



St John

Modern Slavery Statement 2024



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 2023 to 30 June 2024 (**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 operations, 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 three customer-focused operating divisions, supported by two Corporate Services divisions.

Service Stream 1: Preventative

SJWA offers a range of nationally accredited first aid courses and shorter non-accredited training options across Perth Metropolitan and Regional WA. The preventative training programs are designed to enhance the overall health of the WA community. Primary school programs offer age-appropriate first aid classes for students in Kindergarten to year 6. SJWA courses also encompass tailored programs for industry and support for aging well. The Group offers a range of first aid supplies and equipment through physical shop locations, field servicing operations and online webstores ensuring people and businesses have access to the right first aid equipment when they need it.



Service Stream 2: Community

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 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 2907¹ events during the Reporting Period.

Industry Medical Services provides a range of services to corporate customers, including qualified and experienced medical teams 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

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 team members serve, spread over 2.5 million square kilometres.

SJWA also runs the State Control Centre, which fields Triple Zero calls. The State Control Centre received 307689² Triple Zero calls during the Reporting Period.

Patient Transport Services caters to non-emergency or 'booked' patient transport needs and is resourced by low or medium 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 SJWA driver attends

before, during and after the appointment to provide further peace of mind.

Corporate: People

The People stream supports all departments in the 'human' element of the Group's business.

Corporate: Enterprise Performance

The Enterprise Performance stream supports Service Streams 1, 2 and 3 and the People stream in securing and maintaining the Group's position from the perspective of finance, IT, business intelligence/program management, property, procurement, project management, legal, risk and governance.

Office of the Group CEO

Each of the above five streams report directly to the Group CEO. The Office of the Group CEO includes the Corporate Affairs and Strategy teams.

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 team members is paramount throughout 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. In addition, SJWA's team members have 24/7 access to an internal wellbeing and support program who assist by providing cost free counselling and guidance.

The Group engages 8660 team members throughout the State of Western Australia (3594 paid and 5066³ⁱ volunteers) and is committed to providing services with the highest standards of personal and corporate integrity.

With a dedicated People 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 within operations is low. The Group has established and embedded policies, procedures, and governance practices that include, but are not limited to, recruitment and selection, onboarding, visa management, grievance resolution, fitness for work, and wellbeing and support.

¹ St John WA FY24 Annual Report

² St John WA FY24 Annual Report

³ St John WA FY24 Impact Report



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 operations.

The Group also procures goods and services related to a range of support business functions including office and corporate administration, building and construction, large scale inventories, contracting services, security, cleaning, catering, information technology infrastructure and uniforms. The Group's highest risk exposure to Modern Slavery is in the procurement of goods and services and the Group has improved processes, procedures, education of team members and auditing in these areas, as outlined elsewhere in this Statement.

Whilst the majority of purchasing is through suppliers based in Australia; it is acknowledged that many of the products and services the Group procures have complex global supply chains. It is also acknowledged that various procured goods are purchased through multi-tier supply sources which creates complexities in reviewing Modern Slavery risks and obtaining required information. The Group uses a risk assessment tool to identify the level of Modern Slavery risk for procurements and recommend appropriate due diligence in the selection of suppliers and terms to govern the contractual relationship. Ongoing monitoring has focussed on supplier surveys.

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

Textile production remain high risk industries globally, with growing risks within agriculture, construction, cleaning/hospitality and some areas of manufacturing. The sectors and countries from

which some key suppliers source have a high risk of modern day slavery.

For example, SJWA procures the following:

- Fast moving consumer goods
- Electronic equipment
- Uniforms
- Cleaning services
- Construction and labour hire services

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 for 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 prevalence of modern slavery. The Global Slavery Index of 2023 of the Minderoo Foundation ranks countries based on government response to modern slavery. SJWA procures goods from countries which may present a high risk of modern slavery:

- **China:** SJWA procures medical consumables and branded items such as first aid kits, pens and promotional items.
- **India:** SJWA procures uniforms and electronics which may be manufactured in India.
- **Bangladesh:** SJWA procures uniform products that are manufactured in Bangladesh.

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.

The Group Board agreed to a series of high level Environmental, Social, People and Governance (ESPG) targets which outline SJWA's commitment to, among other aims, ensuring that SJWA manages its social licence to operate by improving processes around how the organisation deals with "vulnerable people".

As part of embedding the new Group corporate structure and leadership team, a series of strategy development workshops were held. 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 responsibilities were noted from a Social, Economic and Legal impact perspective.

To further minimise modern slavery risk in the supply chain, SJWA commenced a comprehensive "Procurement with Confidence & Agility" program, 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); and 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 slavery risks. Other key focus areas for reducing risk are using more local suppliers 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 described below and summarised in Table 1: Effectiveness Assessment.

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 and providing risk rating levels before SJWA awards 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 the Group to move towards proactive best practice in modern slavery (as reflected in the Group's FY25 priorities below).

- Enhancing education in procurement processes and ethical sourcing and the Modern Slavery Policy, including targeted sessions on better procurement practices for the management team.
- Updating the Supplier Survey using prioritised risk-based approach to improve the survey from previous iterations.
- Additional emphasis on pre-tender risk assessment, risk-based contract clauses and technical assessment of modern slavery controls for those goods/services with high risk of modern slavery which gives the Group the ability to automatically discount vendors based on findings of high unaddressed risk of modern slavery.
- 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.

Completing a short form walkthrough audit of the new Modern Slavery policy and processes as well as the Modern Slavery risk assessment tool.

Procurement of Operational Uniforms for 5,500+ team members (high risk sector, product, geographic and supply chain):

1. Assessed bidders' approach to modern slavery, including Modern Slavery Statements.
2. Incorporated contract clauses aligned to the "Long Form" options in the Australian Government Modern Slavery guidance.
3. Selected a supplier with strong ethical sourcing policy and processes, including SEDEX certification. SEDEX (Supplier Ethical Data Exchange) is the largest collaborative platform for sharing ethical supply chain data to help to reduce risk and improve supply chain practices.



Governance and Policies

The Group's 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 continued to improve during the Reporting Period. The Group completed a comprehensive review of the Code of Conduct and 11 supporting policies and group standards. Management of policies by the Group is subject to an annual audit to ensure SJWA retain ISO9001 (Quality Management) accreditation.

The Group is continuing to review and assess procurement policies and associated documentation to further refine the modern slavery framework and also business processes in respect to modern slavery, ethical procurement and upholding human rights principles in procurement. One example is in the updated Whistleblowing Policy. Enhancements include utilising an external expert agency to manage whistleblowing allegations and conduct investigations, and training of key staff.

Team Members may go into people's homes and workplaces and have insight into patients living arrangements. The Group recognises that team members may be in a position to identify signs of modern slavery. Therefore, during the year, the Group worked on a Safeguarding Vulnerable People Policy which outlines measures that team members can take to protect vulnerable people from abuse, neglect, or exploitation during their interactions with SJWA by recognising, responding to and reporting concerns. Since this policy was adopted shortly after the Reporting Period more information will be provided on implementation and training in next year's Modern Slavery Statement.

Employment practices

The Group's robust policies and procedures for recruitment and remuneration of employees, ensure compliance with applicable employment laws and regulations. Validation of Working Rights occurs as a part of the onboarding process to eliminate risk of employees working under illegitimate circumstances

There has been an introduction of an International and National relocation guideline in the Reporting Period which details compensation for, and terms

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 ensure compliance with applicable Awards, Employment Agreements, and employment laws.

The remuneration department conducts yearly audits of remuneration reviews of those employees excluded from coverage of an industrial instrument to ensure their salaries remain in excess of any potentially applicable Award. Those employees covered by an Award or Agreement have automatic salary increases consistent with the applicable industrial instrument.

Volunteer Practices

Volunteer team members are a fundamental component of SJWA's operations. For this reason, volunteers are afforded maximum inclusivity to ensure they have working conditions (including access to uniforms, wellbeing support, training and education, corporate benefits, reward and recognition etc) which are comparable to paid team members whilst simultaneously recognising the gratuitous nature of their service.

At the time of commencement, volunteers are required to read and execute a Volunteer Expectation Agreement which makes clear their rights, roles and responsibilities as a volunteer. This agreement binds both the volunteer and SJWA. In addition, upon commencement, volunteers are required to undertake training which affirms their rights and responsibilities as a volunteer whilst also detailing their operational scope.

To ensure volunteers remain competent and confident in their scope, they receive ongoing education through SJWA's Continuing Education Program.

SJWA's priority is ensuring volunteers are supported and do not suffer any detriment from their service. For this reason, SJWA maintains a Volunteer Advocacy Team who advances any issues or concerns. In addition, the organisation pays volunteers an honorarium where they complete shifts of a certain length and reimburses any out-of-pocket costs associated with volunteering.

Training and education of team members

Procurement education continues within the Group focusing 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 and is to be incorporated in both induction and ongoing training for team members in 2024/25. This will include emphasis on awareness of modern slavery risks and whistleblowing.

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 which was extensively reviewed and updated during the Reporting Period. 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 continues to recognise that knowledge sharing, including targeted training for team members, 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 the Reporting Period have been encouraging in their effectiveness specifically in improving procurement processes and understanding Modern Slavery risk in the purchasing business units. This continues to be a primary focus for FY25 and should give greater confidence to teams dealing with suppliers and managing difficult or educational conversations around combatting modern slavery practices.

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

Key focuses for FY25 will include:

Identify, assess and commence strategies to address the key risks for cleaning and

construction arrangements, deemed to be at elevated risk of modern slavery.

- Consistently apply the risk-based approach to new tenders and contracts.
- Target the supplier survey to capture updates to modern slavery key risk indicators.
- Review and refresh the Ethical Sourcing and Modern Slavery Policy.
- Provide training for the Procurement team and Heads of Department in the Ethical Sourcing and Modern Slavery Policy.
- Provide Accountable and Ethical Decision Making training to key team members initially and progressively to all team members.
- Rollout the updated Whistleblower Policy and the Safeguarding Vulnerable People Policy.
- Roll out the internal review program for procurement and supply chain management in greater depth across the Group.
- SJWA and Apollo Health Ltd to continue working together to integrate procurement and supply chain knowledge, experience and learnings to ensure continued consistency in procurement, modern slavery compliance and alignment with organisational values.



Table 1: Effectiveness Assessment

Actions taken to satisfy FY 24 priorities	Achieved
Enhance number of suppliers monitored in relation to Modern Slavery – <i>by increasing by over 60% or 17 suppliers the number of reviews completed.</i>	✓
Incorporate appropriate modern slavery clauses into all contracts, commensurate with the risk – <i>by incorporating the Attorney General Department's Model Modern Slavery contract clauses into our standard contracts aligned with the level of risk.</i>	✓
Establish reporting mechanisms, associated with contractual clauses / requirements for our highest risk contracts – <i>by requiring that suppliers have mechanisms to enable reporting of modern slavery safely and establishing a Whistleblower policy and procedures and engaging outside expert to manage any investigations that may arise.</i>	✓
Develop an internal audit program for procurement and supply chain management – <i>completed a walkthrough audit of MS Policy, processes and risk assessment tool.</i>	✓
Ongoing enhancement of governance, procurement framework and practices, and training as outlined elsewhere in this Statement – <i>procurement staff attended best practice training and developed a handbook with risk assessment tool and pre-qualification requirements for bidders. Whistleblower policy approved by the Board and Accountable and Ethical Decision Making training has been drafted (postponed from FY 2024 to FY2025 due to competing priorities).</i>	✓
Mechanisms for workers and suppliers or their workers to anonymously report actual or suspected incident of modern slavery in our or supplier operations – <i>see comments above regarding the Whistleblower Policy.</i>	✓
SJWA to assist executive and senior manager at Apollo Health Ltd 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 - <i>Procurement and Apollo Health identified and assessed the level of risks across the Apollo supply chain and substantially negotiated the inclusion of standard form Modern Slavery terms with a third party supplier (which represents the majority of consumables spend for Apollo Health). The agreement was finalised at the start of the FY 2025 Reporting Period.</i>	✓



Consultation

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

The majority of procurement and sourcing for the 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.

The SJWA procurement team has worked with Apollo Health to identify and assess the level of Modern Slavery risk across the supply chain. The majority of consumables spend for Apollo Health is with EBOS Group Australia Pty Ltd (trading as EBOS Healthcare). Apollo Health successfully negotiated the inclusion of standard form Modern Slavery terms for that contract (which was finalised at the start of the FY 2025 Reporting Period).

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 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.

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 2023 to 30 June 2024.

A handwritten signature in black ink, appearing to read 'Sally Carbon', written over a dotted line.

Ms. Sally Carbon
Chairperson

12 December 2024