

MODERN SLAVERY STATEMENT SEASONS LIVING AUSTRALIA

As a provider of retirement living and aged care services, Seasons Living's approach to modern slavery is based on our values of Trust and Integrity. We are very aware of the need to protect the most vulnerable member of our society by ensuring that our processes identify potential risks in our supply chains and where necessary, establish remediation plans. Seasons Living recognises that modern slavery is a crime that exploits human victims and that can take many forms of slavery, servitude, forced labour and human trafficking. We have a zero-tolerance approach to causing, contributing to, or being directly linked to modern slavery practices.

Seasons Living Australia ACN 108 866 904 is an Australian Private Company, operating 8 retirement villages, an in-home care service for seniors and a residential aged care service in southeast Queensland. With over 300 employees, Seasons Living aims to provide accommodation and support to seniors to live their best quality of life.

All our operations are based in Australia.

We predominantly procure products from the following categories of supply chain:

- Healthcare/medical services, equipment and consumables, including allied health professionals
- Cleaning supplies and suppliers
- Food and related consumables

To assess the identified risks of modern slavery practices in our operations and supply chains, Seasons Living reviewed our data in relation to the suppliers we engage, with a particular focus on those to whom we devote the most annual expenditure.

We considered it prudent that a key priority is ensuring that our own internal processes related to labour are in order. In 2021 we conducted a due diligence of our labour practices and concluded:

- We have a strong focus on the safety of our employees, volunteers and contractors. Most employees are recruited through online advertising, employee referral and other proactive searches by our management team.
- With our operations based in Australia and our workforce predominantly employed under an Enterprise Agreement, the risk of Seasons Living's operations directly causing or contributing to modern slavery is low.

SEASONS LIVING AUSTRALIA

ABN 58 108 866 904

PO Box 6028

Brendale QLD 4500

EMAIL info@seasonsliving.com.au

seasonsliving.com.au

- We have HR policies and procedures to ensure compliance with legislative requirements and fundamental rights at work including dignity at work and prevention of discrimination throughout employment.
- Before making an offer of employment to a candidate, we check their eligibility to work in Australia including ensuring they have the relevant work visas.
- We pay all staff an appropriate wage for work performed, in accordance with an Enterprise Agreement approved by the Fair Work Commission
- We have a proactive policy related to the reporting of wrongdoing, including Whistleblower Policy and arrangements and Grievance Procedures. The Whistleblower policy provides a framework to deal with any reports of suspected modern slavery practices within Seasons Living. This policy applies to all current and former employees, volunteers, directors, officers, contractors and suppliers.
- Training has been provided to Seasons Living employees to increase their awareness of modern slavery risks and our responsibilities under the Modern Slavery Act 2018 (Cth)

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 several factors including:

- Supplier country of operation- we recognise that suppliers may operate in countries with a higher risk of modern slavery practices
- Supplier category- some industries are known to have a higher incidence of modern slavery
- Workforce- suppliers that operate with a contingent workforce can have a higher risk of modern slavery

In relation to the relationships we have with our suppliers:

- We ask for an Annual Supplier Declaration to reflect that suppliers have taken reasonable steps to assess and address potential modern slavery risks in their operations and supply chains
- We strive to develop supportive, transparent and collaborative relationships with supplier and clearly communicate our expectations to them

Seasons Living will assess the effectiveness of our actions to identify and evaluate modern slavery risks by:

- Reviewing and reporting on the issues raised through our Whistleblower Policy
- Include consideration of modern slavery in internal audits
- Continue to work with suppliers and determine their awareness of modern slavery risks

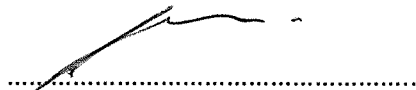
- Conduct regular reviews of our supplier expenditure data to ensure we identify emerging risks
- Conduct an annual review of our risk of modern slavery
- Conduct regular reviews of our policies and procedures including those related to modern slavery risk

This report has endorsed by the Director of Seasons Living Australia Pty Ltd.

Tracey Silvester

Tracey Silvester
CEO

Pursuant to a resolution of Seasons Living Australia Pty Ltd made the 6th of October 2022 this Statement has been approved and endorsed by Philip Alan Usher the sole director and proprietor of Seasons Living Australia Pty Ltd .



Philip Alan Usher

Dated: 6 October 2022