



IRT Modern Slavery Statement

2025

Acknowledgement of Country

IRT acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples.

Statement by the Chair and CEO

As a leading not-for-profit provider of aged care services, our approach to modern slavery is based on our values of Integrity, Respect and Trust. We are very aware of the need to protect the most vulnerable members of our society by ensuring that our processes identify potential risks in our supply chains and, where necessary, establish remediation plans.

Our modern slavery statement for 1 July 2024 – 30 June 2025 has been endorsed by the IRT Board of Directors.



Peter Fitzgerald
Chair



Ross Gallagher
CEO



Criteria 2: Reporting entity, structure, operations and supply chains

Illawarra Retirement Trust ACN 000 726 536 (“IRT”) is an Australian public company limited by guarantee and is registered with the Australian Charities and Not For Profits Commission (ACNC).

IRT is one of Australia’s largest community based seniors’ lifestyle and care providers with more than 2,600 employees. It operates throughout New South Wales, the Australian Capital Territory and Queensland and has its headquarters in Wollongong NSW.

Our mission is to create communities where seniors achieve their optimum quality of life. We’ve been delivering on this for more than 50 years.

Our main operations include:



20 Aged Care Centres



29 Retirement Villages



Home Care services



Catering business



ITeC Academy, our registered training organisation



Age Matters, our charitable foundation.

IRT locations

1 SUNSHINE COAST

- IRT The Palms, Buderim
- IRT Parklands, Currimundi
- IRT Woodlands, Meridan Plains

2 BRISBANE

- IRT The Ridge, Bracken Ridge

3 SYDNEY

- IRT Peakhurst, Peakhurst
- IRT Berala on the Park, Auburn
- IRT Macarthur, Campbelltown

4 SOUTH SYDNEY

- IRT Thomas Holt Kirrawee, Kirrawee
- IRT Thomas Holt Stafford Court, Jannali
- IRT Thomas Holt Kilpatrick Court, Sutherland
- IRT Thomas Holt Sans Souci Gardens, Sans Souci

5 NORTHERN ILLAWARRA

- IRT Seaview, Woonona
- IRT Birch Villa, Corrimal
- IRT Tarrawanna Gardens, Tarrawanna
- IRT Edwina, Corrimal
- Woonona Place, Woonona
- IRT Tarrawanna, Tarrawanna
- Marco Polo Woonona, Woonona

6 CENTRAL ILLAWARRA

- IRT Towradgi Park Lodge, Towradgi
- IRT Towradgi Park, Towradgi
- IRT Braeside, Keiraville
- Howard Court at IRT Pioneer Place, Wollongong
- Parkside at IRT Pioneer Place, Wollongong
- Diment, Wollongong

7 SOUTHERN ILLAWARRA

- William Beach Gardens at IRT Kanahooka, Kanahooka
- Henry Brooks Estate at IRT Kanahooka, Kanahooka
- Kemira at IRT Kanahooka, Kanahooka
- Jasmine Grove at IRT Kanahooka, Kanahooka
- IRT Harbourside, Kiama
- IRT Five Islands, Port Kembla
- Marco Polo Unanderra, Unanderra

8 SHOALHAVEN NORTH

- IRT Greenwell Gardens, Nowra
- IRT Culburra Beach, Culburra Beach

9 SHOALHAVEN SOUTH

- IRT St Georges Basin, St Georges Basin
- IRT Sarah Claydon, Milton

10 EUROBODALLA

- IRT The Clyde, Batemans Bay
- IRT Crown Gardens, Batemans Bay
- IRT Moruya, Moruya
- IRT Dalmeny, Dalmeny

11 ACT

- IRT Kangara Waters, Belconnen

IRT HOME CARE

- We offer IRT home care services in South-East Queensland, South-East Sydney, South-West Sydney, Illawarra, South Coast, Far South Coast and ACT.

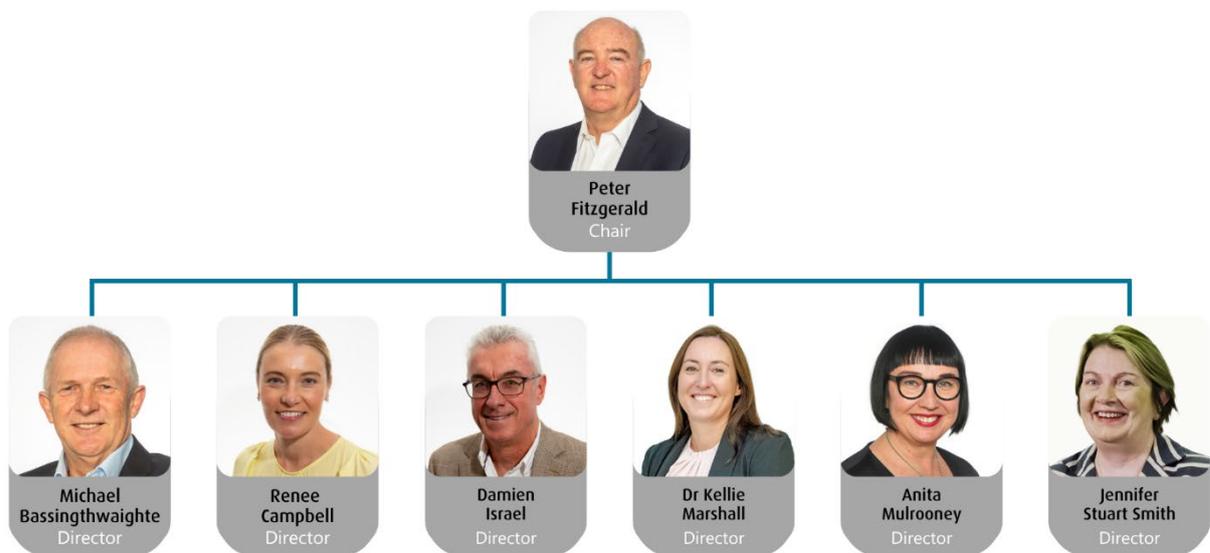


Our Board Governance Structure

This Statement has been made on behalf of IRT and covers all entities owned or controlled by IRT.

Laying the foundations for tomorrow while taking care of today is the focus of our governance work. Our Board governance structure can be represented as:

IRT Board of Directors

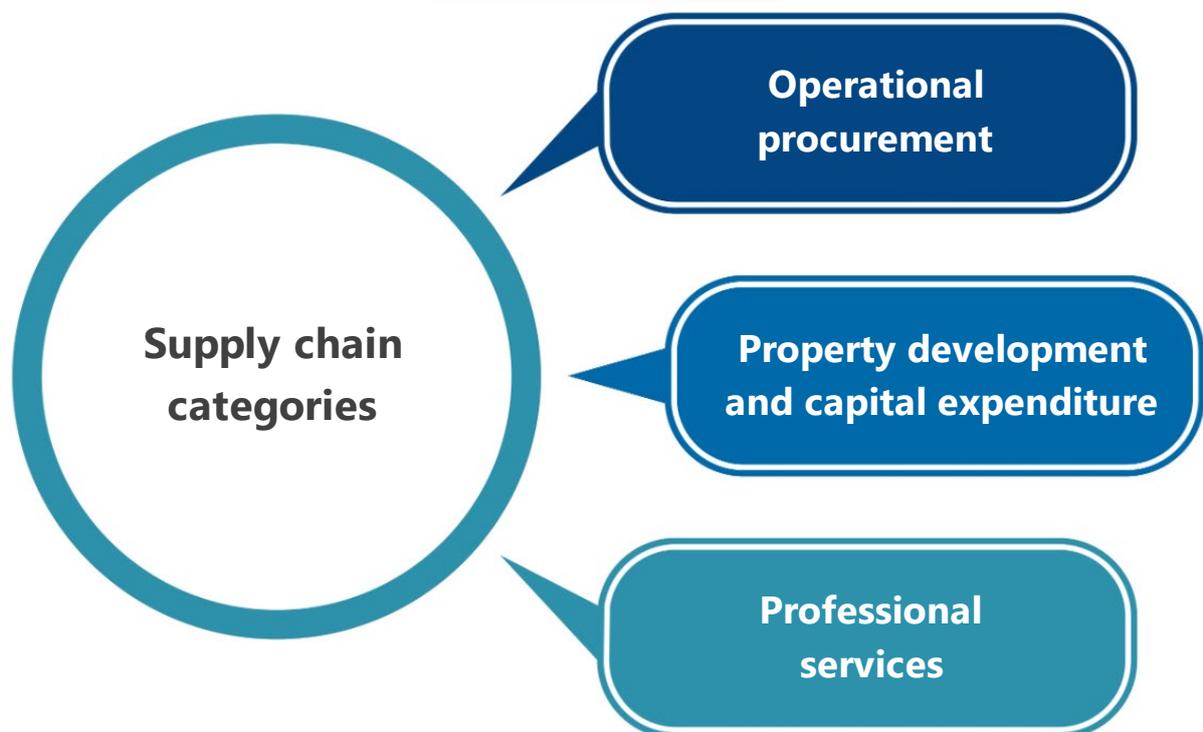


IRT Executive Team



Supply chain categories

We have many suppliers and predominantly procure products and services from the following categories of supply chain:



Operational procurement

- Healthcare and medical services, equipment and consumables, allied health professionals, labour hire, cleaning, catering and hospitality, information technology and utilities.

Property Development and capital expenditure

- Construction of new aged care the retirement village developments, as well as products and services to repair, replace and maintain existing site assets.

Professional services

- Consultants, professional brokers, auditing and assurance, legal and recruitment services.

Risks of modern slavery practices in IRT operations and supply chains



IRT recognises that modern slavery is a crime which exploits human victims and which can take many forms including slavery, servitude, forced labor and human trafficking.

We have a zero tolerance approach to causing, contributing to, or being directly linked to, modern slavery practices.

Criteria 3: Risks of modern slavery practices in IRT operations and supply chains

We have a strong focus on safety for our employees, contractors and volunteers. Most employees are recruited through online advertising, employee referrals and other proactive searches by our internal recruitment team.

With our operations based in Australia and our workforce predominantly employed under an Enterprise Agreement, the risk of IRT operations directly causing or contributing to modern slavery practices is considered to be extremely low.

We have identified that we may cause, contribute to, or be linked to modern slavery practices through our supply chain arrangements. We have identified our top suppliers (by spend) and assessed the risk of modern slavery practices based on a number of risk factors including:

Country of operation

We recognise that suppliers may operate in countries with a higher risk of modern slavery practices.

Category

Some industries are recognised as having a higher incidence of modern slavery.

Workforce

Suppliers that operate with a contingent workforce can have a higher risk of modern slavery.

Criteria 4: Actions taken to assess and address risks of modern slavery practices in IRT operations and supply chains, including due diligence and remediation processes

We are continuing to understand our supply chain risks and investigating the geography and downstream supply chain management for our top suppliers. We have identified a third-party tool to assess these risks. This tool will be of use to us for the next stage in our modern slavery risk assessment which will include introducing a modern slavery questionnaire to be sent to these suppliers to understand what in their supply chains exposes IRT to increased risks in relation to modern slavery.

We are preparing a modern slavery framework and will be commissioning an education module to increase the knowledge across IRT with case studies to ensure that it is impactful.

In relation to our relationship with our suppliers more generally:



Our revised Supplier Annual Declaration and Purchase Order Terms and Conditions require all suppliers to assure us that they have taken reasonable steps to assess and address potential modern slavery risks in their operations and supply



We strive to build supportive, transparent and collaborative relationships with suppliers and clearly communicate our expectations to them.



We continue to use reputable suppliers so that we can mitigate modern slavery risks.



IRT's whistleblowing policy (the Reporting of Wrongdoing Policy) provides a framework to deal with any reports of suspected modern slavery practices within IRT.

The policy applies to current and former employees, volunteers, directors, officers, contractors and suppliers of IRT, and their relatives and dependents who are all eligible to be disclosers.

Criteria 5: How IRT assesses the effectiveness of the actions being taken to assess and address risks of modern slavery practices in its operations and supply chains

IRT will assess the effectiveness of its actions to identify, evaluate and assess modern slavery risks by:



Reviewing and reporting on issues raised through our Reporting of Wrongdoing (Whistleblower) Policy.



Including consideration of modern slavery risks in internal audits.



Continuing to collaborate with our suppliers and determining their awareness of modern slavery risks.



Conducting regular reviews of our supplier expenditure data to ensure that we identify emerging risk areas.



Conducting an annual review of our response to modern slavery.



Conducting regular review of our policies and procedures, which includes those that relate to modern slavery risk.

Consistent with the *Modern Slavery Act*, the IRT Board will review the organisation's actions to address modern slavery risk and approve the annual Modern Slavery Statement.

Criteria 6: Consultation with entities controlled

During the reporting period this Statement covers, IRT owned and controlled one entity: SPiRT Pty Ltd which is inactive. SPiRT Pty Ltd's Company Secretary participated in the preparation of this Statement, and supports the information provided in this Statement.

Other than this, IRT does not own or control any other entities, therefore this criterion is not otherwise applicable.

Criteria 7: Other information which IRT considers relevant

IRT is committed to acting ethically and with integrity in all our relationships. This commitment includes the protection of human rights and lawful, fair and ethical work practices.

We expect our service providers, suppliers and contractors to share this commitment to ensure that modern slavery is not taking place in their organisations or within their own supply chains.

