify, manage and mitigate the specific risks of modern slavery in the Group’s operations and supply chain.

Our Business and Supply Chains

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

St John WA Group

The St John WA Group (**Group**) comprises two entities:

- St John Ambulance Western Australia Ltd ABN 55 028 468 715 (**SJWA**); and
- Apollo Health Ltd ABN 79 159 660 036 (**Apollo Health**).

SJWA is established as a public company limited by guarantee. SJWA trades under the registered business names St John WA and St John Giving. SJWA is registered with the Australian Charities and Not-for-profits Commission as a public benevolent institution. SJWA is a charitable, not-for-profit, humanitarian organisation teaching first aid to the community, delivering the State’s ambulance service while also shaping and leading the sector nationally. SJWA has been servicing and operating as an integral part of the Western Australian community for more than 125 years. SJWA is a reporting entity for the purposes of the Act, having met the reporting threshold in the Reporting Period.

Apollo Health is established as a public company limited by shares, and is a wholly owned subsidiary of SJWA. In the provision of primary health care services, Apollo Health trades under various business names, including, St John Medical, St John Dental and St John Urgent Care. Apollo Health is registered with the Australian Charities and Not-for-profits Commission as a health promotion charity. Apollo Health is not a reporting entity for the purposes of the Act. However, this Statement is provided on behalf of both entities within the Group, given that both

entities operate in the same sector and share many suppliers. Further, SJWA sets the policies and processes on behalf of the Group, and SJWA conducts the majority of sourcing and procurement on behalf of both entities. Accordingly, Apollo Health is reporting on a voluntary basis.

Our Operating Model

The Group operates across 4 customer-focused operating divisions.

Ambulance Services

SJWA provides emergency ambulance and transport services in metropolitan Perth and fifteen regional centres. Volunteer teams provide these services in other regional areas allowing SJWA to meet the diverse needs of the communities in which the Group serve, spread over 2.5 million square kilometres. This is the largest geographical area serviced by a single ambulance operator in the world.

The Group also run the State Operations Centre, which fields Triple Zero calls. The State Operations Centre received 305,900 Triple Zero calls during the Reporting Period.

Event Health Services provides first aid cover and medical services at WA events and attends more than 4,000 events annually.

Industry Health Services provides qualified, experienced medical staff for short or long term projects to look after the daily health and emergency medical needs of its customers' workers.

First Aid Training

SJWA offers a range of nationally accredited courses as well as shorter, non-accredited training options across Perth Metropolitan and Regional WA.

First Aid Supplies

The Group offers a range of first aid supplies and equipment through physical shop locations, field servicing operations and online webstores.

Primary Health Care

Apollo Health, trading as St John Medical, operates three super clinics and one medical centre. All centres offer general practice, walk-in urgent care clinics, a skin cancer clinic, and pathology. The three super clinics also offer dental services.

The Group's integrated approach means that in addition to family medicine, we bring together multiple allied health services under the one roof to provide a convenient and comprehensive healthcare solution.

Our People

To support the Group's operations, the Group engages 1,791 paid staff and 11,374 volunteers. Paid workforce includes doctors, nurses, dentists, paramedics, patient transport officers, first aid trainers, communication officers and administration staff, who play a vital role supporting the Group's coordination of a sophisticated, centralised supply chain, and providing opportunities for training and development.

The Group has the highest standards when it comes to our own safety and conduct. The Group ensures that all staff and volunteers undergo a rigorous safety screening process.

Respecting human rights, including the right to be free from slavery is inherent in the Group's purpose: to serve humanity and build resilient communities through the relief of sickness, distress, suffering and danger.

Our operations and supply chains risk

Modern Slavery Reporting Criteria Three: Describe the risks of modern slavery practices in the operations and supply chains in the reporting entity and any entities owned or controlled by the reporting entity

Given the range of inputs into the operations of our divisions, the Group has a vast supply chain that includes the purchase of products and services required for the delivery of our ambulance, health services and retail operations.

The Group also procures goods and services related to a range of support business functions including office and corporate administration, building and construction, engineering, labour hire, security, cleaning, catering, information technology infrastructure and uniforms.

The greatest area of risk associated with labour and human rights by product type is within the sourcing of our medical goods, uniforms and electronics.

Committed to reduce the prevalence of modern slavery in its supply chain, the Group undertook a risk gap analysis to establish an action plan.

Risk mitigation and remediation

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

During the Reporting Period, the Group commenced preparatory work to establish a framework to mitigate modern slavery risks.

This extends to working with suppliers to establish open and transparent relationships with the objective of improving supplier awareness of modern slavery risks.

Documentation development

The Group developed and introduced an Ethical Sourcing and Modern Slavery Policy which has provided the guiding principle on behaviours and actions required for all divisions to ensure they are compliant with the Group's commitment to eradicating its risk to modern slavery within its supply chain and operations.

The Group revised its procurement policy and associated documentation to: ensure compliance with the Act by its suppliers; identify suppliers where the risk of modern slavery is high; and otherwise identify areas of risk in its procurement practices.

The Group has designed a supplier questionnaire with the objective of improving supplier awareness of modern slavery. The supplier questionnaires are to be sent to tier 1 suppliers and risk assessed during the course of the 2020/21 reporting period.

The Group improved its tender and supplier on-boarding templates to ensure that all future tender and sourcing activities require our suppliers to demonstrate their compliance with the mandatory evaluation criteria and to ensure that there are efforts being made to secure equitable labour conditions in supply chains.

The Group updated its procurement agreement templates to include obligations on suppliers to continuously monitor and report on modern slavery within its organisation and supply chain, and to report to the Group on the steps it is taking towards compliance with the mandatory evaluation criteria.

Supplier Audit

The Group has compiled a database of its top tier suppliers of medical equipment by spend including the country of manufacture of goods. This data is being utilised to initially assess the potential modern slavery risks in its operations and supply chain with emphasis on high risk geographical locations and business transactions.

This will allow the Group to conduct further due diligence on local and global supply chains and prioritise the suppliers that it needs to engage with to assess the extent to which the Group is being complicit in the modern slavery trade.

Remediation

During the Reporting Period, the Group did not establish any remediation processes focused solely on modern slavery. As an organisation the Group values and observes all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity. The Group has a whistleblower policy and protocol for receiving anonymous disclosures under the policy. It is proposed to extend these processes and the scope of protected disclosures under the policy to include anonymous reporting of suspected modern slavery practices in the Group's supply chain.

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

We recognise that knowledge sharing, including targeted training for employees, and action, including mitigation measures where we see a risk of involvement, are vital to successfully preventing modern slavery.

Over the coming year, we will continue to set clear expectations to support our employees and suppliers to be alert to possible involvement in modern slavery and to reject it.

A key focus for FY21 will be training our purchasing business units and their teams to promote awareness of Modern Slavery risk and embed an awareness and understanding of how to respond to this risk.

During the Reporting Period, the Group committed to a program of identifying modern slavery risk through gap analysis and action plan creation. As part of that framework the Group will assess progress against the action plan twice per year.

The Group's actions need to go further before providing any meaningful commentary on the effectiveness of its preliminary actions. This process will provide the Group with an opportunity to commence dialogue with suppliers and to understand which suppliers are aware of and/or required to comply with the Act, how suppliers are currently responding to combatting modern slavery practices and which suppliers the Group will need to engage further with based on a higher level of identified risk.

Consultation

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

The majority of procurement and sourcing for the St John WA Group is conducted by St John Ambulance Western Australia Ltd. As part of consultation with the Group's entities, each Board of Directors has reviewed and noted this Modern Slavery Statement prior to it being approved by the Board of Directors of St John Ambulance Western Australia Ltd, the reporting entity.

This Modern Slavery Statement is made in accordance with section 14 of the *Modern Slavery Act 2018* (Cth) and represents the St John WA Group Statement for the period 1 July 2019 to 30 June 2020.



Mr. Shayne Leslie

Chairman

February 2021