

# **Modern Slavery Statement**

# 1 July 2023 – 30 June 2024

## Introduction

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) (Act), and cover the 2023 – 2024 finanancial year reporting period. Peter MacCallum Cancer Centre (Peter Mac) is established under section 166a of the Health Services Act.

Peter Mac is recognised globally as a leader in cancer care, research, and education. Within Australia, Peter Mac is unique, being the only public hospital exclusively dedicated to cancer care, research, and education.

Our patients are at the heart of what we do, and it is our commitment to deliver the very best cancer care possible. In this reporting period we have cared for 47,293 patients and provide treatment for 532,484 occasions of service (this includes 108,660 telehealth appointments).

## **Reporting Criterion 1: Reporting Health Service**

Peter MacCallum Cancer Institute – ABN 42 100 504 883 Trading as Peter MacCallum Cancer Centre Peter MacCallum Cancer Foundation Ltd – ABN 14 786 237 480 Cell Therapies Pty Ltd – ABN 15 100 285 916

# Reporting Criterion 2: Peter Mac's Structure, Operations & Supply Chain

Peter MacCallum Cancer Centre (Peter Mac) is a public / private entity located at 305 Grattan Street, Melbourne, Victoria, Australia.

Peter Mac employs 4,210 staff, including more than 700 researchers working across laboratory, clinical, translational, and health services research to continue to provide improved treatments, better care, and potential cures for cancer. In addition, Peter Mac is thankful for the generous support of 435 volunteers. The break down in staff is found below:





Peter Mac operates services across Victoria, with local, national, and international partnerships. Our sites in Victoria include the following:

- Parkville
- East Melbourne
- Sunshine
- Bendigo
- Moorabbin
- Box Hill

Peter Mac procures a wide range of goods and services, either directly sourced from the supplier or through Health Share Victoria (HSV) via mandated collective purchasing agreements. Peter Mac's direct spend is spread across multiple categories, including but not limited to:

- Medical devices including electronic devices
- Surgical instruments
- IMCT
- Uniforms
- PPE
- Contractors and Services including service and maintenance agreements on medical devices

Health Share Victoria is a state-wide supply chain organisation that partners with Victorian public health services to procure best-value goods and services. HSV works in partnership with public health services to understand their requirements, facilitate large-scale collective tenders and manage common-use contracts on behalf of the state.

Peter Mac purchases the goods and services it needs from the suppliers who are party to HSV collective agreements. As such, it is recognised that HSV has a significant role in Peter Mac's supply chains.

# Reporting Criterion 3: Risks of Modern Slavery Practices in Operations and Supply Chains

#### PETER MAC'S IDENTIFIED MODERN SLAVERY RISK

Peter Mac has not caused or contributed to modern slavery practices, but rather is linked to risks which exist locally, offshore and in high-risk geographies.

The general health sector understanding is that the highest risk is in the procurement of medical goods, surgical equipment and medical supplies, particularly those that are manufactured or procured overseas in high risk countries. Often these risks relate to hazardous working conditions, labour exploitation, child labour and other abuses particularly at lower tiers of a supply chain and in countries with little or no human rights regulations.

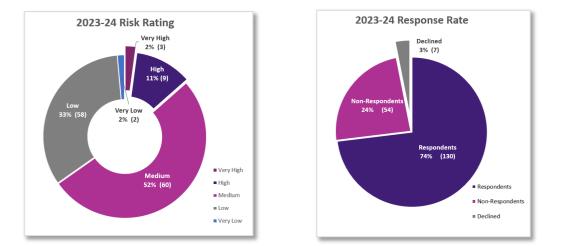
Peter Mac's Modern Slavery risk is across our entire supply chain, and encompasses our supplier, the manufacturer, the shipping line, the raw material suppliers, and any other business or organisation that has a role to play in the manufacturing or delivery of the end products that we procure. This risk is also relevant to engagement of organisations that provide services such as security, construction, catering and freight. The risk can be several layers deep and challenging to fully identify and manage.

#### HSV RISK ASSESSMENT OF PETER MAC CONTRACTS 2023-24

The HSV Procurement Policy outlines HSV's commitment to assist mandated health services by assessing and addressing modern slavery risk in health service supply chains within Collective Purchasing Agreements, with a view to assisting mandated health services with meeting their Reporting Requirement under the Act.

HSV Data and Analytics identified 193 Peter Mac suppliers from the spend data for the financial period 2023-24. HSV distributed a questionnaire to those 193 suppliers on behalf of Peter Mac, with a response rate of 73%, (141 suppliers).

In assessing the 141 suppliers, HSV utilised an assessment tool, comprising of macro and micro assessment components. The majority of Peter Mac suppliers (87% or 122 suppliers) register as low-medium risk at the time of reporting, with 13% (19 suppliers) registering in the high-very high risk. These suppliers are managed by HSV and any corrective action will be managed on behalf of Peter Mac by HSV.



#### **PPP ARRANGEMENT – VICTORIAN COMPREHENSIVE CANCER CENTRE**

The Victorian Comprehensive Cancer Centre (VCCC - Peter Mac's Parkville campus), operates under a Public-Private Partnership (PPP). This agreement is between the State Government of Victoria and Plenary Health. Plenary Health in turn have a contract with Honeywell as the facility management company. Consequently, Peter Mac does not have any contractual relationship with Plenary or Honeywell. Both organisations submit a Modern Slavery statement annually to the Australian Attorney General , which Peter Mac has access to.

As the Facility Manager, Honeywell have subcontracted a number of services including electrical contractors, plumbers, security, waste collection, pest control, medical gas supply, cleaning and carpark management.

Honeywell's Business Code of Conduct outlines Honeywell's commitment to respect human rights. Honeywell also expects its supply chain to abide by its Supplier Code of Business Conduct. Their code of conduct details Honeywell's requirements and the expectations they place on their suppliers in relation to compliance with Modern Slavery policies and principles.

Plenary introduced and adopted a Modern Slavery Policy declaring zero tolerance to all forms of Modern Slavery. This policy applies to all employees across its entities.

#### **ONGOING IDENTIFICATION OF OUR RISKS**

The Modern Slavery Supplier Questionnaire is a mandatory requirement for all Peter Mac procurement led, market activities regardless of spend. Peter Mac decided to implement this requirement across all procurement led activities in order to identify any high risk suppliers rather than only focusing on high spend contracts.

Of the 29 completed procurement activities in 2023 / 2024, the risk assessment tool was completed for each of the activities. This does not include contract extensions, or service agreements where a questionnaire is not required. All suppliers were deemed a low or medium risk rating (8 were deemed low and 21 were deemed medium). All suppliers had Modern Slavery clauses added into the contract and given no suppliers were of a high risk, remediation at this stage is not required.

## **Reporting Criterion 4: Actions Taken to Assess and Address Risks** of Modern Slavery

This section highlights the actions undertaken during the 2023 / 2024 reporting period supporting Peter Mac's commitment to Modern Slavery practices.

#### FINALISE DOCUMENTATION

#### Questionnaire

For the 2023 / 2024 reporting period with the support of HSV, Peter Mac's Procurement Team adopted the updated HSV Risk Assessment Tool. The tool is used by the procurement team in procurement led, market activities to assist in identifying modern slavery risks within the supplier's supply chain and to provide an overall risk rating.

The supplier questionnaire utilises a combined macro and micro-environmental approach which is based on the risk factors set by the Australian Attorney General. The questionnaire requires suppliers to provide a response to a range of questions that cover geographic risk, sector and industry risk, product and services risk and supply chain model risk. Eighty percent of the suppliers response is based their risk, for instance, does the supplier have a modern slavery policy, what is their due diligence around their suppliers and who their suppliers are engaging with. The remaining 20% is on the macro or geographic, sector, and industry risk.

The supplier's response is then scored based on a risk level from 1-3, with 3 considered high risk. Any suppliers with a high risk rating are required to include in their contract a risk mitigation strategy to reduce their risk rating. This is to be reviewed annually between the supplier and the contract manager.

#### Policy

A Modern Slavery clause has been added into the Peter Mac Procurement Governance and Procurement Policy providing guidance to the procurement team on when to request completion of a Modern Slavery Risk Assessment and how to manage the outcome of the assessment.

All policies and procedures are stored on Peter Mac SharePoint and are accessible by all Peter Mac staff.

#### Contracts

The key Peter Mac contracts, including the Goods Agreement, Goods and Services Agreement and Services Agreement were updated previously to include approved clauses in relation to Modern Slavery, including the official definition of Modern Slavery, our expectations of the supplier in relation to preventing Modern Slavery, and what to do if they identify Modern Slavery within their supply chain.

When reviewing suppliers' contracts, Peter Mac's Modern Slavery contract clauses are inserted into their contract as a non-negotiable.

#### **DUE DILIGENCE**

Commencing last reporting period, regardless of activity value, the Modern Slavery Risk Assessment is now completed by all suppliers participating in procurement led market activity.

Procurement led activities which are scored, a minimum of 10% of the total score is allocated to social procurement. This encompasses the outcome of the suppliers Modern Slavery Risk Assessment, Local Jobs First (if over \$3m), the Supplier Code of Conduct Declaration and the Social Commitment Questionnaire.

Any awarded supplier with a high rating from the risk assessment tool will need to provide a risk mitigation plan which is to be reviewed annually as part of the supplier review program.

#### **EXPAND TRAINING**

The Peter Mac Procurement team adopted and implemented into Peter Mac's Learning Hub, the HSV Modern Slavery training module. All members of the procurement team (8) have completed and passed the training program. Additionally, training was extended to Contract Managers, of which 37 successfully completed. The online Modern Slavery training is an annual program which all members of the procurement team will need to undertake.

The Peter Mac Director of Procurement and the Procurement Administrator also attend the HSV monthly community of learning sessions which provides updates and guidance on how health services can demonstrate progress, identify risks and also support in preparing their annual statements.

### **Reporting Criterion 5: Next Stages to Assess Effectiveness**

The next stages in Peter Mac's Modern Slavery roadmap will focus on improving current processes and developing reporting tools to assess effectiveness.

#### **EXPAND TRAINING**

Last reporting period the procurement team opened the training module to all contract managers. Of 92 contract managers, 37 completed the training (approximately 41%). This reporting period the procurement team will continue to work with contract managers to increase completion of the training module (objective to have 60% of the contract managers complete the training), and open it to other areas of the business in order to increase awareness of the potential threat and impact Modern Slavery can have on our business.

The expansion of the training will also include the executive team and Board Members. We will also work with HSV to extend the online training to selected suppliers, focusing on those with either a medium or high risk rating.

#### **WORKING WITH TIER 1 SUPPLIERS**

The procurement team will commence a review of all suppliers based on spend, and identify which suppliers have completed either the HSV Modern Slavery Risk Assessment or have completed a risk assessment issued by PMCC within the last 5 years as a result of a procurement led activity.

This will identify suppliers to target and request they complete the risk assessment tool.

Our goal is to ensure that 100% of the suppliers with an annual spend of over \$1m have either completed the risk assessment tool, either issued by HSV or through a PMCC procurement led activity.

Consequently, any supplier with a high rating from the risk assessment tool will need to provide a risk mitigation plan which is to be reviewed annually as part of their contract management plan.

#### **ENHANCE REPORTING**

Increase awareness to the executive team and Board by reporting annually details of:

- Who has completed Modern Slavery training.
- Statistics in regards to suppliers that have completed the risk assessment questionnaire, including details regarding manufacturing locations, policies in place, if they are mandated to report annually and etc.
- Risk ratings of the suppliers that have completed the assessment and actions taken.

#### **GRIEVANCE MECHANISIM**

The current reporting period will see the development and implementation of a modern slavery grievance mechanism which will support staff who have witnessed or suspect that a Modern Slavery incident has occurred. This is to be completed within the reporting period.

## **Closing Statement**

This 2023-24 Modern Slavery Statement has been prepared by the Peter MacCallum Cancer Centre and outlines the steps taken as an organisation to identify, manage and mitigate specific risks around Modern Slavery in Peter Mac's operations and supply chain.

The statement captures the activities of Peter M ac and the entities controlled by it. It has been prepared by the Procurement team in collaboration with Peter Mac controlled entities, Cell Therapies Pty Ltd, and Peter MacCallum Cancer Foundation Ltd.

This Modern Slavery Statement was approved by the Peter MacCallum Cancer Institute's Board of Directors, on 10 December 2024.

This Modern Slavery Statement is signed by a responsible member of Peter MacCallum Cancer Institute, as defined by the Act.

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Prof. Rosemary McKenzie Board Chair

Prof. Jason Payne Chief Executive