

Modern Slavery Statement 2022

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 2021 to 30 June 2022 (**Reporting Period**) to identify, manage and mitigate the specific risks of modern slavery in the Group's operations and supply chain.

Our 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 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 policies and processes on behalf of the Group, and SJWA conducts the majority of sourcing and procurement on behalf of both entities.

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.

Our Operating Model

The Group operates across 4 customer-focused operating divisions.

Ambulance Services

SJWA provides emergency ambulance and transport services in metropolitan Perth and nineteen regional centres. Volunteer teams provide these services in other regional areas allowing SJWA to meet the diverse needs of the communities in which the Group serve, spread over 2.5 million square kilometres.

The Group also runs the State Operations Centre, which fields Triple Zero calls. The State Operations Centre received 288,113 Triple Zero calls during the Reporting Period.

Event Health Services provides first aid cover and medical services at WA events and attends almost 3,500 events annually.

Industry Medical Services provides qualified and experienced medical staff for short- or long-term projects to look after the daily health and emergency medical needs of its customer's workers.

First Aid Training

SJWA offers a range of nationally accredited courses, as well as shorter non-accredited training options, across Perth Metropolitan and Regional WA.

First Aid Supplies

The Group offers a range of first aid supplies and equipment through physical shop locations, field servicing operations and online webstores.

Primary Health Care

Apollo Health Ltd (trading as St John General Practice, St John Urgent Care and St John Dental) operates six super clinics in the metro area and one rural medical centre. In addition to the GP services common to each of these clinics, the five metro clinics 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 aims to provide an alternative to the emergency department for urgent but non-life-threatening injuries and illnesses.

Our 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 employees and volunteers is paramount throughout our operations and is underpinned by the Group's values. Our people have multiple avenues to access specialist external support services which are frequently promoted and easily accessible.

The Group engages 2,241 full-time equivalent staff and about 6,000 volunteers throughout the State of Western Australia and is committed to providing services with the highest standards of personal and corporate integrity.

With a dedicated People and Culture Department made up of suitably qualified and experienced personnel based out of our State Office, the Group is confident that the risk of modern slavery is low. The Group has established and embedded policies, procedures, and governance practices that include, but not limited to recruitment and selection, onboarding, visa management, grievance resolution, fitness for work and wellbeing and support.

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 with regular audits conducted.

Our Supply Chain

Given the range of inputs into the operations of our divisions, the Group has a sizeable supply chain that includes the purchase of products and services required for the delivery of our ambulance, health services and retail operations.

The Group also procures goods and services related to a range of support business functions including office and corporate administration, building and construction, engineering, labour hire, security, cleaning, catering, information technology infrastructure and uniforms.

Whilst all purchasing is made through suppliers based in Australia; it is noted that some of the products we source originate from overseas.

Our 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

Sector and industry risks:

Electronics and textile production remain high risk industries globally. We understand the nature of these sectors in which some of our key suppliers operate means that their workforce is more vulnerable to exploitation.

- SJWA procures electronic equipment including tablets, mobile phones, laptops, monitors and accessories.
- SJWA also procures and sources uniforms in large quantities for the workforce

Products and services risks:

Paper and medical goods are recognised as high-risk products globally. Services such as cleaning have an inherent risk of modern slavery as positions often have lower wages, involve manual labour and are frequently on a casual basis. Workers are often from migrant, low socio-economic, or culturally diverse backgrounds.

- SJWA's demand for medical goods and PPE continues to increase as a result of the global COVID-19 pandemic and significant operational and supply chain disruption.
- Cleaning services are utilised by SJWA for each of our office and operational sites.

Geographic risks:

Some countries may have higher risks of modern slavery. The Global Slavery Index of 2018 of the Minderoo Foundation ranks countries based on government response to modern slavery. SJWA procures goods from countries, which may present a higher risk of modern slavery:

- **China:** SJWA sources medical consumables and branded items such as first aid kits, pens and promotional items
- **India:** SJWA sources uniforms and electronics which may be manufactured in India.

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

During the 3rd Reporting Period, the Group has focused on:

- Education in our procurement processes and our Ethical sourcing and Modern Slavery Policy
- Updating our Supplier Survey, using a prioritised risk-based approach
- Addressing modern slavery in our procurement processes and tender pre-qualifications
- Incorporating modern slavery clauses in our supplier contracts

Policies

[The Group's Ethical Sourcing and 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 its supply chain and operations.

The Group's Procurement Policy and associated documentation ensures compliance with the Act by its suppliers; to identify suppliers where the risk of modern slavery is high; and to otherwise identify areas of risk in its procurement practices.

Employment practices

The Group's robust policies and procedures for recruitment and remuneration of staff, ensure compliance with applicable employment laws and regulations. For all new staff, our onboarding processes includes verification of experience, qualifications, police clearance and rights to work in Australia. Our People and Culture Department conduct regular audits ensuring the Group's compliance with labour laws, applicable Modern Awards and Enterprise Agreements for the wages and benefits received by our employees.

External supplier assessment

The supplier survey continues to be key to providing the detailed information on our supplier's product and services to SJWA. This data provides us with visibility into our supply chain and the risks associated with products and services, sectors and industries and geographical risks.

The Group embedded the modern slavery supplier survey as part of its pre-qualification in supplier tender responses, ensuring suppliers are compliant with the Act (where appropriate) and providing risk rating levels even before we engage and commence our supplier procurement processes.

Supplier monitoring

Whilst the supplier survey provides the initial risk assessment and actions, we acknowledge that ongoing monitoring of our suppliers could be improved to enable us to move towards proactive best practice in modern slavery - this is reflected in our FY23 priorities below.

For example: Creation of an annual supplier survey to capture updates to key risk indicators.

Training and education of staff

Procurement education continues within the Group focussing on best practices, ethical sourcing and due diligence.

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 and protocol for receiving anonymous disclosures of real or perceived wrongdoing under the Policy. We did not receive any disclosures of any instances of modern slavery within the business. It is proposed to extend these processes and the scope of protected disclosures under the policy 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

We continue to recognise that knowledge sharing, including targeted training for employees, and acting, including mitigation measures, where we see a risk of involvement, are vital to successfully preventing modern slavery.

The Group's actions in FY22 have been encouraging in their effectiveness specifically in improvement in procurement processes and understanding Modern Slavery risk in its purchasing business units. This continues to be a primary focus for FY23 to provide confidence to our teams in their dialogue with suppliers, and in managing any difficult or educational conversations, around combatting modern slavery practices.

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

Key focuses for FY23 will include:

- The number of suppliers monitored in compliance of the Modern Slavery Act.
- The number of supplier contracts incorporating modern slavery clauses.
- Targeting 10 key suppliers, by way of an additional survey, who potentially present as higher risk of modern slavery based on their profile in products and services, sector or industry, or geographical risk to better understand potential modern slavery risks within our supply chains and or note trends in risks associated with:
 - Understanding of key concepts like supply chain and sub-suppliers;
 - Understanding of modern slavery in supply chains.
- Grievance mechanisms for workers to anonymously report actual or suspected incident of modern slavery.

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 St John WA Group is conducted by St John Ambulance Western Australia Ltd. SJWA and its wholly owned subsidiary Apollo Health Ltd are managed and governed by the same Executive and 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 2021 to 30 June 2022.



Ms. Sally Carbon
Chairperson

24 November 2022