

## Mildura Health Modern Slavery Statement 2024

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### 1. Structure and operations

This statement is made by Mildura District Hospital Fund Limit ABN 13 078 202 089 for the year ending 31 December 2024.

Mildura Health:

- Is a public company limited by guarantee and is a resident in Australia.
- Is a not-for-profit open access health insurer providing health insurance policies to eligible customers in Australia.
- Is headquartered in Mildura, Victoria.
- Employs approximately 45 people.
- Operates two brands, Mildura Health Fund (MHF) and Mildura Health Private Hospital (MHPH).

Most employees are employed directly and on a permanent contract and there is a process of assurance that employees are paid in accordance with awards and employment contracts and that entitlements are provided. Therefore, the operations risk assessment focused on third party suppliers.

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### 2. Supply Chain

Suppliers to Mildura Health provide goods and services to support the operations with none being on-sold. Generally, the relationships with suppliers are stable and long term, with suppliers located or having a presence in Australia. The main types of products and services identified include:

- Products directly provided by suppliers such as office supplies and corporate uniforms.
- Services provided by suppliers such as legal services, investment management services, health service provider contracting services, banking, utilities, telecommunications, auditing and actuarial services, cleaning services, security services, maintenance services, software and hosting services, sponsorships and information technology support and advisory services.
- Product and services used by indirect suppliers to MHF's supply chain such as electronic services to the suppliers of the membership management and claims processing system and hosting services.

Insured persons utilise the services of health care providers located in Australia, and then the insured persons will claim benefits against their health service costs. While not directly a supply chain service, consideration should be given to health service providers because of contracting arrangements in place with some providers.

Mildura Health also owns and operates a Private Hospital (MHPH). MHPH procure medical-related items which include but not limited to medical consumable products, medical equipment (including maintenance), pharmaceuticals, food and nutrition, linen services, utilities, agency labour, pathology and radiology services, pharmaceuticals, personal protective equipment, textiles, travel, consultancy services, facility management including security, information & communication technology (ICT) and advertising/marketing.

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### 3. Risk Identification

Whilst MHF has a fairly straight forward supply chain, MHPH may have a potential to be exposed to a number of modern slavery risks due to the diversity of products and services. These potential risks are due to associated geographic locations, industries, and regulatory systems further down those supply chains.

Some of the potential general risks identified in MHPH supply chain includes:

- Labour practices in offshore manufacturing facilities, some of which are located in Southeast Asia;
- Labour practices in sourcing of raw materials, including rubber and cotton; and
- Industry risks associated with textiles, electronics and cleaning services.

In addition, we have identified the following potential high-risk areas specific to healthcare:

- Surgical and examination gloves;
- Surgical instruments; and
- Linens and gowns.

Given the complexity in such extensive supply chains, we will work on a risk assessment methodology to improve the visibility of high-risk areas within the hospital supply chain.

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### 4. Mitigation, remediation and due diligence

Mildura Health adopts a risk-based approach to prioritise and apply mitigating strategies to higher risk product and service providers. The key mitigation activities are:

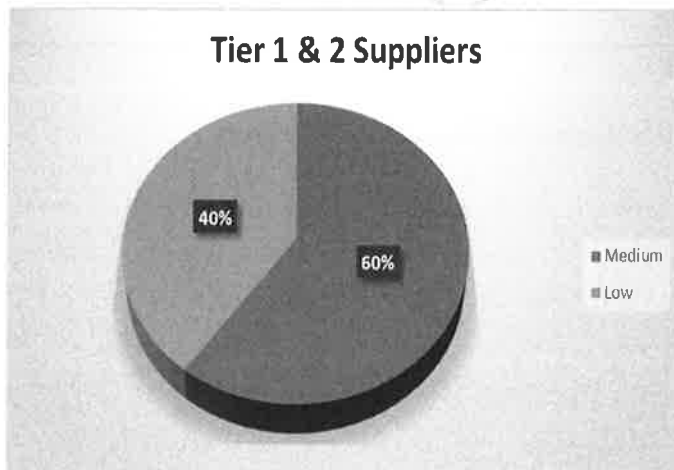
- Strengthening contracts with priority product and service providers in relation to their compliance with and operations under anti-slavery laws, which may include inspection and auditing of records.
- Obtaining evidence or warranty of compliance with modern anti-slavery laws.

Other key mitigating strategies are:

- New product and service providers being screened to assess potential human rights impacts.
- Staff being encouraged to report modern slavery risks through the established compliance reporting processes, with incidents recorded and managed.

Consistent with Mildura Health's stated values, where potential situations of modern slavery are identified, we will always endeavour, as far as possible, to do the right thing by the potential affected person. Each issue will be addressed as it arises with the principles of respect and fairness applied.

Analysis of supply chains of both MHF and MHPH has been undertaken. Of the 30 Tier 1 (>\$250k) & 2 (>\$100k to <\$250k) suppliers for MHPH none were determined to be High Risk. Supplier questionnaires have also been sent to all suppliers in the analysis.



Risk Rating	No.
High	0
Medium	18
Low	12

## 5. Assessing the effectiveness

The effectiveness of actions undertaken to assess and address modern slavery risks will be through:

- An annual executive management assessment of Mildura Health’s response to modern slavery. Executive management has assessed that Mildura Health’s response is appropriate relative to its size and complexity. There is a continued expectation of business partners making commitments in relation to modern slavery.
- Having no reported incidents of Mildura Health causing or contributing to modern slavery practices. There have been no reported incidents.
- Having no product or service providers prosecuted for slavery or human trafficking activities. There are no reported prosecutions.
- Monitoring frequency and trends of reported modern slavery risks. Trends are monitored on an on-going basis.

## 6. Consulting with controlled entities

During the reporting period this statement covers, we have actively engaged and consulted with our subsidiary MHPH in the development of this statement. We discussed details of the Modern Slavery Act 2018’s reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

## 7. Contact Information

Address	79 Deakin Avenue Mildura, VIC 3500
Postal	PO Box 5046 Mildura, VIC 3502
Telephone	03 5023 0269
Email	memberexperience@mildurahealthfund.com.au

**8. Approval**

This statement was approved by resolution of the Board of Directors of Mildura Health.

Insert signature



**Terrance Hill**

**Chair**

11/12/24.

DD MONTH YEAR

**9. Mandatory criteria**

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

<b>Mandatory Criteria</b>	<b>Page number/s</b>
a) Identify the reporting entity.	1
b) Describe the reporting entity's structure, operations and supply chains.	1
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	1 & 2
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	2
e) Describe how the reporting entity assesses the effectiveness of these actions.	3
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	3
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	3