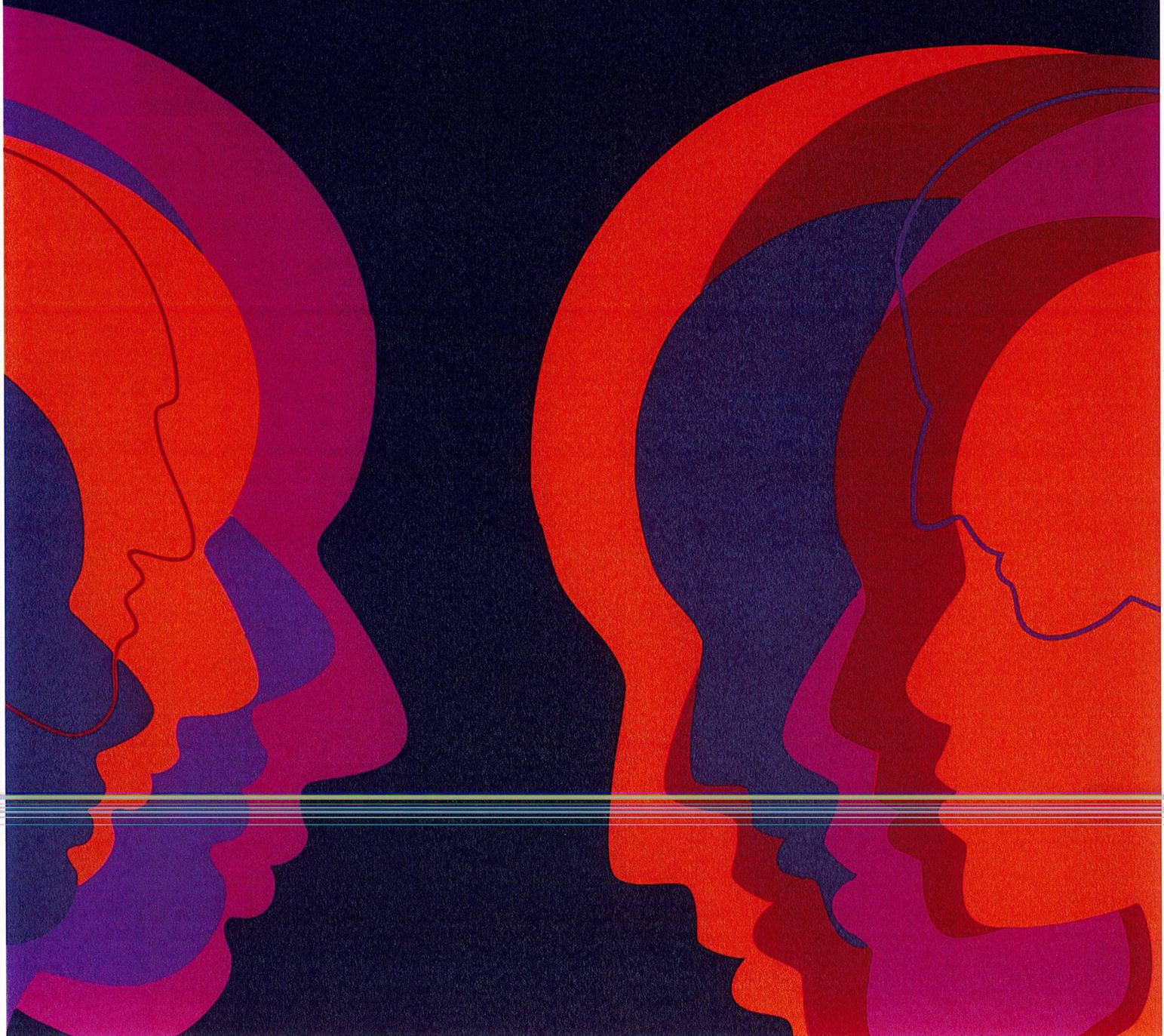


Modern Slavery Statement 2024–2025



Disclosure Note

This Statement has been made on behalf of HammondCare. This Statement covers all entities owned or controlled by HammondCare.

This Statement is approved by HammondCare's Board of Directors.

A handwritten signature in dark ink, appearing to read "Peter Bailey". The signature is written in a cursive, flowing style.

Peter Bailey

HammondCare Board Chair

11 December 2025

ABN 48 000 026 219

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About us

HammondCare is a leader in health and aged care, specialising in dementia, palliative, and complex care.

Our Mission

Our passion is improving the quality of life for people in need.

HammondCare stands for compassion, and we are strongly and intrinsically Christian. The work of HammondCare is motivated by Christian principles and values expressed in the words and deeds of Jesus Christ. HammondCare believes in the value of all people as made in the image of God and as loved by God. We are therefore called to show the same love, with compassion and respect, for people in need.

Serving others

We serve older people with complex care needs, regardless of their circumstances.

From our CEO

As a mission-driven organisation, our Christian values remind us of the inherent worth and dignity of every individual. This belief inspires us to act with compassion and respect towards those in need, motivating our ongoing efforts to enhance the quality of life for those we serve. It also compels us to ensure that our organisational policies, procedures, and procurement practices actively protect vulnerable individuals, including those at risk of modern slavery.

Our 2025 Modern Slavery Statement, and the daily actions that support it, demonstrate our unwavering commitment to combating modern slavery through transparent, ethical, and accountable practices across our organisation. Over the past year, we have strengthened our approach by improving vendor data management, implementing centralised compliance dashboards, introducing automated reminders for reviews and checks, and reinforcing governance, accountability, and escalation processes. These measures are supported by our continued focus on modern slavery awareness and cultural training. We are proud to stand alongside other responsible organisations in this collective effort.



Andrew Thorburn
CEO

Reporting Criteria 1 & 2: About HammondCare

Organisational structure

Company structure and related entities

HammondCare (**ABN 48 000 026 219**) is a public company limited by guarantee and registered with the Australian Charities and Not-for-Profit Commission (ACNC).

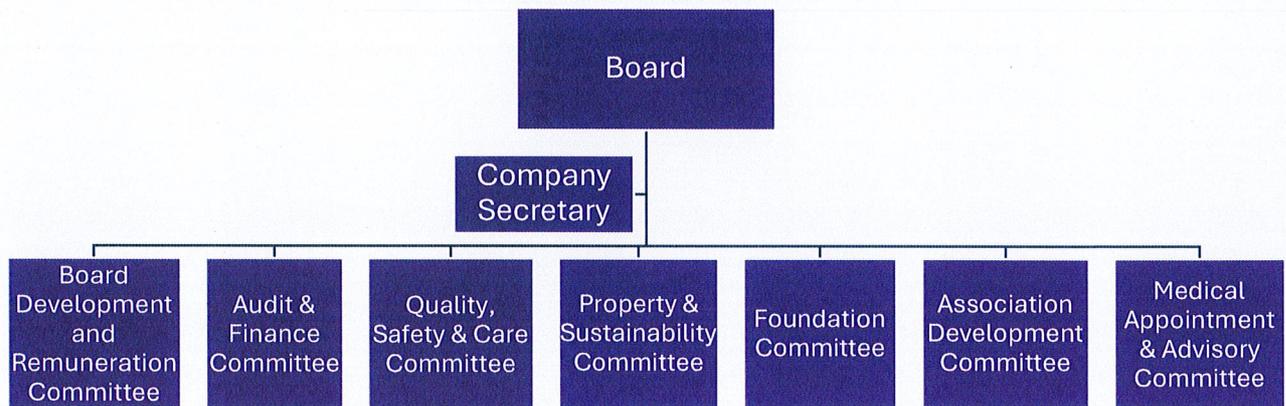
HammondCare is the sole shareholder of HammondCare Health and Hospitals (**ABN: 72 074 354 028**) which is a public company limited by shares and registered with the ACNC.

Our Governance Framework

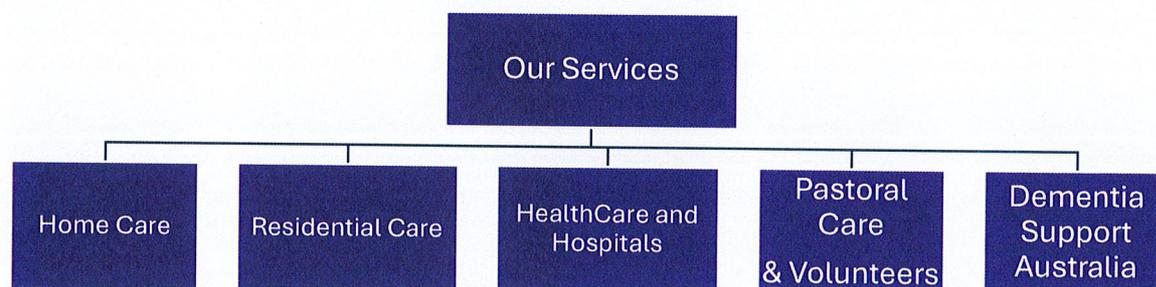
Effective corporate governance is critical to our longer-term success.

HammondCare's governance arrangements are set out in the Company Constitution and all Directors, Executive and staff members are required to meet the standards of conduct and behaviour as provided for in the Mission in Action.

The Board's roles and responsibilities are set out in the Board Charter and the Board Governance Handbook. Certain responsibilities are delegated to the Executive Team. The Board is assisted by Board sub-committees, which include members of the Board and Executive Team, set out below:



Service Operations



Home Care

We offer home care across NSW, ACT, Victoria, and Queensland. We provide services so that older people and people living with dementia can continue to enjoy life and remain in their own home supported by a consistent team of trained carers.

Residential Care

HammondCare's residential care homes are located across 13 sites in NSW, Victoria, and South Australia. Our approach in these homes is to offer a sense of belonging and feeling at home, with a commitment to dementia-specific care.

HealthCare and Hospitals

HammondCare's healthcare and hospital services offer palliative and supportive care, rehabilitation, mental health care for older adults, pain management, and other essential support services.

Pastoral Care & Volunteers

Providing understanding, care, and support in times of need, Pastoral Care is an integrated and core part of our services at HammondCare. With over 850 volunteers, the program offers opportunities to provide companionship, assist with activities, and support clients in residential care, hospitals, and home settings.

Dementia Support Australia

Dementia Support Australia, operated by HammondCare, is a national service providing expert advice and practical assistance for people living with dementia and those who care for them. Funded by the Australian Government, it offers 24/7 support through specialised programs that focus on managing behavioural changes and improving quality of life.

Reporting Criteria 3: Modern Slavery Risk in Operations and Supply Chain

Operational Risks

Our People

HammondCare has over 5,968 dedicated staff, along with 850 volunteers, working across 91 service locations, caring for more than 44,464 people across Australia. The risk of modern slavery within HammondCare's directly employed workforce is assessed as low, reflecting Australia's regulated labour market and the tight regulatory settings of health and aged-care industries. Nevertheless, HammondCare maintains vigilance through policy, mandatory training and reporting and whistleblower pathways, recognising that risk to people must remain a central focus.

Supply Chain Risks

Building and Construction

Building and Construction remains one of the highest potential risks of modern slavery for HammondCare, due to subcontracting chains, labour-hire practices that can obscure accountability, and building materials sourced internationally. We ensure that both smaller and larger construction companies provide Statutory Declarations confirming that sub-contractors have been paid correctly, and our contract management system allows the organisation's Modern Slavery statement to be added.

Whilst there have been no new builds in the reporting period, Building and Construction remains one of the highest potential risks of modern slavery for HammondCare. This is because we continue to consider areas of growth, as well as ongoing repair and maintenance of older sites.

Facilities management, cleaning, and property maintenance can involve vulnerable workforces and variable oversight of subcontractors. Catering and food supply chains can involve seasonal labour, low margins and high volumes that have been associated internationally with debt bondage and other exploitation. Medical supplies and personal protective equipment may be manufactured in higher-risk jurisdictions and have historically raised concerns in relation to rubber and textiles. Information and communications technology and electronics, particularly upstream raw materials such as cobalt and mica, may also present risk within multinational supply networks.

Strengthening Contract Management to Support Ethical Supply Chains

HammondCare has taken proactive steps to enhance its contract management practices as part of its broader commitment to preventing modern slavery. An internal audit of contract management processes confirmed strong governance across supplier oversight, contract approvals under the Delegation of Authority (DoA), and end-to-end contract lifecycle management. While no major issues were identified, targeted improvements were implemented to further strengthen consistency and control.

Key features of HammondCare's contract management system include:

- **Mandatory supplier-initiated data updates**, ensuring accurate and current supplier records.
- **Centralised compliance dashboards**, providing visibility into contract status, top spend categories, and supplier performance.
- **Automated notifications and renewal reminders**, enabling timely action and reducing risk of contract lapses.

All sampled contract variations were found to be approved in accordance with the DoA, reinforcing robust internal controls. These measures enhance transparency, data integrity, and responsiveness, critical elements in identifying and addressing modern slavery risks across HammondCare's operations in FY2024–25.

Reporting Criteria 4: Actions to Assess and Address Risk

The following outlines the actions and measures taken to assess and address the risk of modern slavery in our operations. Our commitment to ethical and responsible business practices is paramount, and we acknowledge the importance of addressing this pressing global issue.

Risk assessment

Supply Chain Assessment

- HammondCare requires suppliers to initiate and substantiate changes to their records in the supply management system, ensuring up-to-date and accurate vendor data for more reliable monitoring and audit trails.
- Centralised compliance dashboards are used to monitor supplier onboarding, attestations, and regional roll-out, providing visibility across the supply chain.
- A risk-based due diligence approach is applied to higher-risk categories, using structured questionnaires and, where relevant, statutory declarations such as subcontractor payment declarations in construction.
- The Supplier Modern Slavery Questionnaire, aligned with Commonwealth guidance, is used to assess supplier visibility beyond Tier-1, policies, training, migrant-worker considerations, and escalation and remediation practices.

Internal operational assessment

- Ongoing monitoring of employment contracts, workplace conditions, and employee engagement continues, which includes assessment of any modern slavery risks associated with recruitment and employment.
- We continue to draw on advice received from a third-party to ensure impartiality.
- Confidential reporting mechanisms, including whistleblower protections, are maintained to ensure that any adverse human rights impacts can be raised and addressed promptly.

Risk mitigation

Supplier Code of Conduct and due diligence

- HammondCare's Supplier Code of Conduct and Group Terms and Conditions require all suppliers to take reasonable steps to eliminate modern slavery from their operations and supply chains, and to comply with the Modern Slavery Act 2018 (Cth).
- Ongoing due diligence is conducted through structured supplier assessments, regular monitoring, and corrective-action pathways to address any identified risks or incidents.

Employee Code of Conduct

- Code of Conduct launched and continued in 2024 that aligns with the Mission, Motivation and Mission in Action that explicitly sets out standards of professional behaviour and principles. All employees have been briefed and required to sign the Code of Conduct, with all future employees doing so during onboarding.

Training and education

- Development and implementation of modern slavery training for all employees, focusing on recognising, preventing, and reporting instances of modern slavery.
- Training is mandatory for all employees annually, with refresher courses provided regularly.

Internal controls and reporting mechanisms:

- We have established internal controls to monitor and evaluate potential risks within our own operations, including the promotion of safe and ethical recruitment practices through the HammondCare Enterprise Risk Register.
- Reporting mechanisms are in place to allow staff to report any concerns related to modern slavery, ensuring whistleblower protections through third party engagement to assist in managing whistleblower disclosures.
- We will continue our commitment to address modern slavery issues by ensuring we have processes in place to respond to any adverse human rights impacts should any modern slavery issues be identified.

Reporting Criteria 5: Effectiveness Assessment

HammondCare assesses the effectiveness of its actions to address modern slavery risks through a multi-faceted approach. Where risks or non-compliance are identified, corrective action plans are implemented and tracked to resolution. Our approach is informed by ongoing internal audits, feedback from staff and suppliers, and benchmarking against sector best practice. These measures ensure that our modern slavery programme remains robust, adaptive, and focused on achieving tangible improvements in risk mitigation and ethical conduct across our operations and supply chain.

This report represents our dedication to ethical and responsible business practices and is a testament to our ongoing commitment to creating a safe, inclusive, and modern slavery-free environment for all.

Reporting Criteria 6: Process of Consultation with entities owned or controlled

HammondCare Health and Hospitals is managed and governed by the same Executive Team and Board as HammondCare and has been fully included in the process of consultation. The following outlines our consultation and collaboration with the community and our partners.

Collaboration and partnerships

- Active participation in industry associations and collaboration with peers, government agencies, and NGOs to share best practices and insights in the fight against modern slavery.
- We have joined industry alliances aimed at improving modern slavery awareness and prevention.

Transparency and reporting

- We are committed to transparency and regular reporting on our progress in addressing modern slavery risks.
- Annual Modern Slavery reports are published and made accessible to the public and relevant authorities.

Continuous improvement

We continue to embed our understanding of Modern Slavery in the context of our organisation. We are refreshing our efforts and commitment to continuous improvement in line with our strategic Next Chapter review.

- Regular reviews and audits are conducted to ensure compliance with laws and regulations.
- Continue to review and strengthen HammondCare's Enterprise Risk Register, including our Governance and Regulation risk, which encompasses Modern Slavery.
- Scenario-based refresher training will be sustained, tailored to high-risk categories to maintain staff awareness and capability.
- Transparency will be reinforced by periodically reviewing KPI monitoring and escalation processes, and by publishing an annual summary of actions and outcomes.
- Compliance is monitored through our Enterprise Risk Management System (ERMS), ensuring risks related to Modern Slavery are tracked and addressed.