

Modern Slavery Statement



About this statement

This statement is made on behalf of RA (Holdings) 2014 Pty Limited, ACN 603 289 792 (**RetireAustralia**) as the reporting entity pursuant to the *Modern Slavery Act 2018* (Cth) in respect of RetireAustralia and all entities owned or controlled by RetireAustralia (**RetireAustralia Group**) for the year 1 April 2021 to 31 March 2022.

This statement is endorsed on behalf of the Directors of RetireAustralia on 28 September 2022.



Dr Brett Robinson
Chief Executive Officer



Mr Anthony Heald
General Manager – Culture, Strategy & Business
Services

On behalf of the Directors of RetireAustralia

Message from the Chief Executive Officer

Welcome to RetireAustralia's inaugural Modern Slavery statement (**Statement**), for the 12 months ended 31 March 2022. This Statement outlines RetireAustralia's commitment to preventing, minimising and mitigating (wherever it exists) any Modern Slavery violations in our operations and supply chain.

As a recognised leader in the retirement living industry, both as an operator and as a developer, RetireAustralia recognises that it must take an active leading role in the prevention of Modern Slavery. RetireAustralia recognises that no country, industry or individual is immune from the risk of Modern Slavery in the supply chains that it uses or the products it buys and therefore the responsibility falls on all of us to recognise the human suffering that may be implicit in the actions we take, and to make changes to address this.

This Statement summarises the steps that RetireAustralia is taking to identify, prevent, mitigate and verify for how it addresses Modern Slavery risks within our operations and our supply chains. RetireAustralia believes that education, transparency, compliance and accountability are critical to ensure fair, transparent and ethical dealings. Our employees, contractors, residents, volunteers, and consultants are at the centre of our commitment to responsibility and are central to our plan to actively identify and work towards eliminating all forms of Modern Slavery in our operations and supply chains.



Dr Brett Robinson
Chief Executive Officer

Modern Slavery Statement

1. About RetireAustralia:

Section 16(1) (a) of the Modern Slavery Act 2018 requires modern slavery statements to identify the reporting entity or entities covered by the statement.

RetireAustralia is the relevant reporting entity and has its registered office at Level 4, 200 Mary Street, Brisbane, Queensland 4000 Australia.

The RetireAustralia Group comprises of 60 private companies, being listed in the below table, operating in Queensland, New South Wales and South Australia. The companies all operate and develop retirement villages.

Entity	ACN
<i>RA (Holdings) 2014 Pty Ltd</i>	603 289 792
<i>RA 2014 Pty Ltd</i>	603 311 619
<i>Retire Australia Management Pty Ltd</i>	151 586 597
<i>Retire Australia Finance Pty Ltd</i>	605 719 739
<i>Retire Australia Management No. 2 Pty Ltd</i>	611 100 746
<i>Bartonvale Holdings (SA) Pty Ltd</i>	124 282 462
<i>Bartonvale Consolidated Pty Ltd</i>	124 284 117
<i>Lifestyle Property Services Pty Ltd</i>	003 249 509
<i>Retire Australia Care and Services Pty Ltd</i>	617 346 077
<i>Tarragal Glen Retirement Village Pty Ltd</i>	002 784 929
<i>Tarragal Glen Retirement Village II Pty Ltd</i>	003 739 464
<i>Tarragal Glen Retirement Village III Pty Ltd</i>	082 159 117
<i>Glengara Village Pty Ltd</i>	075 803 342
<i>Wood Glen Retirement Village Pty Ltd</i>	060 007 123
<i>Errol Investments Pty Ltd</i>	001 183 277
<i>Ultimate Staff Suppliers Pty Ltd</i>	083 260 913
<i>The Glen Group (NSW) Pty Ltd</i>	110 532 511
<i>Gannon Holdings (SA) Pty Ltd</i>	122 282 651
<i>Gannon Consolidated Pty Ltd</i>	122 284 155
<i>Tincture Press Pty Ltd</i>	079 087 399
<i>Murray Gardens Retirement Estate Pty Ltd</i>	078 956 706
<i>Riverina Gums Estate Pty Ltd</i>	008 284 599
<i>Glengowrie Estate Pty Ltd</i>	061 931 628
<i>Gannon Estates Pty Ltd</i>	106 052 671
<i>Spring Grove Estate Pty Ltd</i>	090 590 248
<i>Gannon Retirement Services Pty Ltd</i>	008 202 677
<i>Lincoln Grove Estate Pty Ltd</i>	093 548 737
<i>Boambee Gardens Estate-Coffs Harbour Pty Ltd</i>	051 065 331
<i>Scarborough Mews Estate Pty Ltd</i>	084 370 570
<i>Carlyle Gardens Retirement Village Bargara Pty Ltd</i>	111 524 095

<i>Krogate Management Pty Ltd</i>	008 056 817
<i>Tea Tree Gardens Holdings Pty Ltd</i>	008 083 547
<i>Quantivale Pty Ltd</i>	008 083 556
<i>Bartonvale Pty Ltd</i>	008 006 862
<i>Barton Vale Lodge Pty Ltd</i>	008 120 750
<i>Manor Group Holdings (Qld) Pty Ltd</i>	124 665 729
<i>Manor Group Consolidated Pty Ltd</i>	124 665 738
<i>The Manor Group Pty Ltd</i>	065 215 189
<i>Wellington Manor Pty Ltd</i>	054 667 024
<i>Hatway Holdings Pty Ltd</i>	050 411 044
<i>Palm Gardens Holdings (SA) Pty Ltd</i>	124 715 797
<i>Palm Gardens Consolidated Pty Ltd</i>	124 715 804
<i>Retire Australia (Palm Gardens) Pty Ltd</i>	127 155 855
<i>Lifestyle Holdings (NSW) Pty Ltd</i>	126 128 229
<i>Lifestyle Consolidated Pty Ltd</i>	126 128 238
<i>Lifestyle Management Services Pty Ltd</i>	066 842 822
<i>Lifestyle Care Services Pty Ltd</i>	003 177 491
<i>Noyea Pty Ltd</i>	169 342 170
<i>Noyea Operations Pty Ltd</i>	169 342 189
<i>Retire Australia Sales (QLD) Pty Ltd</i>	600 309 411
<i>Aberdeen (N.S.W.) Pty Ltd (Bramblewood)</i>	000 412 608
<i>Drayton Villas Pty Ltd</i>	010 994 251
<i>Retire Australia (Tarragindi) Pty Ltd</i>	614 087 375
<i>30 Andrew Avenue Pty Ltd</i>	614 087 866
<i>Retire Australia (Lutwyche) Pty Ltd</i>	614 307 005
<i>Retire Australia (Ashgrove) Pty Ltd</i>	615 409 464
<i>Retire Australia (Burleigh) Pty Ltd</i>	616 531 401
<i>Retire Australia (Lane Cove) Pty Ltd</i>	619 956 884
<i>Retire Australia (Yeronga) Pty Ltd</i>	644 707 951
<i>Yeronga Heart Pty Ltd</i>	646 702 534

We provide this statement on behalf of all of the entities that are owned or controlled by RetireAustralia.



2. Structure, operations and supply chains:

Section 16(1) (b) of the Modern Slavery Act 2018 requires modern slavery statements to describe the structure, operations and supply chains of the reporting entity.

Our Structure

Since 2014, RetireAustralia has been jointly owned by Infratil Limited and New Zealand Superannuation Fund. As stated in Part 1 of this Statement, RetireAustralia is part of the RetireAustralia Group together with the other entities listed in that Part.

RetireAustralia and our subsidiaries are governed by a board of non-executive directors with expertise spanning healthcare, property development, corporate finance and business development. We currently manage 28 retirement villages with over 5,500 villas and apartments across New South Wales, Queensland and South Australia. We directly employ over 450 workers across these locations.

Our Operations

RetireAustralia is a leading private owner, operator and developer of retirement villages in Australia. Our purpose is to create thriving communities where older Australians live the life they choose in their own home. Our vision is to be a leading provider of integrated care and independent living communities for older Australians. We are building thriving communities.

Our portfolio consists of 28 well-established retirement village communities (with 3 brownfield developments under construction) including independent living units, serviced apartments, home care accommodation, in addition to 1 greenfield development under construction. RetireAustralia also has an acquisition program, however no purchases were made in the last financial year.

The below table provides an overview of our core operations at our retirement villages as at 31 March 2022:



5,283 residences in villages



214 units under developments



290 residents accessing home care

RetireAustralia is actively involved in the resale and refurbishment of units in established communities to new incoming residents and the sale of units to new residents in new communities following development. In our past financial year to 31 March 2022, RetireAustralia refurbished and resold 489 units.

We also operate a home care business, RetireAustralia Home Care Services (RetireAustralia Care and Services Pty Ltd), that provides home care services exclusively to residents of RetireAustralia villages in New South Wales, Queensland and South Australia.

As a business, RetireAustralia has three main areas of focus in our operations:

We're dedicated to providing an exceptional resident experience.

Our communities are run with care, experience and passion. We work hard to ensure our residents can live the life they choose in their own home, supported by seamless support and care pathways and quality age-friendly homes. We're focused on ensuring our residents and their families have a positive experience when moving into, living in and leaving a RetireAustralia community. We're upfront about our offering, so from the day residents move in, they have peace of mind knowing exactly what they will pay and the lifestyle, care and support they can expect.

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We enable a nimble and empowered workforce.

Providing quality service to our residents takes a richly skilled team, who ably demonstrate a deep sense of conviction in our Purpose and Vision. Our team members work dynamically and with simplicity to meet performance expectations while consistently upholding our Culture of Care and our values of Leadership, Integrity, Respect, One Team and Excellence, which are the foundation of all our actions, behaviours and decisions.

We are growing an optimal portfolio of retirement communities.

We are developing new retirement communities in metropolitan areas while consistently optimising our established retirement communities to ensure they provide high-quality retirement lifestyles, with choices in care and support available to residents when needed. Our new villages are contemporary in design, integrated with the surrounding community and have age-friendly features making them perfect for now and ideal for later.

Within all of our operations, RetireAustralia is actively committed to acting ethically and with integrity in the engagement and management of all employees, contractors, volunteers and consultants and minimising the risk of Modern Slavery practices within our supply chains.

Our Supply Chains

RetireAustralia uses the goods and services obtained through our supply chains to support our operations, including to provide relevant goods, carry out projects, professional advice, works, and services at our villages, development sites and offices.

In our past Financial Year, RetireAustralia's supply chains included approximately 1,340 vendors of goods and services, including;

- Corporate vendors delivering - professional services, IT, stationery and travel;
- Operational vendors delivering - grounds maintenance, cleaning, waste management and catering; and
- Property services vendors delivering - air conditioning, fire maintenance, security and valuation services.

Approximately 49% of the instances of the supply of goods and/or services from vendors occurred under formal contracts for the provision of those services.

The vast majority of RetireAustralia's vendors are located in Australia in Queensland, New South Wales and South Australia.

Only seven of RetireAustralia's vendors are located (or have a head office) outside of Australia. These vendors were based in New Zealand and United States of America.

Of these foreign vendors four provide consulting services and three are software providers. Together they only accounted for a total supply of \$187,750 in goods and services. None of the goods and/or services provided by these vendors are considered high risk for Modern Slavery.

3. Risks:

Section 16(1)(c) of the Modern Slavery Act 2018 requires modern slavery statements to describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns and controls.

Commonwealth Modern Slavery Act 2018 - The Guidance for Reporting Entities explains that Modern Slavery refers to situations where victims are subjected to coercion, threats, deception or exploitation to undermine their freedom, for the perpetrator's gain. For example, Modern Slavery includes trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, exploitation of child labour, deceptive recruiting for labour or services.

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It is intended that Modern Slavery describes forms of serious exploitation, where a worker is deprived of their personal freedom. It does not necessarily include situations where workers are subjected to poor working conditions or underpaid. However, these circumstances may escalate into Modern Slavery or provide an indication that Modern Slavery is also taking place.

Risks in RetireAustralia's operations and supply chains

RetireAustralia has not identified any instances of Modern Slavery in our supply chains in the last Financial Year.

Despite this, RetireAustralia remains alert to the potential risk of Modern Slavery in our supply chains and monitors and regularly reviews our supply chain for Modern Slavery risks.

RetireAustralia performed a high-level risk assessment of our supply chain from May to June 2022. This assessment took into consideration the volume and category of goods and or services procured, as well as the geographic location of our vendors and of their manufacturers for goods and services we purchase from them.

To identify the areas of highest risk, we considered the following risk indicators (table below) for the potential occurrence of Modern Slavery:

Risk Indicator	Description
Industry sector	Certain industries may have a high prevalence of Modern Slavery because of their characteristics, products and processes. For example – manufacturing, cleaning, construction, waste management, food, hospitality, uniforms, PPE and security.
Product and services	Certain products and services may have a high prevalence for Modern Slavery because of the way they are produced or used. For example – use of under paid and over worked labour, child labour and forced labour.
Geographic location	Certain countries have a high prevalence of Modern Slavery due to poor government structures, corruption, weak labour laws, conflict and or political instability, migration flow and poverty.
Supply chain model	Where supply chain models are larger and more complex, they are more prevalent to carry a higher risk of Modern Slavery. For example – levels of subcontracting, recruiter fees, lack of supply chain processes, poor audit trails and lack of transparency.

Based on these risk indicators and analysis of our vendors during the risk assessment period, RetireAustralia has identified that 99% of vendors have Australian supply origins.

4. Actions:

Section 16(1)(d) of the Modern Slavery Act 2018 requires reporting entities to describe the actions they have taken to assess and address the risks outlined in the previous section, including due diligence and remediation processes.

RetireAustralia is committed to ensuring that in providing the services it offers it minimises the risk of Modern Slavery being present in our supply chains. We strive to achieve this through our Procurement Framework and ensuring that goods and services purchased are provided by vendors who respect and adhere to appropriate human rights standards.



Our Procurement Framework

RetireAustralia procures goods and services in accordance with our Procurement Framework, corporate policies, processes and procedures.

Our Procurement Framework is applicable to all employees, contractors, volunteers and consultants engaged to perform work on behalf of RetireAustralia. It sets out our procurement methodologies, outlining the value and risks associated with the purchasing of any goods and or services. The Framework's main principles are:

- Value for money;
- Probity and accountability; and
- Social, sustainable and environmental responsibility.

As part of RetireAustralia's work to identify and mitigate the risks of Modern Slavery practices, we undertake due diligence on new vendors and undertake regular reviews of existing vendors in accordance with our Procurement Framework. This due diligence process enables us to:

- identify and assess potential Modern Slavery risks within in those new vendors;
- map our supply chains to assess particular industry, product or geographical risks of Modern Slavery;
- set clear expectations of vendor's business practices and respect for human rights in our contractual arrangements;
- mitigate and resolve any identified Modern Slavery risks within our supply chain; and
- monitor the risk of Modern Slavery practices within our supply chain and conduct audits if necessary.

RetireAustralia also has systems in place for remediation in the event that any Modern Slavery practices are identified in our supply chain. This remediation process provides for appropriate steps to be taken to:

- ensure our vendors implement appropriate action plans and systems to address any identified Modern Slavery practices or risks in their organisation or supply chains; and
- take appropriate action where vendors fail to address any identified Modern Slavery practices or risks in their organisation or supply chains.

Some practical steps we have taken to address the risks of Modern Slavery in our operations and supply chain are described below.

Risk mitigation through our Procurement Framework

The RetireAustralia Procurement Framework sets out the values, principles, scope and structure of how procurement activities are to be undertaken by all RetireAustralia employees, contractors, volunteers and consultants.

RetireAustralia's Procurement Framework addresses Modern Slavery, including as follows:

Governance

Adherence to our Procurement Framework ensures open competition, transparency, probity and fairness in all stages of the procurement process and in dealings with current and proposed vendors. The Framework requires all those conducting our procurement activities to uphold the principle of sustainable, social responsible and environmental responsibility and explicitly refers to compliance with the domestic and international laws referred to in the definition of Modern Slavery in the Modern Slavery Act 2018.

Tendering

Within our tendering documentation (Request for Tender, Request for Quote and Request for Proposal), potential vendors are required to respond to a selection of questions about their sustainable procurement, labour practices, recruitment and supply chains. Their responses to these sections are a weighted criteria and form part of any project's evaluation plan.

Contract

As of 2022, all of the terms and conditions of engagement (Precedents and Purchase Orders) used by RetireAustralia have been updated to include clauses addressing any actual or suspected Modern Slavery in our vendors and their supply chains. The clauses clearly state RetireAustralia's expectation that our vendors are required to comply with the Modern Slavery Act 2018, be open to being audited by us for compliance, and what actions (support and guidance towards remediation) or consequences (including possible termination) will apply if breaches are identified.

Contractor management

In addition to our Procurement Framework and tendering and contractual documentation, RetireAustralia has a Contractor Code of Conduct, which is promoted in our vendor inductions, contract templates, and procurement and contractor management documents.

The Contractor Code of Conduct sets out RetireAustralia's commitment to and expectations that our vendors will conduct their operations free from Modern Slavery and take appropriate steps to identify and rectify any Modern Slavery that is present in their organisations and supply chains. The Code has been provided to all of our vendors engaged under a formal agreement and those categorised as a potential risk of instances of Modern Slavery.

Vendors delivering goods and or services under a formal agreement are obligated to deliver the goods and services to a set of Key Performance Indicators (KPI), including sustainable procurement, corporate responsibility, environmental impact and innovation. The KPIs are used to measure the vendor's performance and compliance.

All vendors categorised as being a potential Modern Slavery risk are required to respond to RetireAustralia's Modern Slavery survey to allow us to capture information about their policies, process and risk management frameworks around supply chains, labour and recruitment. The survey is issued annually as part of our risk management process. RetireAustralia then assesses the responses provided and determines whether any further action is required, subject to whether or not the responses satisfy RetireAustralia that there is no Modern Slavery risk.

In addition, RetireAustralia provides support for workers and other persons to safely come forward with any information that they have about Modern Slavery practices or risks.

RetireAustralia has systems in place to encourage the reporting of any Modern Slavery concerns from whistle blowers and from anyone else with information about Modern Slavery practices or risks, including employees, consultants, volunteers, residents, contractors and vendors.

5. Effectiveness:

Section 16(1)(e) of the Modern Slavery Act 2018 requires modern slavery statements to describe how the reporting entity assesses the effectiveness of the actions being taken to assess and address modern slavery risks.

We will continue to review and improve our processes and procedures as necessary so that we comply with our obligations under the Act. This may include:

- building on the work already done to eliminate Modern Slavery by reviewing at senior leadership level the actions taken to minimise Modern Slavery risks;

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- the development of business KPIs to assess how we are performing in managing Modern Slavery risks;
- conducting internal audits or monitoring of specific steps taken by RetireAustralia to assess and address Modern Slavery risks;
- ensuring that Modern Slavery is addressed throughout the procurement process through due diligence and to identify any improvements before they enter the supply chain;
- the provision of appropriate training and education to key individuals and teams who are responsible for managing procurement processes and contractual relationships; and
- continuing to promote awareness of Modern Slavery across the wider organisation and with our vendors.

We will continue to monitor the actions we have implemented in 2021–22 in subsequent years and will consider opportunities to review their effectiveness in future statements as part of a process of continuous improvement

6. Consultation:

Section 16(1)(f) of the Modern Slavery Act 2018 requires reporting entities to describe the process of consultation with any entities that the reporting entity owns or controls.

RetireAustralia oversees the operations of, and receives regular reports from, the entities that it owns or controls, which are listed in Part 1 and 2 of this statement. There is significant commonality of management personnel between RetireAustralia and most of its owned businesses. There are also regular discussions between RetireAustralia and the officers and boards of those entities in relation to governance and organisational risks.

RetireAustralia has not specifically consulted with those entities in relation to the preparation of this Statement as those entities are wholly owned subsidiaries and the nature of the operations and activities of those entities means that they do not have their own supply chains separate to those of RetireAustralia.

7. Related activities:

Section 16(1)(f) of the Modern Slavery Act 2018 allows for reporting entities to include any other relevant information that the reporting entity thinks is relevant.

The following definitions are relevant to the document:

- **Modern Slavery** includes eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services. The worst forms of child labour means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.
- **Operations** are the activities undertaken by RetireAustralia to pursue our business objectives and strategy in Australia which include:
 - the direct employment of workers;
 - delivery of services;
 - construction;
 - financial investments;
 - joint ventures;
 - sale, management and leasing of property; and
 - purchasing, marketing and sales.
- **Risks of Modern Slavery** means the potential for an entity to cause, contribute to, or be directly linked to Modern Slavery through our operations and supply chains.



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- **Supply chains** means the products and services (including labour) that contribute to RetireAustralia's products and services. This includes products and services sourced in Australia or overseas and extends beyond direct vendors. The definition of supply chains includes:
 - products provided to the entity by vendors;
 - services provided by vendors; and
 - products and services used by indirect vendors in the entity's supply chains.
- **Modern Slavery Act 2018 (Cth)** means the Commonwealth Act requiring entities based, or operating, in Australia, which have an annual consolidated revenue of more than \$100 million, to report annually on the risks of modern slavery in their operations and supply chains, and actions to address those risks.