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# Modern Slavery Statement 2023

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**Police Health Limited**

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## Structure and operations

This statement is made by Police Health Limited  
ABN 86 135 221 519 for the year ending 30 June 2023.

Police Health Limited:

- Is a public company limited by guarantee, and is resident in Australia.
- Is a not-for-profit restricted access health insurer, providing health insurance policies to eligible customers in Australia.
- Is headquartered in Adelaide, South Australia.
- Employs approximately -75 people.
- Operates two brands, Police Health and Emergency Services Health.

Most employees are employed directly and on permanent contracts and there is a process of assurance that employees are paid in accordance with awards and employment contracts and that entitlements are provided. Therefore, the operations risk assessment focused on third party suppliers.

## Supply chain

Suppliers to Police Health Limited provide goods and services to support the operations with none being on-sold. Generally, the relationships with suppliers are stable and long term, with suppliers located or having a presence in Australia. The main types of products and services identified include:

- Products directly provided by suppliers such as office supplies and corporate uniforms.
- Services provided by suppliers, such as legal services, investment management services, health service provider contracting services, banking, utilities, telecommunications, auditing and actuarial services, cleaning services, security services, maintenance services, software and hosting services, sponsorships and information technology support and advisory services.

This Statement was approved by  
resolution of the Board of Directors  
of Police Health Limited



**Peter Shanahan**  
Chairperson  
20 September  
2023

- Products and services used by indirect suppliers to Police Health Limited's supply chain such as electronic services to the supplier of the membership management and claims processing system and hosting services.

Insured persons utilise the services of health care providers located in Australia, and then the insured persons will claim benefits against their health service costs. While not directly a supply chain service, consideration is given to health service providers because of contracting arrangements in place with some providers.

## Risk identification

Police Health Limited has reviewed its structures, operations and practices to assess any risks and identified that:

- There is no identifiable risk that Police Health Limited causes modern slavery practices.
- There is no identifiable risk that Police Health Limited may contribute to modern slavery practices.
- There is risk in Police Health being directly linked to modern slavery practices through its supply chain or the activities of material health service providers.

A risk assessment of service and product suppliers indicates the possible risk of suppliers themselves causing or contributing to modern slavery practices is low, except for cleaning services. Identified was that there was likely to be a higher risk relating to the supply chain of service and product suppliers in relation to the purchase of corporate uniforms and in the provision of the core membership management and claims processing system. There is a low risk that material health service providers cause or contribute to modern slavery practices, with the risk likely being in their supply chain.

There are thousands of health services providers whose health services provided to insured persons will attract a benefit, ranging from self-employed single operators to large public and private hospitals. The focus has been on material health services providers such as public hospitals, private hospitals, large radiology companies and large pathology companies.

## Mitigation, remediation and due diligence

Police Health Limited adopts a risk-based approach to prioritise and apply mitigating strategies to higher risk product and service providers. The key mitigation activities are:

- Strengthening contracts with priority product and service providers in relation to their compliance with and operations under anti-slavery laws, which may include inspection and auditing of records.

- Obtaining evidence or warranty of compliance with modern anti-slavery laws.

Other key mitigating strategies are:

- New product and service providers being screened to assess potential human rights impacts.
- Staff being encouraged to report modern slavery risks through the established compliance reporting processes, with incidents recorded and managed.

Consistent with Police Health Limited's stated values, where potential situations of modern slavery are identified, we will always endeavour, as far as possible, to do the right thing by the potential affected person. Each issue will be addressed as it arises with the principles of respect and fairness applied.

## Assessing the effectiveness

The effectiveness of actions undertaken to assess and address modern slavery risks will be through:

- An annual senior management assessment of Police Health Limited's response to modern slavery.  
Senior management has assessed that Police Health's response is appropriate relative to its size and complexity. There is a continued expectation of business partners making commitments in relation to modern slavery.
- Having no reported incidents of Police Health Limited causing or contributing to modern slavery practices.  
There have been no reported incidents.
- Having no product or service providers prosecuted for slavery or human trafficking activities.  
There are no reported prosecutions.
- Monitoring frequency and trends of reported modern slavery risks.  
Trends are monitored on an on-going basis.

## Consulting with controlled entities

There were no controlled entities requiring consultant during the 2023 financial year.



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