



St John

Modern Slavery Statement 2023

14 December 2023





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 2022 to 30 June 2023 (**Reporting Period**) to identify, manage and mitigate the specific risks of modern slavery in the Group's operations and supply chain.

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 more than 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 General Practice, 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 broader policies and processes on behalf of the Group, with both entities being responsible for enacting these policies and processes within their sourcing and procurement practices.

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.

Operating Model

The Group operates across 3 customer-focused operating divisions, supported by 2 Corporate Services divisions.

Service Stream 1: Preventative Services

The Group offers a range of nationally accredited first aid courses, as well as shorter non-accredited training options, across Perth Metropolitan and Regional WA. The Group also offers a range of first aid supplies and equipment through physical shop locations, field servicing operations and online webstores.

Service Stream 2: Community Services

Apollo Health Ltd (trading as St John General Practice, St John Urgent Care and St John Dental) operates six health centres in the metro area and one rural medical centre: Armadale, Cannington, Cockburn, Joondalup, Kambalda (rural medical centre), Midland, and Osborne Park. In addition to the GP services common to each of these clinics, the six health centres 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.

Event Health Services provides first aid cover and medical services at WA events and attended 3534 events during the Reporting Period.



Industry Medical Services provides a range of services to corporate customers, including - qualified and experienced medical team for short or long-term projects; medical facility on-site resources; first aid training and supplies; and medical and safety services.

Service Stream 3: Emergency Services

SJWA provides emergency ambulance and patient transport services in metropolitan Perth and several regional centres. Volunteer teams provide these services in other regional areas allowing SJWA to meet the diverse needs of the communities in which SJWA serve, spread over 2.5 million square kilometres.

SJWA also runs the State Operations Centre, which fields Triple Zero calls. The State Operations Centre received 287,130 Triple Zero calls during the Reporting Period.

Patient Transport Services caters to non-emergency or 'booked' patient transport needs and are resourced by low, medium or high acuity crews, depending on the patient's need. Community Transport Services provides a door-to-door service to people who need to travel to community centres and medical appointments. For those requiring additional support, the service also includes a companion option in which the St John driver attends before, during and after the appointment to provide further peace of mind.

Corporate: People, Culture & Development

The People, Culture & Development (PCD) stream support Service Streams 1, 2 and 3 in the 'human' element of the Group's business.

Corporate: Finance

The Finance stream support Service Streams 1, 2 and 3 in securing and maintaining the Group's position from a 'financial' perspective, including corporate services (IT, business intelligence, property, procurement, project management, etc.).

Office of the Group CEO

Each of the above 5 streams report directly into the Group CEO. The Office of the Group CEO includes the Company Secretariat, Legal, Corporate Affairs and Strategy.

People

The Group's people are integral to its purpose of serving humanity and building resilient communities in which it operates. Due to operating in complex and at times challenging environments the health and wellbeing of all employees and volunteers is paramount throughout the operations and is underpinned by the Group's values. SJWA's people have multiple avenues to access specialist external support services which are frequently promoted and easily accessible.

The Group engages 3130 paid and 4288¹ volunteer team members throughout the State of Western Australia and is committed to providing services with the highest standards of personal and corporate integrity.

With a dedicated People and Culture Department made up of suitably qualified and experienced personnel based out of the State Office, the Group is confident that the risk of modern slavery is low. The Group has established and embedded policies, procedures, and governance practices that include, but not limited to recruitment and selection, onboarding, visa management, grievance resolution, fitness for work, and wellbeing and support.

The Group is bound by Australian labour laws regulating wages, benefits and working conditions of paid employees and utilises Modern Awards and Enterprise Agreements where appropriate.

Supply Chain

Given the range of inputs into the operations of SJWA's divisions, the Group has a sizeable supply chain that includes the purchase of products and services required for the delivery of the 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 the majority of purchasing is made through suppliers based in Australia; it is acknowledged that many of the products and services the organisation procure from suppliers have complex global supply chains.



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.

On analysis of the supply chains and operations to identify modern slavery related risks some key risk areas were noted:

Sector and industry risks:

Electronics and textile production remain high risk industries globally. The sectors and countries from which some key suppliers source have high risk of modern day slavery.

- SJWA procures electronic equipment including tablets, mobile phones, laptops, monitors and accessories.
- SJWA also procures and sources uniforms in large quantities for the workforce.

Products and services risks:

Paper and medical goods are recognised as high-risk products globally and cleaning services have inherent modern slavery risks.

- A significant amount of SJWA's supply chain products are fast moving consumer goods, that are predominantly single-use medical products. It is acknowledged that the complex global supply chains for these items are often obscured, lack transparency and have exploitative practices/conditions within them.
- Outsourced cleaning services are utilised by SJWA for each office and operational sites. Cleaning services often have lower wages, involve manual labour, are outsourced and are frequently on a casual basis. Workers are often from migrant, low socio-economic, or culturally diverse backgrounds.

Geographic risks:

Some countries have higher risks of modern slavery. The Global Slavery Index of 2018 of the Mindereroo Foundation ranks countries based on government response to modern slavery. SJWA procures goods from countries, which may present a higher risk of modern slavery:

- **China:** SJWA sources medical consumables and branded items such as first aid kits, pens and promotional items.
- **India:** SJWA sources uniforms and electronics which may be manufactured in India.

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 2022/23, the St John Group Board agreed to a series of high level Environmental, Social, People and Governance (ESPG) targets which outline SJWA's commitment to, among other, ensuring that the social licence to operate is managed by improving processes around dealing with "vulnerable people".

As part of embedding the new St John Group corporate structure and leadership team, a series of strategy development workshops were held in 2022/23. These included facilitated PESTEL (Political, Environmental, Social, Technological, Economic and Legal) sessions when various risks were identified and categorised as being "on the horizon versus on the doorstep". Modern Slavery and the responsibilities were noted from a Social, Economic and Legal impact perspective.

In further minimising modern slavery risk in the supply chain, a comprehensive "Procurement with Confidence & Agility" program was commenced, supported by the Group Chief Executive Officer. Among the initiatives were - better use of data analytics; progressing category management in procurement (a cross functional approach to managing similar areas of spend); consolidation exercise working towards reducing the number of suppliers. Upon completion of this program, Supply Chain will be able to allocate resources in a more timely and targeted manner in accordance with executive priorities, including encouraging suppliers to proactively address modern day slavery risks in their supply chains. Furthermore, considerations related to regionalisation within the supply chain and reducing the tiered level exposure through distributors are key focuses for reducing future risk.



During this Reporting Period, the Group focused on the following risk mitigation strategies:

- Enhancing education in procurement processes and Ethical sourcing and Modern Slavery Policy, including targeted sessions on better procurement practices for the management team.
- Updating the Supplier Survey, using prioritised risk-based approach and learnings from previous iterations.
- Additional emphasis on addressing modern slavery in procurement processes and tender pre-qualifications, through critical scoring methods based on the SJWA developed questionnaire.
- Continue to incorporate modern slavery clauses in supplier contracts.
- A series of risk workshops with the procurement team on both specific procurement exercises and more generally other elements as outlined above.

External supplier assessment

The Group has established a modern slavery supplier survey as part of its pre-qualification in supplier tender responses, ensuring suppliers are compliant with the Act (where applicable) and providing risk rating levels before SJWA award contracts.

Supplier monitoring

Whilst the supplier survey provides the initial risk assessment and actions, SJWA acknowledge that this is the first step. These surveys will form a baseline to be used for learning more about suppliers, industry and risks to enable us to move towards proactive best practice in modern slavery, as reflected in SJWA's FY24 priorities below.

For example: Creation of an annual supplier survey to capture updates to key risk indicators.

Governance and Policies

The Group's Ethical Sourcing and Modern Slavery Policy provides 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 supply chain and operations.

More generally within the Group, the management of, and governance around, policies improved during 2022/23, including establishment of a policy champion network and design of a new policy

template. Management of policies is subject to an annual audit to ensure SJWA retain the ISO9001 (Quality Management) accreditation.

Group procurement policies and associated documentation are being reviewed and assessed to further refine the modern slavery framework and business processes in respect to modern slavery, ethical procurement and upholding human rights principles in procurement.

Employment practices

The Group's robust policies and procedures for recruitment and remuneration of team members, ensure compliance with applicable employment laws and regulations. Validation of Working Rights occurs as a part of the employee onboarding process.

There has been an introduction of an International and National relocation guideline in 2023 which details compensation for, and term and conditions of, relocating to Western Australia to work for the Group.

There are regular audits conducted of employment contracts and they are updated with changes to Awards, Employment Agreements, or employment laws.

The remuneration department conducts yearly audits of remuneration reviews of those employees not covered by an Award or Agreement to ensure they remain above-award. Those employees covered by an award or agreement have automatic salary increases as at the dates detailed in the award or agreement.

Volunteer Practices

SJWA aim to be inclusive with Volunteer team members. As a part of onboarding and induction, volunteers are given training modules to complete which details organisational culture, along with skill training courses which allows them to commence their work as a volunteer.

They are also provided with ongoing training which allows them to maintain the skills to be able to perform volunteer shifts.

Volunteers are given Volunteer Agreement Contracts which details the expectations and requirements of both the Group and the volunteers.

SWA has well-articulated Volunteer Training Pathways for volunteers to undertake short courses or programs enabling them to increase their scope of work, and with further education, avail



themselves of career pathways within the organisation.

Training and education of team members

Procurement education continues within the Group focussing on best practices, ethical sourcing and due diligence. A new learning module around "Accountable and Ethical Decision Making" was drafted and reviewed by Risk Management, Supply Chain and People Learning in 2022/23 and is to be incorporated into both induction and ongoing training for team members in 2023/24. This will include emphasis on modern slavery.

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. SJWA did not receive any disclosures of any instances of modern slavery within the business. The scope of protected disclosures under the Policy is being extended 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.

SJWA continue to recognise that knowledge sharing, including targeted training for employees, and acting, including mitigation measures, where the organisation sees a risk of involvement, are vital to successfully preventing modern slavery.

The Group's actions in FY23 have been encouraging in their effectiveness specifically in improvement in procurement processes and understanding Modern Slavery risk in the purchasing business units. This continues to be a primary focus for FY24 to provide confidence to teams in their dialogue with suppliers, and in managing any difficult or educational conversations, around combatting modern slavery practices.

Over the coming year, SJWA will continue to set clear expectations to support employees and suppliers to be alert to possible involvement in modern slavery and to reject it.

Key focuses for FY24 will include:

- Enhance number of suppliers monitored in relation to Modern Slavery.
- Incorporate appropriate modern slavery clauses into all contracts, commensurate with the risk.
- Establish reporting mechanisms, associated with contractual clauses / requirements for SJWA's highest risk contracts.
- Develop an internal review program for procurement and supply chain management.
- Ongoing enhancement of governance, procurement framework and practices, and training as outlined elsewhere in this Statement.
- Mechanisms for workers and suppliers or their workers to anonymously report actual or suspected incident of modern slavery in SJWA or supplier operations.
- SJWA to assist Apollo Health Ltd's executive and senior managers, to embed effective actions to assess and address modern slavery risks within their procurement processes, by sharing information, guidance materials and resources for adoption by Apollo Health Ltd within its procurement processes.

Consultation

Modern Slavery Reporting Criteria Six: Describe the process of consultation with any entities the reporting entity owns or controls.

Majority of procurement and sourcing for the St John WA Group is conducted by SJWA. Some procurement is undertaken by Apollo Health Ltd for its St John Health Centres, primarily through a third-party supplier who source and supply healthcare, medical and pharmaceutical products.

Consultations have taken place with Apollo Health executive and senior managers to raise awareness and get commitment to implement more broadly the improved modern slavery processes established within SJWA for the primary health business operated by Apollo Health Ltd in the 2024 reporting period.

SJWA consulted with Apollo Health Ltd executives in the development of this Statement.

SJWA and its wholly owned subsidiary, Apollo Health Ltd, are managed and governed by the same



Board of Directors, who have reviewed and approved this Modern Slavery Statement. All elements of SJWA's strategy, values, purpose and mission are applicable to Apollo. Multiple working groups, management committees etc are in place to ensure seamless integration and cooperation at all levels up to and including senior executive team.

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 2022 to 30 June 2023.

Ms. Sally Carbon
Chairperson

14 December 2023

ⁱ St John WA Annual Report FY22/23

