



## MODERN SLAVERY STATEMENT FY2019/2020

PEOPLECARE HEALTH LIMITED

ABN 95087 648 753

REGISTERED OFFICE: Corner Victoria & Young Streets, Wollongong, NSW, 2500

### WHO ARE WE?

Peoplecare is a member-owned not-for-profit health fund that exists purely to benefit its members all over Australia.

Peoplecare formed in 1952 as the health fund for John Lysaght Australia Ltd and later expanded to BHP in the late 1970s. The fund grew from 2000 to offer health insurance to the employees of BlueScope Steel, One Steel, BHP Billiton and a range of more than 40 affiliated companies.

In 2006 Peoplecare opened itself up to anyone to join and officially first became known as Peoplecare.

Growing for more than 69 years, Peoplecare now covers more than 70,000 people on more than 33,000 memberships and employs more than 200 people across its business.

Peoplecare commits to eradicating modern slavery (under the Modern Slavery Act 2018) from its operations and this statement is provided to outline the actions taken to do this for the 2019/2020 financial year ("reporting period").

### Structure and Operations

Peoplecare Health Limited ABN 95 087 648 753 (trading as "Peoplecare") is a company limited by guarantee that operates predominately in Wollongong, NSW.

Peoplecare's core operations is to underwrite and distribute private health insurance through hospital and extras policies that are issued through direct sales and via intermediaries.

Further to its private health insurance underwriting and distribution, Peoplecare:

- operates a diversified business model through the provision of outsourced management services and licensing of marketing and management agreements to third party health insurance funds and insurance organisations; and
- operates a dental and optical store, Peoplecare Eyes and Teeth.

### Supply Chain

Peoplecare engages suppliers, predominately based in Australia, across its business for the provision of goods and services to support its operations, and these include:

- IT equipment and services
- Telecommunication services

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**Peoplecare Health Limited, a registered private health insurer**

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- Health professional services
- Medical consumables
- Merchandise and office supplies

Peoplecare rigorously reviews its key suppliers, in accordance with the regulatory standards required and its own internal outsourcing and associated policies.

As part of its statement, Peoplecare reports on its actions to assess and address modern slavery risks associated with its operations and its supply chains.

## MODERN SLAVERY RISKS

As a provider of private health insurance in Australia, Peoplecare's risk of Modern Slavery within its operations is considered low due to it predominately operating in an office environment.

However, the risks of Modern Slavery is likely to be found within our supply chain. To identify key risk areas for Modern Slavery Peoplecare developed an Industry Supply Chain Risk Matrix which utilises supplier and geographic risk. The Industry Supply Chain Risk Matrix allows Peoplecare to identify and assess the risk of modern slavery within an organisation that we engage with or are interested in engaging with.

Peoplecare is working through a review of its current suppliers to identify its high-risk suppliers so that it can undertake detailed assessments on these high-risk suppliers to determine whether or not they are engaging in modern slavery within their operations and/or supply chain.

## ACTIONS

During the 2019/2020 reporting period, Peoplecare undertook the following actions to address the risk of modern slavery practices within its supply chain:

<b>Modern Slavery Procedure</b>	<i>We introduced a Modern Slavery Procedure for our business that establishes our commitment to addressing modern slavery risks in our business as well as detailing the steps to undertake to address modern slavery risks.</i>
<b>Updating company policies</b>	<i>We have reviewed our procurement policies to introduce safeguards for modern slavery risks in our procurement policies.</i>
<b>Updated our supply terms</b>	<i>We introduced updated supply terms regarding modern slavery for our direct suppliers which introduces a number of safeguards for modern slavery risks, including audit rights, termination rights and provision of assistance where known instances occur. We have drafted these supply terms to allow us to work collaboratively with our suppliers to address</i>

	<i>these risks and any incidents that may occur. We have begun to roll-out these updated terms with all new suppliers and have started the process to amend our existing terms with high risk suppliers to include these safeguards.</i>
<b>Modern Slavery Questionnaire</b>	<i>We have introduced a modern slavery questionnaire that requires supplier responses prior to entering into a formal arrangement with each supplier. This questionnaire assesses the risk of modern slavery within the operations and supply chain of all of our direct suppliers to determine whether Peoplecare is comfortable that modern slavery risks are effectively managed, prior to entering into any such arrangements.</i>
<b>Modern Slavery Statement of Commitment</b>	<i>We have published a statement of commitment to publicly declare our commitment to working to eradicate modern slavery practices from our operations and our supply chain.</i>
<b>Industry Engagement</b>	<i>We are a member of an industry group working collaboratively to find ways of addressing risks common to the industry, engaging with common suppliers and driving an industry approach to modern slavery risk.</i>
<b>Whistleblower Policy</b>	<i>We have introduced a whistleblower policy that allows employees and other to anonymously report on any misconduct, which includes modern slavery.</i>
<b>Compliance Obligations Framework</b>	<i>We have introduced a compliance obligations framework that highlights and allows for regular attesting to Peoplecare's obligations which includes our Modern Slavery Obligations.</i>

## ASSESSMENT

Peoplecare recognises the importance of monitoring the effectiveness of our modern slavery processes and actions. In our operations and our supply chain we are working to better assess the effectiveness of our actions to address modern slavery.

The processes and actions we are undertaking:

- periodically assessing supplier compliance;
- establishing levers for future supplier audits in relation to modern slavery;
- regular reviews and attestations of our operational compliance to modern slavery; and
- regular reviews of our processes and actions to ensure they allow us to meet our commitment to meeting the ethical standards we have committed to and our modern slavery obligations

## OTHER RELEVANT INFORMATION

### Next Steps

Peoplecare is committed to maintaining high ethical standards and will continue to review the effectiveness of our processes and actions to improve our ability to detect, mitigate and reduce the risk of modern slavery within our business and supply chain. For the following reporting period we have identified the following key actions:

- Continue to review of all current suppliers to determine high risk suppliers
- Updating of supplier terms to include modern slavery provisions for current suppliers
- Continue supplier reviews of all new suppliers we engage with
- Continue to attest to our modern slavery obligations
- Independent monitoring and evaluation of Peoplecare's actions to address modern slavery risks

This statement is made for the financial year ending 30 June 2020 and was approved by the Board of Peoplecare on 10<sup>th</sup> March 2021.



Glenn Lennell  
Chair, Board of Directors  
Peoplecare Health Limited



Dr Melinda Williams  
Chief Executive Officer  
Peoplecare Health Limited