

Modern Slavery Statement

July 2024-June 2025



RSL LifeCare Limited
ABN 43 000 048 957



Executive Summary

RSL LifeCare Limited is committed to upholding human rights and eliminating modern slavery in its operations and supply chains. This Modern Slavery Statement covers the period 1 July 2024 to 30 June 2025 (FY25) and outlines the steps taken to identify, assess, and mitigate modern slavery risks in compliance with the Modern Slavery Act 2018 (Cth).

Key Highlights

- **Governance and Accountability:** Oversight by the Board and Executive Leadership Team, supported by a robust risk management framework and quarterly reporting.
- **Risk Assessment:** Comprehensive review of operations and supply chains, identifying higher-risk categories such as labour hire, uniforms, cleaning, construction, and food services.
- **Actions Taken:**
 - Consolidation of labour hire agencies from 60 to 10, with enhanced due diligence.
 - Mandatory supplier questionnaires and updated procurement contracts with modern slavery clauses.
 - Implementation of a Supplier Code of Conduct and internal grievance mechanisms.
- **Effectiveness Measures:** Regular audits, executive attestations, and internal reporting systems to monitor compliance and address concerns.
- **Continuous Improvement:** Commitment to ongoing policy reviews, training, and strengthening contractual protections.
- **Consultation:** Engagement with internal stakeholders across legal, procurement, property, and HR functions.

Looking Ahead

RSL LifeCare will continue to mature its modern slavery response by:

- Expanding supplier engagement and training programmes.
- Introducing measurable KPIs to assess effectiveness.
- Enhancing collaboration with sector bodies and industry initiatives.
- Increasing transparency through improved reporting and stakeholder consultation.

This statement reflects our dedication to ethical practices and safeguarding the wellbeing of those connected to our organisation and supply chains.



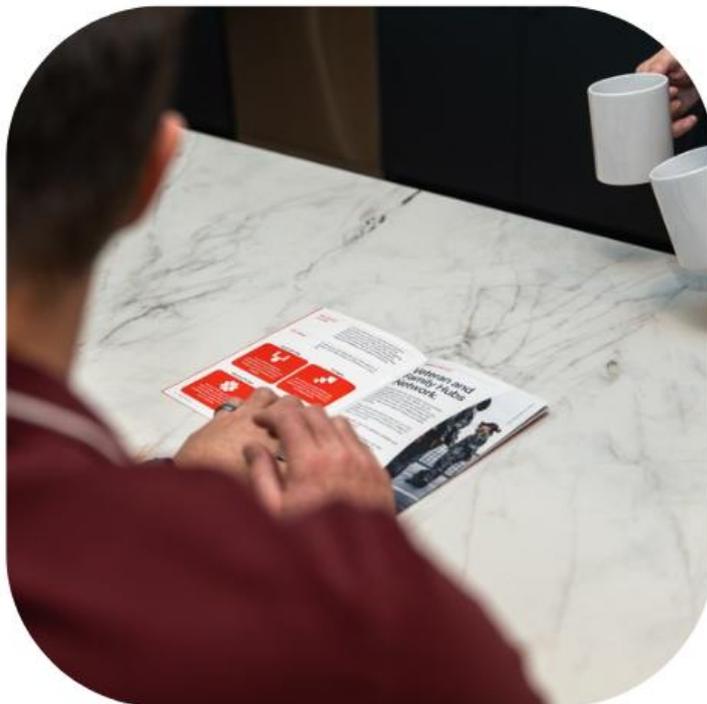
About this Statement

RSL LifeCare is proud to present this Statement which reports on our progress and ongoing activities throughout the period 1 July 2024 to 30 June 2025 (*FY25*) to identify and mitigate against the risks of modern slavery in our operations and supply chains.

A key focus for RSL LifeCare during FY25 was work done by our Procurement team in identifying and understanding our suppliers' practices regarding modern slavery as part of the assessment and on-boarding process. All potential and new suppliers are required to answer questions about their modern slavery position and all supply contracts contain representations about how our suppliers manage modern slavery risk in their operations and supply. As part of this process, we are pleased to have collaborated with many of our suppliers for the purpose of raising the level of awareness in addressing modern slavery.

As RSL LifeCare's modern slavery response program matures we will look to improve both our practices and our measurements of effectiveness. We will aim to do this by continuing to review our risk management framework and practices, our policies and procedures (including our Procurement Policy and our Supplier Code of Conduct), our contract clauses and to build knowledge and awareness through communication and training.

Freedom and control of one's life should be a universal right enjoyed by all. Sadly this isn't always the case. The safety and wellbeing of our people and communities is at the forefront of our operations and we strive to improve our approach to identifying and mitigating modern slavery risks.



1. Our structure & business

Reporting Entity

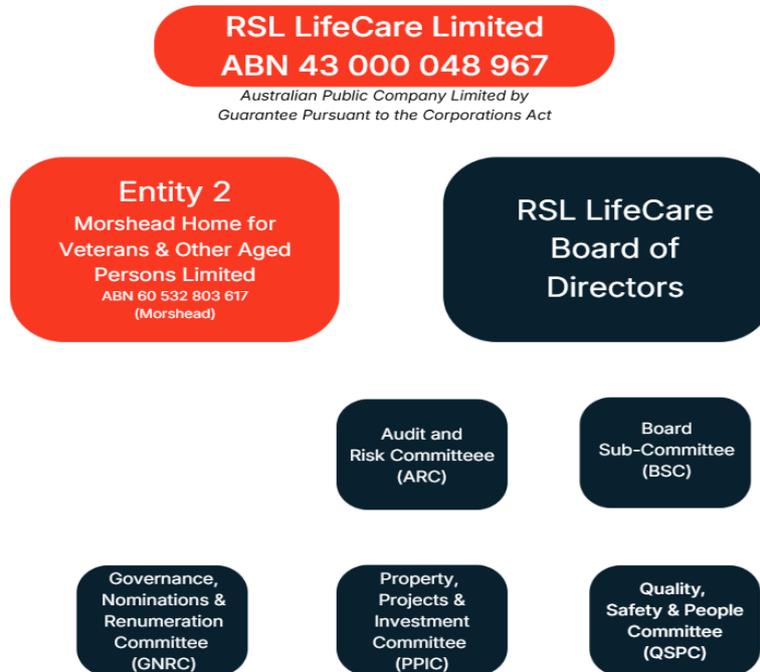
RSL LifeCare Limited (ABN 43 000 048 957) is the reporting entity, with its head office located at 120 Pacific Highway, St Leonards NSW 2065. RSL LifeCare is an Australian public company limited by guarantee and registered with the Australian Charities and Not-for-Profit Commission (ACNC).

Organisation Structure and Governance Framework

Our constitution details the governance and objectives of our organisation, with our primary purpose being to provide benevolent relief to persons suffering from ill health, disability, infirmity, homelessness, or financial hardship. Priority for these services is to be afforded to veterans and older people. The Board of RSL LifeCare is responsible for the culture, strategy, compliance, and performance of the organisation. It ensures that our activities are consistent with our constitution and comply with legal and regulatory requirements. The Board is supported by standing committees that are demonstrated in the Governance Structure chart set out below.

Morshead Home for Veterans and Other Aged Persons Limited is a wholly owned subsidiary of RSL Lifecare. It owns residential care facilities and retirement living villages in the ACT.

RSL LifeCare Governance Structure

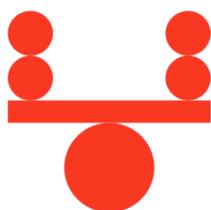


RSL LifeCare's Corporate Purpose, Vision and Values

Purpose: to enrich the lives of veterans and seniors

Vision: Creating proud communities, living their best lives

Values: RSL LifeCare's values are the foundation for how we work together, support our residents, innovate and problem solve to support our Vision.



Do the right thing

We take action, we don't walk past problems, we act with integrity and play by the rules, always.



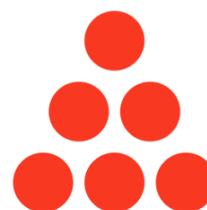
Aim higher

We strive for excellence in what we do, seek simple solutions and lead through meaningful innovation. Curiosity helps our understanding and drives progress.



Care from the heart

We empower people to live proudly, with purpose, providing care and support that creates confidence in their future.

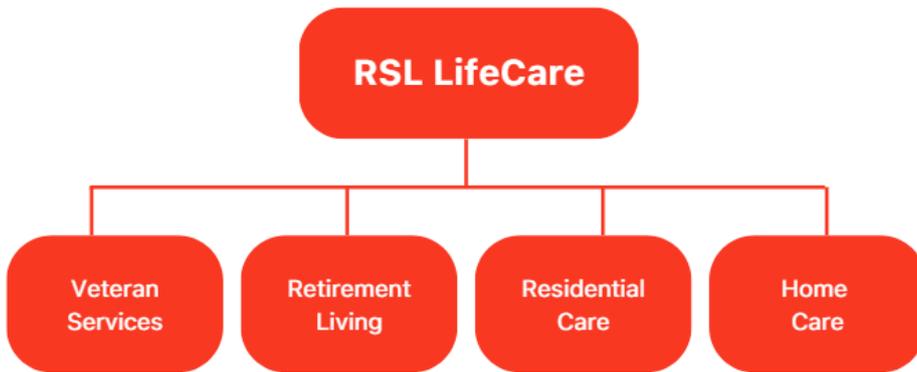


Act as one team

We support and encourage each other every day, acknowledging and celebrating our differences and experiences.

Operations

The Board delegates to the Chief Executive Officer the authority to manage the day-to-day affairs of RSL LifeCare (subject to the limits specified in the Delegations of Authority). The CEO, with a team of experienced Senior Executives is accountable for service delivery to our clients and residents via four service areas, as set out below.



Veteran Services

RSL LifeCare's Veteran Services operations provide veterans with a range of practical support services to help support their finances, mental health, and physical wellbeing to live sustainably and independently in their chosen community.

RSL LifeCare has (with the assistance of grant funding from the Commonwealth Government) established and operates a series of Veteran and Family Hubs in the regions of Shoalhaven, Central Coast, Riverina, and Queanbeyan, with more planned to open soon in the Hawksbury Region, the Hunter Valley and Tweed Heads. These Hubs offer a veteran-centric, community-focused program offering a variety of wellbeing services for veterans and their families. The Hubs are based on the Department of Veterans' Affairs (DVA) Veteran Wellbeing Centre model, consisting of seven key elements:

- Health
- Education and training
- Housing
- Social support and connection
- Employment
- Income and finance
- Recognition and respect

RSL LifeCare's "Homes for Heroes" program provides practical solutions to assist veterans experiencing homelessness or at risk of becoming homeless. The program:

- provides safe short to medium term accommodation while the veteran's homeless related issues are being addressed;
- offers case management and support to assist the veteran into long-term sustainable living options with significant rent concessions;
- connects the veteran to other services offered by RSL LifeCare, including employment, education and training, financial assistance, DVA claims support and positive networks like RSL sub-Branches; and
- assists with putting in place strategies to respond to any ongoing requests from the veteran for information or advice as well as referrals to clinical and allied support where required.

RSL LifeCare also operates a "Spur Ranch" Equine Therapy program near Picton in NSW. The program is designed to support veterans in their mental and physical recovery and offers horse-riding activities that help participants reconnect with nature while building confidence, resilience and camaraderie.

Retirement Living

RSL LifeCare operates 27 retirement living villages across NSW and the ACT. These villages provide our retirement living communities the opportunity to enjoy their independence while benefitting from a supportive and engaging environment. Our villages offer security, safety, and services including gardening & lawns services, waste services and maintenance as well as providing communal facilities aimed at promoting community and social engagement.

Residential Care

RSL LifeCare operates 29 residential aged care homes across NSW and the ACT. Services offered at these homes include nursing care, convalescent care, respite, allied health, meals, laundry, and cleaning.

Residents at our homes may also enjoy a series of lifestyle programs, from events that promote active participation, skill sharing and gentle physical activity to more specialised programs including art therapy classes and more tailored support to enhance the lives of residents with memory impairments.

Home Care and Assisted Living Support

Home care is rapidly becoming one of the most vital sectors in aged care with RSL LifeCare offering a range of services designed to help individuals live safely and comfortably in their own homes include:

- Housekeeping – helping with light duties around the house
- Home nursing care
- Personal care – assisting with basic daily routines
- Transport – helping to get out and about
- Allied health services – providing diagnosis, recovery and quality of life
- Dementia care – supporting people to stay at home with loved ones
- Post-hospital care – assisting with home recovery
- Purchasing support equipment – helping purchase aids, equipment and home modifications
- Restorative care – improving functionality, vitality and strength
- Palliative care – supporting people with serious, chronic conditions
- Respite care – providing planned or emergency care

Our service locations

The locations of our service operations are as depicted in the below image.



Supply Chains

To enable RSL LifeCare to carry out its operations we rely on the services of specialist third party suppliers. All of our suppliers are either based in, or have offices in, Australia. RSL LifeCare procures goods and services from suppliers in the categories outlined below (in no order):

1. Medical Supplies	5. Supplementary labour	9. Workplace Supplies & Uniforms	13. Travel Services
2. Furniture & Equipment	6. Energy & Sustainability	10. Hospitality & Hygiene Supplies	14. Fleet
3. Pharmacy & Allied Health	7. Property Services & Facility Management (FM)	11. IT	15. Construction & Capital Works
4. Food	8. Marketing Communications & Events	12. Consultants & Professional Services	16. Homecare & Community Services



2. Modern slavery risks in RSL LifeCare's operations and supply chain

Operations

As noted above, RSL LifeCare is a service provider in the veteran services, aged care, and senior living sector. We operate in Australia only, a country that is identified as 'low risk' in the Global Slavery Index. Our employees are predominantly in NSW, with a smaller number in the ACT. At the time of compiling this statement RSL LifeCare has around 4,340 employees and a further 625 volunteers. All employees are remunerated in accordance with Australian employment conditions and standards, with our employees engaged either under an award, or on an employment contract.

RSL LifeCare has a range of corporate governance policies and procedures in place to safeguard the health and wellbeing of our people and promote a culture that treats everyone equitably, appropriately, and consistently. RSL LifeCare complies with the regulatory environment applicable to the aged care sector. We consider that risks of modern slavery practices affecting people employed by us is low.

Supply Chains

Having considered each of the categories of third-party suppliers used by RSL LifeCare we consider that those in the areas of building and construction, facilities management, agency labour, uniform manufacturing, food, and cleaning services are the categories of highest potential risk.

3. Actions taken to assess and address risks

RSL LifeCare's approach to managing modern slavery risk is guided by our risk management framework and processes.

Risk Management Governance

Board Approved Policy – The RSL LifeCare Risk Management Policy is approved by the Board and clarifies roles and responsibilities for managing all key organisational risks, including the risk of modern slavery.

Board Oversight – The Board and its Committees receive regular updates on material risks. These updates include any modern slavery risks and any associated compliance issues.

Executive Accountability – Each material risk has a designated owner from the RSL LifeCare Executive Leadership Team. The Executive Leadership Team coordinates annual reviews of each risk and reports key findings to the Board.

Risk Management Policy and Process

RSL LifeCare's Risk Management Policy supports RSL LifeCare in making risk-informed decisions and to provide the basis for evaluating and monitoring the risk profile of the organisation on an ongoing basis. The RSL LifeCare Risk Management Framework sets out the detailed organisational arrangements and tools that all staff should use to manage risks on a day-to-day basis.

RSL LifeCare promotes and aligns roles and responsibilities for risk management to the 'Three Lines of Defence' model which divides roles and responsibilities in the following ways:

- **First Line of Defence** - Functions that own and manage risk (Line Management). Line management has a responsibility to collect and analyse data and engage with residents and team members to ensure risks are identified, assessed, rated, treated, reported, and continuously improved upon.
- **Second Line of Defence** - Functions that oversee or specialise in risk management, management assurance and compliance and operate 'independently' from the operational lines of the business.
- **Third Line of Defence** - Functions that provide assurance are independent from the 1st and 2nd Lines of Defence. They independently test and verify that Line 1 and 2 defences are designed effectively and are operating as intended.

Supply Chain Risks

Our work to date continues to indicate that modern slavery risks are most likely to present further up the supply chains of our suppliers. Our focus during FY25 has been in relation to our procurement practices.

An area of key risk previously identified by RSL LifeCare was the use of frontline nursing and care staff supplied through labour hire agencies. RSL LifeCare has gone through a process of reviewing and consolidating its labour hire arrangements from approximately 60 different agencies to 10. Due diligence was undertaken in respect of each of these 10 suppliers (including in relation to corporate structure and trading and operations history) and each supplier has entered into a contract with RSL LifeCare, which contract requires the supplier to confirm they have systems and processes in place that address their modern slavery risks.

More generally in respect of RSL LifeCare's procurement processes we have:

- a Procurement Policy which sets out expectations for Suppliers to RSL LifeCare and requires due diligence to be performed in respect of all new suppliers to determine their compliance with the Modern Slavery Act as well as our suppliers' risk level and control procedures to supply chain and modern slavery risks.
- a Supplier Request Form, in the form of a questionnaire and which requires any new Supplier to complete the Form and confirm their awareness of and compliance with the Modern Slavery Act.
- a Supplier Code of Conduct that addresses modern slavery requirements in respect of the Supplier's own operations and supply chains;
- updated RSL LifeCare's suite of standard form procurement contracts to include representations from each supplier that they comply with their legal obligations under the Modern Slavery Act 2018; and
- sought to ensure that each of RSL LifeCare's suppliers are aware of RSL LifeCare's requirements and standards, including the existence and content of the Supplier Code of Contracts.

RSL LifeCare also has internal reporting systems in place that enable staff, customers and contractors to report any issues that are of concern, including matters that may relate to modern slavery or not. We have had reports about excessive working hours with these reported issues allocated to the appropriate internal teams for investigation and resolution.

4. Assessing effectiveness and consultation

Risk Management Framework - The Board Audit and Risk Committee, as part of their quarterly governance processes, validate/endorse Management's view of the effectiveness of the Risk Management Framework and the implementation and effectiveness of controls to manage risk.

RSL LifeCare also has an internal audit program that is undertaken by independent auditors each quarter who review key areas of risk and provide a view of the design and operating effectiveness of key risk management controls and provide recommendations on any identified gaps. Additionally, we undertake a quarterly Executive attestation process to ensure the effectiveness of the Risk Management Systems and Framework.

Policies - RSL LifeCare schedules periodic and regular reviews of our policies, including our Supplier Code of Conduct, Risk Management and Procurement policies. As part of our ongoing improvement, RSL LifeCare will look to include (as part of our review) specific or additional modern slavery provisions in these and other policies where relevant.

Contracts - We also regularly review our precedent contracts. Our procurement contracts include specific clauses dealing with modern slavery risk management. There are other contracts, for example, construction or works contracts, that we will be reviewing to include the same or similar clauses.

Procurement - Undertaking due diligence inquiries, as part of our procurement and tendering processes, assists with providing us with early-visibility of a supplier's potential modern slavery risk. In addition, RSL LifeCare monitors compliance with our Supplier Code of Conduct by requiring all suppliers to complete a questionnaire acknowledging same. Suppliers will not be approved and onboarded at RSL LifeCare unless and until they have provided such acknowledgment.

Grievances - RSL LifeCare monitors and reports to the Board of Directors issues or trends that are reported through our grievance, complaint and whistleblower processes. This will include any issues or concerns about modern slavery practices with RSL LifeCare or our supply chains.

Consultation

In preparing RSL LifeCare's modern slavery response consultation has taken place with functions which operate across both RSL LifeCare and Morshead Home for Veterans and Other Aged Persons Limited. This includes legal, procurement, property and human resources.



5. Board approval

The Board of Directors of RSL LifeCare Limited reviewed and approved this modern slavery statement on 4 December 2025.



Sangeeta Venkatesan
CHAIR OF THE BOARD



Janet Muir
CHIEF EXECUTIVE OFFICER

Signature: 

Signature: 