

Brightwater

Modern Slavery Statement

2024 – 2025

Brightwater Central, 2A Walter Road West
Inglewood WA 6052

brightwatergroup.com |    

Brightwater Care Group Limited ABN 23 445 460 050 ACN 612 921 632

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BRIGHTWATER CARE GROUP MODERN SLAVERY STATEMENT

**Reporting Period:
2024/2025 financial year**

Introduction

Brightwater Care Group Limited ACN 612 921 632 of 2A Walter Road West, Inglewood WA 6052 (**Brightwater**) is subject to the Modern Slavery Act 2018 (Cth) (**Act**).

Acknowledgement of Country

In the spirit of reconciliation, Brightwater acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

What is modern slavery?

The term modern slavery is used to describe the range of serious exploitative practices that deprive individuals of their freedom through coercion, threats, or deception.

The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour mean situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Where Brightwater refers to 'modern slavery', this is intended to cover the range of slavery and slavery-like practices that fall within the Act's definition of the term.

Brightwater is committed to uphold the dignity of every individual by identifying, managing, and reducing the risk of modern slavery across its operations and supply chains. Brightwater does not tolerate any form of modern slavery in any part of the organisation.

Scope and purpose

As a reporting entity under the Act, Brightwater is required to prepare an annual Modern Slavery Statement (**Statement**) that identifies modern slavery risks in our supply chain and the actions taken to address those risks.

In addition to satisfying the reporting requirement under the Act, this Statement reflects a stance on modern slavery that is reflective of Brightwater's Mission and Values.

About Brightwater

Brightwater is a public company limited by guarantee and registered under the *Corporations Act 2001* (Cth). It is not part of a larger corporate group and does not own

or control other entities. Brightwater is established as a charity, and its objectives are solely benevolent.

Brightwater is a not-for-profit organisation dedicated to supporting the Western Australian community through aged care, disability and retirement living services.

Our Vision: 'Thrive. Connect. Belong.'

We create communities where people connect and belong, thriving through progressive and responsive care.

Brightwater recognises that its clients and staff need to be connected to what matters to them, have somewhere they belong and daily opportunities to thrive. Brightwater looks forward to progressing and further embedding this Vision over the next 12 months.

Our Mission: "Pursuing the dignity of independence"

At Brightwater, we value the potential that lives inside each and every one of us, no matter what that looks like. It's our ability to strive towards our best self every day, to keep learning and to keep growing.

Our Values: At Brightwater we are connected by one spirit

- *Our spirit is shared when we are **caring**: We are interested, empathetic partners who empower others and ourselves.*
- *Our spirit is **authentic**: We are honest, accountable, inclusive and understanding.*
- *Our spirit shows that we are **progressive**: We listen and share, we are curious and embrace new ways.*
- *Our spirit is **courageous**: We show leadership and have a go, we are decisive and speak up.*

Our shared spirit connects us to our Brightwater community. It guides us to achieve our Mission and pursue the dignity of independence. This is at the heart of everything we do.

Diversity & Inclusion: *At Brightwater, we welcome people with the full diversity of life experiences, thoughts and beliefs. We foster a culture of inclusion, collaboration and innovation where our clients and staff can flourish.*

Brightwater is committed to:

- Building and supporting an inclusive culture;
- Providing inclusive and respectful services, enabling our client's to fully enjoy life's possibilities;
- Recognising and supporting the unique challenges and experiences of people; culturally and linguistically diverse communities; individuals with disabilities; and Aboriginal and Torres Strait Islanders; and
- Celebrating the achievements of a diverse community.

Brightwater Governance Structure

Brightwater was established in 1901 as the Homes of Peace for the Dying and Incurable; an initiative of Lady Madeleine Onslow and Dr Athelstan Saw.

In 1997, Homes of Peace became Brightwater Care Group. During the 2015-2016 financial year, Brightwater transferred its registration as an incorporated association to a

public company limited by guarantee and registered under the Corporations Act 2001 (Cth), facilitating the adoption of an enhance governance framework.

Brightwater is committed to implementing high standards of organisational governance, prioritising stakeholder participation, and driving values-based decision making to ensure Brightwater:

- achieves its purpose by delivering client focused services;
- complies with all relevant laws, standards and codes;
- meets community expectations of probity, accountability, and transparency; and
- recognises the need for culturally safe and inclusive leadership and governance.

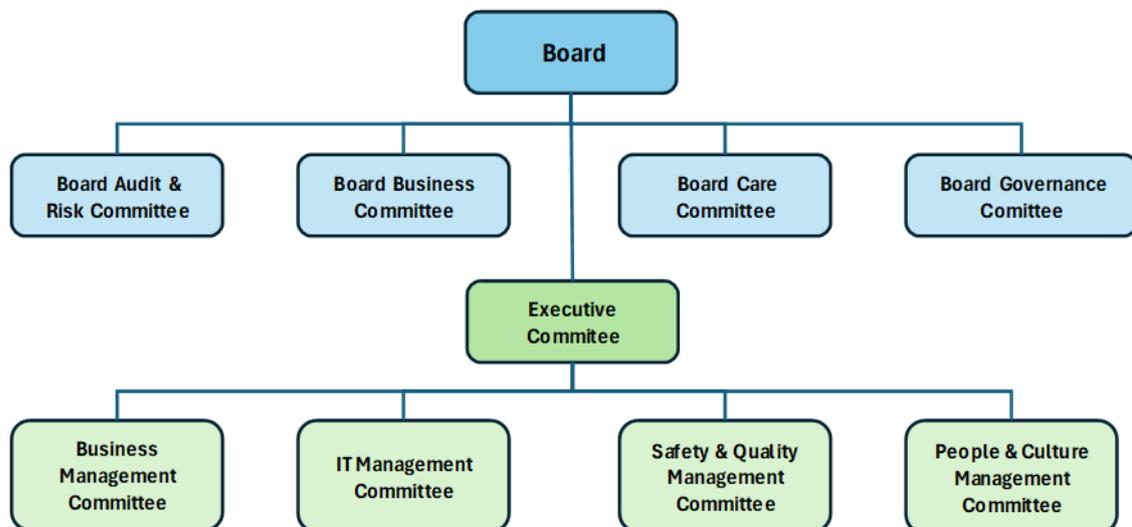
Role of the Board

Brightwater is governed by a Board that is the guardian of Brightwater’s Vision, Mission, philosophy and values. It is responsible for the overall management and strategic direction of Brightwater and for delivering performance in accordance with Brightwater’s goals and objectives.

Brightwater’s Board is made up of Directors appointed in accordance with Brightwater’s Constitution. The Board has an appropriate number of independent, non-executive directors who can hold Management to account and who act in the organisation’s best interests.

Brightwater has established standing Board and Management Committees to assist the Board in the performance of its responsibilities.

Brightwater Governance Committee Structure



Board Committees

To assist the Board in the performance of its responsibilities, it has established four standing Committees and may establish other Committees from time to time to deal with discrete functions or matters of specific importance.

- **Audit & Risk Committee:** Oversees Brightwater's financial position, performance and reporting integrity (including internal and external audit functions), and reviewing and making recommendations regarding risk identification, management and mitigation.
- **Business Committee:** The Business Committee's purpose is to analyse information and provide recommendations to the Board on a variety of business and executive functions, including Brightwater's investment strategy, and reviewing feasibility reports and business case submissions.
- **Care Committee:** Ensures that the Company's clinical governance structures and care services functions represent best practice, operate effectively, align with strategy and reflect the voice of our clients and the Brightwater's Mission.
- **Governance Committee:** Responsible for Board, Director and CEO evaluations, succession planning, monitoring and reviewing CEO remuneration, and monitoring Brightwater's governance generally.

Executive and Management Committees

Executive Committee: The purpose of the Executive Committee includes but is not limited to implementing the strategic direction of Brightwater set by the Board, and to effectively manage the operational, strategic and corporate affairs of Brightwater.

As part of Brightwater's Governance Framework "second line of defence" risk-based approach, there are four Management Committees reporting directly to the Executive Committee.

These Management Committees oversee the development, implementation, monitoring, and evaluation of systems, policies, procedures, and practices for their specific focus areas:

- **Business Management Committee:** Financial and business management and growth.
- **IT Management Committee:** IT planning, management and capability development, as well as IT security.
- **Safety & Quality Management Committee:** Quality of care and service delivery.
- **People & Culture Management Committee:** Workforce planning, management and capability development, as well as workplace health and safety.

Brightwater Operations and Supply Chain

Brightwater's Operations

As of 30 June 2025, Brightwater employs approximately 2,746 staff members, who represent 102 Nationalities. This workforce is supplemented by approximately 168 volunteers.

Brightwater's activities fall into seven broad categories, all of which are directed towards Brightwater's benevolent purpose. Our Commercial Services and Research Centre help us in our vision to lead in providing care services, support and development opportunities for the people we care for, with all funds redirected back into supporting our clients. All activities are conducted within Western Australia.

Those categories are:

- **Residential aged care services (including transitional care):** Brightwater operates ten resident aged care facilities (including transitional care) that provide specialist support, day-to-day care, and accommodation to over 747 clients who have complex needs;
- **Disability services:** Brightwater operates eleven resident disability facilities that supports over 144 clients with acquired or progressive neurological disabilities, including brain injuries, Huntington's disease, and early onset dementia. Services include supported independent living, therapies, rehabilitation, behavioural and nursing support. A Capacity Building Program supports 560 clients with a disability living in their home or in the community;
- **Retirement services:** Brightwater provides a close-knit lifestyle and retirement community consisting of 168 independent living houses to approximately 208 residents wishing to live independently for longer in their own homes;
- **At-home care services:** Brightwater assists over 2,715 clients with at-home living through various support programs, enabling them to remain in the comfort and familiarity of their own home while receiving the care and support that they need to live as independently as possible. During the FY25 period Brightwater helped over 400 clients to return home from hospital;
- **Linen services:** Brightwater operates an in-house linen function and also provides an external commercial linen service to 165 customers. On average 180 tonnes of linen is washed per week;
- **Catering services:** Brightwater operates an in-house catering function for clients at its facilities and provides an external catering commercial service with over 97,000 meals produced each month; and
- **Research services:** Brightwater funds both internal and external research and collaborates with the public and internal and external partners to define a problem, to build research capacity within Brightwater, and to undertake quality research studies. Research priorities include brain health, ageing well, brain injury rehabilitation, independence, dementia care, quality of life, Huntington's Disease and nutrition.

Brightwater's Supply Chain

Brightwater procures a range of goods and services necessary to support the above activities with spend for the year exceeding \$64 million. Approximately 90% of our spend are with 10% of our supplier base.

Our supply partners range from large national providers to small local businesses, with the majority based in Australia. As a result, a high percentage of our direct spend is within Australia and we understand some of these companies may procure goods and services from suppliers located overseas.

Brightwater has stable long-term relationships with many suppliers which enables us to maintain solid relationships, support both the local and national economy, and uphold shared values of caring, being authentic, progressive and courageous.

The main goods and services categories we procure are:

- **Labour and workforce** – Agency direct care personnel, various consultants and contractors to support operations as required.
- **Clinical and care** – Medical equipment, consumables, infection control supplies and personal protective equipment used while providing care and support to our clients.
- **Hospitality and domestic services** – Food, beverage supplies, laundry, linen, cleaning and waste management.
- **Services at home** - Purchases to support our home services clients. These are often smaller businesses which are not directly within our central procurement control.
- **Facilities and property management programs** - Capital works, refurbishments, and maintenance to maintain our buildings and surrounds to an expected high standard.
- **Utilities and motor vehicle fleet** - Electricity, gas, water, vehicle purchases and transport logistics.
- **Information and communication technology** – IT/communication infrastructure and equipment, software, and system support.
- **Corporate services** – Insurance, marketing, legal and human resources, and audit services.

Brightwater continues to increase its focus in sustainable procurement which includes modern slavery clauses into all contractual arrangements with third parties, setting measurable goals such as reducing emissions, increasing recycled content and encouraging local suppliers. Brightwater's Procurement Framework and governance procedures are also evolving to identify and remove suppliers where there is evidence of modern slavery.

Brightwater's Procurement Team continues to develop its procurement capability by

engaging directly with key suppliers with collaborative procurement and tendering activities. This has further enhanced our partnerships with our suppliers.

Risks of modern slavery practices in our operations and supply chain

Brightwater's business areas and operations have remained consistent over the past 12-month period. Brightwater does not consider that there is a significant risk of Brightwater directly causing, contributing to or being linked to modern slavery practices.

Upon review, there has been no significant change to the modern slavery risks identified.

People Risks

Individuals who make up Brightwater's workforce are engaged by us in accordance with our documented staff recruitment, screening and human resources policies. Such individuals are either Australian citizens, permanent residents or working on visas. It is our view that the risk of modern slavery from staff employed by Brightwater is very low, as a result of the highly regulated nature of the labour market in Australia.

Whilst the majority of Brightwater's workforce is directly employed under enterprise agreements approved by the Fair Work Commission, or individual employment contracts, we do use 3rd party agency staff to supplement our workforce from time to time.

Agreements are in place with a panel of reputable staffing agencies that are registered Australian businesses and are also subject to the same government and regulatory oversight when employing workers. All third-party staffing agencies engaged have agreed to standard terms which includes modern slavery provisions. These clauses ensure staffing agencies acknowledge Brightwater's commitment in complying with the Act and require them to also comply with their own obligations relating to modern slavery. To date, no staffing agencies have raised any issues with these standard clauses.

Though no direct instances of modern slavery have been identified within Brightwater, we do remain cognisant of the hidden nature of people exploitation and the importance of maintaining robust awareness and oversight.

Supply Chain Risks

Brightwater does not knowingly procure any goods or services that could relate to modern slavery practices, though we acknowledge there can be limitations in our practical ability to scrutinise the supply chains of parties who supply goods or services to us. Our Procurement Framework and Governance continues to evolve, and if we become aware of evidence of modern slavery, those suppliers will be removed.

Brightwater recognises that the greatest supply chain risk is for goods sourced by our suppliers from outside of Australia. Brightwater is aware that with increased demand for aged care and disability services, this may lead to heightened risks of modern slavery in countries identified as higher risk areas according to the Global Slavery Index.

Upon review, the greatest modern slavery risks associated with our business are still likely to arise in the following areas:

Purchases from overseas, including:

- Medical and healthcare equipment manufactured overseas;
- Technology (equipment and services);
- Clothing, personal protective equipment (PPE) and other personal equipment;
- Commercial and catering consumables; and
- Linen (supply of materials including sheets and towels).

Actions to assess and address risks (including due diligence and remediation processes)

During the period, Brightwater has reinforced its commitment to identifying, addressing and eliminating modern slavery across our operations and supply chain.

Our Mission and our Values underpin everything that we do.

Brightwater will:

- not engage in modern slavery;
- not condone the presence of modern slavery in Brightwater's supply chain;
- take such reasonable steps as may be available (including exerting commercial influence and using alternate supply/distribution channels) to avoid the presence of modern slavery in Brightwater's supply chain; and
- exercise due diligence to maximise compliance with its Modern Slavery Policy and generally avoid contributing to the global issue of modern slavery.

At an individual level, it is the responsibility of each director, officer, employee, agency worker, contractor and other party acting or purporting to act for or on behalf of Brightwater to follow our stance on modern slavery.

Brightwater has continued to develop its approach assessing and addressing modern slavery. During the reporting period, this has included the following:

- **Review of procurement process:** A review was undertaken by Brightwater's Internal Auditors to identify enhancement opportunities of key procurement practices, processes and controls within the sourcing, contract lifecycle management and procure to pay stages of the procurement lifecycle.
- **Modern Slavery Working Group:** This senior management group coordinates Brightwater's modern slavery response and meets on an as required basis to ensure compliance to the Act.
- **Standard contracts:** Our procurement practices continue to be reviewed and improved with standard supplier agreements required for suppliers, which reflect Brightwater's stance and expectations with suppliers on modern slavery.

- **Code of Conduct:** The Induction training and onboarding modules were updated to ensure all new staff are aware of their obligations under the revised Code of Conduct. All People Leaders also attended training, with all staff now required to complete an e-learning training module each year.
- **Whistleblower Policy:** Training on an updated Whistleblower Policy was provided to all People Leaders. The policy is designed to foster good corporate governance, risk management, and aims to promote a culture of integrity, ethical conduct and corporate compliance, whilst protecting persons from disadvantage who reasonably suspect and report wrongdoing.
- **Integrity Governance Framework:** A new Integrity Governance Framework to facilitate a culture of integrity and compliance, and to promote reporting of potential breaches of the Code of Conduct, has been embedded into Brightwater's overarching Governance Framework.
- **Integrity Advisory Group:** An advisory group has been established under the Integrity Governance Framework with a purpose to:
 - Monitor and provide advice about integrity risks and treatments;
 - contribute to the ongoing development and strengthening of Brightwater's integrity, fraud and corruption prevention strategies; and
 - contributes to the implementation, evaluation and review of the Integrity Governance Framework.
- **Integrity Risk Register:** An Integrity Risk Register has been developed to identify, document, assess, and track integrity-related risks (which includes modern slavery), that can adversely impact on Brightwater's reputation and operations. Where controls are deemed inadequate to risk identified, proposed risk treatments are being developed to further manage the risk.
- **Supplier due diligence:** A review of Brightwater's key suppliers' approach to modern slavery was undertaken to confirm evidence of compliance to the Act. Where this was not available, a modern slavery questionnaire was issued for suppliers to complete.
- **Staffing agencies:** Brightwater engages with its panel of preferred agencies for the provision of care workers, hospitality, nursing and disability support workers. Initiatives to reduce dependency on agency staff together with a review of agency performance were undertaken. Spot checks on agency staff qualifications, clearances and entitlements were conducted. This will be ongoing into the next reporting period.
- **Brightwater supplier portal:** The portal continues to be the single point of entry for organisations to register their interest in becoming a Brightwater supplier. Brightwater's website provides information for prospective suppliers as to our expectations on, modern slavery, code of conduct, and privacy.

When purchasing, we require our suppliers to comply with all applicable laws - which includes modern slavery laws, employment laws and workplace laws. We endeavour to work only with suppliers who are aligned to our Values. Further, where we identify that a

particular purchase comes with heightened risk, we will request additional information and undertake additional risk assessment.

Remediation may take many forms. We have a designated point of contact for modern slavery complaints and concerns.

Brightwater encourages those raising concerns about modern slavery within the Brightwater supply chain to raise them directly with us in the first instance, so that we have an opportunity to remedy the situation. There are many ways for staff, our clients, suppliers and the public to contact us. We also have a Whistleblower Policy that can help encourage reporting.

Where problems are identified and cannot be remediated, we will be prepared to terminate supply contracts and source alternate suppliers.

Looking ahead, over the next 12 months, the focus for Brightwater will include:

Implementing actions from procurement review: Actions to address findings from the procurement review will include:

- Developing a revised Procurement Framework to support the selection of reputable suppliers with a consistent onboarding/screening process that includes minimum ethical practices and sourcing requirements;
- Enhancing core procurement controls which includes a review of contract templates including modern slavery provisions and requirements; and
- Delivering training and awareness sessions to educate staff on updated requirements of the procurement framework.

Categorisation and review of suppliers: Commence categorisation to determine those suppliers that may have a high exposure to modern slavery and to reinforce importance of reviewing their supply chain for modern slavery and reiterate Brightwater's position of zero tolerance to breaches of the Act.

Staffing agencies: Further reduce the dependency on staffing agencies by refining rostering practices and using Brightwater's casual staff pool. Ongoing integrity checks will continue on agency staff, including employment conditions and entitlements.

Modern Slavery Questionnaire: Broaden the use of the Modern Slavery Questionnaire to additional suppliers to complete and attest compliance to the Act.

Assessing the effectiveness of our actions

No instances of modern slavery have been reported or found within our operations or associated with our supply arrangements. However, we appreciate that this does not necessarily mean that we do not have any cases of modern slavery.

Brightwater continually reviews the effectiveness of our actions using qualitative and quantitative methods. On an ongoing basis, Brightwater:

- Reviews and monitors existing and emerging modern slavery risks;
- Communicates with suppliers about issues of modern slavery, including through monitoring responses to Brightwater's modern slavery questionnaires;

- Monitors the number of modern slavery complaints or concerns it receives and conducts risk assessments and commences remedial action where suspected modern slavery instances are identified; and
- Maintains a Modern Slavery Working Group which:
 - coordinates Brightwater's modern slavery actions in line with the Brightwater Modern Slavery Policy;
 - conducts ongoing risk analysis of Brightwater's supply chain;
 - prepares Brightwater's annual Modern Slavery Statement; and
 - monitors and reviews the content and completion of Brightwater's guidance materials and training on modern slavery.

Consultation

As a single reporting entity that does not own or control any other entities, Brightwater undertakes internal consultation through structure cross-functional engagement. This is performed by the Modern Slavery Group, comprising representatives from legal, risk, procurement and people services.

Other Relevant Information

Brightwater continues to recognise the importance of managing and mitigating risks of modern slavery in its operations and supply chain. Increasing the awareness of our staff and suppliers ensures that Modern Slavery remains part of their decision-making process.

The Modern Slavery Statement is presented annually to the Audit and Risk Committee, and then to the Board for approval.

Brightwater is committed to refining its procedures and protocols to ensure it does not participate in modern slavery activities. We will continue to encourage our suppliers and staff to be vigilant, and act against instances of modern slavery within our community.

Approval

This statement was approved by the Board of Brightwater Care Group Limited on 1 December 2025.



Joanne Farrell
Chair of Brightwater Care Group Limited
1 December 2025