

THE BETHANIE GROUP INC
(ABN 60 992 323 642)

Modern Slavery Statement

FY25



Bethanie



Bethanie's Mission is to demonstrate the love of God by positively changing the way Australians experience ageing — every customer, every family, every community, every day.

Chair's statement

Bethanie's Mission is grounded in the belief that every person has inherent dignity and worth. Our response to Modern Slavery flows from this conviction: to stand with those who are oppressed or vulnerable, and to seek equity and fairness where there is exploitation.

We recognise that the brokenness of the world gives rise to injustice and abuse. Yet we are called to be a community of hope, reflecting God's compassion in both word and deed. In this spirit, Bethanie continues to nurture a workplace where people flourish, seeking to continually improve conditions and benefits for our employees, and continuing to support access to programs that enhance wholistic wellbeing.

Through careful oversight of our supply chains, and by holding our suppliers and partners to account, we ensure our work honours the same values of dignity, rights, and love that shape our Mission. Additional scrutiny remains in place for larger contracts to guard against modern slavery risks.

Guided by our faith, Bethanie is dedicated to the elimination of modern slavery and to stand in solidarity with all the people who are vulnerable or at risk of abuse or exploitation.

This statement was approved by the Bethanie Board on 22nd October 2025.¹



A handwritten signature in white ink that reads "D Forsyth".

Diana Forsyth
Chair

¹ - See section 16(2)(a) of the Modern Slavery Act 2018 (Cth).

Identify the reporting entity,²

This is Bethanie's Modern Slavery Statement, prepared to meet the requirements of the Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2025 (FY25). Bethanie is a not-for-profit incorporated association pursuant to the Associations Incorporation Act 2015 (WA).

Describe the reporting entity's structure, operations and supply chains,³

Bethanie is an incorporated association which operates aged care services in Western Australia and is registered with the Australian Charities and Not-for-profits Commission (ACNC). Bethanie has three subsidiaries, being Bethanie Housing Ltd, Bethanie Primary Care Limited, and Vacant Beds Limited.

Bethanie has a relationship with the Churches of Christ in Western Australia (CoCWA). CoCWA oversees the direction of the organisation via a Board who decide on policy and give strategic direction to the Chief Executive.

The appointments of all Bethanie Directors are approved by a Board of Trustees.

The Bethanie Board is assisted by the following Board Committees, which consist of representatives drawn from both the Board and Executive:

1 Risk and Assurance Committee

2 Growth, Property and Technology Committee

3 People, Culture and Governance Committee

4 Clinical and Care Governance Committee

Bethanie's operations

Bethanie operates its services throughout Western Australia. Bethanie's business segments include:



Residential Care Services: This segment includes the provision of aged care services in nursing homes and aged care facilities.



Independent Living Unit Services: This segment includes the supply of accommodation in retirement villages and independent living unit villas. The sales of lease for life licences are also included in this segment.



Community Care Services: This segment covers the provision of community aged care service programs which are funded by the State and Commonwealth Governments.



Community Housing: This segment includes the activities associated with the construction of community housing for Bethanie Housing and the provision of community housing for seniors.



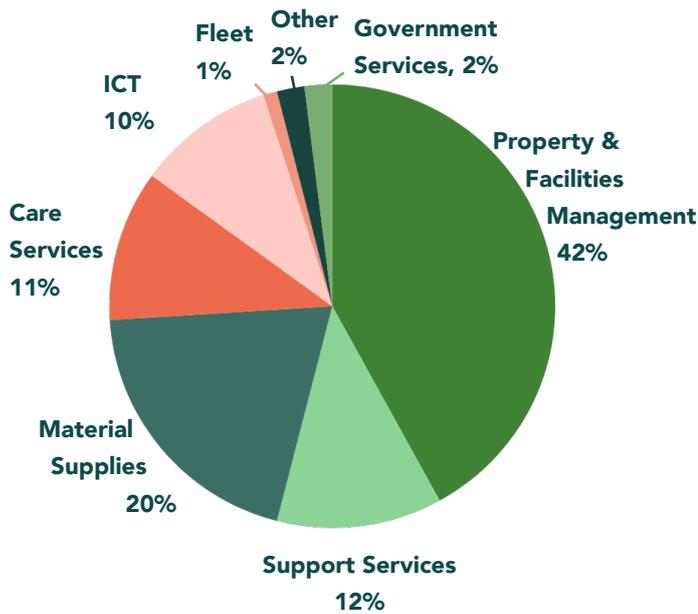
Bethanie Projects: This segment mainly includes the costs associated with building construction supervision.

2- See section (1)(a) of the Modern Slavery Act 2018 (Cth).

3 - See section 16(1)(b) of the Modern Slavery Act 2018 (Cth).

Supply chain

We continue to prioritise our preferred suppliers with a significant amount of spend through those suppliers and contractors. These suppliers and contractors provide and supply maintenance, construction, goods, consultancy services and agency staff. Spend with Bethanie’s suppliers continues to be greater than \$60 million per annum, categorised by the Procurement categories below:



Bethanie’s procurement processes are focused on continuous improvement and supported by appropriate governance via procurement policies and procedures, along with Bethanie’s Mission Discernment Framework prioritising its Mission.

Risks of modern slavery practices in the operations and supply chains facing Bethanie₄

Bethanie’s Mission and business area have remained consistent with previous years, meaning that Modern Slavery risks remain the same, although we seek to limit opportunities for Modern Slavery through our on-going actions. We continue to employ staff in line with the relevant legislation,

providing a safe workplace, and working towards enhancing our people’s experience.

In Bethanie’s supply chain, a review of spend categories has determined that the greatest risks continue to be with:

- 1 Construction
- 2 Agency staff
- 3 Cleaning services
- 4 Pharmaceutical products
- 5 Food and grocery
- 6 Cleaning supplies
- 7 Apparel and uniforms

Actions taken by Bethanie to assess and address these risks₅

Bethanie continues to limit opportunities for Modern Slavery in its operations and supply through the actions detailed below during FY25.

Operations

Bethanie is committed to upholding the principles of freedom of association and the right of employees to engage in collective bargaining, whether independently or with the assistance of third parties. Recognising the importance of mitigating the risks of modern slavery, we place immense value on our people and continuously strive to enhance their experience.

The fundamental human rights of all our people, particularly those who may be vulnerable, are of utmost importance. We are committed to ensuring that all employees are free from prejudice based on race, culture, gender, sexuality, and other personal characteristics. Our policies provide for:

4 - See section 16(1)(c) of the Modern Slavery Act 2018 (Cth).

5- See section 16(1)(d) of the Modern Slavery Act 2018 (Cth).

- **Right to Privacy:** Bethanie safeguards each individual's right to privacy, maintaining confidentiality and protecting personal information in line with our ethical standards and legal requirements.
- **Health and Safety:** We prioritise physical and mental well-being through rigorous safety standards and wellness initiatives, fostering a workplace that supports our team members holistically.
- **Freedom of Expression:** We uphold the right of every employee to express their views openly within our community, ensuring all voices are respected in decisions that impact their work and well-being.

We recognise the unique needs of a diverse workforce, including many team members for whom English is a second language, students, and individuals unfamiliar with bargaining and workplace change processes. To address potential vulnerabilities and reinforce protections against exploitation, we prioritise:

- **Union Engagement:** By informing and consulting with Unions during bargaining and workplace change processes, we ensure employees have trusted representatives advocating for fair treatment. We provide accessible and clear information to support understanding and engagement throughout these processes.
- **Clear Communication:** Our communication strategies ensure all employees are informed of their rights, benefits, and protections. This includes face-to-face discussions, written resources, and digital tools tailored to diverse needs.

Over the past year, Bethanie has implemented new measures to improve employee conditions and benefits, these include:

- **Enterprise Agreement Negotiations:** We have finalised negotiations with employee and their representatives for our three enterprise agreements, ensuring employees covered by these agreements had a voice regarding their terms and conditions of employment, minimum

rates of pay, and other entitlements. These agreements are aligned with the latest legislative changes to ensure fairness and transparency.

- **Employee Benefits:** We have expanded our benefits program to help our people get more from their pay and support their overall health and wellbeing. This includes options to maximise take-home pay through salary packaging and other savings programs and providing access to health and wellbeing initiatives such as discounted gym memberships, and flu and covid vaccinations

Looking ahead, over the next 12 months, Bethanie plans to introduce and enhance our people's experience through programs including:

- **Leadership Development Program:** A new program designed to empower leaders and foster a culture of growth and excellence.
- **Performance Development and Management Framework:** We will further enhance our Performance Development and Management Framework to drive continuous improvement and professional advancement.
- **Enhanced Onboarding Programs:** We are committed to enhancing our new employee onboarding programs to ensure a seamless and supportive transition for new team members into the Bethanie community.
- **Human Capital Management System:** We will continue to enhance our Human Capital Management System to further streamline HR processes, strengthen data-driven decision-making, and improve the employee experience. Upcoming improvements will integrate learning and development, recruitment and onboarding, and other tools to support our people throughout their employment journey.

Supply Chain

Bethanie continues to monitor risks and create awareness in its supply chain through actions that have been imbedded in its day-to-day processes. We continue to limit opportunities for modern slavery through consolidating the approach from previous years through:

- Approaching suppliers representing 70% of its annual spend to detail their actions to limit modern slavery and the risks within their supply chains.
- Continuous improvement in tender processes over a number of years to ensure awareness.
- Selection of suppliers aligned with Bethanie's Mission through selection criteria.
- Modern Slavery information required as part of requests for tender.
- Clauses in standard contracts that require actions related to Modern Slavery.

Describe how the reporting entity assesses the effectiveness of these actions,

Continued improvement in employee conditions and benefits, along with creating awareness in its supply chain, through processes requiring information and commitments, supports limiting opportunities for modern slavery within Bethanie and with its supply chain partners.

Process of consultation with associated entities,

All associated entities have been consulted on Modern Slavery risks and the contents of Bethanie's Modern Slavery Statement FY25. These entities comply with Bethanie processes and policies and report regularly to Bethanie.

6 - See section 16(1)(e) of the Modern Slavery Act 2018 (Cth).

7 - See section 16(1)(f) of the Modern Slavery Act 2018 (Cth).

 Call 131 151
 bethanie.com.au



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