

MODERN SLAVERY STATEMENT 2021



Making every day the best it can be

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Disclosure Note

This statement has been made on behalf of Allity Aged Care.
This Statement covers all entities owned and controlled by Allity.

This statement is approved by Allity’s Board of Directors.

Ben Frewin,
Chairman

About this Statement

This statement has been prepared pursuant to s11 of the Australian Modern Slavery Act 2018 (Cth) (the **Act**) and is the first modern slavery report for the reporting entity.

The reporting entity for the purposes of the Act is Allity's parent entity, Australian Aged Care Partners Holdings Pty Limited (the **Parent Entity**) ACN 162 265 983. The Parent Entity's offices are located at Level 1, 39 Albany Street, Crows Nest NSW 2065. This statement applies to every wholly owned entity of the Parent Entity and will be referred to collectively in this statement as Allity (**Allity**).

This is Allity's first Modern Slavery Statement, which outlines the steps taken to identify, manage and mitigate the risk of modern slavery specific to our operations and supply chain during the financial year ending 30 June 2020.

What is Modern Slavery

At its broadest, the term 'modern slavery' as it is used around the world, refers to a large range of exploitative crimes. The Australian regulatory scheme defines modern slavery to incorporate conduct that would constitute an offence under existing human trafficking, slavery and slavery-like offence provisions set out in the Commonwealth Criminal Code. Modern slavery therefore encompasses slavery, servitude, child labour, forced labour, human trafficking, debt bondage, slavery-like practices, forced marriage and deceptive recruiting for labour or services.

Modern slavery is estimated to affect over 40 million people worldwide today. Modern slavery practices have also been identified in Australia across a wide range of industries and locations including labour exploitation on farms, in restaurants and domestic services.

About Allity

Allity is a privately owned residential aged care provider.

We instil a philosophy of individualised care throughout our Homes. We aim to provide quality care and services in home-like environments where our residents are always valued and respected and a place where they are proud to call Home.

Our Vision:

From the very beginning, our vision has been clear "To Change the Face of Aged Care" and in doing so, change how aged care is perceived.

Our Mission:

To "*Make every day the best it can be*" is how we support the achievement of our Vision. A commitment to making every day the best has meaning for everyone, whether it be for our residents, their families or our employees. No matter if you are in the kitchen, driving the bus or working in our offices, being part of Allity means you strive for to do this for yourself and everyone around you.

Our Values:

At the heart of everything we do are our values of:

- Respect
- Integrity
- Passion
- Accountability
- Teamwork
- Innovation

Organisational Structure and Operations

Collectively, Allity is comprised of entities that undertake the following functions.



The Allity structure includes the Parent Entity, consolidation entities, and inactive entities. However, all entities within the Allity Group operate for the direct or indirect purpose of providing residential aged care and retirement village operations and management services wholly within Australia.

Allity currently operates approximately 4,000 allocated places across 44 operational residential aged care facilities in NSW, VIC, QLD and SA. Allity also currently operates or manages 6 retirement villages. Allity’s workforce employs in excess of 4,400 employees.

Supply Chains

Allity had approximately 1,500 direct suppliers in FY20 (being the financial year ended 30 June 2020) that provided a range of goods and services to support Allity’s operations. Our supply chain is diverse and encompasses small local businesses through to national and global supply chains.

Examples of Goods	Examples of Services
<ul style="list-style-type: none"> > Medical equipment > Medical consumables > Furnishings > Food supply > Textiles > Building materials 	<ul style="list-style-type: none"> > Allied Health > Nursing agency staff > Cleaning > Trade services for refurbishments and maintenance > Lifestyle and entertainment > Specialised IT systems

Responsibility

Allity has a robust corporate governance framework in place. The Head of Quality and Risk is ultimately responsible for managing the human rights risks, and they are directly accountable to Allity’s CEO and Board.

The Allity Board is responsible for overseeing Allity’s operations and reviewing key areas of risk including human rights risk. Recommendations are made to the Board by key stakeholders below.



Assessment, Identification and Mitigation of Modern Slavery Risk

Allity has a comprehensive set of policies and procedures that articulate its values, work processes and expectations of employees and suppliers. These policies and procedures are regularly reviewed and updated. The following policies are the most relevant in addressing modern slavery risks within Allity and our supply chain:

Policy/procedure	Purpose
Employee Handbook	How we expect Allity Employees to behave in the workplace towards each other and our consumers.
Grievance Resolution Process	Sets out our internal grievance procedures including assessment, investigation and remediation.
Modern Slavery Code of Conduct	Outlines our expectations of suppliers and contractors to comply with modern slavery legislation and working cooperatively with Allity to mitigate risks.
Whistleblowing Policy	Sets out misconduct subject to whistleblowing, mechanisms for reporting and protections provided to whistle-blowers.
Corporate Governance Policy	Outlines framework including the mechanisms, processes, roles and responsibilities by which Allity is controlled and directed.
Complaint Management Policy	Provides Allity’s clear and consistent approach to complaints handling.
Enterprise Agreements (EAs)	Across group to ensure fair conditions and wages for a majority of our team members.

FY20 Modern Slavery Risk Mitigation Initiatives

Enhanced workforce function: including labour analysis and enhanced on boarding to assess risk within our own operations and reduce reliance on external labour hire.

Modern Slavery Code of Conduct: created to outline our expectations of suppliers and contractors to comply with modern slavery legislation and working cooperatively with Allity to mitigate risks.

Supplier risk review: comprehensive analysis undertaken of high risk suppliers by industry and Allity spend.

Supplier self-assessment tool: created and distributed to 'first tier' of suppliers to assess modern slavery risk within Allity's supply chain.

Procurement: standard supplier agreements have been updated to ensure that suppliers of goods and services contracted by Allity agree to comply with all Modern Slavery Laws and Allity's Modern Slavery Code of Conduct

This year Allity started developing its corporate understanding of modern slavery risk. Allity developed key processes to assess areas of elevated modern slavery risks within its business and supply chain.

Allity recognises that modern slavery risk may occur in our organisation and extended supply chain. We are aware the level of risk is influenced by factors such as vulnerable populations, product and service category, industry and geographic location. Accordingly, we have tailored our risk processes to ensure that we are focusing our efforts on those areas that present an elevated risk.

Within our own business, Allity acknowledges that modern slavery risks associated with workforce characteristics due to the nature of the work and required skillset are the most significant in our operations. To mitigate this, the business has enhanced its workforce function and oversight of home-based rostering processes this year. It has also strengthened on boarding systems to engage as many staff as possible on contracts with the business directly, so as to reduce reliance on (externally contracted) Agency staff wherever possible. This lowers our modern slavery risks associated with workforce characteristics. The nursing and care sector is subject to industry enterprise agreements to ensure fair pay and working conditions for at-risk labour. Allity regularly liaises with unions; each home has the opportunity to appoint a union representative. Additionally, staff have access to internal grievance mechanisms and an anonymous whistleblowing hotline which is operated by a third party.

Allity is strongly committed to working with sustainable and ethical suppliers and service providers. Within our supply chain, we have assessed established a 'first tier' of 68 suppliers within all the products and services we procure, first by assessing risk with all top spend suppliers and then within the categories of consumables, food supply, and people services, as they present an elevated risk of modern slavery.

As required to deliver the care and services to our residents across our homes, Allity engages third party labour providers. Many of these workers are immigrants, temporary migrant workers, international students, or other vulnerable groups who may be less aware of their rights and subsequently, susceptible to exploitation. Third party labour providers have been reviewed within our first tier supplier group.

Each supplier was required to complete self-assessment tool to review the risk of modern slavery practices. Specific risks were reviewed by Allity's legal team. Allity has also established a Modern Slavery Code of Conduct for suppliers of goods and services. This was directly distributed to our first tier suppliers and is available for download on Allity's website.

Allity has updated its standard supplier agreements to ensure that suppliers of goods and services contracted by Allity agree to comply with all Modern Slavery Laws and Allity's Modern Slavery Code of Conduct. Suppliers are also contractually required to notify Allity of any actual or suspected Modern Slavery in its supply chain which has a connection to Allity and to provide all reasonable assistance to support Allity's own Modern Slavery compliance.

Assessing the effectiveness of our actions

Allity will assess the effectiveness of the above actions through a variety of review mechanisms including:

- Annual review of the effectiveness of our policies and procedures relating to modern slavery, assessing if they have served their purpose in the day to day aspects of the organisation. Policies and procedures will be updated as required.
- Annual risk assessment audit of suppliers through self-assessment tool.
- Regular review and improvement of Allity's due diligence processes as they relate to suppliers.
- Review of reported risks reported internally or externally for example via whistleblowing, grievance process etc.
- Workplace pulse surveys conducted bi-annually. Employees can anonymously provide feedback about satisfaction, working conditions etc.

Future Commitment

Plans for FY21

Allity has a number of actions planned for FY21 that directly relate to our efforts to identify, manage and mitigate our risks of modern slavery:

- Implementation of review and assessment mechanisms as described above.
- Creation of an internal modern slavery reporting register to allow Allity to track any potential or suspected breaches of the Act in its own organisation or by suppliers.
- All new and recontracted major suppliers for FY21 will be assessed prior to recontracting in the following high risk categories:
 - Medical consumables;
 - Food supply;
 - Student placement agreements;
 - Telecommunications and IT.

Plans Beyond 2021

Allity has identified additional and ongoing actions for the future to ensure a more robust risk mitigation strategy for modern slavery moving forward:

- Training and capacity building in Allity's key stakeholders and team members responsible for procurement on risk identification and due diligence processes.
- Other employees will be provided education to build awareness of global modern slavery to raise awareness of risks, be able to identify and confidently report incidents.
- Continued cooperation with our suppliers to make sure that Allity partners with suppliers that share our modern slavery commitment.
- Expand use of supplier self-assessment tool to 'second tier' of suppliers.
- Update existing policies to ensure a more robust framework to identify and mitigate modern slavery risk.
- Broaden supplier engagement and utilisation of self-assessment tool.