

Eldercare
peace of mind

Modern Slavery Statement

1 JULY 2023 - 30 JUNE 2024

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Introduction

Eldercare Australia Ltd (“**Eldercare**”, “**we**”, “**our**”, “**us**”) is one of South Australia’s leading aged care and retirement living providers. Our residents and our local community are at the heart of what we do. Accordingly, we base our governance decisions around benefiting our residents and the community around us.

Eldercare does not tolerate modern slavery practices. We take genuine steps to identify and mitigate any risks of modern slavery in our operations and supply chains. Addressing modern slavery risks aligns with our core values of Respect, Accountability and Connection and our Corporate Social Responsibility Strategy.

This is our fifth modern slavery statement. This statement is for the reporting period from 1 July 2023 to 30 June 2024 and addresses the mandatory requirements outlined in section 16 of the *Modern Slavery Act 2018 (Cth)* (“Act”).

The focus of this reporting period has been on broadening our understanding of the modern slavery risk profiles deeper in our supply chains and incorporating broader ethical and sustainability considerations into our supply chain due diligence.

We set this out in this modern slavery statement.

Reporting Entity | Eldercare Australia Ltd

Australian Business Number | 63 758 127 271

Head Office | 247 Fullarton Road, Eastwood South Australia 5063

Website | <https://www.eldercare.net.au>

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About Us

Eldercare has been caring for elderly South Australians since 1959. The wellbeing of our residents is central to everything that we do and is the centrepiece of our operational and governance decisions.

Eldercare operates in a highly regulated industry. We support our staff to provide consistent quality care to our residents. We are values driven and we aim to deliver peace of mind with our care.

We strive every day to maintain the ‘heart’ in our organisation while balancing this by adequately responding to a rigorous and evolving regulatory framework. We continue to prioritise modern slavery compliance and our role as a reporting entity to identify, remediate and report on modern slavery risks found in our organisation and supply chains.

Our modern slavery compliance framework aligns with our core values and allows us to ensure that there is respect, accountability, and connection in our broader community and throughout our supply chains.

Our Values

Respect	Accountability	Connection
We protect the dignity, rights and values of individuals	We are all responsible for working safely and with integrity	We develop vibrant and supportive relationships based on warmth and generosity
		

White Ribbon Workplace

We are very proud to have White Ribbon Workplace Accreditation for our efforts towards ending violence against women. We want to create a community that is safe and inclusive for our staff, our residents, their families and the broader community and ensure that they feel safe, welcome and cared for.



Rainbow Tick Accredited

Eldercare is proud to be a Rainbow Tick accredited organisation for the quality and performance of our LGBTQI inclusivity program and is the first South Australian residential aged care provider to receive accreditation.



Share the Dignity Program

Eldercare is proud to be in its seventh year participating in the “Share the Dignity” program. The initiative raises funds for women who are homeless or affected by domestic violence. Additionally, our suppliers have donated over 250 bags of personal hygiene products as well as toys for children in need.



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Reporting Entity

This modern slavery statement for the reporting period of 1 July 2023 to 30 June 2024 is made by Eldercare Australia Ltd ABN 63 758 127 271.

Eldercare does not have any subsidiaries and does not own or control any other entities.

Structure, Operations and Supply Chains

Structure

Eldercare is a not-for-profit organisation and is registered with the Australian Charities and Not-for-profits Commission (ACNC). Eldercare is solely based in South Australia with its headquarters at 247 Fullarton Road, Eastwood SA 5063.

We are governed by a Board which oversees our governance and compliance obligations. Our executive team lead the day-to-day operations of Eldercare.

Operations

Eldercare has been operating as an aged care provider for 65 years and cares for more than 1,000 residents across our 13 aged care homes across South Australia. Eldercare employs 1,750 staff and has over 250 volunteers who support us and are vital to our operations. If required, Eldercare engages labour hire entities to assist with staff shortages (for example, nurses and personal carers).

In addition to our aged care homes, we support the community by providing:



200 independent living units
across our **12 retirement villages**



Allied health services which can assist over
375 clients at our day therapy centre

The wide range of services that we provide means that we can support and serve our community in a variety of ways, which helps to ensure that retirees and those needing support can come to us for support in various stages of their retirement and supported living journeys.

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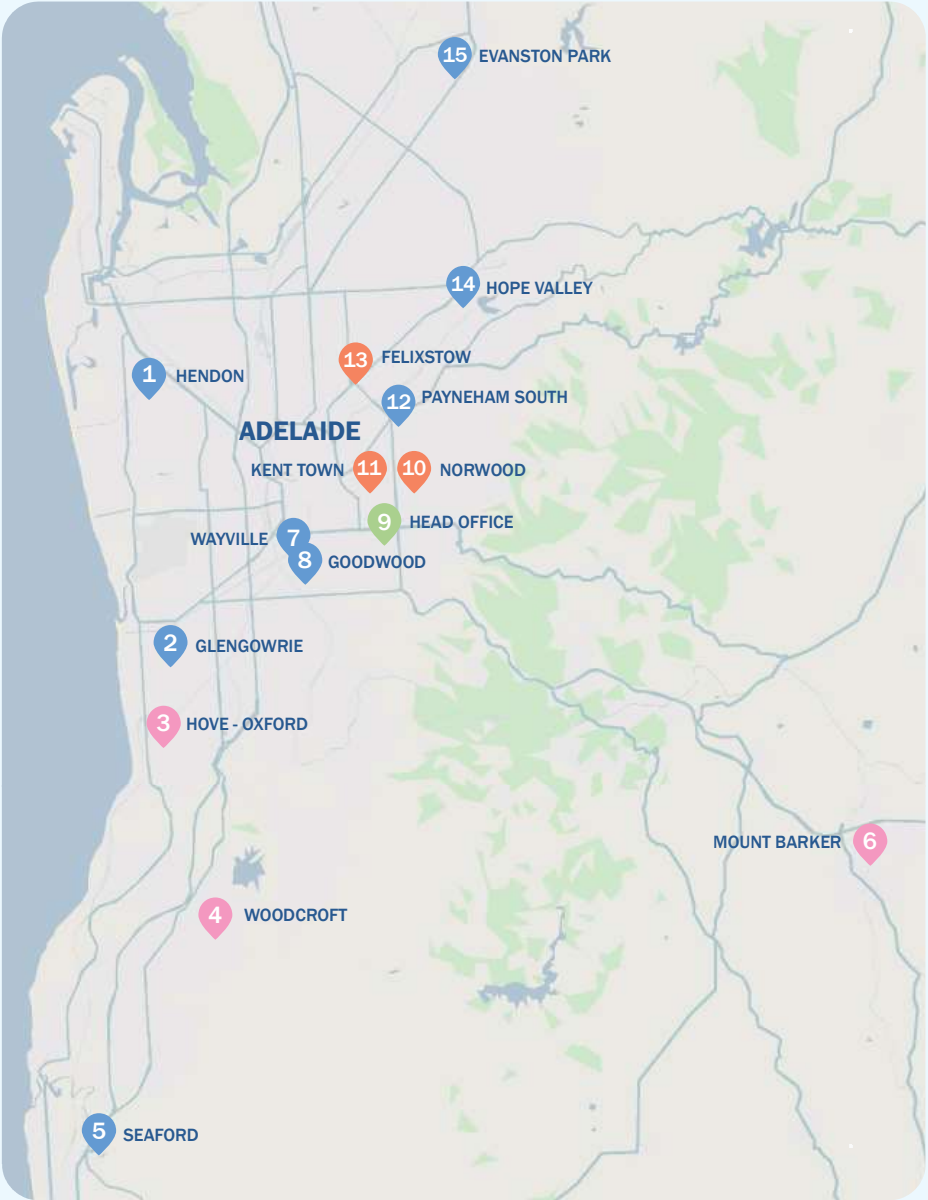
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Locations of Eldercare Sites

1. Acacia Court, Hendon
2. Allambi, Glengowrie
3. Oxford, Hove
4. Cottage Grove, Woodcroft
5. Seaford, Seaford
6. Sash Ferguson, Mount Barker
7. The Lodge, Wayville
8. Goodwood, Goodwood
9. Head Office
10. Kingsborough, Norwood
11. College Green, Kent Town
12. Trowbridge House, Payneham South
13. Mulberry Grove, Felixstow
14. Hope Valley, Hope Valley
15. Evanston Park, Evanston Park

- Residential Site Only
- Retirement Living Site Only
- Co-Located Residential & Retirement Living
- Head Office



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Suppliers

Our suppliers are vital to our operations and maintaining our high quality of care. We continue to engage with suppliers that are focused on quality and are industry leaders in their respective sectors. Eldercare is proudly based in South Australia and strives to engage local suppliers to support the local economy and community.

In the reporting period Eldercare engaged with 201 suppliers. Eldercare prefers to engage long-term suppliers and to minimise one-off engagements with suppliers where possible. We define a “long-term supplier” as a supplier who we have engaged with for 3 years or more.¹

In FY24, 75% of our total suppliers are long-term suppliers with whom Eldercare has engaged with for over 10 years.

Supply Chains

We engage with a wide variety of suppliers across our operations to enable us to deliver our quality services to our residents.

Our suppliers are categorised under two broad categories:

1 Providing goods and services relating to the provision of direct care to residents

2 Providing goods and services supporting the provision of direct care to residents

¹We have set our definition of “long-term supplier” to 3 years or more as our supplier records for modern slavery purposes only date back to our first reporting period, the 2020 calendar year. In reality, many suppliers have been engaged for a much greater length of time, many of whom greater than 10 years.


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Our suppliers who provide goods and services related to the provision of direct care to our residents assist us in providing the following services:



Care Services

Nurses, personal care workers, allied health professionals, medical consumables, pharmaceuticals, direct care related support equipment and personal protective equipment (PPE).



Hospitality

Food, cleaning, laundry, linen, consumables and hospitality labour.



Wellbeing

Chaplaincy, lifestyle activities, events, entertainment, hairdressing, beauty therapy and massage.

Our suppliers who provide goods and services which assist us in providing ancillary support functions to the business are in the following areas:



Business administration

Professional and administrative services, consultancy, IT, insurance and head office support.



Property services

Utilities, maintenance to buildings and equipment, building projects and refurbishments.



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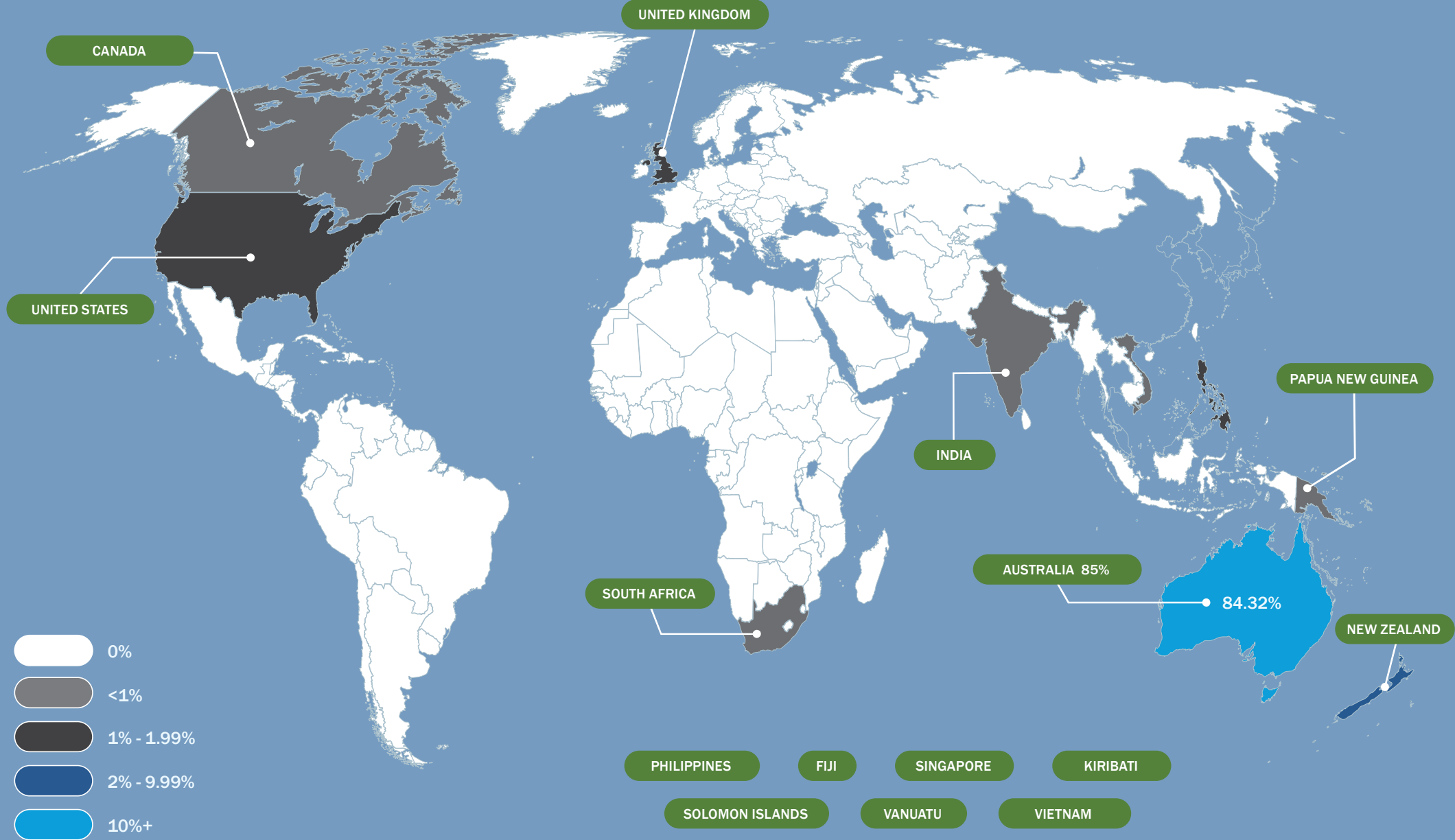


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Tier 1 Suppliers Operating Locations

Tier 1 Supplier: Immediate Eldercare Supplier

In the reporting period Eldercare continued to undertake detailed analysis regarding its tier 1 suppliers. The following map identifies the key locations of our tier 1 suppliers.

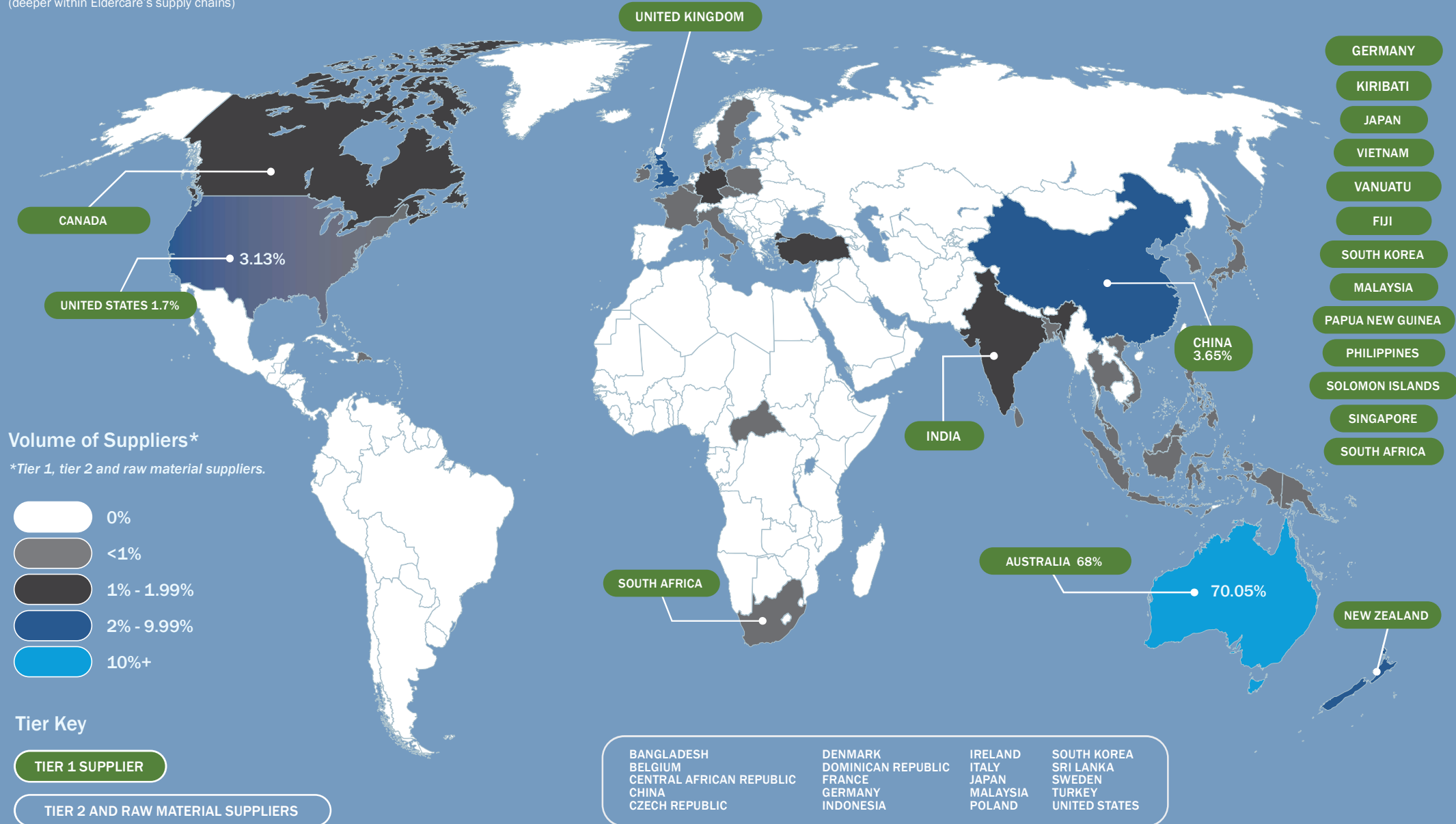


Tier 1, Tier 2 & Raw Material Suppliers

Tier 2 Supplier: Direct Supplier to Eldercare's Tier 1 Suppliers

Raw Material Supplier: Organisations that work with input materials to manufacture products for Eldercare's suppliers (deeper within Eldercare's supply chains)

In the reporting period Eldercare continued to undertake detailed analysis regarding its tier 1 suppliers and continued to look deeper into its supply chains beyond tier 1. The following map identifies the key locations of our suppliers and also closer analysis of suppliers deeper within our supply chains.



Risks of Modern Slavery

The assessment of modern slavery risks within our operations and our supply chains is a continual undertaking which Eldercare seeks to continuously improve on in each reporting period in response to newly identified risks and the maturity of our modern slavery compliance framework.

The “cause, contribute to and directly linked to” framework from the United Nations Guiding Principles on Business and Human Rights guides our modern slavery risk assessment process. Using this framework, we assess the modern slavery risks associated with our operations and supply chains and whether Eldercare could be deemed to cause, contribute to or be directly linked to any instances or risks of modern slavery.

CAUSE

Instances and heightened risks of modern slavery that an organisation causes itself via its activities or omissions that results in harm.

For example – employing migrant workers and withholding their passports and other identity documentation.

CONTRIBUTE TO

Activities or omissions to facilitate, enable or incentivise harm, instances of modern slavery and heightened risks of modern slavery.

For example – an organisation engages a supplier and places unreasonably short lead times on orders placed with the supplier, leading to significant overtime and underpayment issues within the supplier.

DIRECTLY LINKED TO

Being linked with harm, instances of modern slavery or heightened risks of modern slavery through the purchase of products and services and an organisations business relationships (i.e., supplier and stakeholder relationships).

For example – engaging a supplier that is later discovered to be engaging child labour.

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Eldercare uses the “cause, contribute and directly linked to” framework in conjunction with our due diligence processes (which are explained further in Criteria 4 below) to comprehensively assess our modern slavery risks.

In particular, Eldercare has developed a risk matrix which assesses suppliers against four categories of risk factors:

- 1. Geographic risks** – specific risks associated with the jurisdiction in which the supplier operates.
- 2. Product and services risk** - specific risks associated with the product or service purchased by the reporting entity.
- 3. Entity risks** – specific risks associated with that particular supplier. For example, the risks associated with a smaller, isolated factory (higher risk) vs a large multi-national firm (lower risk).
- 4. Sector and industry risks** – specific risks associated with the sector or industry in which that supplier operates.

Operational risks

Eldercare solely operates in South Australia. We operate in the aged care and retirement living industries which both are highly regulated. Accordingly, we have strong internal governance and leadership driving our operations and consider that we have a low risk of modern slavery occurring in our own operations (the specific details of our operations are outlined in Criteria 2).

Our strong internal governance is supported by our comprehensive policy and procedure frameworks and our compliance with local laws and requirements.

For example, Eldercare:

- pays all employees in accordance with Australian laws and requirements;
- has comprehensive grievance mechanisms in place for reporting concerns or grievances, such as a Whistleblower Policy to allow eligible whistleblowers to report eligible disclosures;
- provides staff wellness programs, social club events and flexible working conditions;
- supports all employees through employee assistance frameworks; and
- has a robust training framework.

To support this, Eldercare undertakes specific employee training on modern slavery (which is discussed further in Criteria 4). Further, modern slavery is discussed in newsletters and briefings.

Labour Hire

As is typical in the aged care sector, Eldercare is reliant on labour hire in order to perform its services to residents. The roles where labour hire is required includes nurses, personal carers, cleaners and kitchen hands.

Given the short term nature of labour hire, and the fact that Eldercare cannot have the same level of oversight as it does over its own employees and operations, there is an increased risk with labour hire entities. This is where training and understanding by Eldercare employees is critical to assist with identifying potential modern slavery indicators.

Further, given the increased risks with labour hire, Eldercare increases due diligence on labour hire entities.



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Supply chain risks

Eldercare assesses that its risks of modern slavery are most likely to present in our supply chains, particularly deeper in our supply chains beyond our Tier 1 suppliers.

Eldercare's Corporate Services Executive is responsible for oversight of Eldercare's modern slavery compliance framework which then facilitates direct reporting to Eldercare's board.

Eldercare's Procurement and Contracts Manager continues to manage our modern slavery compliance framework and is supported by the procurement team to drive and develop our modern slavery compliance framework.

Eldercare has a centralised procurement function which allows for robust oversight over our business-wide procurement and contracting. Centralised procurement means that Eldercare directly works with suppliers to identify risks early in the supplier engagement process. Furthermore, centralised procurement allows us to have control and set our business standards directly to our suppliers.

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Eldercare assesses that the categories of suppliers where modern slavery risks are heightened are as follows:

Sector	Risk
 <p data-bbox="353 695 439 724">LINEN</p>	<p data-bbox="680 461 1653 520">Cotton is a key raw material that is used to fulfill Eldercare’s services. As an aged care provider, Eldercare relies on various sources of linen such as bedding and towels.</p> <p data-bbox="680 566 1715 625">Cotton is a high-risk commodity for modern slavery. This risk has been heightened ever since the identification of forced labour camps in the Xinjiang Uyghur Autonomous Region in China (“Xinjiang”).</p> <p data-bbox="680 671 1751 764">Eldercare continues to implement steps to identify and mitigate the risk associated with cotton and linen supply chains and gain oversight and visibility over these high-risk supply chains. An example of the steps taken to address this specific risk is outlined in Case Study 2 below.</p> <p data-bbox="680 810 1016 836">Risk for Eldercare: directly linked</p>
 <p data-bbox="291 1168 504 1197">CONSUMABLES</p>	<p data-bbox="680 1002 1751 1061">Specific consumables have been identified as higher risk consumables, for instance fruit, rice, cocoa and coffee.</p> <p data-bbox="680 1107 1742 1200">Eldercare has a “buy local” policy. For instance, Eldercare engages local wholesalers however, Eldercare is seeking increased oversight of where the wholesaler is sourcing produce. Risk can be heightened where wholesalers change supply chains without notifying Eldercare.</p> <p data-bbox="680 1246 1016 1272">Risk for Eldercare: directly linked</p>

Sector



MEDICAL SUPPLIERS
(PERSONAL PROTECTIVE
EQUIPMENT (“PPE”) AND
MEDICAL EQUIPMENT

Risk

PPE is a sector that contains heightened modern slavery risks which have been increasingly prevalent since the supply chain strains caused by the COVID-19 pandemic.

This is a risk that Eldercare continues to monitor closely and considers this as an ongoing risk factor.

Risk for Eldercare: directly linked



UNIFORMS
AND APPAREL

The uniforms and apparel sector poses heightened modern slavery risks, particularly with specific raw material supply chains such as cotton, wool, silk and leather. Certain jurisdictions such as the Xinjiang province in China and Myanmar also pose heightened modern slavery risks with linkages to forced labour practices.

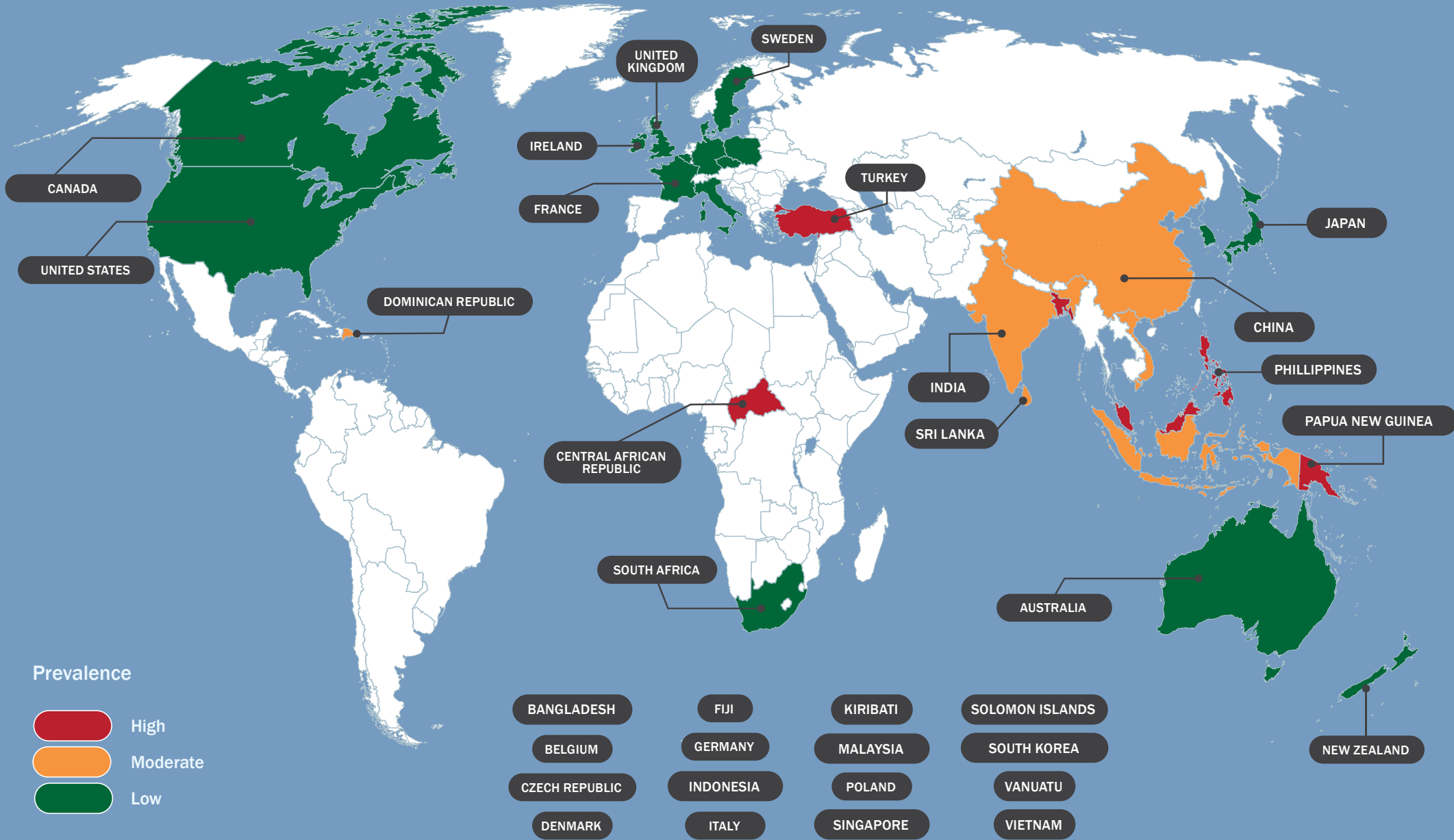
The supply chains of uniforms and clothing are incredibly complex and particular modern slavery risks apply at each stage of the supply chain, from extraction of the raw materials to manufacturing.

Eldercare procures large volumes of clothing and apparel. Like the approach taken to address the risks associated with linen supply chains, Eldercare prioritises uniforms and apparel suppliers for supply chain tracing exercises to ensure that we have oversight of these high risk supply chains.

Risk for Eldercare: directly linked

Modern Slavery Risk

This map demonstrates prevalence of modern slavery (in accordance with the Global Slavery Index) in our supply chains. This includes prevalence deeper in Eldercare's supply chains capturing tier 2 and raw material locations.





Actions taken to address modern slavery risk

In this reporting period, the key focus of our modern slavery compliance framework has been to:

- ▶ continue to dive deeper into our supply chains to understand the modern slavery risks beyond Tier 1 suppliers; and
- ▶ align processes and procedures in our modern slavery compliance framework with our broader ethical and sustainability priorities as a business.

A summary of the key action items undertaken by Eldercare in this reporting period are as follows:



Implementation of a new **risk based due diligence threshold.**



Expansion of **supply chain tracing exercises.**



Alignment of **broader ethical and sustainability initiatives** with Eldercare’s modern slavery compliance framework.

These key action items build on existing systems and processes in place, which are integrated as part of business as usual practices of Eldercare.

Eldercare - Modern Slavery Compliance Key Highlights

FY21	FY22	FY23	FY24
Implementation of Modern Slavery Portal and third-party guidance.	Continued use of Modern Slavery Portal and third-party guidance.	Continued use of Modern Slavery Portal and third-party guidance.	Continued use of Modern Slavery Portal and third-party guidance.
Implemented training programs for suppliers and employees	Continued role out of modern slavery training for suppliers and employees.	Review of modern slavery training for suppliers and employees and continued roll out.	Continued rollout of modern slavery training for suppliers and employees.
Rolling out modern slavery contract clauses.	Annual risk screening and risk matrixing of all suppliers.	Annual risk screening and risk matrixing of all suppliers.	Annual risk screening and risk matrixing of all suppliers.
Initial risk screening and risk matrixing of all suppliers.	Annual questionnaires for Tier 1 suppliers with an annual predicted spend of \$10,000 or more.	Annual questionnaires for Tier 1 suppliers with an annual predicted spend of \$10,000 or more.	Implementation of risk based due diligence. Issuing of questionnaires to all suppliers considered high or moderate risk are issued with questionnaires.
Issuing questionnaires to Tier 1 suppliers with annual predicted spend of \$10,000 or more.	Implementation of supply chain tracing exercises for linen, fresh produce, seafood and medical equipment suppliers.	Expansion of supply chain tracing exercises.	Continued expansion of supply chain tracing exercises.
Implementation of Modern Slavery Policy and Supplier Code of Conduct.	Continued use and annual review of Modern Slavery Policy and Supplier Code of Conduct.	Mapping of identified Tier 2, Tier 3 and raw materials suppliers.	Continued mapping of identified Tier 2, Tier 3 and raw materials suppliers.
	Benchmarking of modern slavery compliance framework against industry competitors.	Continued use and annual review of Modern Slavery Policy and Supplier Code of Conduct.	Continued use and annual review of Modern Slavery Policy and Supplier Code of Conduct.
		Benchmarking of modern slavery compliance framework against industry competitors.	Benchmarking of modern slavery compliance framework against industry competitors.
			Development of draft KPI Framework and Ethical and Sustainable Procurement Policy.

Eldercare continues to engage third party advisors who assist in maintaining and developing its modern slavery compliance framework in each reporting period to ensure that we are meeting the continuous improvement approach underlying the requirements of the Act.

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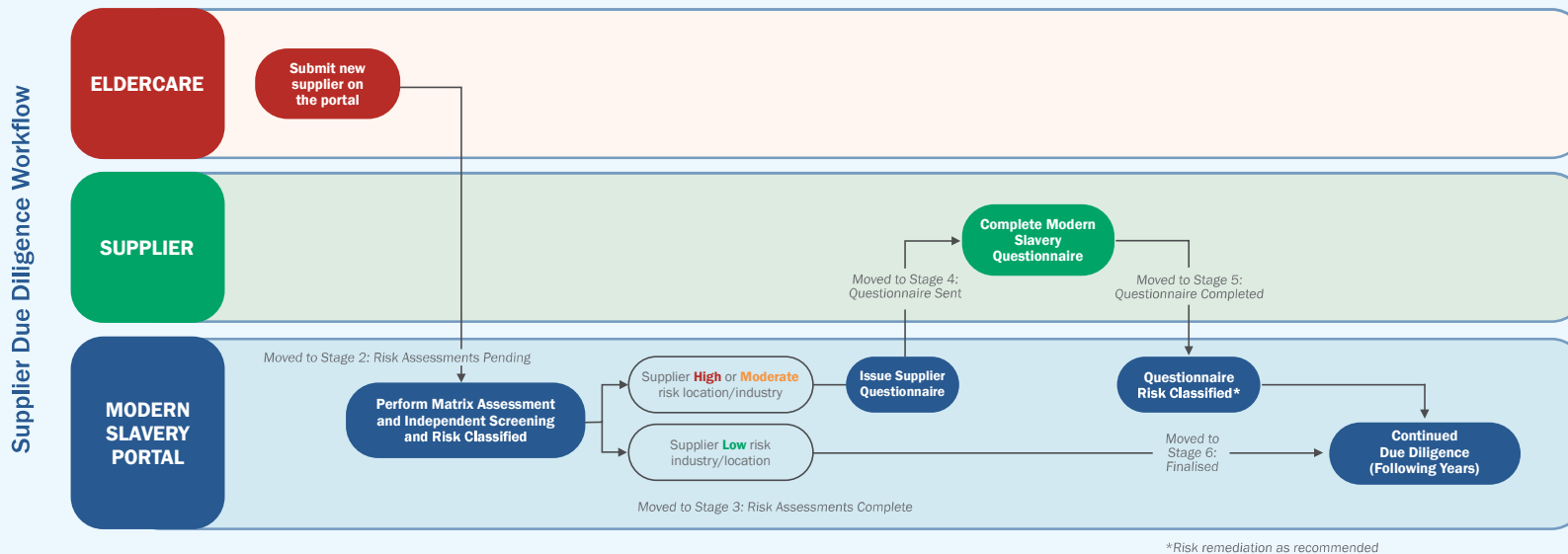
Eldercare has implemented a new risk-based due diligence workflow to guide its due diligence processes.

In the preceding reporting periods, Eldercare has relied on a due diligence workflow which includes a \$10,000 per annum spend threshold. This spend threshold acted as a threshold for completion of questionnaires by suppliers.

This spend threshold was used as a starting point for our modern slavery compliance framework and allowed us to implement a simple threshold for due diligence. As we have matured, we reviewed this threshold and its effectiveness as against a risk methodology analysis. This is on our understanding that spend does not necessarily equate to risk. Accordingly, in the reporting period we implemented a pure risk-based approach to the issuing of questionnaires to suppliers.

Using the risk based due diligence workflow, all suppliers who are assessed as high or moderate risk under the risk screening and risk matrixing processes (which are further outlined below) are issued with supplier questionnaires, irrespective of Eldercare’s spend with the supplier.

This has allowed Eldercare to focus its due diligence efforts on its suppliers with inherent modern slavery risks (based on the risk methodology described in Criteria 3).



Supplier due diligence processes

Pursuant to Eldercare’s risk methodology, Eldercare’s suppliers are assessed via a due diligence workflow . Eldercare’s supplier due diligence is conducted via our Modern Slavery Portal (“Portal”) which streamlines our supplier management and due diligence processes through the automation of due diligence and our suppliers overarching risk score.

The due diligence processes which are undertaken via the Portal are as follows:

Risk matrix assessment

Eldercare utilises a risk matrix which has been developed using data from the Global Slavery Index and the guidance and principles from the ten (10) principles of the United Nations Global Compact (UNGC), the Universal Declaration of Human Rights and the Guidance for Reporting Entities which has been issued by the Australian Government to assist organisations complying with the requirements of the Act.

Our risk matrix utilises risk factors which are outlined further in Criteria 3 above.

During the reporting period, Eldercare undertook risk matrixing on:

- All Tier 1 suppliers
- 2 Tier 2 suppliers
- 1 Tier 3 supplier

Risk screenings

All new suppliers are screened through a risk and compliance tool called Refinitiv. This assesses suppliers for risk across broader environmental, social and governance (ESG) risk factors such as:

- Integrity risks - for example, bribery and corruption.
- Human rights risks – modern slavery, broader employment related issues;
- Environmental risks.
- Data and cyber risks.
- Operational and quality risks.
- Identity risks – for example, transparency risks.
- Financial risks.

Risk screenings provide an important function to allow us to issue spot potential issues. It may also be that a screening result changes the risk profile of a supplier.

During the reporting period, we undertook 204 risk screenings across our Tier 1, Tier 2, Tier 3 and raw materials suppliers. This includes all new suppliers engaged during the reporting period as well as existing suppliers as part of our refresher due diligence process which is outlined further below.



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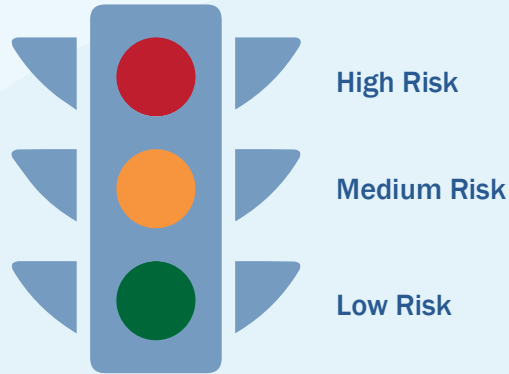


Eldercare
Briony
Chief Manager

Questionnaires

All suppliers who are assessed as high or moderate risk under the risk matrixing and screening processes are issued with modern slavery questionnaires via the Portal.

The Portal scores the results of the questionnaire using a traffic light system. Green means low risk, orange means medium risk and red means high-risk.



During this reporting period, we issued 26 suppliers with a modern slavery questionnaire.

Eldercare has continued to undertake supply chain tracing exercises on specific high risk supply chains which involves the issuing of a supply chain tracing questionnaire, the details of which are outlined in more detail below.

Auditing

Site audits are undertaken on suppliers where there are heightened modern slavery risks associated with that supplier.

In addition to the high modern slavery risk associated with that supplier, we opt to undertake site audits where:

- The answers to modern slavery questionnaires require further due diligence. This could occur in situations where, for example:
 - inconsistent answers were provided within the questionnaire, suggesting that broader operational inconsistencies may be evident;
 - the supplier discloses that they source materials from high-risk locations for modern slavery; and / or
 - the supplier does not provide adequate information through the questionnaire.
- It may also be that the supplier operates in a high-risk sector which Eldercare chooses to target as part of its supply chain tracing programs. For example, in the FY23 reporting period, one of Eldercare's employees who is trained to undertake site audits undertook a site audit of one of our linen suppliers, which we also undertook supply chain tracing on.

Refresher due diligence

All suppliers are subject to annual refresher due diligence. Supplier are risk screened and risk matrixed annually. Eldercare monitors any changes in the risk profiles of its suppliers in the Portal.

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Case Study 1

In this reporting period, we sent out a tailored supply chain tracing questionnaire to one of our food suppliers asking for specific information on their suppliers for specific high risk food commodities, such as:

- Fish
- Frozen vegetables
- Tinned fruit and vegetables
- Tomatoes

The above food commodities have been identified as high-risk food commodities from legislation such as the Uyghur Forced Labour Prevention Act in the United States and lists and guidance such as the United States Department of Labour List of Goods Produced with Child Labour and Forced Labour 2022.

Eldercare will be able to use the results of this supply chain tracing exercise to be able to work with its food suppliers to move towards sourcing produce and goods from local suppliers, which results in an array of benefits beyond the reduction of modern slavery risks in these supply chains.

Where there is a change in a supplier's risk profile, Eldercare undertakes steps to assess the reasons for, and the implications of, this change. For example, if a supplier responds to a questionnaire with a response which indicates that their modern slavery risk profile is higher than the previous reporting period, Eldercare may undertake steps such as, for example, issuing correspondence to the supplier via the Portal asking for more information on the change in their questionnaire answer.

Supply chain tracing

Eldercare undertakes supply chain tracing on key higher risk supply chains which Eldercare prioritises to undertake deep dive due diligence to gain an understanding of modern slavery risks throughout the entire supply chain. In this reporting period, we issued nineteen (19) supply chain tracing questionnaires to our suppliers, using the advantages of technology and automation through our Portal to drive this due diligence.

As we identify suppliers in the supply chains of our Tier 1 suppliers, we undertake risk screenings and risk matrixing on these suppliers. Through the Portal, we link these Tier 2, Tier 3 and raw materials suppliers to our Tier 1 suppliers as we map these supply chains.

Undertaking supply chain tracing efforts is crucial to identifying modern slavery risks in our supply chains, which are more often than not more prevalent deeper in our supply chains.

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Case Study 2

In the previous reporting period, Eldercare undertook supply chain tracing on a key linen supplier because of the heightened modern slavery risks associated with linen and cotton supply chains as described in more detail above. From this exercise, we have identified two (2) Tier 2 suppliers and one (1) Tier 3 suppliers who have all been subject to annual risk screening and risk matrixing.

Because of the risks associated with this supply chain, Eldercare will continue to monitor this supply chain and conduct further due diligence to continue to dive deeper into this supply chain.

Aligning modern slavery compliance framework with broader ethical and sustainability initiatives

In this reporting period, a focus for Eldercare has been to align our modern slavery compliance framework with our other ethical and sustainability focused initiatives. Eldercare has implemented a Corporate Social Responsibility Strategy which outlines specific goals and targets for Eldercare as a business. The specifics of the Corporate Social Responsibility Strategy are outlined in Case Study 3 below.

During this reporting period, Eldercare has been making significant progress with its sustainability initiatives, undertaking a specific project to assess and measure its greenhouse gas emissions. Accordingly, it has been increasingly important to align our modern slavery efforts with our sustainability initiatives. In this reporting period, Eldercare has drafted an Ethical and Sustainable Procurement Policy to align its purchasing decisions with its ethical and sustainable business priorities. This policy will be implemented in the next reporting period.

Eldercare has also issued four suppliers with questionnaires which include questions surrounding broader ESG topics such as their environmental and governance procedures. This will enable Eldercare to be able to assess the broader ESG risks of our suppliers and start to engage with our suppliers on topics such as greenhouse gas emissions measurement and sustainability initiatives.



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Continuation of modern slavery training for suppliers and employees

Eldercare continues to train employees in management and employees who engage with suppliers and purchasing decisions on:

- what modern slavery is;
- risk factors and indicators of modern slavery; and
- the reporting requirements under the Act.

All Eldercare employees undertake annual modern slavery training as part of their employment. The annual training module involves viewing an interactive training program which details key aspects of the Act and also equips employees with simple tools to create greater awareness both at work and in their everyday activities. Employees must then undergo an assessment answering key questions.

We also have an interactive modern slavery training module which is issued to suppliers. For example, if a supplier's response to the modern slavery questionnaire indicates a lack of understanding of what modern slavery is or what their modern slavery risks are, this supplier is a good candidate to be issued with modern slavery training to increase awareness regarding modern slavery risks and understand how they can take action to address their modern slavery risks.

In addition to this, we undertake regular meetings with key suppliers where modern slavery is a key agenda item to ensure that suppliers are continually reminded of how seriously we take our modern slavery compliance and our obligations as a reporting entity to identify and mitigate modern slavery risks within our operations and supply chains.

Education is critical to ensure that suppliers (particularly those that are high risk) understand what modern slavery is, what the risks are for modern slavery and what they can do to reduce these risks. Accordingly, Eldercare will continue to use and issue this training in future reporting periods and ensure that it is up to date with relevant legislative requirements and external guidance that is issued.

Contractual reinforcement of supplier expectations

All supplier contracts, purchase order terms and conditions and our contractor compliance systems contain a robust and detailed modern slavery clause. This clause:

- sets out our expectations with suppliers regarding modern slavery; and
- includes a requirement for our suppliers to report to us any instances of modern slavery in their organisation and supply chains.

All new contracts, agreements and terms and conditions are required to contain a modern slavery contract clause and all existing agreements are amended to include the modern slavery clause as they come up for renewal or extension.

Where it is assessed that the modern slavery risk associated with the relevant third party is heightened, Eldercare may prepare or request a more robust, comprehensive modern slavery clause to be inserted into the relevant agreement.

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Case Study 3

Eldercare's Corporate Social Responsibility Strategy was developed by the Eldercare Board to guide the businesses corporate governance. The strategy is aligned against the United Nations Sustainable Development Goals (SDG's) and has identified specific SDG's as priority areas for the business, such as:

- SDG 3 - Good health and wellbeing
- SDG 5 - Gender Equality
- SDG 7 - Affordable and clean energy
- SDG 8 - Decent work and economic growth
- SDG 10 - Reduced inequalities
- SDG 13 - Climate action

The Corporate Social Responsibility Strategy will guide Eldercare's corporate governance and has key performance indicators and review mechanisms inbuilt in the strategy to track Eldercare's progress towards these goals.

KPI Framework

During this reporting period, Eldercare has also considered implementing a KPI Framework, which would act as a goal setting and progress tracking mechanism for each reporting period. This would be an expansion of current planning efforts which Eldercare undertakes for each reporting period in the form of an action plan.

Eldercare is considering how a KPI Framework might work for its modern slavery compliance and broader ESG initiatives.

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Assessing effectiveness of actions

The overarching purpose of the actions undertaken in this reporting period has been to continue to dive deeper into our supply chains, understand the modern slavery risks deeper in our supply chains and to align the processes and procedures in our modern slavery compliance framework with our broader ethical and sustainability priorities as a business.

The action items that we have implemented in this reporting period have come from us taking a step back and reviewing our current processes and compliance frameworks. As a result of this review, we have implemented changes to how we conduct due diligence by taking an overarching risk approach to our modern slavery compliance framework. This shows the maturity in our modern slavery compliance framework and how far we have come as a reporting entity over the last four (4) years.

In addition to the maturity in our modern slavery compliance framework, Eldercare has continued to mature in the broader ESG space with the implementation of a Corporate Social Responsibility Strategy. This has added another layer to the foundation of Eldercare's corporate social responsibility governance processes and procedures and shows how Eldercare takes a holistic approach to its corporate governance.

Additionally, Eldercare has undertaken a benchmarking exercise which assists us in preparing action plans for each reporting period. This process involved our third-party advisors analysing our FY23 Modern Slavery Statement against the FY23 Modern Slavery

Statements of reporting entities in a similar industry and revenue bracket as Eldercare.

Our third-party advisers developed benchmarking questions based on the mandatory reporting requirements of the Act, what is required to be undertaken to comply with the mandatory reporting requirements and broader initiatives that contribute to having a robust modern slavery compliance framework, which is reviewed and added to in each reporting period based on the maturity of reporting entities and trends that our third party advisers are seeing in the modern slavery compliance space.

As well as considering the results of the benchmarking process, our third-party advisers consider external guidance and reports (for example, the Broken Promises Report issued by the Human Rights Law Centre) to analyse trends and broader areas of improvement across reporting entities as detailed in these reports.

Eldercare have also utilised the benchmarking criteria from the benchmarking tool developed by the Walk Free Foundation ("Tool"). Eldercare is in the "Services and Health Care" category and achieved a score of 25/30 (83%), compared to the average score in the "Services and Health Care" category of 15/30 (50%).

This benchmarking process assists Eldercare in preparing an action plan for the next reporting period. Some key action items that Eldercare is looking to focus on in the next reporting period are outlined in Criteria 7 below.

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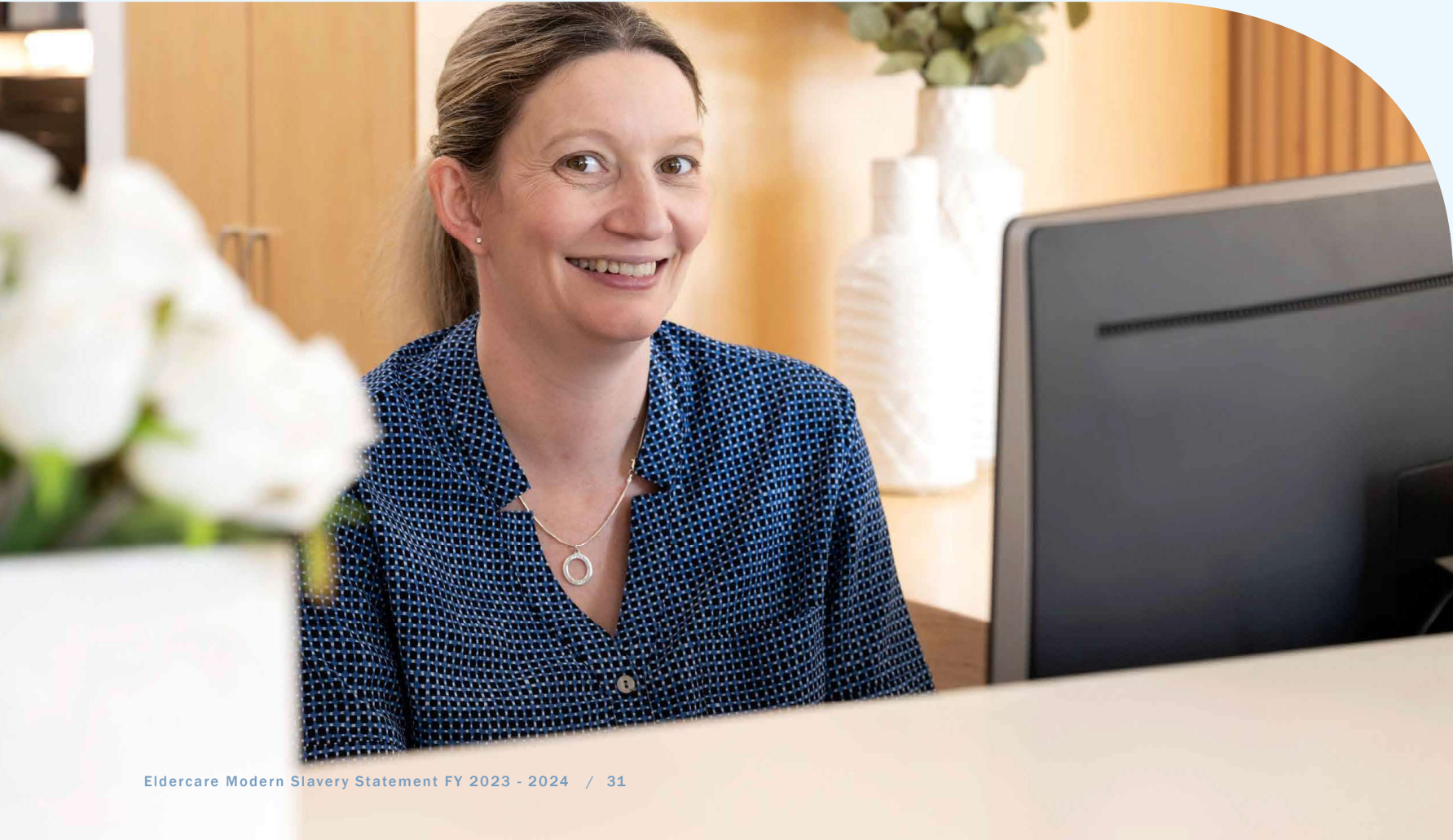
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This criterion is not relevant to Eldercare as Eldercare does not have any subsidiaries and does not own or control any other entities.



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This reporting period was focused on deepening our understanding of our modern slavery risk deeper in our supply chains and how we can integrate broader ethical and sustainability considerations into our supply chain due diligence.

To continue on this progress, we are looking to undertake the following action items:



Alongside the above action items, Eldercare will continue to assess and evolve our modern slavery compliance framework based on any changing circumstances to reduce and address our modern slavery risk. We continue to undertake a progressive and pragmatic approach to our modern slavery compliance framework and our corporate governance which demonstrates our dedication to upholding our purpose of Respect, Accountability and Connection.

Eldercare acknowledges that during the reporting period, the Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill 2023 was passed. This implements one of the proposed changes to the Act in the Review Paper which was released in May 2023. Eldercare will continue to monitor any movements with the broader 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 to the requirements of the Act.

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Board approval

This is the fifth modern slavery statement for Eldercare Australia Ltd and represents the reporting period of 1 July 2023 to 30 June 2024.

Approved by the Eldercare Australia Ltd Board on 29 October 2024.



Professor Justin Beilby
Board Chair

