

MODERN SLAVERY STATEMENT

PLenary Health (NFH) Unit
Trust and Plenary Health (NFH)
Holdings Unit Trust | FY2022





INTRODUCTION

What is modern slavery?

The term “modern slavery” is used to describe situations in which coercion, threats or deception are used to exploit victims and undermine their freedom. Modern slavery takes many forms including slavery, servitude, forced labour, debt bondage, deceptive recruiting for labour or services, the worst forms of child labour (where children are exploited through slavery like practices or exposed to hazardous work), trafficking in persons and forced marriage.

The 2021 Global Estimates of modern slavery indicate there are 49.6 million people in situations of modern slavery (nearly one in every 150 people in the world).¹ Forced labour accounts for 27.6 million of those in modern slavery and forced marriage for 22 million. Women and girls are disproportionately affected and make up 11.8 million of the total in forced labour.² The Covid-19 pandemic has impacted on State responses to modern slavery and the protection of victims, and has exacerbated the underlying drivers of all forms of modern slavery.³

Plenary Health (NFH) vision

Plenary Health (NFH) Unit Trust and Plenary Health (NFH) Holdings Unit Trust (together **Plenary Health (NFH)**) are focused on working with the Victorian Government and Western Health to ensure the best health outcomes for the community in Melbourne’s West through the delivery of the new Footscray Hospital. Plenary Health (NFH) conducts its business with high levels of ethical and professional standards and is committed to recognising and respecting human rights while working on the new Footscray Hospital project.

Plenary Health (NFH) recognises that the nature of its business means that it might be exposed to instances of modern slavery in its supply chains.

We are committed to ongoing engagement with our stakeholders to better collaborate in respecting human rights and undertaking further work to identify and take steps to prevent modern slavery.

This joint Modern Slavery Statement covers:

- Plenary Health (NFH) Pty Ltd as trustee for the Plenary Health (NFH) Unit Trust; and
- Plenary Health (NFH) Holdings Pty Ltd as trustee for the Plenary Health (NFH) Holdings Unit Trust.

This joint Modern Slavery Statement covers the reporting period of 1 January 2022 to 31 December 2022 for all reporting entities.

¹ Global Estimates of Modern Slavery, Forced Labour and Forced Marriage.’ (Report, September 2022) <https://www.ilo.org/global/topics/forced-labour/publications/WCMS_854733/lang--en/index.htm>.

² Ibid.

³ Tomoya Obokata, Forough Ramenzankhah, Rasha Al Saba and Samrawit Gougsa, ‘Good practice in protecting people from modern slavery during the Covid-19 pandemic’, Modern Slavery & Human Rights | Policy Evidence Centre, <<https://modernslaverypec.org/assets/downloads/Best-practice-summary.pdf>>.



OUR OPERATIONS AND SUPPLY CHAINS

Plenary Health (NFH) operations

The Plenary Health (NFH) consortium has been contracted by the Victorian Government, as part of a PPP, to deliver the \$1.5 billion new Footscray Hospital. As part of this Project, Plenary Health (NFH) will design, construct, finance and maintain the new hospital for 25 years.

The Plenary Health (NFH) consortium is comprised of Plenary as project sponsor and investor, Multiplex as builder, Honeywell and Compass as the facilities and maintenance managers and Sojitz Corporation as investor.

The management of Plenary Health (NFH) has been contracted to Plenary Asset Management Pty Ltd via a Management Services Deed for the period of the concession.

The new Footscray Hospital will provide significant community benefits by cutting wait times and reducing pressure on nearby hospitals.

Plenary Health (NFH) has a management team of 16 people who are dedicated to the delivery and management of the new Footscray Hospital.

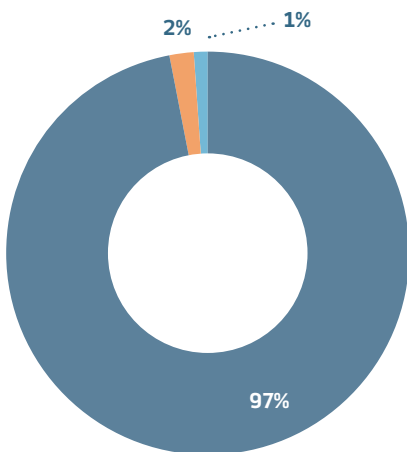
Plenary Health (NFH) supply chains

In the 2022 financial year, the Plenary Health (NFH) Unit Trust spent approximately \$291 million with 21 suppliers.

The main areas of supplier spend were:

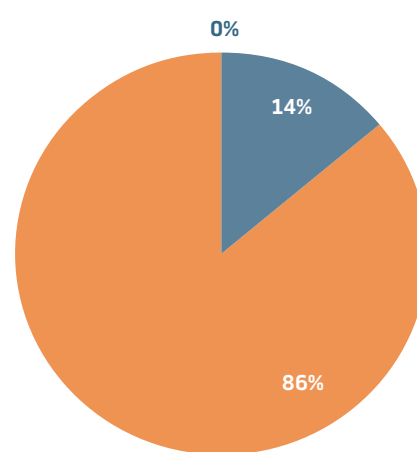
- Subcontractors: for example, costs for the design and construction lead, the services contractor and fees for the management services provider.
- Professional Services: including expenses for auditors and tax return services, the Independent Certifier/Reviewer (responsible for certifying construction and design costs completed, and verifying the services that need to be delivered under the Project Deed, issuing Construction Payment Statements or Progress Certificate, etc.), expenses for advisory and legal services.
- Other: expenses for software solutions, regulatory expenses, administrative expenses, etc.

Geographical spend



- Australia
- US
- UK

Supplier spend



- Professional fees
- Subcontractors
- Other

RISK OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS AND IN THE OPERATIONS AND SUPPLY CHAINS OF THE ENTITIES WHICH WE OWN OR CONTROL

While conducting our analysis for our previous Modern Slavery Statements, we referred to resources such as the Global Slavery Index 2018, the Australian Council of Superannuation Investors' Modern Slavery Report Guide for Investors, and materials and information on risks of modern slavery produced by the International Labour Organization. We also sought external advice and referred to the "Good practice in protecting people from modern slavery during the Covid-19 pandemic" report.⁴ As part of the preparation of this Modern Slavery Statement, we considered the updated data on Global Estimates of Modern Slavery from the International Labour Organization.⁵

We have considered relevant risks of modern slavery practices by reference to a range of intersecting factors such as business activities, labour force structure, sector, and social, political and environmental conditions in the countries in which we and our suppliers operate.

We also requested key suppliers, who provide design and construction services and facilities management services, to complete a modern slavery questionnaire and to request their key suppliers on these assets to complete the questionnaire as well. In addition to the information obtained from the publicly available resources, the responses to the modern slavery questionnaires from our tier 1 suppliers and their tier 1 suppliers were helpful to further assess the risk of modern slavery practices in our operations and supply chains.

Plenary Health (NFH) operations

In 2022 Plenary Health (NFH)'s operations still mainly involved delivery activities, consisting of design management and further site works.

The design and construction (D&C) contractor is an Australian based entity who has an obligation to comply with all relevant Australian legislation. The D&C contractor subcontracts a substantial part of design and construction works as it operates on a subcontractor model. Subcontractors are all Australian based entities, who need to comply with local legislation, which ensures a safe working environment for staff working on the new Footscray Hospital. Plenary Health (NFH) therefore considers the risk of modern slavery across its operations to be low.

⁴ Tomoya Obokata, Forough Ramenzankhah, Rasha Al Saba and Samrawit Gougsa, "Good practice in protecting people from modern slavery during the Covid-19 pandemic", Modern Slavery & Human Rights | Policy Evidence Centre, <<https://modernslaverypec.org/assets/downloads/Best-practice-summary.pdf>>.

⁵ "Global Estimates of Modern Slavery. Forced Labour and Forced Marriage." (Report, September 2022) <https://www.ilo.org/global/topics/forced-labour/publications/WCMS_854733/lang--en/index.htm>.

Plenary Health (NFH) supply chains

We requested our main subcontractors to complete a modern slavery questionnaire and requested them to ask a selection of their key subcontractors to do the same (i.e. tier 2 suppliers). We acknowledge that incidences of modern slavery can exist throughout supply chains at any level and are committed to assessing and reporting on these risks further in future years and statements as part of our process for continuous improvement.

There are certain risk factors present in our supply chains which may increase the potential for risks of modern slavery practices occurring in them. The risk factors that were identified in our supply chains, based on our risk assessment, are:

- Construction sector: this sector presents elevated risks of modern slavery as a result of factors such as potentially unsafe conditions, use of low-skilled labour, long and complex supply chains and tight project deadlines. Plenary Health (NFH) has partnered with a major Australian based D&C contractor, who subcontracts substantial parts of its work on the project. As part of its tendering process, the D&C contractor requires its suppliers, subcontractors and consultants to acknowledge their Anti-Modern Slavery Policy and confirm that they have carried out due diligence of their own supply chain.

In addition, the D&C contractor conducts its own health and safety audits on the new Footscray Hospital, suppliers and subcontractors. These measures reduce the risk of forced labour or unsafe working conditions on the project site.

There is, however, a risk that somewhere in the supply chains of our contractors and subcontractors there might be instances or risks of modern slavery practices, for example in relation to the procuring of materials and supplies from countries that are regarded as having challenging human rights environments or in relation to the manufacture of products necessary to deliver the design or construction of a project.

- Services procurement (such as cleaning, food services, landscaping, parking, etc.). Although Plenary Health (NFH) recognises that these can be potential high risk areas, the majority of such services, which Plenary Health (NFH) procures, are from Australian based contractors. The soft facilities management (FM) services provider only outsources a negligible percentage of its work and provides the majority of the contracted services directly. The hard FM provider outsources a larger part of its work, but has a supplier Code of Conduct in place and communicates its zero tolerance to modern slavery to its subcontractors. In addition, the soft FM services provider has appointed businesses to assist with supplier/sub-contractor due diligence for modern slavery risks. On the basis of a question set, a weighted scoring system is used to provide each supplier a rating. The soft FM services provider is focusing on cleaning activities and manned security and utilises an external business to assist in governance of supplier data related to modern slavery.

Despite the existence of these risk factors in our supply chains, our tier 1 and selected tier 2 suppliers are not aware of concerns raised regarding modern slavery in their supply chains. As part of our continuous improvement program, we are committed to further examining and assessing our supply chains. We recognise the potential for instances of modern slavery practices occurring further down our supply chains and we will strive to analyse and report on lower levels of our supply chains (i.e. beyond tier 2) in our next modern slavery statement.

ACTIONS TAKEN BY PLENARY HEALTH (NFH) AND THE ENTITIES WHICH IT OWNS OR CONTROLS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Plenary Health (NFH) actions

In FY2022 Plenary Health (NFH) have taken steps to further assess and address the risks of modern slavery practices occurring in our operations and supply chains including:

- The revision of the Plenary Health (NFH) modern slavery policy, which was considered current and required no update. The policy applies to and has been communicated to all directors, officers and employees of the reporting entity and all entities owned and controlled by that entity. The policy makes clear that Plenary Health (NFH) adopts a zero tolerance approach to all forms of modern slavery.
- The further mapping of the supply chains of the reporting entities up to tier 2 level and assessment of the risk factors present in those supply chains. The Plenary Health (NFH) compliance, risk, legal and finance teams reviewed the data provided from the previously performed desktop analysis to further map the analysis of the relevant supply chains of the reporting entities.
- The further rollout of the modern slavery questionnaire to key suppliers of the reporting entities which asks information about:
 - whether the supplier is required to report under existing modern slavery legislation;
 - whether the supplier has a written policy, procedure or value statement in relation to modern slavery, human rights or ethical trading risks and the impact on their business;
 - whether the organisation is a signatory to, or a member of, any modern slavery initiative or charter;
 - the extent to which work is outsourced;
 - how the supplier conducts due diligence for modern slavery risk;
 - whether there have been any concerns in relation to modern slavery in their business or supply chains; and
 - whether the organisation or its agents/ subcontractors have been investigated or charged with breaches of legislation relating to modern slavery.
- The identification of key suppliers/ consortium members of the Plenary Health (NFH) project to complete a modern slavery questionnaire, with the request for these suppliers to identify key suppliers who provide services and ask them to complete the modern slavery questionnaire as well.
- There is a fact sheet and recorded awareness session about the *Modern Slavery Act 2018* (Cth), the Plenary Health (NFH) Modern Slavery Policy and Modern Slavery Statement are available on the intranet of the reporting entity. The recorded awareness session discusses the relevance and impact of modern slavery to our business.
- Plenary Health (NFH) has local content requirements it needs to consider when making procurement decisions.

Plenary Health (NFH) remediation processes

The reporting entities are committed to investigating any report of potential incidences of modern slavery occurring anywhere in our operations or supply chains.

We confirm that we would take all appropriate steps to rectify any confirmed incidences of modern slavery in our operations or supply chains. The reporting entities would work collaboratively with their suppliers and, if necessary, their suppliers, to achieve these goals. If, for any reason, progress in this regard was not possible, the reporting entities would take steps to sever their connections to the offending supplier or sub-supplier.



ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Plenary Health (NFH) has reviewed its modern slavery policy and modern slavery questionnaire and considered these both remain up to date and effective. No change was required.

The responses received via the modern slavery questionnaire demonstrate that

the tier 1 and majority of the key tier 2 suppliers have processes in place to address and consider modern slavery in their supply chains. Plenary Health (NFH) will aim to further map the supply chain and review feedback between key areas of its business in relation to modern slavery.

CONSULTATION

The relevant Plenary Health (NFH) entities are integrated with the broader Plenary Group. Their legal, finance and communications functions have all been involved in the preparation of this Modern Slavery Statement and have provided relevant information which is included in this Statement.



ADDITIONAL INFORMATION

Plenary Health (NFH) is committed to working to improve its assessment and addressing of modern slavery risks and as such is committed to continued communication and engagement with current stakeholders on our modern slavery policy in FY2023.

This will allow Plenary Health (NFH) to better assess and address:

- further supply chain risks based on the findings from the previously implemented measures;
- potential internal audits;
- the possibility of partnering with industry groups; and
- potential inclusion of modern slavery clauses in new contracts with relevant stakeholders to ensure Plenary Health (NFH) has sufficient leverage to influence stakeholders to change their practices where necessary.

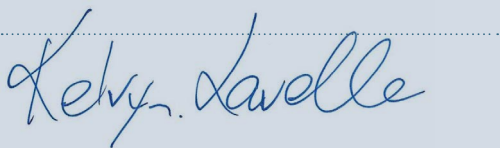
Approval

This joint Modern Slavery Statement is made in accordance with section 14 of the *Modern Slavery Act 2018* (Cth).

This statement was prepared Plenary Health (NFH) Pty Ltd (as trustee of the Plenary Health (NFH) Unit Trust and Plenary Health (NFH) Holdings Pty Ltd (as trustee of the Plenary Health (NFH) Holdings Unit Trust).

This statement has been approved by the Board of Directors of both Plenary Health (NFH) Pty Ltd and Plenary Health (NFH) Holdings Pty Ltd.

Signed for and on behalf of Plenary Health (NFH) Unit Trust and Plenary Health (NFH) Holdings Unit Trust



Kelvyn Lavelle

Chair

Plenary Health (NFH) Pty Ltd (as trustee of the Plenary Health (NFH) Unit Trust)

Plenary Health (NFH) Holdings Pty Ltd (as trustee of the Plenary Health (NFH) Holdings Unit Trust).

