



InvoCare

FY21

**Modern
Slavery
Statement**

Chief Executive Officer's message	4
FY21 in review	4
Our structure and operations	5
Funeral Services	5
Cemeteries & Crematoria	6
Pet Cremations	6
International Operations	6
Workforce	7
Australia	7
New Zealand	7
Singapore	7
Group wide	7
Identifying risks of modern slavery practices	8
In-depth analysis – industries	8
Coffin and casket procurement	8
Flowers	8
Granite	8
Cleaning	9
Actions taken to assess and address modern slavery	10
Policies and procedures	10
Audit, Risk & Compliance Charter	10
Code of Conduct	10
People, Culture & Remuneration Charter	10
Corporate Social Responsibility Policy	10
Sustainability Report	10
Whistleblower Policy	10
Training and education	11
Supply chains	11
Assessing the effectiveness of our actions	12
Consultation	13
COVID-19 impacts	14
Future steps	15

Chief Executive Officer's message

On behalf of the Board and the Executive Leadership Team, I am proud to present the modern slavery statement (Statement) of InvoCare Limited ABN 42 096 437 393 (InvoCare) and its subsidiaries for the reporting period 1 January 2021 to 31 December 2021 (FY21). The Statement reflects our commitment to understanding and addressing the social and ethical challenges associated with the business and to promoting high standards of ethics and integrity.

Upon joining InvoCare in FY21 as Managing Director and Chief Executive Officer, I worked with the team to set our strategic vision for the next five years and embark on a bold change agenda to deliver growth and sustainability despite the continued challenges of COVID-driven disruption to our industry.

The Board, alongside the Executive Leadership Team, increased focus and investment in our Environment, Social and Governance (ESG) goals and the Sustainability Strategy and its programs. This notably included the appointment of a dedicated member of the Executive Leadership Team, Grace Westdorp, responsible for Safety & Sustainability, in March 2021.

We conducted a materiality assessment during the year as part of our enhanced Sustainability Strategy, sharpening our focus on the priority areas where we think we can make a real difference and theming around three key areas of 'People, Place and Planet'. This strategy was officially launched in early 2022. We recognise both the opportunities and the substantial challenges that go hand-in-hand with achieving genuine ESG progress in the business which has an international footprint, hundreds of premises and facilities, large vehicle fleets, energy-intensive operations, a diverse workforce with considerable safety responsibilities and commitments to the community.

Our ongoing commitment to identifying, analysing and mitigating modern slavery risk within our operations and supply chains is part of this Sustainability Strategy. This Statement represents our continuous improvements in the modern slavery space, and we have collaborated with specialists in order to refine and improve our response to the risk of human rights violations in every aspect of the business.

Like others, these efforts have been impacted by the ongoing effect of the COVID-19 pandemic however our teams across our Funerals, Cemeteries & Crematoria and Pet Cremation businesses, as well as our support teams, both domestically and abroad, have continued to step up to the significant challenge of the pandemic. Our flexible COVID response plan is now embedded in the business and continues to serve our people, our partners and our customers well.

This Statement will go over the work undertaken by our team in greater detail. The Board and Executive Leadership Team are confident in the ongoing progress within the modern slavery space as part of our broader multi-year Sustainability Strategy to ensure better results for our 'People, Place and Planet'.

This Statement was reviewed and approved by the Board of InvoCare on 22 June 2022 for lodgement in accordance with the requirements of the Act and I am signing on behalf of the Board as the Responsible Member (as defined in the Act).



Olivier Chretien
Managing Director & Chief Executive Officer
Sydney





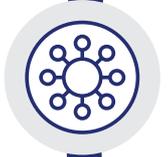
Our Business

- › Identified reporting entities
- › Described our structure, operations and supply chains



Our People

- › Implemented our 'Your Say' employee engagement survey that was conducted during the first half of FY21
- › Reviewed and updated our Whistleblower Policy to further empower our people



Our Places

- › Reviewed information from businesses across Australia, New Zealand and Singapore to understand key sources of modern slavery risk



Our Sustainable Leadership

- › Developed a comprehensive Sustainability Strategy inclusive of elements relating to modern slavery
- › Published the Sustainability Report
- › Appointed Grace Westdorp to the Executive Leadership Team as Executive General Manager - Health, Safety & Sustainability
- › Identified other Executive Leadership Team members and advisers to develop and action our modern slavery plan



Our Partners

- › Identified and analysed our key suppliers in higher-risk industries
- › Updated our supplier contract template to include modern slavery provisions
- › Started the process of requests for information (RFI) for modern slavery and human rights certifications



Our COVID-19 Response

- › Remained operational throughout FY21 COVID-19 lockdowns
- › Maintained continuity of supplier relationships through a measured approach to cost control

Our structure and operations

InvoCare is an Australian public company and is a reporting entity under s 5(1) of the Modern Slavery Act 2018 (Cth) (the 'Act'). InvoCare Australia Pty Limited ABN 22 060 060 031 is a direct subsidiary of InvoCare and is also a reporting entity under s 5(1) of the Act. The principal trading subsidiaries of the InvoCare consolidated group as at the end of FY21 were:

<u>Name of Subsidiary</u>	<u>Country of Incorporation</u>
InvoCare Australia Pty Limited	Australia
Bledisloe Australia Pty Limited	Australia
InvoCare PetCare Pty Limited	Australia
Family PetCare Pty Limited	Australia
InvoCare New Zealand Limited	New Zealand
Singapore Casket Company (Private) Limited	Singapore

This Statement is presented on a consolidated basis and InvoCare is reporting on behalf of the consolidated group.

We operate three key business segments within Australia: Funeral Services; Cemeteries & Crematoria; and Pet Cremations. We also have two international business segments comprising our operations outside of Australia: New Zealand and Singapore.



Funeral Services

We are a leading provider of funeral services in Australia, delivering over 37,000 funerals annually for families, with our three national brands, White Lady, Simplicity and Value Cremations and our 40+ regional and local brands. We have a footprint of over 230 locations which includes funeral homes, shop fronts and shared service centre facilities in metropolitan cities and regional towns across Australia.

Our National Brands



Our Regional and Local Brands



Our structure and operations

continued

Our Related Service Offerings

We offer a number of funeral related services that include: products, support, and assistance when planning a funeral as well as prepaid funeral services. The following brands help supplement and support our funeral services:



Cemeteries & Crematoria

InvoCare is a leading independent operator of cemeteries and crematoria overseeing 15 cemeteries and memorial parks in New South Wales and Queensland, spanning nearly 300 hectares of open space.

The business conducts nearly 3,000 burials and over 20,000 cremations annually with the parks and facilities also available for funerals, memorials and community events.



Pet Cremations

InvoCare's pet cremation business was established in 2019 and is Australia's only national pet cremations business. Operating from 16 locations across five states, our team of over 170 employees provide over 87,000 private cremations annually.

The business uses state-of-the-art tracking technology to provide assurances to grieving families and veterinary clinics as to what stage of the cremation process their pet is in.

Our Pet Cremation Brands



International Operations

Beyond our Australian operations, InvoCare is a leading provider of funeral and related services in New Zealand and Singapore.

Within New Zealand, InvoCare operates 48 locations, 24 brands and has over 200 employees, forming a key part of our business operations.

Our New Zealand Brands



Our Singaporean Brands

Within Singapore, InvoCare operates from two key locations, with over 60 employees and is a growing portion of our business.



Name of Subsidiary	Full time	Part time	Casual	Contingent
Australia	1305	200	173	104
New Zealand	192	39	20	9
Singapore	67	-	-	-

As at 31 December 2021, InvoCare employed approximately 2100 people across our operations in Australia, New Zealand and Singapore.

A portion of our employees are sourced using reputable employment agencies. Understanding of the modern slavery risks posed by the predatory practices of certain recruiters, InvoCare undertakes due diligence on our major employment agency partners to ensure their practices are in line with our commitment to human rights prior to engaging with that agency.

We further mitigate the risk associated with the use of recruitment agencies with our onboarding procedures and our human resources policies. We ensure that all our employees are appropriately remunerated and are aware of our suite of policies including the Code of Conduct which has distinct safeguards against modern slavery risk and the Whistle-blower Policy which provides them with means of reporting unethical conduct.

Australia

Within Australia, there is a total of approximately 2000 team members employed. Close to half are subject to enterprise bargaining agreements, providing them with standards beyond what is required by national law. The majority of our team members in Australia are in professional roles, managerial roles or are semi-skilled or tradespeople. Given the relative lack of unskilled labourers within our direct operations as well as Australian labour laws, there is a minimal risk of modern slavery within our direct operations in Australia.

New Zealand

Within New Zealand, there is a total of approximately 270 team members employed who are subject to the labour laws of the jurisdiction and are mostly comprised of tradespeople, professionals and tertiary qualified workers lowering our risk of modern slavery in our New Zealand operations.

Singapore

Our overseas operation in Singapore employs a total of approximately 65 team members on a full-time basis. The entirety of our Singapore team comprises of either tertiary educated individuals, business professionals, semi-skilled or tradespeople which minimises InvoCare's risk exposure in our Singaporean operations as a large proportion of modern slavery risk in the region is concentrated in unskilled and/or migrant workers.

Group wide

InvoCare has implemented our 'Your Say' employee engagement survey that was conducted during the first half of FY21. The survey received over 1,000 responses and provided baseline data about the employee experience and enabled benchmarking against similar-sized organisations and industries. The insights gathered from the survey have been widely disseminated across our business and our teams have started to build action plans to support the feedback provided. A key change following the survey was the announcement of a new paid parental leave program for Australian and New Zealand employees, supporting both primary and secondary carers.

InvoCare provides a Whistleblower Policy that allows employees, their families, officers and contractors to raise concerns regarding any misconduct or improper situations or circumstances without being subject to victimisation, harassment or discriminatory treatment.



Under our Whistleblower Policy we have received zero reports of any instances of actual or suspected modern slavery in our operations



Identifying risks of modern slavery practices

InvoCare undertook a review of our key first-tier suppliers and reviewed the probable risk of modern slavery occurring within our supply chains. We analysed the industry, the region and the likely inputs of our suppliers to determine the level of modern slavery risk and the type of risk to which our direct suppliers are exposed.

The majority of our suppliers are located in Australia and New Zealand, indicating a low geographical risk of modern slavery occurring in their direct operations due to the comprehensive regulatory frameworks relating to modern slavery and labour laws in these jurisdictions.

Despite this low risk of exposure to modern slavery in our direct suppliers in Australia, we endeavoured to undertake a more in-depth review to understand how modern slavery risk occurs within our supply chains.

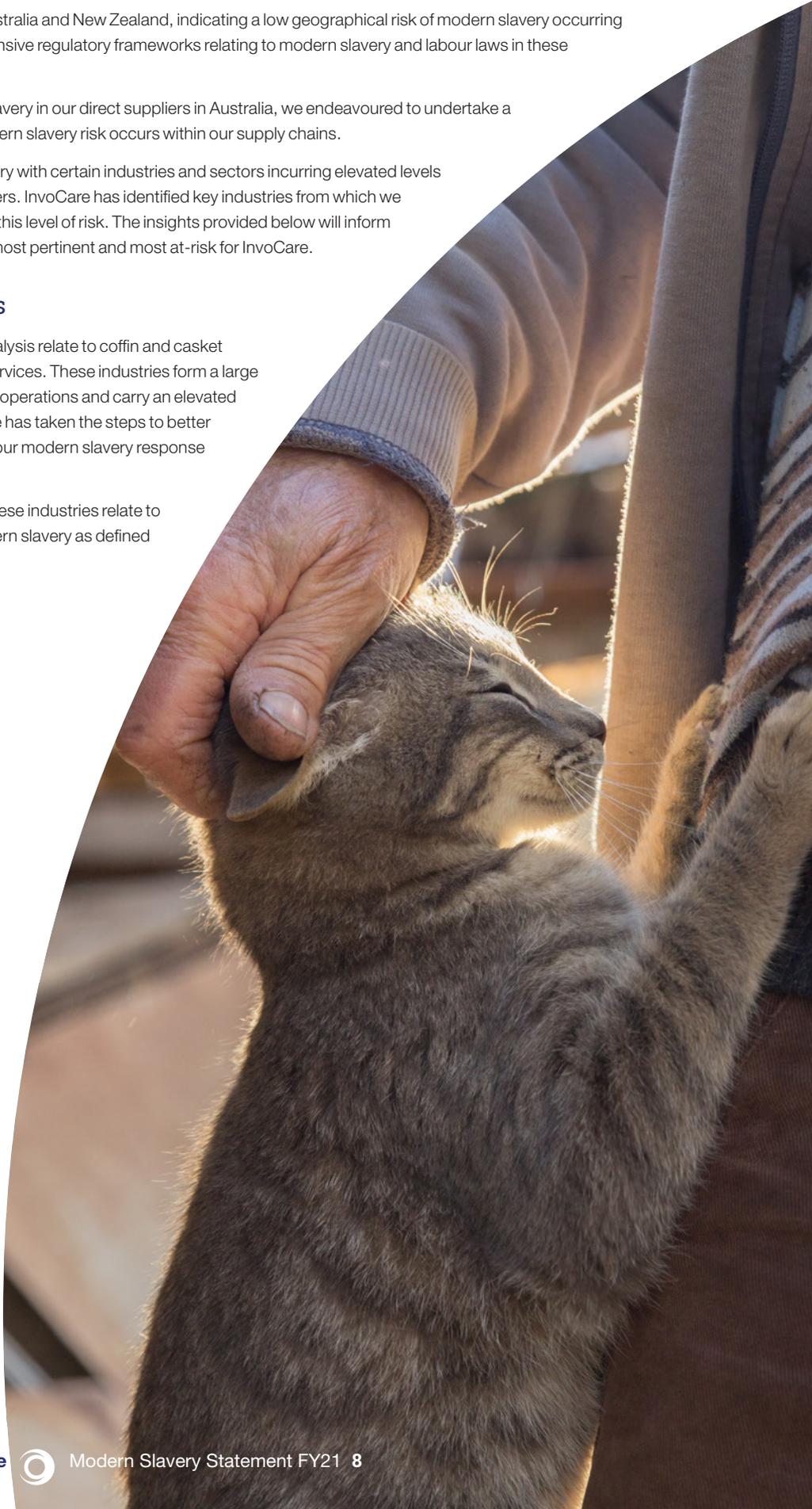
Geographical risk is one facet of modern slavery with certain industries and sectors incurring elevated levels of modern slavery risk when compared to others. InvoCare has identified key industries from which we procure goods and services from which carry this level of risk. The insights provided below will inform future procurement choices in areas that are most pertinent and most at-risk for InvoCare.

In-depth analysis – industries

The industries identified by InvoCare in our analysis relate to coffin and casket procurement, flowers, granite and cleaning services. These industries form a large portion of our procurement, are integral to our operations and carry an elevated level of modern slavery risk. As such, InvoCare has taken the steps to better understand these industries in order to focus our modern slavery response in an actionable and meaningful manner.

The probable risks of modern slavery within these industries relate to the following subset of the eight types of modern slavery as defined in the Act:

- › Slavery
- › Servitude
- › Forced labour
- › Debt bondage
- › Child labour
- › Deceptive recruiting



Coffin and casket procurement

The procurement of coffins and caskets forms an integral part of InvoCare's business operations and a significant part of our supplier spend data in Australia.

This industry sources a large proportion of raw materials in order to manufacture and produce coffins including timber, textiles and metals. Whilst the suppliers that we source from in Australia are locally based and largely employ skilled tradespeople and craftspeople, they present greater risk in their respective supply chains.

The raw materials associated with this industry have been associated with regions that have been reported as involving labour exploitation by international organisations and non-government organisations (NGOs). Lumber yards, mining of minerals and ores to be produced into metals and the farming, processing and manufacture of textiles are heavily at risk of forced labour, slavery and servitude.

Flowers

A key component of our operations is the procurement of flowers for display during funeral services. InvoCare sources from local suppliers of flowers who are subject to the labour laws of the jurisdiction in which they reside, being largely Australia and New Zealand.

The high degree of unskilled labour, seasonal or casual labour prevalent within the flower industry both locally and overseas elevates the potential for exploitation to occur. Additionally, the farming, cultivation and collection of flowers overseas largely occurs in regions which lack regulatory oversight and enforcement, further elevating the risk of modern slavery practices.

Cleaning

InvoCare procures services from cleaning companies to assist with the maintenance of our large network of storefronts, offices and other properties.

Cleaning services carry a risk of modern slavery practices due to the nature of the work and the lack of oversight afforded to employees. The prevalence of unskilled, temporary or unseasonal labour that is generally comprised of migrant workers leads to the risk of exploitation.

Granite

InvoCare sources and procures granite for headstones as part of our funeral services and burials. Similar to the above industries, the sourcing of raw materials incurs modern slavery risk due to the regions in which they are processed and the nature of the work required.

A large proportion of the world's granite is produced in regions that have been identified by international organisations and NGOs as having an elevated risk of modern slavery, such as India. The quarries in which granite is mined and processed around the world have increased instances of exploitative practices such as child labour, debt bondage, forced labour and deceptive recruiting. We have sought and obtained third party certifications from our overseas suppliers regarding their modern slavery actions.

Our direct Australian suppliers of granite headstones and memorial pieces are locally based craftspeople that require a high degree of skill and training in their trade. This combined with the relative low risk of labour exploitation within Australia ensures that our domestic direct suppliers in this industry are able to prevent the exploitation of workers in their direct operations.

We are planning to take further due diligence with suppliers in this industry to ensure their compliance with our Code of Conduct. This process will be greatly assisted by the fact that five of our top ten suppliers in this space are reporting entities under the Modern Slavery Act and have detailed their efforts to identify, mitigate and rectify modern slavery risk in their operations and supply chains.

Summary

The majority of the suppliers that represent an elevated risk of modern slavery are locally operating businesses in Australia and New Zealand and are subject to the labour laws of the jurisdiction. Some of our larger Australian suppliers are also part of key industry associations unique to the funeral service industry such as the Australia Funeral Directors Association and the National Funeral Directors Association of Australia that provide guidelines for the management of staff in a manner that is consistent with Australian law.

However, in order to counteract the risk of modern slavery in our operations and supply chains, we undertook several actions during the reporting period to mitigate and minimise our risk profile.

“ Five of our top ten cleaning suppliers have published their modern slavery statements providing a base for our ongoing due diligence ”

Actions taken to assess and address modern slavery



Policies and Procedures

- › Audit, Risk and Compliance Charter
- › Code of Conduct
- › Corporate Social Responsibility Policy
- › People, Culture & Remuneration Charter
- › Sustainability Report
- › Whistleblower Policy
- › Modern Slavery Statement

A key component in our actions to mitigate modern slavery risk within our operations is our corporate governance and management oversight. Our suite of policies and procedures is widely disseminated throughout our business requiring our staff to adhere to the guidelines set forth in the documents. These policies and protocols help us embed social and human rights principles in our company and ensure that our people are appropriately aware and upholding our commitment to mitigating modern slavery.

Audit, Risk and Compliance Charter

InvoCare's Audit, Risk and Compliance Committee undertakes a number of roles and responsibilities in relation to managing InvoCare's risk and ensuring its ongoing compliance with the law.

The Charter provides the Committee with the relevant powers to investigate, audit and remediate any potential risk identified within the business including but not limited to modern slavery risk within InvoCare's operations and supply chains.

Code of Conduct

All InvoCare staff are required to undertake training in our Code of Conduct and our independent contractors, sales agents, consultants and distributors are all required to comply with key aspects of the Code of Conduct.

The Code of Conduct provides principle-based guidance to help our staff make the right decision and encourages them to speak up should they have concerns regarding the business.

In terms of modern slavery, the Code of Conduct requires the upholding of human rights, including compliance with all relevant labour laws and forbidding the use of any child or forced labour in any of our operations. The Code of Conduct outlines InvoCare's stance towards involuntary servitude, exploitation of children and any physical punishment or abuse in relation to labour and people.

The Code of Conduct also provides options and avenues wherein staff may report any concerns that they may regard as a violation of the Code of Conduct, empowering them to take the appropriate steps should they observe any behaviour that is unethical or inhumane.

Actions taken to assess and address modern slavery continued

People, Culture & Remuneration Charter

The People, Culture and Remuneration Committee provides guidance to the Board on fostering a positive corporate culture and ensuring the fair remuneration of our employees. The Committee provides oversight over any issues relating to the fair compensation of our employees and is responsible for ensuring legal and regulatory compliance in regards to the remuneration of our people.

Corporate Social Responsibility Policy

InvoCare's Corporate Social Responsibility (CSR) Policy provides a high-level overview of InvoCare's ongoing commitment to conducting business in a manner that is responsible and ethical. A core element of our CSR Policy is the requirement that our staff are appropriately remunerated and are provided with a safe and fair workplace that is based on mutual respect.

Sustainability Report

InvoCare's Sustainability Report is a key document that is updated annually, including outlining the importance of human rights to all our stakeholders. Within the Sustainability Report we outline the forthcoming actions to mitigate forms of modern slavery and better understand the risks we incur in our operations and supply chains.

Whistleblower Policy

InvoCare's Whistleblower policy provides the avenues by which employees, their families, officers and contractors can report any misconduct that is contrary to InvoCare's Code of Conduct and more broadly, any activity that is dishonest or unethical.

The Whistleblower policy outlines that these reports may be made anonymously without fear of reprisals and where possible, anonymous reports will be investigated to the same extent to which a public report would be investigated.

During the reporting period, no reports were made that related to modern slavery risks or actual occurrences of modern slavery.

Training and education

In collaboration with experts within the modern slavery space, InvoCare has developed training and education materials that provide employees with an understanding of modern slavery, its impact and how to appropriately identify modern slavery risk indicators within their day-to-day operations.

The training and education modules are planned to be rolled out to staff in the next reporting period.

Supply chains

InvoCare's analysis of our supply chain has led us to conclude that the source of modern slavery risk is less likely to occur with our direct suppliers but nonetheless can exist further down our supply chain, reducing our ability to mitigate it. However, our in-depth analysis above provided key insights into certain risk areas that we are undertaking additional forms of due diligence to minimise our risk exposure.

InvoCare has engaged with key suppliers within our at-risk industries and has issued requests for information relating to their operations and supply chains. A number of respondents have provided certifications from independent third-parties that have undertaken audits and have concluded that there is no apparent modern slavery risk within their direct operations.

These collaborative efforts to better understand our suppliers will be expanded upon in the next reporting period to provide a more holistic understanding of our supply chain and what steps our suppliers are undertaking to mitigate the risk of modern slavery.

In addition, the Australian business has revised its standard contract with suppliers to directly address modern slavery risk throughout our supply chain. Our standard contract requires that the supplier provides assurances that they are not engaging in modern slavery practices, respond to requests for information from InvoCare in relation to fulfilling our modern slavery obligations, provide InvoCare with notice as soon it becomes aware of modern slavery in its operations and supply chains and institute remediation. The contract also provides InvoCare with the right to undertake third-party audits of the supplier's manufacturing premises or operations in order to investigate instances of modern slavery.

“ InvoCare collaborated with Anti-Slavery Australia, a leading NGO within the modern slavery space, to create an interactive training module for our people. ”



Assessing the effectiveness of our actions

InvoCare's analysis of our operations and supply chains indicates a low level of modern slavery risk within our direct operations and our direct suppliers. The acquiring of certifications from third-party organisations and auditors in relation to a number of our key suppliers provides further certainty of their ongoing compliance with our Supplier Contract and our Code of Conduct.

Our inaugural materiality assessment identified key environmental, social and governance issues relevant to our operations and gave us an understanding of what matters to our stakeholders and laid the foundations of our enhanced organisation-wide Sustainability Strategy. This strategy is a multi-year plan that focuses our ESG strategy on the areas of **People, Place and Planet**.

We set out key actions in our previous modern slavery statement including assessments of key suppliers and taking appropriate steps to assist suppliers in resolving identified issues. This reporting period, we successfully completed analysis of key suppliers in at-risk industries in our supply chain and despite not receiving any reports of identified instances of modern slavery, we have commenced dialogue with suppliers to foster a collaborative approach on modern slavery risk.

Due to the infancy of our programs and initiatives to develop our modern slavery response, the ability of InvoCare to appropriately assess our effectiveness is somewhat limited at this stage. However, we endeavour to establish key metrics, both qualitative and quantitative, to provide an increased understanding of the impact of our actions over time.



People



Place



Planet



The consultation process undertaken by InvoCare in relation to our business relied upon the collaboration of various leaders of our business units. The use of collaborative discussions, requests for information to the various businesses that form InvoCare under the oversight of the Executive Leadership Team, has provided a comprehensive understanding of our modern slavery risk exposure that is holistic.

The consultation process has culminated in the publication of this Statement and covers the full breadth of our operations and supply chains both locally and internationally across all our business units.

COVID-19 Impacts

The COVID-19 pandemic has impacted both our operations and our supply chains.

Operationally, our teams have dealt with various forms of lockdowns and restrictions in all of our key markets. Customer preferences have also shifted during the pandemic with the demand for digital products and tools for virtual access to funeral services increasing. This will increase InvoCare's exposure to modern slavery due to the growth of our procurement of technology and electronics to facilitate such requests.

During FY21, InvoCare has continued with our COVID-19 health and safety protocols to ensure our ongoing operation and the safety of our people, clients, suppliers and contractors. Our COVID-19 taskforce and the appointment of an Executive General Manager of Health, Safety and Sustainability to our Executive Leadership Team has provided InvoCare with a holistic and unified approach to mitigating the impact of the pandemic on our operations and our people.

InvoCare has gauged our staff's vaccination status, collaborated with COVID-19 experts and investigated the introduction of technologies to minimise the risk of virus transmission within our facilities and offices.

Ongoing supply chain disruption has impacted our input costs, and, like many companies, InvoCare has seen high levels of COVID-19 related absenteeism impacting our operations. An analysis of our supply chains indicates that despite the cost of our inputs, we have either retained or elevated our spend with integral suppliers within our supply chain. By ensuring ongoing partnerships and minimising disturbance of cash flows to our suppliers, InvoCare ensures that the risk of modern slavery is not further elevated as there is continuity in our supply chains.



InvoCare remains committed to mitigating modern slavery risk in our operations and supply chains as part of our wider ESG policy.

As such, in FY 22 InvoCare will endeavour to:

- › Roll out our training and education modules to our staff
- › Widen the scope of our desktop due diligence exercise to suppliers
- › Continue to submit RFIs to suppliers to understand their proactivity towards modern slavery and any certifications they may have
- › Undertake a review of our policies and procedures



