



Adventist HealthCare Limited

ABN 76 096 452 925

MODERN SLAVERY STATEMENT

UNDER THE *MODERN SLAVERY ACT 2018* (CTH)

REPORTING PERIOD 1 JULY 2019 – 30 JUNE 2020

This Modern Slavery Statement has been approved by the Board of Adventist HealthCare Limited, ABN 76 096 452 925 on 7 February 2022, in its capacity as the principal governing body of Adventist HealthCare Limited.

This Statement is signed by Brett Goods in his capacity as Director and Chief Executive Officer of Adventist HealthCare Limited.



Brett Goods

Director and Chief Executive Officer, Adventist HealthCare Limited

9 February 2022.

1. This is Adventist HealthCare Limited’s modern slavery statement for the first reporting period under the *Modern Slavery Act 2018* (Cth) (the **Act**), which ended on 30 June 2020.
2. We fully acknowledge the very late lodgement of this statement. Whilst preliminary steps in relation to our formal modern slavery response were taken during that inaugural reporting period, unfortunately, the carrying out of comprehensive modern slavery risk assessment measures, and the completion of this Statement during that first reporting period was overlooked. That oversight was, in large part, due to the onset of the COVID-19 pandemic in the first reporting period. This created significant operational difficulties and prescient priorities for our organisation, as one of Sydney’s major private hospitals.
3. From January 2020, amongst an all-encompassing array of other institutional measures, an entirely new infection control procedure was created for implementation across all of our facilities. All of our organisational procedures and staff training response required urgent re-development, including the paramount priority of ensuring the safety of our staff and patients.
4. As an entity with limited corporate capacity, all practical resources were diverted to ensuring an effective response to the pandemic as a first priority. This unprecedented environment for our operations, as a major metropolitan private hospital, impeded the preparation and lodgement of this modern slavery statement in a timely fashion.
5. Despite this, Adventist HealthCare is committed to implementing a meaningful and long-term modern slavery response. Accordingly, once this oversight came to our attention, we promptly engaged external subject matter experts to assist us in implementing a comprehensive modern slavery action framework.
6. Comprehensive modern slavery risk assessment, including our proposed steps for ongoing due diligence, measuring effectiveness for continual improvement, and internal governance measures relating to our supply chains and day-to-day operations are detailed in our Modern Slavery Statement covering the FY20/21 reporting period.¹
7. In consultation with external experts, we retrospectively determined that all key aspects for identifying, assessing and addressing specific modern slavery risks, as outlined in that Statement (for the 2nd reporting period), were also applicable for the first reporting period. This is due to the consistent nature of our key supply chains and core operations over the two reporting periods.
8. However, in order to clearly delineate the measures that have only been undertaken following the conclusion of the first reporting period, we have not reproduced that analysis in the body of this Statement. Rather, our Modern Slavery Statement prepared for the FY20/21 reporting period has been included as an **Annexure** to this Statement.

Reporting requirement #1 – “Identify the reporting entity”

9. The mandatory reporting entity is Adventist HealthCare Limited – ABN 76 096 452 925.

Reporting requirement #2 – “Describe the reporting entity’s structure operations and supply chains”

Structure and Operations

10. This section sets out key features of the reporting entity as applicable during the subject (first) reporting period. These features remain current to the present, unless otherwise noted.
11. Adventist HealthCare is a public company, limited by guarantee, and registered with the Australian Charities and Not for Profits Commission.
12. The primary function of Adventist Healthcare is the operation of the Sydney Adventist Hospital, commonly known as “the San”. This hospital is located in Wahroonga, NSW, and is both the largest private and not-for-profit hospital in NSW. We also operate a second medical facility, San Day Surgery at Hornsby. This facility specialises in a variety of day surgical procedures including Ophthalmic, Plastic & Cosmetic, Hand, Oral & Dental, and Gynaecology.
13. The San Hospital provides a range of medical services, including comprehensive acute surgical, medical and obstetric care. Further areas of specialist medical services include complex cardiac procedures, robotics, and minimally invasive surgery.
14. To facilitate these services, the San Hospital has a broad range of medical facilities, including operating theatres, endoscopy suites, cardiac catheterisation laboratories, intensive care and coronary care units, renal dialysis units, rehabilitation and sleep studies units, integrated cancer centre, diagnostic imaging, and a range of diagnostic allied health and support services.

¹ We note that at the date of preparing this Modern Slavery Statement for the FY19/20 reporting period, the Modern Slavery Statement for the FY20/21 has been reviewed and finalised by executive members and is awaiting Board Approval, but it not yet lodged with the Australian Border Force. The statement for the FY20/21 was prepared in advance of this Statement reporting on the FY19/20.

15. In addition to our services for admitted patients, the San Hospital also operates a range of outpatient services including:
- Physiotherapy;
 - Radiology;
 - Ultrasound for women;
 - Nuclear medicine;
 - Wound care clinic; and
 - Medical and dental centre.
16. The San Hospital is a teaching facility with a purpose-built clinical educational centre.
17. As a provider that is focused on holistic care of our patients and their families, we facilitate the following services onsite at the San Hospital:
- Meals and catering services for patients and visitors, through our brands ‘San catering’ and ‘San Snax’
 - Spiritual care services team
 - Onsite Gift shop
 - Low cost accommodation for outpatients and families at our Jacaranda lodge.
18. To assist with operating this wide range of medical and healthcare services, Adventist Healthcare trade under several other business names, including:
- Fox Valley Medical & Dental Centre;
 - San Day Surgery Hornsby;
 - San Radiology & Nuclear Medicine;
 - Sydney Adventist Hospital Pharmacy;
 - Sydney Adventist Hospital
19. All of our various services, businesses, and facilities are located in Sydney, New South Wales.
20. During the subject reporting period, Adventist HealthCare employed over 2,200 staff and engaged 1,156 accredited medical officers. Our broad range of services requires a diverse range of personnel, ranging from healthcare professionals, to cleaning staff, administrative functions, and corporate executives.
21. Adventist Healthcare is heavily reliant upon the support of our suppliers to ensure the safe and high-quality operation of our medical facilities. We procure goods and services from the following industries in relation to our health and medical operations:
- Medical devices, equipment, and suppliers;
 - Pharmaceutical products;
 - Logistical and transport services;
 - Laundry services;
 - Facilities Maintenance;
 - IT software and networking services;
 - Cleaning services;
 - Utilities.
22. We also have relationships with suppliers that support the operation of our corporate and administrative functions, such as:
- Computer, Technological & Telecommunication services;
 - Office supplies;
 - Business services;
 - Finance services;
 - Insurance services; and
 - Legal services.
23. During the subject reporting period, Adventist HealthCare engaged approximately 1,650 direct suppliers in relation to both our healthcare and corporate operations. A significant proportion of these suppliers are based in Australia.

Reporting requirement #3 - Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns and controls

24. As noted above, the comprehensive modern slavery risk assessment for our supply chains and operations during the subject reporting period occurred subsequent to the conclusion of that period. The subsequently identified areas of potentially elevated modern slavery risk include issues relating to the following:

- Procurement of medical goods
- Procurement of personal and protective equipment
- Services reliant upon low skilled workers, such as cleaning and laundry

25. A detailed analysis of each of these potential risk areas was undertaken as part of our comprehensive due diligence for the FY20/21 reporting period and can be found in the Annexure to this Statement.

Reporting requirement #4 - Describe the actions taken by reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

26. As noted above, the onset of the COVID-19 pandemic, drastically impacted our capacity and priorities in implementing comprehensive measures to specifically assess and address potential modern slavery issues in our supply chains and operations.

27. During the subject reporting period, our Corporate Governance Committee initially reported to our Board's Audit and Risk Committee on the requirements of lodging a Statement under the Act, including each of the mandatory reporting criteria. Unfortunately, further substantive action on those recommendations, including the timely preparation of a statement, did not occur as planned, which we primarily attribute to the overwhelming impact of the COVID-19 pandemic on our operations, capacity and institutional focus.

28. Our Head of Corporate Risk Management, who was responsible for initiating our overall response during the reporting period, did, however, undertake specialised modern slavery training during the subject reporting period. This training was developed by external subject matter experts, and focused on the following key areas:

- Defining key areas of modern slavery and sources of exploitation;
- An overview of the highest risk industries and hotspots of modern slavery;
- Methods to address risks arising from supplier relationships;
- Frameworks for assessing links to modern slavery;
- Best practice for remediation and risk mitigation;
- The impact of COVID-19 upon patterns and instances of modern slavery;

29. Our Head of Corporate Risk Management also engaged in further professional development relating to modern slavery issues during the subject reporting period.

30. The key steps that we have subsequently taken, and continue to take, to assess and address our overall modern slavery risks, including due diligence and remediation processes, are outlined in our Modern Slavery Statement for the FY20/21 reporting period (see **Annexure**).

Reporting requirement #5 - Describe how the reporting entity assesses the effectiveness of these actions

31. A formal framework, with specific key performance indicators, for assessing the effectiveness of modern slavery due diligence measures was not implemented during the subject reporting period.

32. However, as detailed in our Second Statement (see **Annexure**), Adventist Healthcare has now implemented a comprehensive modern slavery response framework, including developing indicators for substantively assessing the effectiveness of our actions on an ongoing basis.

Reporting requirement #6 - Describe the process of consultation with any entities the reporting entity owns or controls

33. During the subject reporting period Adventist HealthCare did not own or control any other entities. This reporting requirement is not applicable.

Reporting requirement #7 - Any other relevant information

34. As noted above, the unprecedented challenges of the COVID-19 pandemic provided a major disruption to implementing detailed modern slavery measures during the first reporting period.

35. Notwithstanding the ongoing challenges of the pandemic, we are committed to making up for lost time. We consider that the measures described in our Second Statement provide us with a foundational platform for implementing an effective, long-term modern slavery response that will ultimately have a meaningful impact throughout our operations and supply chains in addressing the scourge of modern slavery.

Annexure:

Adventist HealthCare Limited's Modern Slavery Statement FY 20/21



Adventist HealthCare Limited

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This Statement is signed by Brett Goods in his capacity as Director and Chief Executive Officer of Adventist HealthCare Limited.

A handwritten signature in black ink, appearing to read 'Brett Goods', written in a cursive style.

Brett Goods
Director and Chief Executive Officer, Adventist HealthCare Limited

9 February 2022.

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PART ONE Mandatory reporting requirements - Preliminary information

1. This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**).

Reporting requirement #1 – “Identify the reporting entity”

2. The mandatory reporting entity is Adventist HealthCare Limited – ABN 76 096 452 925.

Reporting requirement #2 – “Describe the reporting entity’s structure operations and supply chains”

3. Adventist HealthCare is a public company, limited by guarantee, and registered with the Australian Charities and Not for Profits Commission.
4. We are a not-for-profit organisation that provides a variety of healthcare facilities and services. Our mission is “Christianity in Action – Caring for the body, mind and spirit of our patients, colleagues, community and ourselves”. This means that our profits are re-invested to our facilities.
5. Our operations are primarily centred around running the Sydney Adventist Hospital, which is located in Wahroonga, NSW. “The San”, as it is widely known, is both the largest private and not-for-profit hospital in NSW. Our major medical facility, San Day Surgery at Hornsby specialises in a variety of day surgical procedures including Ophthalmic, Plastic & Cosmetic, Hand, Oral & Dental, and Gynaecology.
6. Adventist Healthcare also trades under several other business names, including:
 - Fox Valley Medical & Dental Centre;
 - San Day Surgery Hornsby;
 - San Radiology & Nuclear Medicine;
 - Sydney Adventist Hospital Pharmacy;
 - Sydney Adventist Hospital
7. The Sydney Adventist Hospital provides a range of medical services, including comprehensive acute surgical, medical and obstetric care. Further areas of specialist medical services include complex cardiac procedures, robotics, and minimally invasive surgery.
8. Our facilities include operating theatres, endoscopy suites, cardiac catheterisation laboratories, intensive care and coronary care units, renal dialysis units, rehabilitation and sleep studies units, integrated cancer centre, diagnostic imaging, and a range of diagnostic allied health and support services.
9. The Sydney Adventist Hospital has various outpatient services including:
 - Physiotherapy;
 - Radiology;
 - Ultrasound for women;
 - Nuclear medicine;
 - Wound care clinic; and
 - Medical and dental centre.
10. During the reporting period, Adventist HealthCare was appointed as trustee for the ELIA Wellness Trust. The ELIA Wellness Trust’s mission is to promote improved wellness and lifestyle in the community. Whilst the legal structure of the ELIA Wellness Trust was established during FY21, the operations and functions of the ELIA Wellness Trust have not yet commenced and as such it was a non-operational controlled entity during the reporting period.
11. The Sydney Adventist Hospital is also a teaching facility with a purpose-built clinical educational centre.
12. In addition to our medical services, Adventist HealthCare also provides the following services through the Sydney Adventist Hospital:
 - Low cost accommodation for Meals and catering services for patients and visitors, through our brands ‘San catering’ and ‘San Snax’
 - Spiritual care services team
 - Onsite Gift shop
 - outpatients and families at our Jacaranda lodge.
13. All our services, businesses, and facilities are located in Sydney, New South Wales.
14. The following is a snapshot of our operations during the reporting period:
 - 528 licenced overnight beds available;
 - 177,754 total bed days occupied ;
 - 1,907 babies delivered;
 - 18,409 cases presented to Emergency Care;
 - 24,224 total surgeries.

15. During the reporting period, Adventist HealthCare undertook an increasing role in assisting in managing the healthcare response to the escalating COVID-19 pandemic. Our operational focus shifted to include participation in the NSW Health vaccination program and caring for public patients (due to the increased caseload across the NSW public hospital sector). Whilst this represented a material shift in our operations, we consider that it did not significantly impact our overall modern slavery risk profile, given that it was a re-allocation of our existing staff and accommodation resources.
16. During the reporting period, we also commenced the implementation of the AS4187 Project at the Sydney Adventist Hospital. The AS4187 Project relates to new regulatory compliance requirements for cleaning operating theatres and sterilisation of theatre equipment. It has involved various non-recurring construction projects to upgrade our operating theatres and related facilities for the installation of new sterilisation devices.
17. Adventist HealthCare currently employs over 2,200 staff. This includes a broad range of employees, such as healthcare professionals, administrative staff, and corporate services.
18. Adventist HealthCare has approximately 1,600 direct suppliers, which are primarily based in Australia.
19. Suppliers support the daily operations of our medical facilities from a variety of industries including:
 - Medical devices, equipment, and suppliers;
 - Pharmaceutical products;
 - Logistical and transport services;
 - Laundry services;
 - Facilities Maintenance;
 - IT software and networking services;
 - Cleaning services;
 - Utilities.
20. Suppliers that assist with our corporate functions include:
 - Computer, Technological & Telecommunication services;
 - Office supplies;
 - Business services;
 - Finance services;
 - Insurance services; and
 - Legal services.

PART TWO - Assessing and addressing modern slavery risk

Reporting requirement #3 - Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns and controls

21. No actual or suspected incidences of modern slavery were identified in our operations and supply chains during the reporting period. Our overall modern slavery risk profile, including the risk exposure of our key direct suppliers, has been assessed as being relatively low.
22. Adventist HealthCare has identified the following industries as posing a higher potential risk of modern slavery within our supply chains and operations:
 - Building & Constructions services;
 - Cleaning services;
 - Procurement of Medical and surgical devices;
 - Procurement of PPE.

Building & construction

23. As detailed above, Adventist HealthCare has commenced works relating to the AS4187 project. This major physical upgrade has required additional construction and renovation suppliers, such as plumbing and electrical services, to facilitate the installation of state-of-the-art sterilisation equipment.
24. We acknowledge, on a global and national scale, the heightened general modern slavery risks associated with the building and construction industry. This is attributable to a range of factors, such as a low barrier to entry for unskilled migrant workers, relatively low wage work, and heavy reliance on subcontracting arrangements that minimise transparency over labour conditions and upstream suppliers.

25. Our primary construction contractor for the AS4187 project is also a mandatory reporting entity under the Act. We have carefully reviewed this supplier's published Modern Slavery Statement, which demonstrates an acute awareness of the risks occurring within the building and construction industry in Australia. We have also considered the extensive measures that our supplier has implemented to prevent instances of modern slavery in their workforce. This includes appointing modern slavery representatives for key operating divisions and delivering modern slavery training to each construction site employee and subcontractor.

Cleaning services

26. Adventist HealthCare directly employs cleaning staff, and also contracts with specialised cleaning services. We acknowledge that, at a general industry category level, the Australian cleaning industry is another potential area for significantly elevated modern slavery risks, including due to a high prevalence of vulnerable workers, such as temporary visa holders who are susceptible to debt bondage arrangements through their (employer) sponsors.
27. We consider that these industry-level risks are actively mitigated in our own supply chains and operations by the fact that we directly employ the majority of our cleaning staff. We do not employ cleaning staff through recruitment agencies.
28. The only contract cleaners that we engage are specialised medical cleaners to assist with the sterilisation of facilities, such as our operating theatres, radiology clinic, nurses' residences and the like.

Procurement of Medical and surgical devices

29. As providers of a full range of critical and specialist medical services, we purchase a significant volume of medical devices, surgical devices, and related consumables. These products are often manufactured using a diverse array of raw material components and manufacturing processes. This means they are characterised by complex supply chains with relatively low levels of visibility, particularly at the lower, more remote tiers of the supply chain. For example, metal alloys may be extracted and mined in international locations with a high prevalence of child or forced labour.

Personal Protective Equipment

30. It is perhaps self-evident to note that personal protective equipment ("PPE") supply chains have always been a significant component of medical services of the kind that are at the core of our day-to-day operations.
31. Adventist HealthCare has continued to procure atypically high quantities of certain types of PPE that specifically relate to meeting the health and safety challenges of the ongoing COVID-19 pandemic. PPE such as rubber gloves and uniforms may have an elevated risk of modern slavery, particularly at the manufacturing stage. Increased supply chain pressures and shorter delivery timeframes during the COVID-19 pandemic have exacerbated such modern slavery risks in the production of products such as rubber gloves.
32. We are continuing to monitor these identified modern slavery risk areas in balancing our obligation to provide the highest practicable levels of safety and hygiene to our patients, staff and the wider community. We plan to focus on engagement with suppliers operating in these industries as part of our future due diligence response.

Reporting requirement #4 - Describe the actions taken by reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

Supplier Engagement

33. We are in the process of requesting information from select suppliers about their modern slavery response, including disclosure of Supplier Codes of Conduct, and/or confirmation relating to key supply chain review processes.²
34. Adventist HealthCare recognises that partnering with suppliers and having visibility over their operations and supply chains is a key feature of a modern slavery response. We are seeking to expand this process in future reporting periods.
35. We have also incorporated modern slavery provisions into our procurement contracts with a select group of suppliers. During the next reporting period, we plan to more widely roll out the use of these provisions that expressly address the modern slavery issue in a range of appropriate supplier contracts.

Policy and Internal Governance

36. We consider effective modern slavery due diligence to be a long-term effort. Simply put, we recognise that for an organisation to achieve a practically effective and impactful modern slavery response it must commit to a marathon, not a sprint.

² Note this action occurred after 30 June 2021 and prior to the date of lodgement.

37. Adventist HealthCare is still in the process of developing a modern slavery compliance framework to guide our overall strategy and response in upcoming reporting periods, including our planned focus on the following key areas:
- Establishing a formal risk identification process for operations and supply chains, through strategically reviewing suppliers by industry and geographical risks. This targeted analysis will operate in tandem with a supplier screening process that will categorise suppliers based on the level of engagement with modern slavery or certifications in relation to human rights.
 - Implementing a risk assessment system for high risk suppliers, to identify specific entities for further due diligence or auditing. This assessment will focus upon desktop-based reviews and critical assessment prioritisations.
 - Creating a risk mitigation framework that focuses on appropriately tailored risk verification process, engaging with suppliers in auditing activities, and issuing supplier self-assessment questionnaires.
 - Facilitating risk reduction through executive oversight of our modern slavery framework. We will create an oversight committee that will be responsible for reviewing the results of our risk identification and assessment, to assist with directing our modern slavery response and reviewing the effectiveness of our action on a regular basis. It is intended that the oversight committee will provide annual reporting updates to the audit and risk committee of the Adventist HealthCare Board, including recommendations in relation to purchasing practices, supplier engagement, and internal training.
38. We intend to finalise our modern slavery compliance framework, including obtaining Board approval for organisation-wide implementation in the next reporting period.
39. Our Supplier Code of Conduct is being updated to include express anti-slavery provisions, including codifying zero tolerance for child labour, and entrenching the expectation that suppliers cannot benefit, directly or indirectly, from any form of forced labour. We plan to further develop and finalise the modern slavery provisions for this policy in FY22.
40. Adventist HealthCare has also utilised executive reporting channels for progressively reporting on our modern slavery response to the audit and risk committee of the Adventist HealthCare Board.³ We intend to implement regular update mechanisms during the next reporting period through the creation of an oversight committee, which will form part of our modern slavery compliance framework, as described above.

Industry collaboration

41. Adventist HealthCare has consulted with other Adventist entities in the Seventh-day Adventist church organisation. Chosen was an entity which has developed and implemented a comprehensive modern slavery response, with an established track record. This entity has provided us with guidance in relation to developing our own overarching framework and roadmap for future modern slavery due diligence. We are exploring the possibility of engaging in further partnerships with this entity in future reporting periods.

³ Note this action occurred after 30 June 2021 and prior to the date of lodgement.

PART THREE - Measuring effectiveness, consultation, and other information

Reporting requirement #5 - Describe how the reporting entity assesses the effectiveness of these actions

42. Adventist HealthCare has established internal modern slavery reporting processes to ensure that key internal stakeholders are periodically assessing the effectiveness of our modern slavery response. To assist with this, we have developed the following key indicators, which will be used to benchmark the effectiveness of our response over coming reporting periods:

| Pillar | Action area indicator for FY22 & FY23 |
|---|---|
| <i>Risk assessment</i> | Comprehensive supply chain mapping |
| <i>Supplier engagement</i> | Undertaking deep dive on high-risk suppliers Continued review of our supplier’s modern slavery related action Expanding the use of modern slavery provisions for supplier contracts |
| <i>Internal governance & policy frameworks</i> | Implement our modern slavery compliance framework Finalise modern slavery clauses for supplier code of conduct Undertake formal policy review and gap analysis Operation of the modern slavery oversight committee |
| <i>Modern slavery training</i> | Training of key internal stakeholders and oversight committee |
| <i>Industry collaboration</i> | AHCL has consulted with other Adventist Entities in the Seventh-day Adventist church organisation who also have Modern Slavery obligations informing AHCL in its approach |
| <i>Grievance procedures & empower worker voices</i> | Review modern slavery provisions for Whistleblower policy |

Reporting requirement #6 - Describe the process of consultation with any entities the reporting entity owns or controls

43. All appropriate internal consultation between Adventist HealthCare’s key departments and personnel has occurred in relation to the preparation of this Modern Slavery Statement, and will be ongoing as part of our continuing modern slavery response.

44. As noted above, although the ELIA Wellness Trust (“Trust”) was established as a controlled entity of Adventist HealthCare during the reporting period, the operational control and business activities of ELIA Wellness have not commenced through the Trust itself. These operational activities are still yet to be transitioned from ownership of the previous controlling entity, as of the reporting date. Therefore, there has not been any consultation with the not-yet-operational ELIA Wellness Trust regarding Adventist HealthCare’s overall modern slavery response during the reporting period.

Reporting requirement #7 - Any other relevant information

45. The ongoing COVID-19 pandemic has continued to place significant burdens upon our operational resources during the reporting period, including the diversion of personnel to assist with the NSW Health response to the Covid-19 pandemic, including the community vaccination program. As a result, our ability to undertake extensive modern slavery action during the reporting period has been significantly curtailed. We intend to significantly expand and build upon our efforts to date during the next reporting period.

46. Adventist HealthCare also candidly acknowledges that we have lodged this Statement after the deadline for the FY20/21 reporting period. As an organisation we worked to prepare and finalise this Statement prior to 31 December 2021. However due to the renewed pressures placed by the Omicron variant of COVID-19 requiring executive level resources, together with the onset of the Christmas shutdown period, the FY20/21 Statement was not completed in time for the Board to meet prior to the lodgement deadline for the purpose of approving the Statement.