

Modern Slavery Statement 2023–2024



Disclosure Note

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

This Statement is approved by HammondCare's Board of Directors.

A handwritten signature in black ink, appearing to read 'Kok Kong Chan', is positioned above the printed name.

Kok Kong Chan
HammondCare Chair

ABN 48 000 026 219

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About us

HammondCare is a global leader in health and aged care, specialising in complex dementia and palliative care.

Our Mission

Our passion is improving quality of life for people in need.

HammondCare stands for compassion, and we are strongly and intrinsically Christian. The work of HammondCare is motivated by Christian principles and values expressed in the words and deeds of Jesus Christ. HammondCare believes in the value of all people as made in the image of God and as loved by God. We are therefore called to show the same love, with compassion and respect, for people in need.

Serving others

We serve older people with complex care needs, regardless of their circumstances.

From our CEO

The passion we share at HammondCare for improving quality of life for people in need is not only expressed through our direct care services, but overflows into a deep sense of corporate responsibility for wellbeing across our society and world. Our Mission requires us to uphold the highest ethical standards which is why we identify modern slavery as a profound violation of human rights which directly contradicts our commitment to dignity and safety for every individual.

Our Modern Slavery Statement reflects our resolute stance against exploitation and our commitment to transparency, accountability, and ethical practices across our operations. This has and will continue to be our priority. Combatting modern slavery is an everyday mindset and our approach will be one of continuous improvement. We will seek to enhance our policies, strengthen supply chain management, and engage our community to ensure our commitment remains front of mind.



Andrew Thorburn
CEO

Reporting Criteria 1 & 2: About HammondCare

Organisational structure

Company structure and related entities

HammondCare (**ABN 48 000 026 219**) is a public company limited by guarantee and registered with the Australian Charities and Not for Profits Commission (ACNC).

HammondCare is the sole shareholder of HammondCare Health and Hospitals (**ABN: 72 074 354 028**) which is a public company limited by shares and registered with the ACNC.

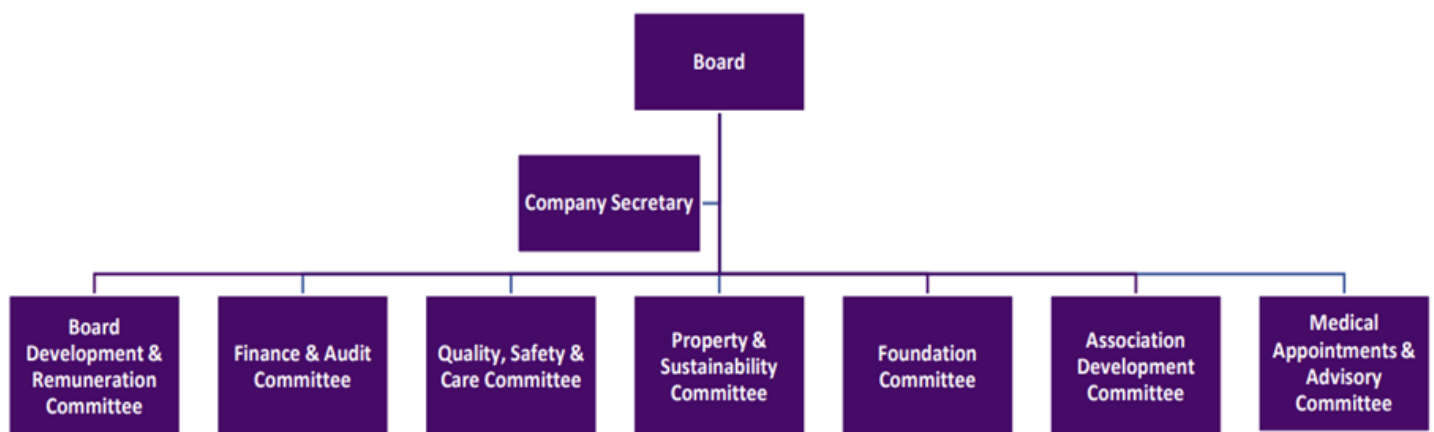
HammondCare also operates in the United Kingdom providing consultancy and dementia support services.

Our Governance Framework

Effective corporate governance is critical to our longer-term success.

HammondCare's governance arrangements are set out in the Company Constitution and all Directors, Executive and staff members are required to meet the standards of conduct and behaviour as provided for in the Mission in Action.

The Board's roles and responsibilities are set out in the Board Charter and the Board Governance Handbook. Certain responsibilities are delegated to the Executive Team. The Board is assisted by Board sub-committees, which include members of the Board and Executive Team, set out below:



Service Operations

HammondCare At Home

We offer home care across NSW, ACT, Victoria, and Queensland. We provide services so that older people and people living with dementia can continue to enjoy life and remain in their own home supported by a consistent team of trained carers.

Residential Care

HammondCare's 19 residential care homes are located at 12 locations across NSW, Victoria, and South Australia. Our approach in these homes is to offer a sense of belonging and feeling at home, with a commitment to dementia-specific care.

The Dementia Centre

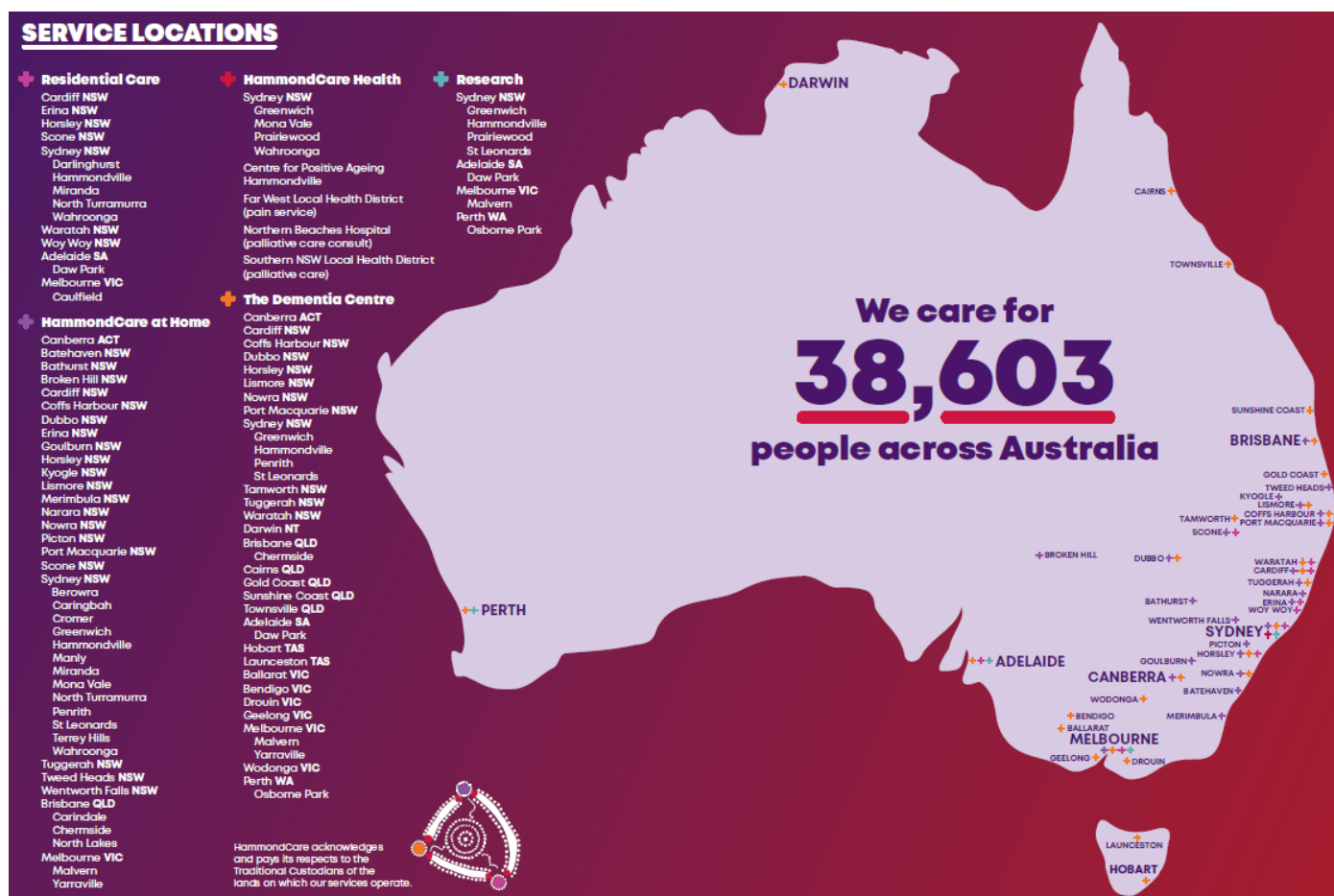
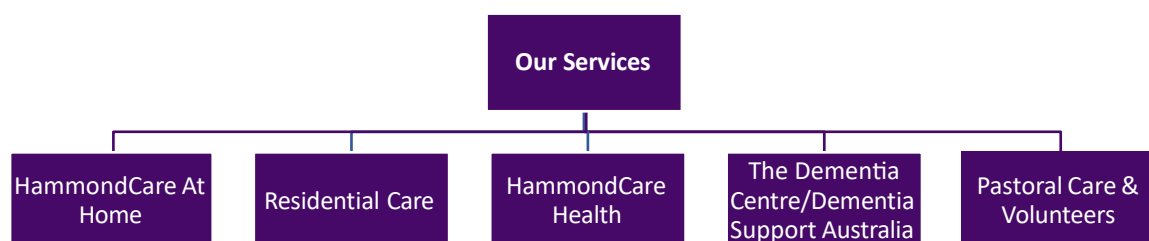
The Dementia Centre was founded by HammondCare in 1995 as an impartial resource and provider of research and expertise to the aged and dementia care community - in Australia and internationally.

Health

HammondCare's health services provide palliative and supportive care, rehabilitation, mental health care for older people, pain management and other vital support services.

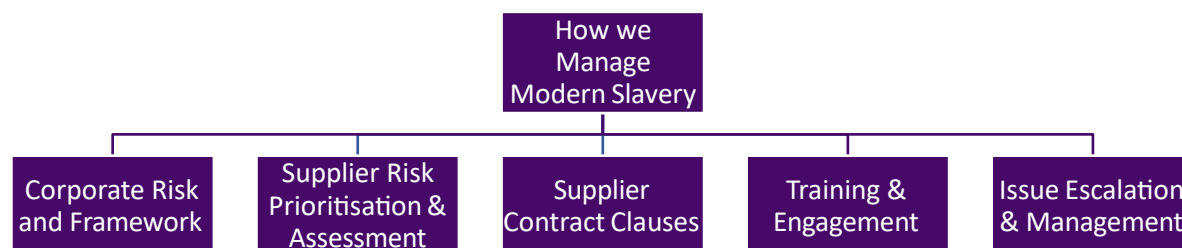
Pastoral Care

Providing understanding, care, and support in times of need, Pastoral Care is an integrated and core part of our services at HammondCare.



How we manage Modern Slavery

The following outlines the mechanisms in place to manage modern slavery and ensure we have effective structures, systems, and processes to respond to the risk of modern slavery.



Supply Chains

HammondCare has many suppliers and procures goods and services across several different categories. The main procurement categories are:

- Construction Services (building, major repairs, upgrades)
- Facilities Management (cleaning, security, plant and equipment maintenance, inspections)
- Medical Consumables (PPE, medical devices, and supplies)
- Health Services (optometry, physiotherapy, mental health)
- ICT Hardware and Software (PCs and laptops, network services and software)
- Food and Catering Products (groceries, meat, dairy products, fruit, and vegetables)
- Utilities (electricity, gas, water, telecoms)

Reporting Criteria 3: Modern Slavery Risk in Operations and Supply Chain

Operational Risks

Our People

HammondCare has over 5,792 dedicated staff, along with 861 volunteers, working across 99 service locations caring for more than 38,603 people across Australia. The risk of modern slavery in the workforce directly employed by HammondCare is low - the labour market in Australia is heavily regulated, with tight regulation of the aged care and health industries.

Supply Chain Risks

Building and Construction

Building and Construction remains one of the highest potential risks of modern slavery for HammondCare. We continue to ensure that both smaller and larger construction companies provide Statutory Declarations that sub-contractors have been paid correctly and our contract management system has the option to add the organisation's Modern Slavery statement.

Whilst there have been no new builds in the reporting period, Building and Construction remains one of the highest potential risks of modern slavery for HammondCare. This is because we continue to consider larger scale capital works projects to support possible areas of growth, as well as our ongoing repair and maintenance of older sites.

Reporting Criteria 4: Actions to Assess and Address Risk

The following outlines the actions and measures taken to assess and address the risk of modern slavery in our operations. Our commitment to ethical and responsible business practices is paramount, and we acknowledge the importance of addressing this pressing global issue.

Risk assessment

Supply Chain Assessment

- Comprehensive review of the supply chain to identify potential areas where modern slavery risks may exist. This assessment covered both direct suppliers and subcontractors.
- Using the established risk assessment matrix, suppliers were categorised based on potential exposure to modern slavery risks, with a focus on high-risk regions and industries.
- Any identified high-risk suppliers were subject to further scrutiny and assessment.

Internal operational assessment

- Ongoing monitoring of employment contracts, workplace conditions and employee engagement continue which includes assessment of any modern slavery risks associated recruitment and employment.
- We continue to draw on advice received from a third-party to ensure impartiality.

Risk mitigation

Supplier Code of Conduct and due diligence

- As part of our ongoing commitment to work safely, ethically, and responsibly, we have continued to embed our mandatory supplier code of conduct. It reflects our shared commitment to responsible business practices and outlines the standards we expect of suppliers. Our Supplier Group Terms and Conditions highlight the responsibility of the contractor to take reasonable steps to ensure there is no modern slavery in supply chains or any parts of the business.
- We require our contractors to represent, warrant and undertake that it conducts its business in a manner that is consistent with the principles of Modern Slavery Act 2018 Cth.

Employee Code of Conduct

- Code of Conduct launched in 2024 that aligns with the Mission, Motivation and Mission in Action that explicitly sets out standards of professional behaviour and principles. All

employees have been briefed and required to sign the Code of Conduct with all future employees doing so during onboarding.

Training and education

- Development and implementation of modern slavery training for all employees, focusing on recognising, preventing, and reporting instances of modern slavery.
- Training is mandatory for all employees annually, with refresher courses provided regularly.
- The completion rate for mandatory Modern Slavery Training is above 90% across the organisation.

Internal controls and reporting mechanisms:

- We have established internal controls to monitor and evaluate potential risks within our own operations, including the promotion of safe and ethical recruitment practices through the HammondCare Enterprise Risk Register.
- Reporting mechanisms are in place to allow staff to report any concerns related to modern slavery, ensuring whistleblower protections through third party engagement to assist in managing whistleblower disclosures.
- We will continue our commitment to address modern slavery issues by ensuring we have processes in place to respond to any adverse human rights impacts should any modern slavery issues be identified.

Reporting Criteria 5: Effectiveness Assessment

HammondCare is committed to assessing and addressing the risk of modern slavery, both within our operations and throughout our supply chain. We believe that our comprehensive risk assessment and mitigation measures, along with our commitment to transparency and collaboration, will contribute to the global effort to eradicate modern slavery.

This report represents our dedication to ethical and responsible business practices and is a testament to our ongoing commitment to creating a safe, inclusive, and modern slavery-free environment for all.

Reporting Criteria 6: Process of Consultation with entities owned or controlled

HammondCare Health and Hospitals is managed and governed by the same Executive Team and Board as HammondCare and has been fully included in the process of consultation. The following outlines our consultation and collaboration with the community and our partners.

Collaboration and partnerships

- Active participation in industry associations and collaboration with peers, government agencies, and NGOs to share best practice and insights in the fight against modern slavery.
- We have joined industry alliances aimed at improving modern slavery awareness and prevention.

Transparency and reporting

- We are committed to transparency and regular reporting on our progress in addressing modern slavery risks.
- Annual Modern Slavery reports are published and made accessible to the public, and relevant authorities.

Continuous improvement

We continue to embed our understanding on Modern Slavery in the context of our organisation. We are refreshing our efforts and commitment to continuous improvement in line with our strategic Next Chapter review.

- Regular reviews and audits are conducted to ensure compliance with laws and regulations.
- Review and strengthening of HammondCare's Enterprise Risk Register, including our Governance and Regulation risk which encompasses Modern Slavery.
- Improvements to HammondCare's systems tracking our Obligations to improve transparency and monitoring.
- Changes to vendor information triggers a mandatory process in Coupa (contractor management system) that requires suppliers to submit details of the changes directly.
- Coupa automatically sends reminder emails to managers periodically prior to a contract expiry date and review details.

Further continuous improvement actions have been approved for the next financial year.