



IRT Modern Slavery Statement 2021

Reporting entity, structure, operations and supply chains

Illawarra Retirement Trust ACN 000 726 536 (“IRT Group”) is an Australian public company limited by guarantee. It trades under a number of registered business names including IRT Aged Care Centres, IRT Retirement Villages, IRT Home Care, IRT Catering, IRT Academy and Age Matters.

IRT Group is one of Australia’s largest community based seniors’ lifestyle and care providers with over 2,800 employees. It operates throughout New South Wales, Australian Capital Territory and Queensland and has its headquarters in Wollongong NSW.

Our mission is to create communities where seniors achieve their optimum quality of life. We’ve been delivering on this for more than 50 years.

As a public benevolent institution, IRT Group returns profits to the community through customer benevolence, grants and advocacy programs.

Our main operations include:



20 Aged Care Centres



32 Retirement Villages



Home Care Services



Catering business



Registered training organisation
IRT Academy



Charitable foundation
Age Matters

All of our operations are based in Australia.

We predominantly procure products and services from the following categories of supply chain:

- healthcare/medical services, equipment and consumables, including allied health professionals;
- cleaning supplies and suppliers;
- food and related consumables, and
- construction and facilities management/maintenance.

Risks of modern slavery practices in IRT Group operations and supply chains

IRT Group recognises that modern slavery is a crime which exploits human victims and which can take many forms including slavery, servitude, forced labour and human trafficking. We have a zero tolerance approach to causing, contributing to, or being directly linked to, modern slavery practices.

We have a strong focus of safety for our employees, contractors and volunteers. Most employees are recruited through online advertising, employee referral and other proactive searches by our internal recruitment team.

With our operations based in Australia and our workforce predominantly employed under an Enterprise Agreement, the risk of IRT operations directly causing or contributing to modern slavery practices is low.

We have identified that we may cause, contribute to, or be linked to modern slavery practices through our supply chain arrangements. We have identified our top suppliers (by spend) and assessed the risk of modern slavery practices based on a number of risk factors including:

- Supplier country of operation – we recognise that suppliers may operate in countries with a higher risk of modern slavery practices.
- Supplier category – some industries are recognised as having a higher incidence of modern slavery.
- Workforce – suppliers that operate with a contingent workforce can have a higher risk of modern slavery.

Based on these risk factors, our engagement of suppliers in the building and construction industry is considered to have the highest potential of all our supply categories, to cause, contribute or be linked to modern slavery practices. This potential is based on:

- the prevalence of sub-contracting arrangements and the frequent use of labour hire companies; and
- use of building materials associated with labour exploitation and modern slavery such as concrete, timber, steel, quarried stone products, glass, construction textiles and other goods and services.



Actions taken to assess and address risks of modern slavery practices in IRT Group operations and supply chains, including due diligence and remediation processes

In order to assess the identified risks of modern slavery practices in our operations and supply chains, IRT Group reviewed our data in relation to the suppliers we engage, with a particular focus on those to whom we devote the most annual expenditure.

This exercise reinforced that the focus for our first Modern Slavery Statement should be on our construction sector. Additionally, we consider it prudent that a key priority from the outset is ensuring that our own internal practices related to labour are in order.

During FY20, IRT Group has undertaken a range of due diligence processes in relation to our own labour practices, and our construction sector, including:

- reviewing our employment and labour related internal policies
- reviewing our construction contracts and engagement processes with our suppliers.

In relation to IRT Group's internal employment and labour practices:

- We have HR policies and procedures to ensure compliance with legislative requirements, and fundamental rights at work including dignity at work and prevention of discrimination throughout employment
- Before making an offer of permanent employment to a candidate, we check their eligibility to work in Australia including ensuring that they have a legitimate passport and work visas where relevant
- We pay all staff an appropriate wages for work performed, in accordance with an Enterprise Agreement approved by the Fair Work Commission
- We have a proactive Reporting of Serious Wrongdoing Policy and the use of a reporting hotline which is widely promoted to all current and former employees, volunteers, directors, officers, contractors and suppliers of IRT, their relatives and dependents.
- All of our policies and procedures are made available to staff via the IRT intranet.
- Training has been provided to IRT Group procurement employees to increase their awareness of modern slavery risks and our responsibilities under the Modern Slavery Act 2018 (Cth).

In relation to our engagement of suppliers in the construction industry:

- Contractual provisions are included in our standard construction contracts requiring suppliers to:
 - ✓ Comply with all applicable Modern Slavery Laws;
 - ✓ Not engage in Modern Slavery Like Practices;
 - ✓ Thoroughly investigate labour practices to ensure that there is no Modern Slavery used in its operations or supply chain;
 - ✓ Confirm that all necessary processes, procedures, investigations and compliance systems to ensure it can provide the warranties under this clause at all relevant times have been put into place; and
 - ✓ Confirm that all necessary actions and investigations have been undertaken to validate the warranties provided.
- We strive to build supportive, transparent and collaborative relationships with suppliers and clearly communicate our expectations to them.

IRT's whistleblowing policy (the Reporting of Wrongdoing Policy) provides a framework to deal with any reports of suspected modern slavery practices within IRT. The policy applies to current and former employees, volunteers, directors, officers, contractors and suppliers of IRT, and their relatives and dependents who are all eligible to be disclosers.

How IRT Group assesses the effectiveness of the actions being taken to assess and address risks of modern slavery practices in its operations and supply chains

IRT Group will assess the effectiveness of its actions to identify, evaluate and assess modern slavery risks by:

- reviewing and reporting on issues raised through our Reporting of Wrongdoing (Whistleblower) Policy
- including consideration of modern slavery risks in internal audits
- continuing to collaborate with our suppliers and determining their awareness of modern slavery risks
- conducting regular reviews of our supplier expenditure data to ensure that we identify emerging risk areas
- conducting an annual review of our response to modern slavery
- conducting regular review of our policies and procedures, which includes those that relate to modern slavery risk

Consistent with the Modern Slavery Act, the Board of IRT will review the organisations actions to address modern slavery risk and approve the annual Modern Slavery Statement.

Other information which IRT Group considers relevant

IRT Group is committed to acting ethically and with integrity in all our relationships. This commitment includes the protection of human rights and lawful, fair and ethical work practices.

We expect our service providers, suppliers and contractors to share this commitment to ensure that modern slavery is not taking place in their organisations or within their own supply chains.