

Warrigal

Inspiring communities
for older people

Warrigal Modern
Slavery Statement
for the Financial Year
2023 - 2024

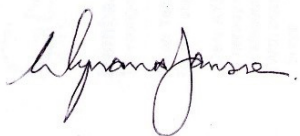
Criterion 1 –

About Warrigal

Warrigal is an aged care provider operating in the regions of New South Wales and the Australian Capital Territory in Australia. Warrigal provides a comprehensive range of aged care services extending across residential aged care homes, villages, and personalised care for clients within the community.

Approval of this Statement

This statement has been presented to the Board of Directors as a stand- alone document for their review and approval. The Board of Directors approved this statement on 25th November 2024 and submitted the statement to be signed by our Chairman of the Board.



Signed by Wyn Janssen

Board Chair

Date: 25 November 2024

Criterion 2 — Our structure, operations and supply chains

Structure

Name: Warrigal Care

ACN: 002 392 636

ABN: 34 002 392 636

Registration Date: 16/03/1982

Locality of Registration: 2 Pine Street, Albion Park Rail, NSW 2527

Type: Australian Public Company, Limited by Guarantee

Warrigal Care is registered as a company with the Australian Charities and Not-for-Profits Commission (ACNC).

As at 30 June 2024, Warrigal Care was the sole member of Multicultural Aged Care Illawarra (MACI). MACI is a dormant, non-trading organisation that is in the process of a members' voluntary liquidation.

Business Names

Warrigal Care

Warrigal Stirling

Warrigal Community Care

Warrigal Calwell

Links Seaside

Operations

Our Board of Directors are made up solely of volunteers who oversee an executive team that guide our entire workforce to realise Warrigal's vision and create better lives for older people.

Summary of Activities

Warrigal operates in the Illawarra and Southern Highlands regions of NSW along with Goulburn, Queanbeyan and the ACT.

During the financial year 2023 to 2024 Warrigal managed 13 residential care homes for elderly people who cannot live independently. We provided those residents with accommodation, meals and other hospitality services along with assistance with their daily care needs. We also managed 12 community or lifestyle villages where residents live independently. Home Care is a large part of Warrigal's business and we deliver various levels of in-home care support to customers across the Illawarra and Southern Highlands. We also provide day respite services and offer specialised palliative care and dementia services at several locations.

Warrigal directly employs more than 2200 staff and has the support of more than 400 volunteers.

Supply Chain

Warrigal maintains relationships with multiple suppliers and contractors across all areas of aged care support, our larger contractors and suppliers tender for our business and if successful, agreements are put in place to ensure quality of service and products.

Warrigal made a decision some years ago to outsource areas of the business where we could bring better outcomes for residents, Warrigal now has many contractor partners working across Property, Allied Health, Cleaning and Catering.

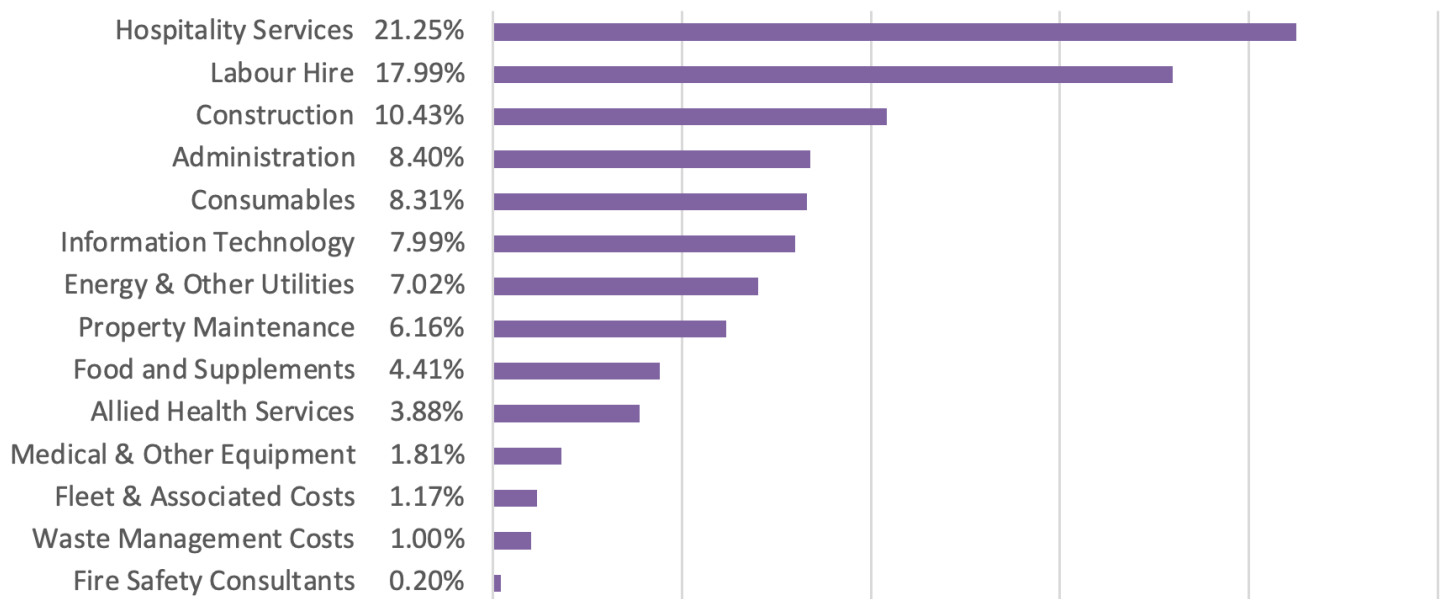
Criterion 3 — Identification of modern slavery risks in our operations and supply chain

Modern Slavery Risks within Operations and Supply Chain

Warrigal takes the Modern Slavery risk seriously and remains a major consideration when selecting suppliers and contracting partners. We recognise that we have limited control of the supply chain beyond the initial tiers but aim to reduce the likelihood of risk through our supplier selection process.

The below chart categorises our suppliers and allows us to compare percentage spend against traditional Modern Slavery high risk areas of supply chains.

Warrigal's Top 100 Suppliers



Possible Modern Slavery risks with Warrigal's supply chain:

- Exploitation of a vulnerable workforce, underpayment of wages, excessive working hours and poor working conditions
- Risks associated with our supply chain could relate to forced labour being used in countries where goods are manufactured or where the raw materials are sourced
- Unethical recruitment agencies, charging high fees for placements or misleading workers regarding the job conditions

Addressing Modern Slavery Risk

Warrigal uses Enterprise Bargaining Agreements for internal workforce which have been negotiated in consultation with the relevant unions. Along with these EBAs, Warrigal has robust policies for Human Resource, Work Health & Safety, Bullying and Harassment. We encourage feedback from staff at all levels. For these reasons and that the nature of our industry is to care for and treat people with dignity and fairness, we feel that the risk of Modern Slavery occurrences within our own workforce to be unlikely.

Warrigal has a large supply chain which is managed by a small team, together the team is responsible for all purchases and management of contractors. Having a small team to cover all aspects of the supply change means that we can liaise easily, make decisions, build supplier relationships and effect change where required. We also utilise the services of a third party Contractor Management Company to help us keep track of the contracting companies we use, their staff, qualifications and Workers Compensation insurance status.

We have identified our top 100 suppliers by spend and compared them against potential Modern Slavery high risk areas identified across Australia.

Construction, hospitality and third party labour arrangements for nursing are potentially our biggest risk areas.

Warrigal purchases all of its supplies and services from suppliers within Australia however some of those suppliers may in turn purchase goods from other companies or countries that could be considered as high risk areas.

Although Warrigal agreements and tender processes align us with companies we believe do not support Modern Slavery within their own workforces, it is possible that the risks lay within the supply chains of those contractors and suppliers.



Criterion 4 — Actions to assess and address risk

Due Diligence and Remediation

- Listed our top one hundred suppliers based on spend amounts and categorised them as Low, Medium or High risk suppliers
- Appoint an executive to oversee the Modern Slavery risks and mitigation strategies
- Board and Senior Management Awareness
- Creation of a questionnaire screening tool used by potential suppliers to measure risk within their organisations
- All Warrigal drafted agreements now include a Modern Slavery clause which requires suppliers to abide by the Modern Slavery Act 2018 and assist Warrigal with our reporting obligations
- Identified possible high risk suppliers
- Achieved engagement with our major suppliers

The risks of Modern Slavery occurrences within our supply chain is mitigated by using reputable suppliers. Our agreements specify that suppliers are required to also comply with the Modern Slavery Act 2018 and that suppliers liaise with Warrigal and comply with requests for information.

Criterion 5 — Effectiveness Assessment

Effectiveness

In order to assure our approach to Modern Slavery risk stays relevant and effective Warrigal plans to:

- Continue to communicate with new and existing suppliers
- Require suppliers to complete a questionnaire that will highlight Modern Slavery risk within their organisation when supplying proposals
- Review Questionnaire Screening tools that have been completed by new and existing suppliers
- Maintain Modern Slavery risk as part of the decision matrix when evaluating tender proposals
- Review existing business systems against the requirements of Modern Slavery legislation
- Continue to educate and involve different areas of the business to strengthen our knowledge of possible risks and risk management strategies
- Reviewing feedback for possible instances of Modern Slavery
- Aim for continuous improvement with our approach to Modern Slavery risk by reiterating to new and old suppliers, our commitment to the reduction of possible risk

Criterion 6 — Consultation with entities owned or controlled

Consultation with other entities owned by Warrigal

Warrigal does not own or control any other entities and therefore is not required to report on consultation process with such entities.

Criterion 7 — Other relevant information

Warrigal was founded by volunteers to assist the vulnerable in our community and continues to uphold the vision and philosophy of treating people with dignity and respect.

This dedication extends to maintaining ethical standards in all areas of our business, including the supply chain. We are committed to safeguarding human rights and implementing lawful, fair, and ethical work practices. We expect our service providers, suppliers, and contractors to share this commitment, reducing the likelihood of modern slavery occurring within their organisations or supply chains.

Initially when the Modern Slavery Act Reporting Requirement was implemented, Warrigal took part in networking sessions with other age care providers. This collaboration was to support each other in our understanding of the requirement and to promote the group wide approach to ethical procurement.



