

# Modern Slavery Statement

## About Us

Benetas is a charitable organisation structured as a public company limited by guarantee, and does not own or control any other entity.

Benetas is a leading not-for-profit organisation engaging 1670 employees, with a mission to provide older Victorians, their families and carers with a full range of quality community based services, residential aged care homes, retirement living, primary and home care plus respite services, across metropolitan and regional Victoria. Benetas' main operations include its aged care and community health care services, including the people it directly employs.

Benetas' supply chain includes suppliers and contractors covering hospitality services (i.e. food services, catering, cleaning, laundry); allied health; agency labour; pharmacy & medical supplies; property services (i.e. maintenance, utilities, waste management, security, etc.); information, communication & technology; gardening; equipment purchases; capital & property development works, and investment advisers.

## Modern Slavery Position

Benetas rejects any form of modern slavery and human trafficking, and we are committed to implementing effective systems and controls to ensure it does not take place directly within our own business or our supply chains. We respect the human rights of our employees, volunteers, customers, suppliers and business partners, and we aim to identify and manage any risks related to these rights.

# Our Workplace Risk Assessment

Benetas engages employees that align with our values and we comply with all relevant local and national laws related to human rights and modern slavery in our workplace. As an organisation we are committed to maintaining a diverse and inclusive workplace, treating people with respect and dignity, and have no tolerance for discrimination or harassment. Benetas has been recognised with continued WGEA citations as an employer of choice for gender equality and have a strong focus on managing the health, safety and wellbeing of our employees and volunteers. We are also committed to creating and maintaining both a diverse workforce and an inclusive and safe workplace for all.

As an aged care service provider in a highly regulated industry, Benetas considers the risk of modern slavery within its direct business operations to be relatively low. However it recognises that through its supply chain, Benetas may be indirectly exposed to the risk of modern slavery and human trafficking.

### **Our Actions Taken**

Benetas has commenced awareness training for employees and continues to review our risk frameworks, policies and procedures to mitigate any potential human rights violations in our business operations and supply chains through:

- Governance Benetas raises the awareness of modern slavery risks, informing the board and management of our obligations and accountabilities for identifying and managing these risks.
- Supplier Obligations Benetas has issued a Supplier Code of Conduct which outlines Benetas' commitment to ethical, socially responsible and sustainable practices and makes it clear that we are committed to developing relationships with business partners, suppliers and contractors that align with our values and commitment to managing modern slavery risks.
- Grievance and Feedback Mechanisms Benetas has a Whistleblower Policy and complaints mechanism process that allows all Benetas directors, executives, managers, employees, volunteers, suppliers, contractors and consultants, the ability to raise concerns such as modern slavery risks in a confidential manner.



#### Modern Slavery Statement continued

- Awareness Training Human rights / modern slavery awareness training has been completed by relevant managers involved in the procurement of goods and services within Benetas.
- Supplier Selection Tender documents now request that tenderers provide information on their approach to managing modern slavery in their supply chain. Supplier responses will influence the evaluation and final supplier selection.
- Supplier Compliance Benetas has selected and is currently implementing an online contractor compliance and induction system to manage contractor administration and compliance.

#### Impacts of COVID-19

Covid-19 has had an impact on the Benetas supply chain for Personal Protective Equipment (PPE) and we are aware of the increased risk of modern slavery that this demand has created.

To mitigate this risk, Benetas has aligned with reputable suppliers to source PPE and other impacted products. Our current suppliers still have challenges as a result of lockdowns and travel restrictions which limit their ability to conduct physical audits, however some products have been moved to manufacturing and supply in Australia such as gloves and hand sanitiser.

Our suppliers know that Benetas does not support cheaper pricing where modern slavery is suspected.

#### What we are planning?

Benetas intends to strengthen our understanding of human rights issues as they apply to our business operations and in particular our supply chains.

Our key areas of focus will be to:

- Continue to update relevant Benetas policies to specifically reference modern slavery risks and key accountabilities.
- Develop a risk-based assessment framework to identify supplier segments that potentially have higher risks of human rights violations within their supply chain. This will be used by relevant managers as a tool to educate and mitigate risk when engaging in supply arrangements that may be exposing Benetas to modern slavery practices.
- Update standard supplier templates and contractor management to raise expectations of our commitment to managing modern slavery risks in our supply chains.
- Develop key performance indicators to measure the effectiveness in preventing modern slavery risks.

#### Statement

This statement was approved by the board of the Anglican Aged Care Services Group trading as Benetas (ABN 60 082 451 992) pursuant to section 13 of the Modern Slavery Act 2018 on 4 October 2021 and constitutes our modern slavery and human trafficking statement for the financial year ended 30 June 2021.



This statement is signed by Michael Urwin in his role as Chairman of the Board for Anglican Aged Care Services Group.

#### Michael Urwin Chairman October 2021