

Modern Slavery Statement 2021

Introduction

The St John WA Group's Modern Slavery Statement (**Statement**) is 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 2020 to 30 June 2021 (**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 of two operating 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 130 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 in itself 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, share many suppliers and prepare consolidated financial statements. 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.

To the extent that this Statement outlines activities conducted by SJWA, those activities have been conducted by SJWA on its own behalf and on behalf of Apollo Health, unless expressly stated otherwise.

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.

The Group also runs the State Operations Centre, which fields Triple Zero calls. The State Operations Centre received 267,521 Triple Zero calls during the Reporting Period.

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

Industry Medical Services provides qualified and experienced medical staff for short- or long-term projects to look after the daily health and emergency medical needs of its customer's 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 Ltd (trading as St John Medical, St John Urgent Care and St John Dental) operates five super clinics in the metro area and one rural medical centre. In addition to the GP services common to each of these clinics, the five metro clinics also offer dental services and walk-in urgent care. A range of allied health, specialist and pathology services (operated by external providers) are co-located at these centres to help provide an integrated service to patients. The St John Urgent Care service aims to provide an alternative to the emergency department for urgent but non-life-threatening injuries and illnesses.

Our People

To support the Group's operations, the Group engages 2,031 paid staff and more than 6,000 clinical volunteers, supported by broader community outreach programmes. 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 centre led supply chain and providing opportunities for training and development.

The Group is bound by Australian labour laws regulating wages, benefits and working conditions of its paid employees. Other than key management personnel, our paid staff are covered by an enterprise agreement or applicable award.

Our Supply Chain

Given the range of inputs into the operations of our divisions, the Group has a sizeable 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.

Whilst all purchasing is made through suppliers based in Australia; it is noted that some of the products we source originate from overseas.

Our operations and supply chains risk

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

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

Due to the global COVID-19 pandemic our risk has increased during the Reporting Period in other product areas, most significantly in personal protective equipment (PPE).

Risk mitigation and remediation

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

During the Reporting Period, the Group continued work to:

- Validate its framework to mitigate modern slavery risks.
- Engage its suppliers to improve 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 risk of 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; to identify suppliers where the risk of modern slavery is high; and to otherwise identify areas of risk in its procurement practices.

The Group's supplier questionnaire was reviewed and edited with the objective of improving supplier responses and its assessment of modern slavery. Supplier questionnaires were sent to high spend/risk suppliers during the course of the 2020/21 Reporting Period.

The Group found that the mechanism for assessment of high spend/risk suppliers did not wholly capture all of the groups associated risks with Modern Slavery supplier categories. The Group has revised its analysis of supplier categories to allow an even more targeted approach.

To reduce the prevalence of modern slavery in its supply chain, the scope of the Group Modern Slavery action plan was increased to identify product origin for geographical risk assessment.

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

Supplier Audit

The Group continued to expand its database of suppliers by spend to include the country of manufacture of goods, also included in assessing modern slavery category risk rating. This data is being utilised to validate the potential modern slavery risk categories in its operations and supply chain with emphasis on high-risk geographical locations and business transactions.

The Group is conducting further due diligence on local and global supply chains to prioritise the suppliers that it needs to engage with, enhancing conformity with the St John WA Ethical Sourcing and Modern Slavery Policy.

Remediation

During the Reporting Period, the Group did not receive any complaints associated with modern slavery and did not establish any remediation processes focused solely on modern slavery.

The Group has a Whistleblower Policy and protocol for receiving anonymous disclosures of real or perceived wrongdoing under the Policy and did not receive any disclosures of any instances of modern slavery within the business. 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 by supplier or partner organisations 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 continue to recognise that knowledge sharing, including targeted training for employees, and acting, including mitigation measures, where we see a risk of involvement, are vital to successfully preventing modern slavery.

The Group's preliminary actions in FY21 have been encouraging in their effectiveness specifically in education and understanding Modern Slavery risk in its purchasing business units. This continues to be a primary focus for FY22 to provide confidence to our teams in their dialogue with suppliers, and in managing any difficult or educational conversations, around combatting modern slavery practices.

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.

Key focuses for FY22 will include:

- Targeting our training to higher risk purchasing business units and their teams to further promote awareness of Modern Slavery risk and embed the awareness and understanding of how to respond to this risk.
- During the next reporting period the Group's action plan for managing modern slavery risks will be validated and assessed twice in regular intervals as part of its commitment to the program framework.

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. SJWA and its wholly owned subsidiary Apollo Health are managed and governed by the same Executive and Board of Directors, who have reviewed and approved this Modern Slavery Statement.

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 2020 to 30 June 2021.



Mr. Shayne Leslie

Chairman

25 November 2021