



THE BETHANIE GROUP INC
**MODERN SLAVERY
STATEMENT**

FY2022



Bethanie



Bethanie has continued on from its progress last year to further develop its knowledge and approach to Modern Slavery with the approval of this third statement.

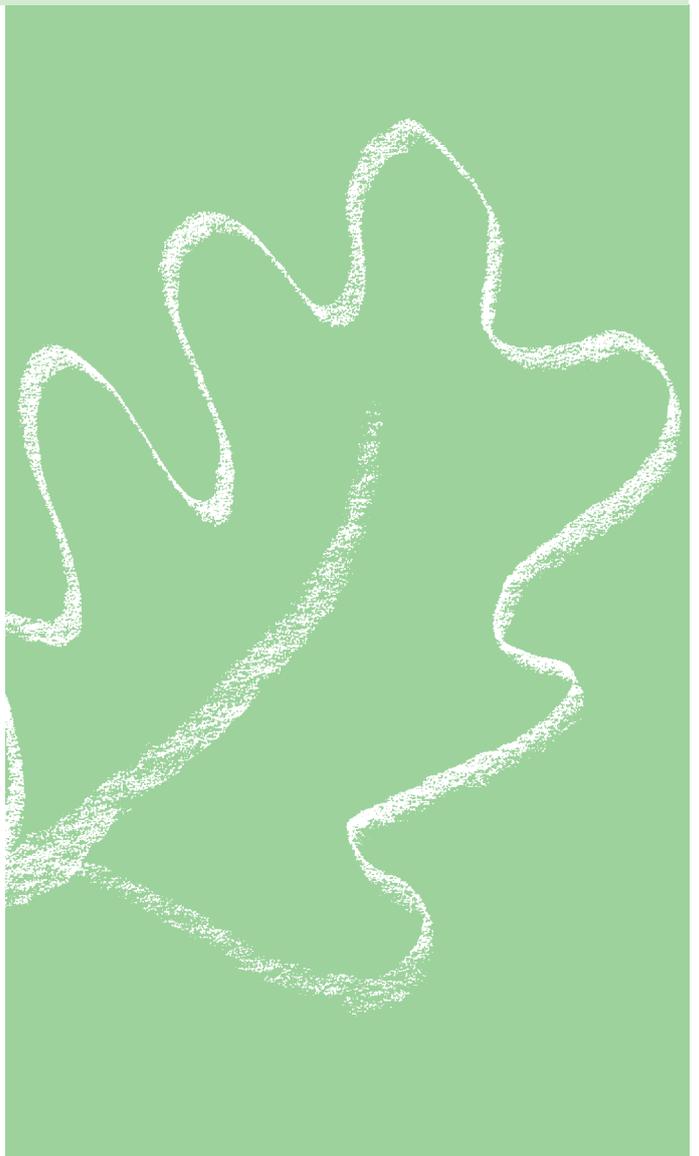
Modern Slavery minimisation continues to be an important focus for Bethanie as it aligns with Bethanie's values and supports the protection of human rights of those within its supply chain and operations.

Bethanie's increased focus on the reduction of opportunities for Modern Slavery in its supply chain and operations can be seen through several key actions. These actions include a significantly increased review of supplier information, and the continued improvement in conditions for Bethanie employees, both detailed in this statement. Both are significant improvements in our approach to minimising Modern Slavery risks.

As with previous years, Bethanie will continue to review options to minimise Modern Slavery risk and create awareness across Bethanie and with its business partners, hoping that awareness will support prevention.

This statement was approved by the Board of The Bethanie Group Inc on 14th October 2022.^

Diana Forsyth
Chair



^See section 16(2)(a) of the Modern Slavery Act 2018 (Cth).



1.



IDENTIFY THE REPORTING ENTITY

This is The Bethanie Group Inc's (60 992 323 648) (Bethanie) Modern Slavery Statement, prepared to meet the requirements of the Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2022 (FY2022). Bethanie is a not-for-profit incorporated association, incorporated under the Associations Incorporation Act 2015 (WA).

¹ See section (1)(a) of the Modern Slavery Act 2018 (Cth).



MISSION

Our mission is to demonstrate the Love of God by positively changing the way Australians experience ageing - every customer, every family, every community, every day.



VISION

Our vision is to enhance the ageing experience of over 1 million Australians by 2030.



VALUES

Justice | Integrity | Stewardship | Compassion | Respect.



2.



DESCRIBE THE REPORTING ENTITY'S STRUCTURE, OPERATIONS, AND SUPPLY CHAINS²

OUR STRUCTURE

Bethanie is an incorporated association which operates aged care services in Western Australia and is registered with the Australian Charities and Not For Profits Commission (ACNC). Bethanie has a single subsidiary, Bethanie Housing Ltd (BHL). BHL is a public company incorporated in Australia. Like Bethanie, it is registered with the ACNC.

Bethanie has a relationship with the Churches of Christ in Western Australia. The church oversees the direction of the organisation via a Board who decide on policy and give strategic direction to the Chief Executive.

The Board is assisted by the following Board Committees, which consist of members drawn from both the Board and Executive:

- Services Review
- Audit & Risk Management
- Nominations, Remuneration & Governance; and
- Business Development.

OUR OPERATIONS

Bethanie operates its services throughout Western Australia, with the vision of enriching the ageing experience of over 1 million Australians by 2030. Bethanie's business segments include:



Residential Care Services: This segment includes the provision of aged care services in nursing homes and aged care facilities.



Independent Living Unit Services: This segment includes the activities of the supply of accommodation in retirement villages and independent living unit villas. The sales of lease for life licences are also included in this segment.



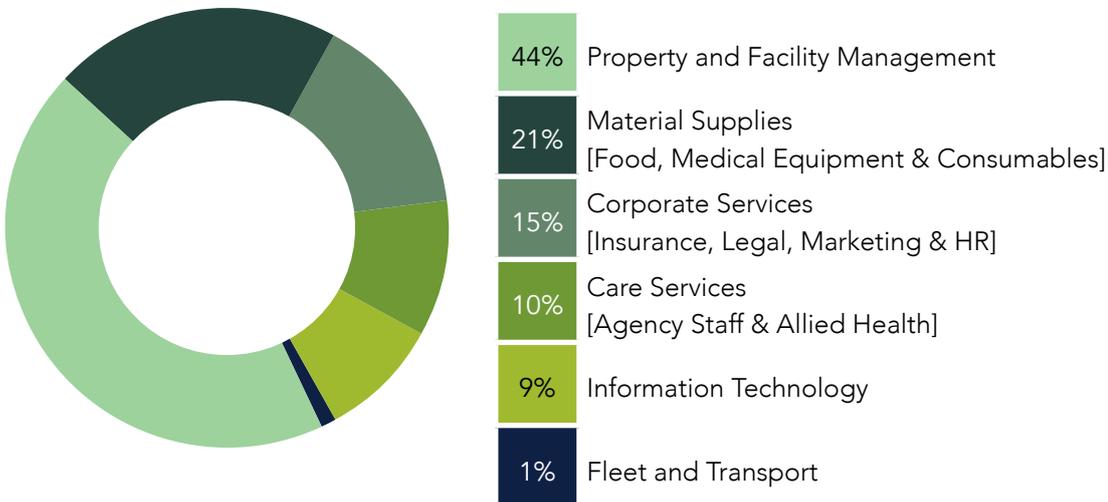
Community Care Services: This segment covers the provision of community aged care service programs which are funded by the State and Commonwealth Governments.



Community Housing: This segment includes the activities associated with the construction of community housing for Bethanie Housing and the provision of community housing for seniors.

OUR SUPPLY CHAIN

Bethanie's spend with suppliers remains greater than \$50 million including with approximately 150 contracted suppliers and other approved suppliers. The suppliers provide construction, goods, services, and consultancy across the following Procurement categories.



Bethanie's procurement team and stakeholders continue to work with its preferred suppliers to increase and improve its procurement capability, including appropriate governance for preferred suppliers. This is further supported by Bethanie's policies and procedures, including Bethanie's Mission Discernment Framework that prioritises our Mission.

² See section 16(1)(b) of the Modern Slavery Act 2018 (Cth).



3.

RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF BETHANIE³

The types of goods and services procured remain similar to last year's statement, it is hoped that through its review of supplier Modern Slavery risk that opportunities for Modern Slavery have been lowered. The key risks noted previously include:

- Construction
- Agency staff
- Cleaning services
- Pharmaceutical products
- Food and grocery
- Cleaning supplies
- Apparel and uniforms.

³ See section 16(1)(c) of the Modern Slavery Act 2018 (Cth).

4.

ACTIONS TAKEN BY BETHANIE TO ASSESS AND ADDRESS THESE RISKS⁴

Bethanie continues to develop its approach to addressing risks using the assessment process from previous statements. Bethanie continues to assess risks within its supply chain, maintaining a consistent approach while increasing the review across its supplier base:

- A review of the Modern Slavery status for key suppliers totalling 65% (FY21 38%) of Bethanie's direct supplier spend
- Information requested as part of tender submissions
- Standard contracts that require actions related to Modern Slavery.

Bethanie remains committed to freedom of association and the ability for employees to collectively bargain, with or without third party involvement. Bethanie has taken multiple actions over the last year to improve employee conditions and entitlements. These include:

- Negotiation of new enterprise agreements providing minimum rates of pay and entitlements above legislative minimums in Australia
- Increased entitlements around Family and Domestic Violence leave
- Increased entitlements during outbreaks
- New salary packaging arrangements with additional options at a lower cost
- Increased employee support, including a wellness program.

⁴ See section 16(1)(d) of the Modern Slavery Act 2018 (Cth).



5.



DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF THESE ACTIONS⁵

Bethanie's actions to date demonstrate its commitment to minimising and mitigating Modern Slavery risk throughout its operations and supply chain, creating awareness. These actions include:

- Requesting Modern Slavery information at the time of tender
- Addition of clauses to its standard procurement contracts
- Reviewing key suppliers' Modern Slavery status
- Improving staff conditions.

This approach is expected to continue with further improvements. It is hoped, that increased awareness will further decrease the opportunity for Modern Slavery within Bethanie's and its partners operations.

⁵ See section 16(1)(e) of the Modern Slavery Act 2018 (Cth).

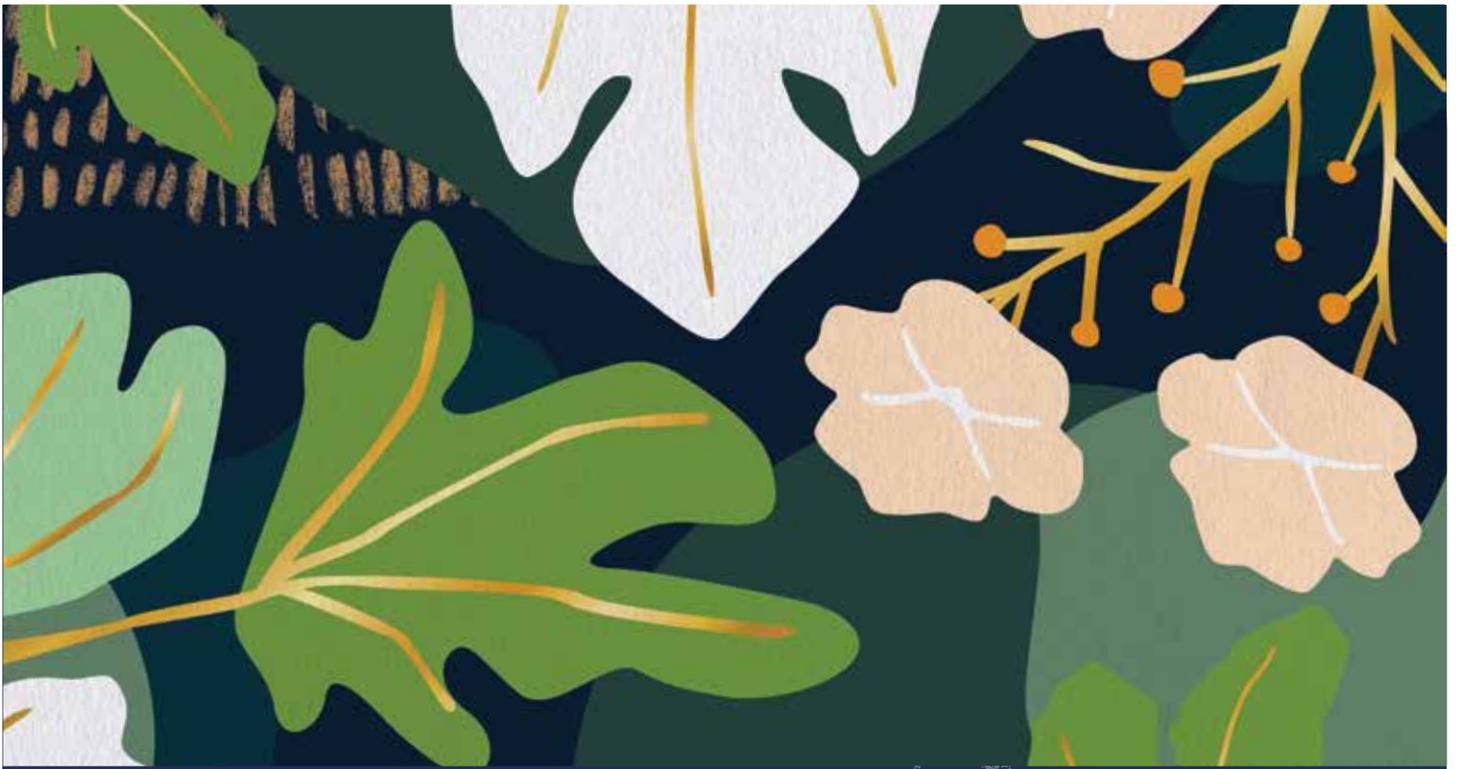
6.



PROCESS OF CONSULTATION WITH ASSOCIATED ENTITIES⁶

The Board for BHL is made up of members of the Bethanie Board and an independent housing-specific board member. BHL complies with Bethanie processes and polices and reports regularly to Bethanie.

⁶ See section 16(1)(f) of the Modern Slavery Act 2018 (Cth).



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Bethanie