Modern Slavery Statement

1 July 2025 – 30 June 2026

Helping Hand
new aged care

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Helping Hand provides services across many lands, traditionally owned by the Kaurna, Narungga, Ngadjuri, Nukunu, Barngarla, and Peramangk people. Helping Hand acknowledges the Traditional Owners of the land on which we work and provide services. We pay respect to their culture and heritage, and Elders past, present and emerging.

Helping Hand

Introduction

Helping Hand Aged Care Incorporated ("**Helping Hand**", "**we**", "**our**") is a not-for-profit aged care, home assistance, retirement living and residential care provider. Helping Hand has been serving the South Australian community for over 70 years and cares for over 7000 South Australians.

Helping Hand prioritises independence, choice, freedom and quality of care for our residents, employees, our community and stakeholders. We are guided by our core values of Excellence, Respect, Compassion and Community and our overarching vision of being the most trusted and exceptional partner in aged care and wellbeing services. Our operations are underpinned by our mission to create communities and experiences to enable older people to live their best lives.

During the reporting period, Helping Hand relocated to a new, amalgamated head office at 180 Port Road, Hindmarsh SA 5007 bringing together previously separate teams into a single location to support a more integrated, "one team" approach. We also commenced redevelopment works at our Yeltana and Copperhouse Court Residential Care Homes in regional South Australia (Whyalla), which will deliver an additional eight residential care rooms, along with upgrades to existing rooms and amenities. This redevelopment will enhance our ability to expand and improve services for the local community. Further redevelopment works have also commenced at our North Adelaide residential facility.

In addition, we have expanded our Home Care footprint through the establishment of allied health hubs in Golden Grove and Parafield Gardens, supporting improved access to integrated care services for clients. We have also completed improvements at our Port Pirie site, including the introduction of a café to enhance the experience for residents, clients, and visitors.

Alongside these initiatives, we have progressed our digital roadmap, focusing on system enhancements and improvements to support more efficient, integrated, and responsive service delivery across the organisation.

Our commitment to ensure that we achieve and continue to live out our core values and vision in everything that we do coincides with our priorities for the reporting period. Our focus was to address core operational and supply chain risks which are prevalent within the aged care sector. This has included:

- continuing to expand our supply chain tracing efforts with a focus on our food, uniform and linen suppliers; and
- implementing new due diligence measures on designated high-risk industries, with a particular focus on cleaning and labour hire suppliers.

We detail this within this modern slavery statement for the reporting period of 1 July 2025 to 30 June 2026, which is our seventh modern slavery statement.

Criteria 1 – Reporting Entity

The reporting entity is Helping Hand Aged Care Incorporated (ABN 19 636 743 675). Helping Hand does not have any subsidiaries that it owns or controls.

Criteria 2 – Structure, Operations and Supply Chains

Structure

Helping Hand operates solely in South Australia with our head office at 180 Port Road, Hindmarsh SA 5007.

Helping Hand is a not-for-profit incorporated association and is registered with the Australian Charities and Not-for-Profits Commission (ACNC). Helping Hand does not own or control any other entities.

As a not-for-profit incorporated association, Helping Hand is governed by a board of directors who oversee our governance to ensure that we are performing to our highest level, meeting our clients' needs and acting in accordance with our core values and vision. Our executive team is responsible for our overall operations and help us deliver the best possible services for our clients.

We employ 2319 employees, of which 1540 are permanent and 779 are casual, as well as 182 volunteers across more than 20 locations and provide services to over 7000 clients in their own homes and in ours. We prioritise engaging employees and volunteers with a diverse range of skills and training levels which is reflective of the diverse society that we operate within and serve.

Operations

At Helping Hand, we provide a range of aged care services across South Australia for our clients, which we summarise in the following categories:

Retirement living
Helping Hand has seven retirement living communities. We provide services to these communities such as maintenance and gardening services to the retirement living homes.

Residential Care
Eleven of our operating locations offer services such as respite, personal care and nursing, meals, laundry, and cleaning.

Support at Home
We provide assistance to clients in their own homes across metropolitan Adelaide, the Eyre Peninsula, the Barossa Valley, the Mid North, Lower North, Whyalla, and York Peninsula.

Wellness Hubs
Helping Hand has two wellness hubs and provides wellness services to our clients such as allied health and nursing, social support, and exercise classes.

Our operational locations are as follows:





Helping Hand

Our suppliers

Our suppliers[1] are critical to our operations and assist us in carrying out our services by either providing goods or services that:

- are directly used in our client services; or
- assist our workers in the provision of our client services.

We endeavour to maintain long-term and stable relationships with our suppliers. We are proudly South Australian based and endeavour to use local suppliers where possible. However, this is not always possible, particularly if there have been supply chain disruptions or for our regional areas where there may be limited alternatives for suppliers of certain goods and services because of availabilities in the area.

Furthermore, given Helping Hand operates in a complex industry requiring the procurement of a diverse range of products and services, our supply chains are equally complex. Accordingly, interstate and / or international suppliers are required in certain circumstances.

The table below outlines the total number of Tier 1 suppliers engaged by Helping Hand in FY25 and FY26:

FY26	**FY25**
743 Tier 1 Suppliers	1,172 Tier 1 Suppliers

[1] We define our supply chains as follows: **Tier 1 suppliers** are the suppliers that we directly engage with and enter into contractual arrangements with, **Tier 2 suppliers** are the suppliers that our Tier 1 suppliers engage to supply Helping Hand with goods and services, **Tier 3 suppliers** are the suppliers that our Tier 2 suppliers engage to provide goods and services to the Tier 1 supplier, **Raw Materials suppliers** are the suppliers that that provide the raw materials that are used up the supply chain to provide goods to Helping Hand.

Our supply chains

Helping Hand requires a diverse range of suppliers to fulfill our services to our clients. We summarise our suppliers into eight broad categories:

Consumables

Administrative services

Professional services

Facility supplier

Electronics

Apparel and laundry

Labour services

Medical

Where are our suppliers based?

Helping Hand's Tier 1 suppliers are primarily based in Australia with a small percentage of suppliers operating globally.

As shown in our supply chain maps below, as you delve deeper into our supply chains down to raw material level, our supply chain becomes very global and diverse, with various tiers of suppliers based on most continents.

Locations of Tier 1 Suppliers (Primary)

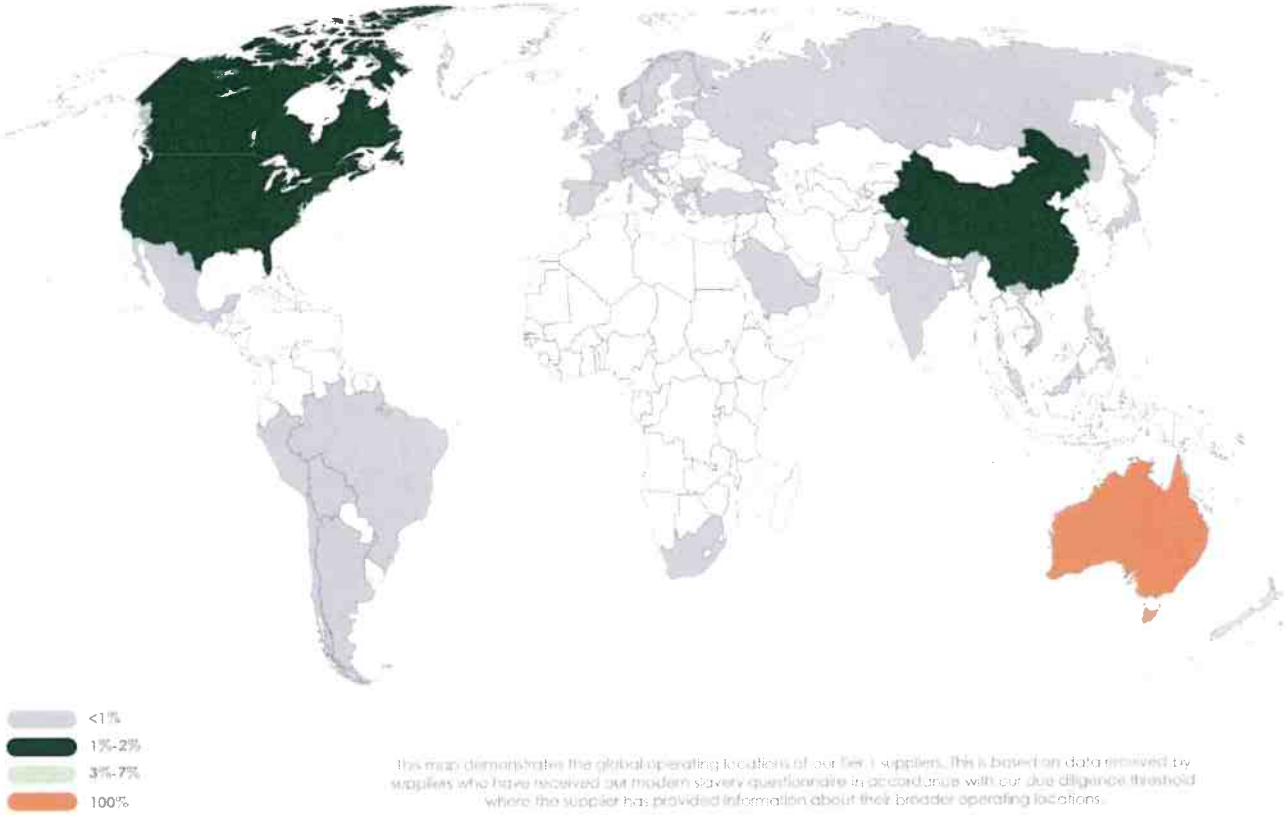


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This map demonstrates the operating locations of the suppliers that we engage based on the addresses supplied to us by the suppliers. Accordingly, 100% of our suppliers' primary operating locations are in Australia.

Helping Hand

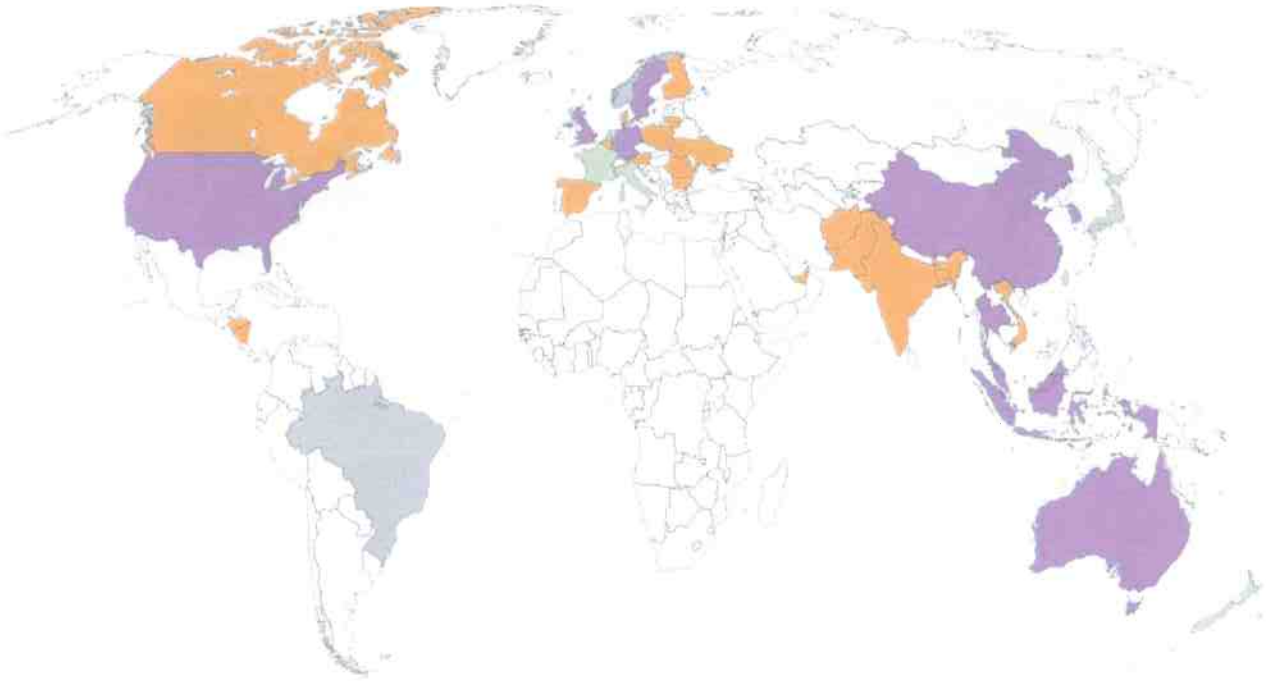
Locations of Tier 1 Suppliers (Global)



This map demonstrates the global operating locations of our Tier 1 suppliers. This is based on data received by suppliers who have received our modern slavery questionnaire in accordance with our due diligence threshold where the supplier has provided information about their broader operating locations.

Helping Hand

Locations of Tier 2, Tier 3 and Raw Materials Suppliers



This map demonstrates the locations of suppliers deeper in our supply chains. This is based on data received from Tier 1 and Tier 2 suppliers via our modern slavery questionnaire, supply chain tracing exercises and questionnaires sent directly to our tier 2 suppliers.

Helping Hand

Criteria 3 – Risks of Modern Slavery

The assessment of modern slavery risks in our operations and supply chains is a continual undertaking which Helping Hand aims to improve on in each reporting period. Helping Hand responds to changes in risk and the improvement of global risk methodologies and implements these changes into its due diligence and risk frameworks.

The foundation of Helping Hand's modern slavery risk assessments is the UN Guiding Principles on Business and Human Rights ("**UNGP's**"). The UNGP's are a set of guidelines for entities to use to prevent, address and remedy human rights abuses committed in business operations and supply chains.

A fundamental aspect of the UNGP's is the "cause, contribute to or directly linked to" model which is used to assess the risks of modern slavery and the appropriate course of remedy when an entity either causes, contributes to, or is directly linked to the risk or instance of modern slavery.

Examples of situations where an entity might cause, contribute to, or be directly linked to modern slavery is shown in the table below:

Cause	Modern slavery that an entity causes itself via its activities or omissions that results in harm. *Example – a supplier that uses forced labour in its operations.*
Contribute to	Activities or omissions to facilitate, enable or incentivise harm. *Example – engaging a supplier that is unusually low-cost compared to other competitors in the industry which requires the use of child labour to lower the labour cost of production.*
Directly linked to	Being linked to harm through products, services, or business relationships *Example – engaging a supplier that is later found to exploit workers.*

How do we assess risk?

Helping Hand takes a multi-factorial approach to the assessment of risk. One aspect of our supplier due diligence framework is our risk matrix. This process assesses suppliers against risk factors based on their sector and industry, the product and services provided by the supplier, geographic / jurisdictional risk based on the location of their operations and entity specific risks.

Sector and industry risks
For example, manufacturing plant (higher risk) vs professional services firm (lower risk)

Product and services risks
For example, cleaning services (higher risk) vs professional consulting services (lower risk)

Geographic risks
For example, China (higher risk) vs The Netherlands (lower risk)

Entity risks
For example, a small factory (higher risk) vs a national business (lower risk)

The data points in our risk matrix have been developed using the following sources:

- Global Slavery Index
- Corruptions and Perceptions Index
- The ten principles of the UN Global Compact
- The Universal Declaration of Human Rights
- Modern Slavery Act Guidance for Reporting Entities
- NSW Government Procurement Guidance and Risk Management Framework
- US Department of Labour – List of Goods Produced by Child Labour and Forced Labour

The risk matrix is one aspect of our multi-faceted supplier due diligence framework. We utilise our risk matrix as part of our initial risk assessment processes to identify inherent modern slavery risks which then informs our targeted due diligence efforts as outlined in Criteria 4.

Our supplier risk assessments are reviewed regularly by Helping Hand and our third-party advisors and changes to the supplier's risk profile are notified to us via the MS Portal. Any significant high-risk findings are reported up through Helping Hand's channels on an as needs basis. Helping Hand's risk profiles change based on factors such as new sourcing regions (i.e., new suppliers, existing suppliers sourcing from alternative suppliers) and emerging risk factors (for example, the heightened risks associated with the newly introduced PALM scheme for labour hire in Australia) which influences due diligence and mitigation efforts. Helping Hand also receives advice from its third-party advisors around what high risk suppliers to target for supply chain tracing to assess risk exposure deeper in the supply chains.

Operational risks

Helping Hand has strong internal governance structures, supporting the overall low risk profiling of our operations. A key feature of our internal governance structures are our frameworks which are strongly embedded within our organisation. This includes an easily accessible grievance mechanism through our *Whistleblower Policy* which is available to all employees, contractors and other "eligible whistleblowers" that work with, and for, Helping Hand. Helping Hand also has other grievance mechanisms for personal employment-related grievances such as our *Workplace Grievance Resolution Procedure*.

Our procurement department, including our Procurement Manager (who is the Modern Slavery Project Leader), are the contact points for employees to report any modern slavery instances and broader notifications, questions or concerns to, which our employees are aware of through our employee modern slavery training and our Modern Slavery Policy.

Helping Hand operates within the aged care industry which is a highly regulated industry with ongoing reporting and disclosure obligations. Compliance with rigorous legislative compliance is part of our business-as-usual operations which naturally extends to how we approach our modern slavery compliance. More broadly, we adhere to legislative and regulatory requirements which are underpinned by our strong governance structures and policies which uphold protections related to workplace rights, freedom of association and freedom from workplace discrimination.

Helping Hand requires the use of labour hire, which is relied upon for roles such as nurses and personal carers and acknowledges it is an inherently high-risk aspect of our operations. Labour hire is high-risk due to the short-term nature of labour hire use and the lack of oversight over the operations of labour hire entities. Labour hire has a high inherent risk rating due to the prevalence of risk factors such as forced labour, debt bondage and underpayment which pose a risk to people, particularly those on temporary visas, including visa arrangements under the PALM scheme. Our steps to mitigate this high inherent risk and the residual risk of labour hire providers is described in Criteria 4.

Supply chain risks

Helping Hand has identified the following supplier categories as key supply chain categories where there are inherent heightened modern slavery risks. Helping Hand acknowledges that the risks of many of the supplier categories outlined below are increasingly prevalent deeper into their respective supply chains (i.e., beyond Tier 1 suppliers directly engaged by Helping Hand) and that the below risk assessments are informed by inherent risk rather than actual risk given limited oversight of the full extent of these supply chains. This limitation has informed due diligence efforts focused on assessing risks beyond Tier 1 suppliers to improve oversight of these supply chains and enable an assessment of actual modern slavery risk.

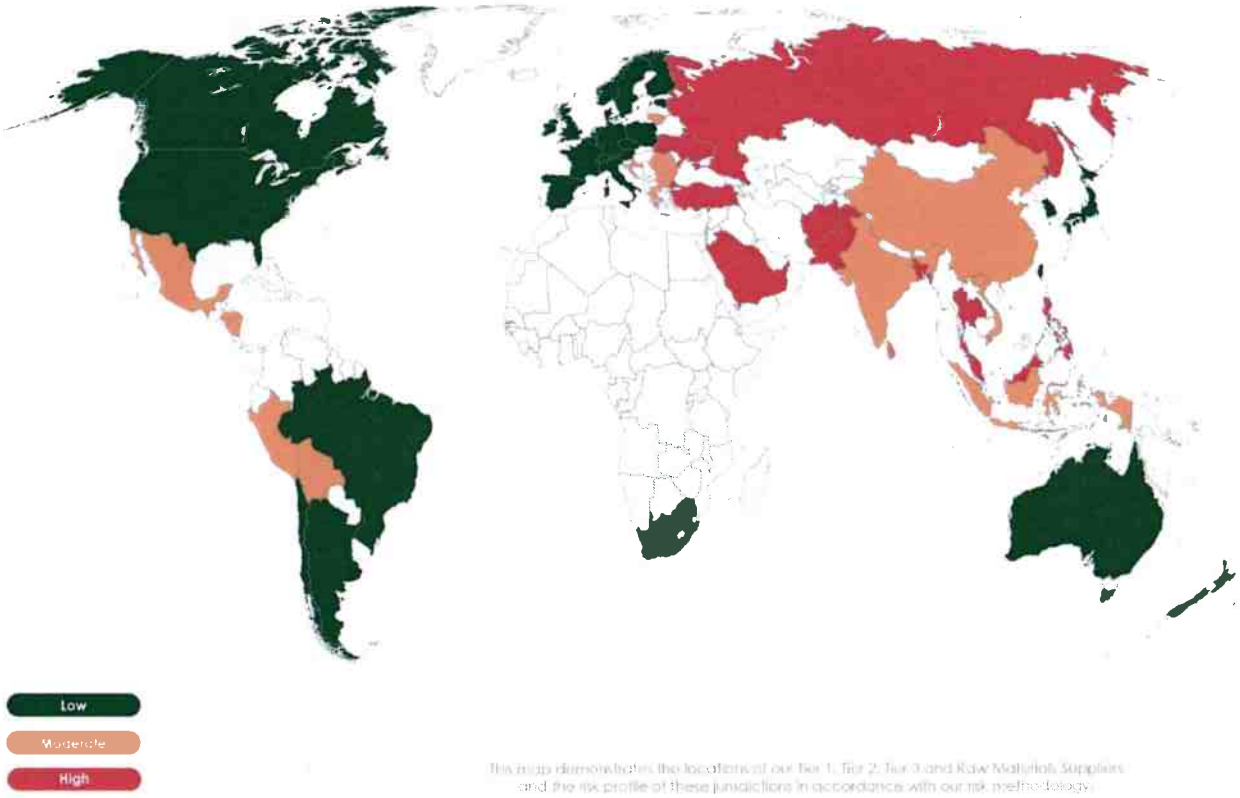
The residual risk of these supply chains is described in Criteria 4.

Category	**Cause, contribute to, directly linked to Helping Hand**	**Likelihood**	**Impact to people**	**Broader Risk**
Consumables (food and beverages, catering and non-perishables)	Directly linked	High	Risk factors include: • Forced labour • Debt bondage • Withholding of identity documentation • Human trafficking The reliance on migrant workers for particular food commodities (for example, fruit picking and seafood) heightens the risk to people.	Specific supply chain risks exist within consumables such as fish and rice which is utilised in providing our services to our residents.
Medical suppliers (PPE and medical equipment)	Directly linked	Moderate	Risk factors include: • Forced and bonded labour • Deceptive recruitment • Poor labour and WHS practices • Excessive overtime • Withholding of identity documentation. The reliance on migrant workers within these supply chains heightens the risk to people.	Face masks, single use gloves and gowns and face shields and other PPE have heightened risks of modern slavery, particularly from countries such as Malaysia. Further, the equipment and materials that makes up most medical equipment is manufactured overseas. These overseas jurisdictions

Category	Cause, contribute to, directly linked to Helping Hand	Likelihood	Impact to people	Broader Risk
				heighten the modern slavery risks of these supply chains.
Cleaning and waste disposal	Directly linked	High	Risk factors include: • Underpayment (often through subcontracting arrangements) • Debt bondage • Wage theft • Excessive overtime Withholding of identity documents. These risks are exacerbated by the prevalence of migrant workers (who are often on temporary employment arrangements) in this industry.	The cleaning and waste disposal industry employs a large number of temporary workers. This means that these roles are attractive to migrant workers and individuals with limited English, increasing financial vulnerability.
Uniforms and Linen	Directly linked	Moderate	Risk factors include: • Forced labour (including from state sanctioned labour) • Child labour • Debt bondage.	Uniforms and linen carry heightened modern slavery risks due to the modern slavery risks associated with raw material supply chains such as cotton. Particular jurisdictions carry heightened modern slavery risks. An additional factor which contributes to the heightened risks of these supply chains is the complexity of these supply chains and the

Category	Cause, contribute to, directly linked to Helping Hand	Likelihood	Impact to people	Broader Risk
				many suppliers involved in these supply chains, from the raw material extraction and processing of the raw materials into the finished product.

Supply Chain Risk



This map demonstrates the locations of our Tier 1, Tier 2, Tier 3 and Raw Materials Suppliers and the risk profile of these jurisdictions in accordance with our risk methodology.

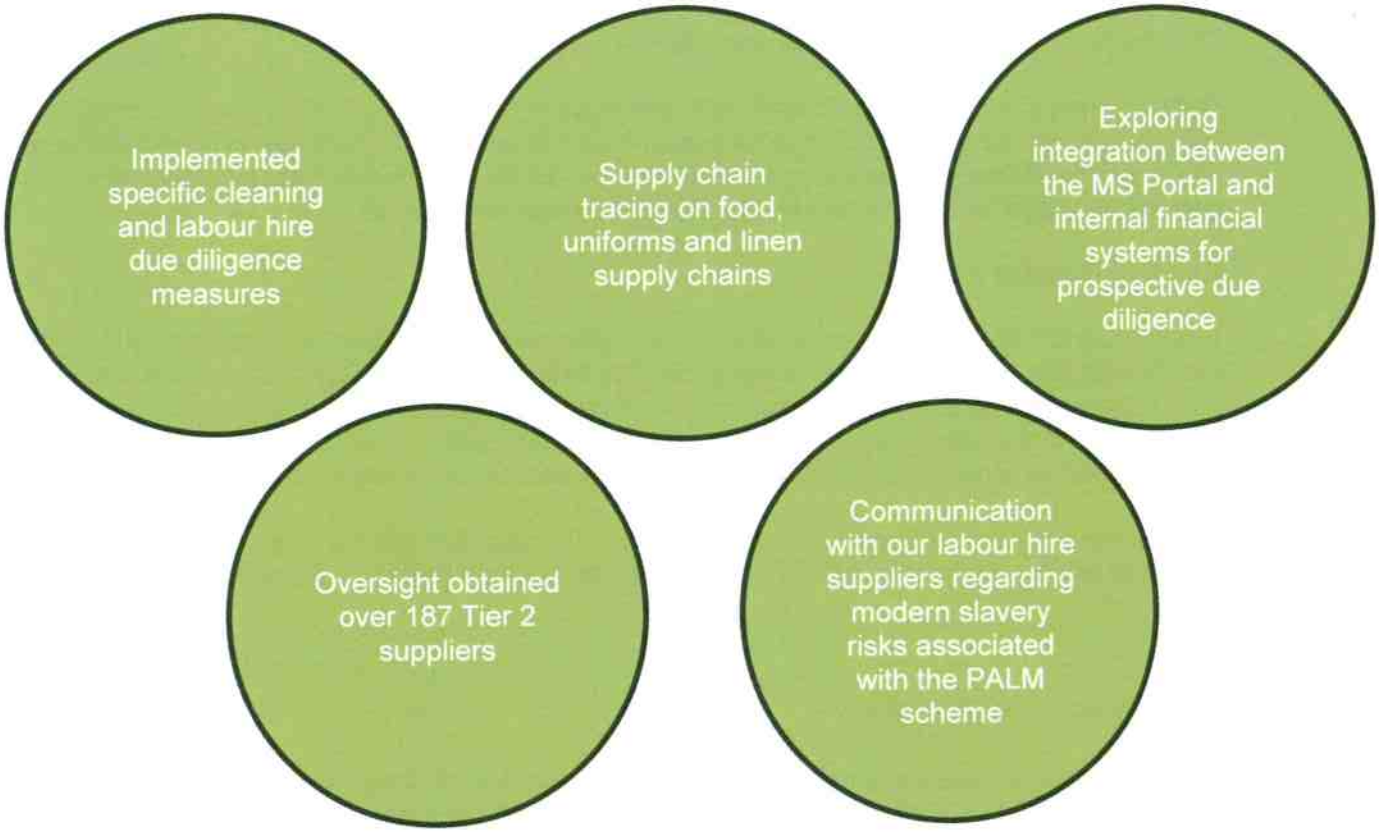
Helping Hand

Criteria 4: Actions to Address Modern Slavery

The focus of our modern slavery compliance framework during FY26 has been to

- continue to expand our supply chain tracing efforts with a focus on our food, uniform and linen suppliers; and
- implement new due diligence measures on identified high-risk industries, with a particular focus on cleaning and labour hire suppliers.

Summary of actions taken in this reporting period



Guidance and systems

Third party guidance

Helping Hand continues to engage a third-party advisor who assists us with the management and continuous development of our modern slavery compliance framework in each reporting period. Our third-party advisor oversees and guides us on the preparation and implementation of our annual action plan which we develop to set out our goals and action items for the reporting period.

Modern Slavery Portal

Through our third-party advisor, we have continued utilising our Modern Slavery Portal ("**MS Portal**") which assists us in undertaking due diligence on our suppliers, mapping our supply chains and otherwise managing our suppliers.

The MS Portal automates aspects of our due diligence through automated risk assessments and notifications. It also allows us to communicate directly with our suppliers, have visibility of when a supplier has opened correspondence or started an action item (for example, knowing when a supplier has started their modern slavery questionnaire) and produce reports and data analytics to manage our supply chain information.

Governance and oversight

Our modern slavery governance structures

Helping Hand's Procurement Department continues to have ultimate oversight over Helping Hand's modern slavery compliance framework. The Procurement Manager (who is the Modern Slavery Project Leader) reports to a member of our Executive who is responsible for, and has general oversight over, Helping Hand's modern slavery compliance.

Existing Policies and Codes

Helping Hand's Modern Slavery Policy and Supplier Code of Conduct are the foundations of Helping Hand's modern slavery compliance. The Supplier Code of Conduct is embedded in our new supplier onboarding form, ensuring that all new suppliers who are onboarded through our prospective due diligence process read and declare to abide by the Supplier Code of Conduct. The prospective due diligence framework is discussed further in this Criteria 4.

The Modern Slavery Policy and Supplier Code of Conduct are due for review in FY27 and therefore will form part of our FY27 action items as outlined further in Criteria 7.

Grievance mechanisms

Helping Hand has various grievance mechanisms available to report grievance and concerns to. An example of this is Helping Hand's whistleblower policy which is available for all employees, volunteers, contractors, suppliers and other eligible whistleblowers to access and use to report grievances and concerns. Helping Hand also has other grievance mechanisms for personal employment-related grievances such as our *Workplace Grievance Resolution Procedure*. These grievance mechanisms are available for the reporting of concerns and complaints regarding modern slavery.

Supplier Due Diligence

Over the last two reporting periods, Helping Hand has been rolling out and integrating a prospective due diligence workflow for new suppliers. Prospective due diligence means that due diligence is conducted as suppliers are being engaged early in the procurement lifecycle by Helping Hand. This has benefits including:

(a) expectations are established between Helping Hand and suppliers early in the relationship, meaning that suppliers are more likely to engage in the due diligence process; and

(b) risk can be identified prior to Helping Hand formally engaging the supplier.

In the last two reporting periods, this rollout has prioritised suppliers engaged by the Home Care and Residential departments. During this reporting period, Helping Hand has taken steps towards further expansion of this process by exploring integration opportunities between our MS Portal and internal financial systems to expand the extent of new suppliers subject to prospective due diligence.

Our standard due diligence processes

Irrespective of whether suppliers have prospective or retrospective due diligence conducted, Helping Hand undertakes the following due diligence steps through our MS Portal.

- **Independent Screenings**: all new suppliers undergo independent due diligence screening through a third-party database called LSEG. Independent screenings integrate a layer of risk management into Helping Hand's due diligence which assesses risk beyond modern slavery risk (i.e., other environmental, social and governance (ESG) risk factors). We screen our suppliers for:
  - Integrity risks (e.g., bribery and corruption).
  - Environmental, Social and Governance Risks (e.g., modern slavery, environmental degradation, and regulatory enforcement).
  - Data and cyber risks (i.e., data security).
  - Operational and quality risks (i.e., product and service quality).
  - Identity risks (i.e., transparency).
  - Financial risks (i.e., financial irregularities).

  All existing suppliers are continuously monitored through LSEG, meaning that Helping Hand are notified if there is a change to the screening result of the relevant supplier.
- **Risk matrix assessments**: the MS Portal provides a risk assessment of our suppliers using our risk matrix (described in Criteria 3). The risk matrix risk assessment and the independent screening risk assessment provides an overall risk score which, in combination with the supplier's predicted annual spend, informs which suppliers receive a modern slavery questionnaire.
- **Questionnaires**: the MS Portal automates the distribution and collation of questionnaires to all suppliers who meet the due diligence threshold of:

  Annual spend of >$10,000 and assessed as high or moderate risk under the risk screening and risk matrix assessment.

  Supplier questionnaires allow Helping Hand to ascertain the current risk profile of the supplier for modern slavery and other ESG risk factors such as environmental and bribery and corruption risk.

  As outlined in the case study below, questionnaires can be tailored to address specific due diligence requirements to assess supplier specific risk factors.

  The MS Portal sends automatic reminders to suppliers to complete the questionnaire at scheduled intervals before and after the due date of the questionnaire if the questionnaire has not been completed. The results of the questionnaires are

automatically scored using a "traffic light system". This traffic light system grades the results as either:

- Green = low risk
- Orange = moderate risk
- Red = high risk

During this reporting period, Helping Hand conducted a review of its modern slavery questionnaire. This is outlined further below.

Case study: Tailored questionnaire issued to supplier to address high risk screening finding

Helping Hand onboarded a new supplier and conducted a risk screening as part of its ordinary due diligence procedures. The risk screening came back with a finding that the supplier had been charged with a breach of child employment laws because the supplier employed children under the age of 15 and failed to obtain a licence to enable it to do so legally.

We tailored a modern slavery questionnaire to ask specific questions around whether the supplier still employs children under 15 years of age and whether they have implemented remediation steps to prevent this non-compliance from occurring again. The supplier's answers satisfied Helping Hand that this non-compliance had been rectified and heightened review of the supplier is taking place going forward.

- **Overall Risk**: The MS Portal shows separate risk ratings for each supplier from the risk screenings, risk matrix assessment and the modern slavery questionnaires. An overall risk rating is then provided based on all due diligence conducted on the supplier.
- **Further Due Diligence**: If there are risks or non-compliances identified throughout the initial due diligence processes, Helping Hand takes additional steps to identify and remediate the risks or non-compliances identified. Depending on the supplier, if any non-compliances are identified, and the severity of any non-compliances identified, Helping Hand may undertake steps such as issuing:
  - communications or tailored questions to suppliers asking them to clarify an answer to a questionnaire or whether an identified non-compliance has been remediated; and / or
  - issuing modern slavery training to the supplier – modern slavery training is generally issued to suppliers if Helping Hand is not satisfied that the supplier understands and is assessing their modern slavery risk.
- **Annual Due Diligence**: Helping Hand maintain an ongoing due diligence approach and uses the automations in the MS Portal to ensure that annual due diligence is being undertaken on all suppliers. All suppliers are re-assessed for modern slavery risk annually to assess if their risk profile has changed. Accordingly, their risk rating is continually updated and refreshed.

  We also issue "refresher questionnaires" to high-risk suppliers. This asks suppliers to review their previous answers to questionnaires issued and provide any updates to these answers based on any changing circumstances. During this reporting period, we undertook a review and update of our refresher questionnaire and have issued this

refresher questionnaire to two suppliers in high-risk industries who completed the modern slavery questionnaire over two years ago.

Amendments to modern slavery and refresher questionnaire

As outlined above, we have conducted a review of our modern slavery questionnaire and refresher questionnaire. As a result of this review, Helping Hand has added a question into the modern slavery questionnaire and refresher questionnaire asking suppliers if they have had ethical site audits conducted on their operations (for example, site audits conducted by BSCI or SMETA) and, if so, to provide a copy of these site audits to Helping Hand for review.

Site audits provide insight into the operational risks associated with suppliers and can shine a light specifically on employment conditions and working hazards which are more difficult to ascertain through desktop based due diligence. Collecting this site audit data is the next stage in the evolution of Helping Hand's due diligence processes and will enable further insight into the operations of suppliers within our supply chains.

Supply chain tracing

Helping Hand have conducted significant supply chain tracing exercises across its supply chains and has continued to prioritise this form of supply chain due diligence. In this reporting period, Helping Hand has issued five suppliers with supply chain tracing questionnaires.

Helping Hand issued the supply chain tracing questionnaire to suppliers in high-risk industries, including food, uniforms and linen supply chains. These supply chains pose risks to Helping Hand, particularly given how critical these suppliers are to enable us to carry out our operations. During this reporting period, we have gained oversight over an additional 187 Tier 2 suppliers.

Case study: Supply chain tracing of key food supply chains

During this reporting period, one of Helping Hand's core food suppliers completed the supply chain tracing questionnaire. Certain food commodities carry heightened modern slavery risks. For example, tomatoes and seafood are considered higher risk food commodities for modern slavery, particularly when sourced from jurisdictions such as China and Thailand respectively. Through this process, Helping Hand was able to obtain oversight over all suppliers engaged by this food supplier to provide Helping Hand with its vital food supplies (Helping Hand's Tier 2 suppliers).

All identified suppliers were risk screened and risk matrixed in accordance with our due diligence processes. Four of the Tier 2 suppliers identified had moderate risk screening results. Helping Hand will continue to work with this supplier to obtain updated information of its Tier 2 suppliers to ensure that it has adequate oversight over the inherent risks associated with this supply chain.

Due diligence on cleaning and labour hire suppliers

Due diligence on cleaning and labour hire suppliers has been a focus of the reporting period for Helping Hand. The Federal Anti-Slavery Commissioner has identified these sectors as being known high-risk industries, with instances of modern slavery within these industries being increasingly prevalent in recent years and publicly scrutinised in the media.

Helping Hand, in conjunction with its third-party advisors, developed a tailored questionnaire for cleaning and labour hire suppliers to specifically address known and prevalent risk indicators within these industries.

For example, we implemented specific questions around the retention of identity documents, debt bondage, the recruitment of workers and the use of subcontractors which are risk indicators which have presented in recent findings of modern slavery in these industries. We have issued these tailored questionnaires to fourteen suppliers during this reporting period.

Case study: Subcontracting identified in cleaning supply chain through enhanced due diligence

Helping Hand issued a bespoke cleaning questionnaire to one of its cleaning suppliers. The supplier answered that they engage subcontractors to provide cleaning services to Helping Hand. Helping Hand's contracts require suppliers to seek Helping Hand's consent before any subcontractors are engaged. Subcontracting in cleaning supply chains is a risk indicator given the lack of oversight over subcontracting arrangements and the risk of worker underpayment occurring through the supply chain.

Our third-party providers flagged these findings with us and our Procurement Manager was able to liaise internally and confirm that (a) the supplier had not obtained consent from Helping Hand to utilise subcontractors and (b) these subcontractors, as well as some of the supplier's direct workers, had not been vetted through our contractor management system.

Helping Hand flagged this with the supplier and sought confirmation and additional information on the above issues. We are working with the supplier to remediate these issues. This includes ensuring that, going forward, all subcontractors are approved by Helping Hand prior to being engaged and all a workers and sub-contractors are vetted through our contractor management system. Helping Hand will continue to monitor this supplier with follow up due diligence in the next reporting period.

Training and staff awareness

Helping Hand continues to roll out modern slavery training which is sent as needed to staff to increase their education around modern slavery and what Helping Hand does to assess and address its modern slavery risks. Furthermore, Helping Hand takes a proactive approach in spreading awareness of key modern slavery risks posed to the business. An example of this is outlined further in the case study below.

Case study: internal awareness of modern slavery risks associated with the PALM scheme

The PALM scheme has been extended for use within the aged care sector with the aim of helping to address staff shortages. However, there have been many instances of modern slavery and modern slavery risk indicators identified with PALM scheme workers. Some of these risk indicators are perpetual risks based on the structure of the scheme and accompanying visa arrangements which are heightened due to the vulnerability of workers within the scheme.

During the reporting period, Helping Hand sent out communications externally to our labour agency providers regarding the heightened modern slavery risks associated with the PALM scheme. These communications helped us establish expectations with our labour hire suppliers to notify and communicate with us surrounding the use of PALM scheme workers.

We also sent out internal communications on this issue to key people within the business who engage with our labour hire providers. The purpose of these communications was to ensure that key people within were aware of these risk indicators when dealing with our labour hire providers

Procurement and Contracting

Prospective due diligence framework

Over the last three reporting periods, Helping Hand has been working with our third-party advisors to implement a prospective due diligence framework, whereby all new suppliers will be subject to due diligence prior to being formally engaged by Helping Hand. Prospective due diligence allows us to identify key risks prior to being "directly linked"[2] to the supplier and any potential modern slavery risks associated with the supplier.

During the reporting period, we have explored integration opportunities between the MS Portal and our Helping Hand internal financial systems. The aim of this is to expand the number of new suppliers subject to prospective due diligence via the MS Portal either prior to being

[2] In accordance with the UNGP's as further outlined and defined in Criteria 3.

engaged by Helping Hand as a supplier, or at the very least very early on in their engagement. Helping Hand will continue to progress this as an action item during the FY27 reporting period.

Contracting

Helping Hand's standard Procurement Agreements have modern slavery clauses as standard, boilerplate clauses. Helping Hand continues to ensure that modern slavery clauses are implemented into all new Helping Hand issued supplier contracts. As existing supplier contracts are renewed, modern slavery clauses are inserted into the contracts.

Continuous Improvement

Action Plan

The action items undertaken during FY26 (as described in this Criteria 4) formed part of an annual Action Plan which was developed by Helping Hand in conjunction with our third-party advisors at the end of the FY25 reporting period.

At the end of each reporting period, Helping Hand and its third-party advisors review the progress made during the reporting period and develop the Action Plan to continuously improve Helping Hand's modern slavery compliance framework. This is discussed further in Criteria 5.

KPI Framework

During the last reporting period, Helping Hand implemented a KPI Framework which contains a series of targets in the areas of employee training, supplier training and supply chain visibility.

Helping Hand continues to work towards the many of the targets set out in this KPI Framework but has pivoted some of its focus on maturing and developing its due diligence on heightened risk areas such as its cleaning and labour hire suppliers given increased scrutiny on these industries during the reporting period.

An action item for Helping Hand in FY27 will be to revise the KPI Framework to suit its effectiveness assessment processes based on current due diligence initiatives. This will enable Helping Hand to have meaningful evaluation processes to ensure continuous improvement in each reporting period.

Criteria 5: Effectiveness of Actions

Helping Hand monitors the effectiveness of its processes and procedures to assess and address modern slavery risks based on:

(a) the extent that our due diligence processes enable Helping Hand to assess actual risk and mature our understanding of inherent risk; and

(b) the quality of information received through our due diligence processes, in particular targeted due diligence processes.

Helping Hand has embedded due diligence processes for the onboarding of new suppliers and the management of existing suppliers, ensuring that all suppliers have refreshed due diligence in each reporting period. This has resulted in:

- 100% of existing suppliers being continuously monitored and risk screened through LSEG; and
- 100% of existing suppliers being risk matrixed (which is refreshed annually).

Around 61% of new suppliers have also been risk screened and risk matrixed through our prospective due diligence workflow which has been progressively expanded across our business. Helping Hand are taking active steps to improve the percentage of new suppliers who are subject to risk screening and risk matrixing either prior to or early on in their engagement with Helping Hand through the integration processes described in Criteria 4.

In this reporting period, we identified one supplier instance with modern slavery risk indicators through the risk screening process which we were able to able to resolve with our supplier. We were also able to identify and begin the process of remediation of a modern slavery risk indicator in one of our cleaning supply chains which is further described above in a case study in Criteria 4. This particular instance will be monitored closely by Helping Hand and this supplier will be subject to annual due diligence to ensure that the identified issues continue to be remediated and comply with Helping Hand requirements

Given the above due diligence processes are firmly embedded into Helping Hand's modern slavery compliance framework, Helping Hand has focused on targeted enhanced due diligence such as supply chain tracing and specific due diligence on cleaning and labour hire suppliers to mature its actual risk assessment processes. Through these processes, 24% of our cleaning and labour hire suppliers engaged by Helping Hand have been issued with targeted due diligence to assess the actual risks of these cleaning and labour hire providers. Helping Hand will evaluate the responses to this due diligence and make adjustments to these processes to ensure that these processes are effective in improving Helping Hand's understanding of risk.

Furthermore, during this reporting period, Helping Hand continued to make significant progress in our expansion of our understanding of our Tier 2 suppliers, gaining visibility over a further 187 Tier 2 suppliers in this reporting period. Four suppliers returned moderate risk screening results which Helping Hand will continue to monitor through the continuous monitoring capabilities within the LSEG screening platform.

We continue to track progress through our annual action plan, which we revisit and mark progress against regularly throughout the reporting period. We also use this as a reflective mechanism to look back on what was progressed in the reporting period, what is working and what can we look to improve or expand upon in the next reporting period. In prior reporting periods, Helping Hand has utilised a KPI Framework to track progress against metrics and targets. An action item for the FY27 reporting period is to revise this KPI Framework to reflect

current due diligence efforts to enable a more comprehensive and mature method of measuring the effectiveness of due diligence undertaken.

A summary of the progress made in this reporting period against the action items outlined in Criteria 7 of the FY25 Modern Slavery Statement is outlined below:

Category	Action Item	Status
Training and engagement	Review of suppliers that have been issued with modern slavery training.	Review undertaken – amendments will be made to the training when proposed amendments to the Act are close to being implemented.
Modern Slavery Questionnaires	Review of our modern slavery questionnaire and our refresher modern slavery questionnaire to ensure that Helping Hand is collecting the required information from suppliers to assess risk.	Completed for both the modern slavery questionnaire and the refresher questionnaire.
Prospective Due Diligence Framework	Continued rollout of the prospective due diligence framework across the business.	Completed and ongoing – an ongoing action is to undertake a review of industry classifications of suppliers and the broader structure of MS Portal in FY27 to streamline integration.
Supply Chain Tracing	Expansion of supply chain tracing efforts with a focus of mapping suppliers beyond the Tier 2 level.	Completed.

Based on the progress made during this reporting period. Helping Hand will develop an action plan for the FY27 reporting period. Some of the action items that will form part of this action plan are outlined in Criteria 7.

Criteria 6: Consultation

This criterion is not applicable as Helping Hand does not own or control any entities.

Criteria 7: Further Information

Helping Hand continues to make significant progress in maturing and expanding its modern slavery compliance framework in each reporting period.

In FY27, we will continue to build on this progress and expand our targeted due diligence efforts made this year with high-risk supply chains such as labour hire, cleaning, uniforms and linen suppliers. Some of the action items that Helping Hand are looking to undertake are outlined in the table below:

Category	Action Item
Labour hire and cleaning due diligence	Further expansion of due diligence across labour hire and cleaning suppliers.
Prospective Due Diligence Framework	Continued exploration and rollout of the integration between the Helping Hand internal financial systems and the MS Portal. Review of industry classifications of suppliers and structure of MS Portal to streamline integration.
Supply Chain Tracing	Continued expansion of supply chain tracing of high-risk supply chains, with a focus on uniforms and linen supply chains.
Modern Slavery Policy and Supplier Code of Conduct	Review of Modern Slavery Policy and Supplier Code of Conduct.
KPI Framework	Review and amend KPI Framework based on new due diligence initiatives implemented during the reporting period.

Helping Hand will continue to monitor any movement with the proposed changes to the Act and, with the guidance of our third-party providers, will ensure that our modern slavery compliance framework is compliant with any changes made to the Act and accompanying guidance.

Board Approval

This is the seventh modern slavery statement for Helping Hand Aged Care Incorporated and represents the reporting period of 1 July 2025 to 30 June 2026.

Approved by the Helping Hand Aged Care Incorporated Board on 25 August 2026.



Janet Finlay
Chair

Helping Hand