



Modern Slavery Statement 2022

This is the third Modern Slavery Statement of DAC Finance Pty Ltd (ACN 129 420 222) trading as Opal HealthCare for the year ended 31 December 2022. This Statement covers all entities controlled by Opal HealthCare, was approved by its Board on 3 May 2023 and is published in accordance with the Modern Slavery Act 2018.

Introduction

As a human centred aged care provider whose purpose is to bring joy to those it cares for, Opal HealthCare is committed to respecting and protecting the human rights of those living and working in our Care Communities and beyond.

This commitment underpins our efforts to combat modern slavery, which are also guided by our core values of CARE – *Compassion, Accountability, Respect and Excellence*.

2022 has been a year of enhancing and improving our modern slavery risk management framework, increasing our team’s awareness of and ability to identify and address modern slavery risks in our supply chain, and better engaging with our suppliers for this purpose.

We are proud of the progress we made in the past 12 months as described in this statement, in the face of Covid-19 remnants and a changing regulatory landscape, and while continuing to welcome new Care Communities into our family.

We recognise that our continuous improvement journey is ongoing and evolving, and look forward to further progressing it in 2023.



Compassion



Accountability



Respect



Excellence

Prof. Peter Shergold, Chair
DAC Finance Pty Limited

Opal HealthCare acknowledges the Traditional Owners of Country throughout Australia and recognises their connection to land and waterways and their continuing rich contribution to our culture and community. We pay our respect to Elders past, present and emerging and to all First Nations Peoples.

Reporting
Criteria 1 & 2

Structure, operations and supply chain

Where our structure and operations remained as described in the previous reporting period, we have restated the same information; otherwise the information has been updated to reflect the 2022 reporting period.

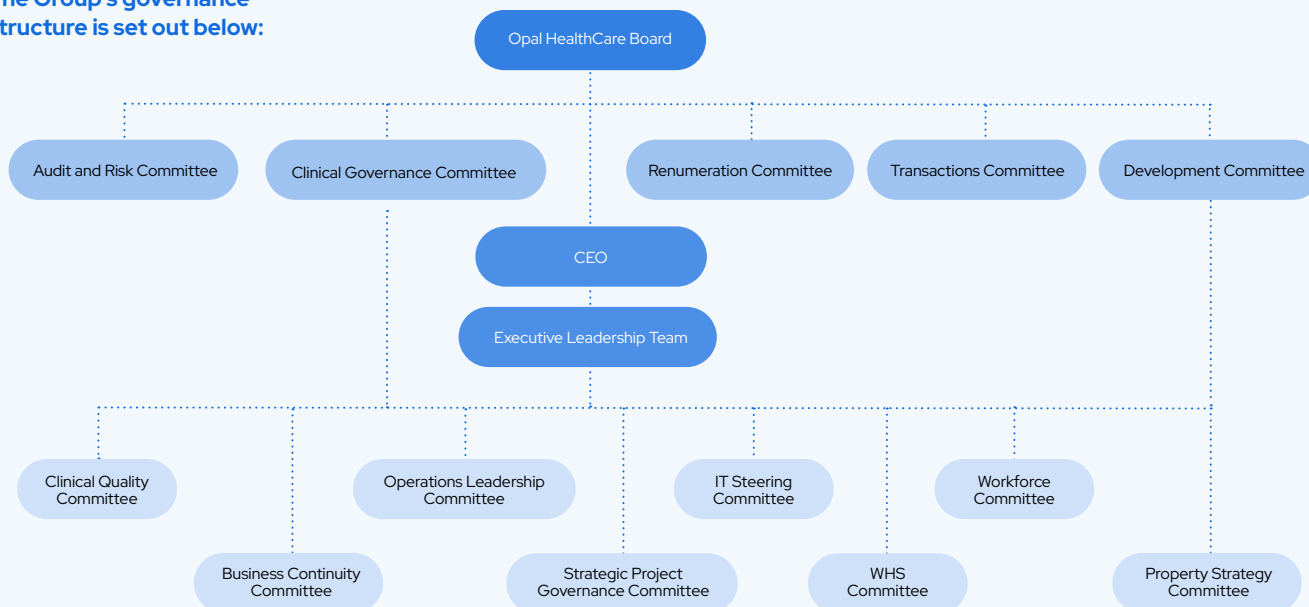
2.1 Structure

DAC Finance Pty Ltd (ACN 129 420 222) trading as Opal HealthCare (Opal HealthCare) is an Australian proprietary company which head office is in Sydney, New South Wales¹.

Opal HealthCare, its subsidiaries² and the companies controlled by them³ together form the Opal HealthCare Group (Group, Opal, we, us). All Group companies are Australian proprietary companies based and operating in Australia only. Opal HealthCare’s subsidiary DPG Services Pty Limited (ACN 090 007 999) is the approved provider which operates our Care Communities and employs their team members, and as such is the main operating Group company. A handful of Group companies hold some of the properties our Care Communities operate from or act as trustee companies, while others have no operating activities.

The Group is governed by Opal HealthCare’s board with the assistance of its sub-committees, which include members of the Board and the Executive Leadership Team. The roles and responsibilities of the Board and its Committees are outlined in their respective charters.

The Group’s governance structure is set out below:



¹Level 11, 420 George Street Sydney NSW 2000.

²DPS Services Pty Limited ACN 090 007 999, Aquarius Group Pty Limited ACN 152 767 747, DAC Finance (Vic) Pty Limited ACN 129 420 506, DAC Finance (NSW/Qld) Pty Limited ACN 129 420 499.

³Domain Group Holdings Pty Limited ACN 123 178 496, Domain Group Investments Pty Limited ACN 123 179 251, Domain Aged Care Management Pty Limited ACN 113 753 834, Domain Aged Care (Services) Pty Limited ACN 114 145 578, Domain Aged Care No. 2 Pty Limited ACN 104 429 183, Domain Aged Care No. 3 Pty Limited ACN 128 348 569, Domain Aged Care (Qld) Pty Limited ACN 104 420 671, Domain Aged Care (Victoria) Pty Limited ACN 118 771 485, Domain Aged Care (Kirra Beach) Pty Limited ACN 115 506 444, Domain Aged Care (Ashmore) Pty Limited ACN 108 106 832, Domain Annex Pty Limited ACN 060 719 557, Aquarius Aged Care Pty Limited ACN 152 767 710, Aquarius Group Aged Care Pty Limited ACN 152 767 756, Aquarius AV Pty Limited ACN 152 767 738, Aquarius Health Pty Limited ACN 123 031 587 and Principal HealthCare Apartments Pty Ltd ACN 121 246 928.

Reporting
Criteria 1 & 2

Modern Slavery risks management responsibilities are vested with the Audit and Risk Committee which reports to the Board. In 2022, we enhanced the Group’s Modern Slavery governance structure through the introduction of a Modern Slavery Working Group consisting of senior members from the Procurement, Risk and Legal functions (MSWG). The MSWG liaises with each business unit executive who is accountable for their unit’s modern slavery risks, and reports to the Executive Leadership Team, which makes recommendations to the Audit and Risk Committee on modern slavery matters.

In the next reporting periods we will continue to review our modern slavery governance structure and update it as needed to ensure it is fit for purpose and effective.

The Group’s enhanced modern slavery governance structure is set out below:



2.2 Operations

The Opal HealthCare Group is one of the largest private residential aged care providers in Australia, caring for approx. 8,000 residents across 91 Care Communities in New South Wales, Victoria, Queensland and Western Australia⁴.

We continue to grow organically and through acquisitions, and in 2022 welcomed 7 new Care Communities into our family.

Our operations centre around resident facing services which include:



Residential aged care - permanent and respite



Dementia care



Palliative care



Transitional care placement for Local Health Districts



Reablement and rehabilitation services to improve residents’ physical and emotional wellbeing, delivered at wellness centres located within our Care Communities in collaboration with third party allied health professionals.

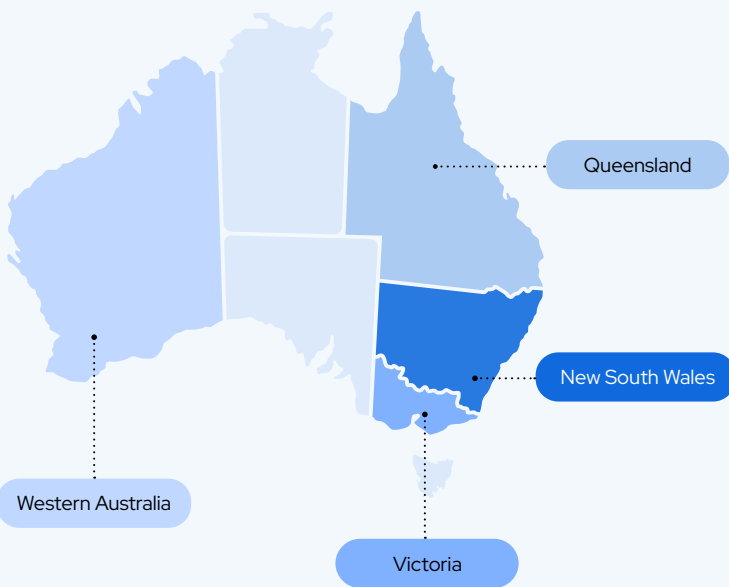
⁴All figures in section 2.2 are as at the end of January 2023.

Reporting
Criteria 1 & 2

We also operate 3 Assisted Living Apartment (ALA) villages in New South Wales, adjacent to our Care Communities in Springwood, Killarney Vale and Mount Hutton, offering retirement village accommodation to approx. 43 residents.

Each Care Community is operated by a dedicated team led by General and Care Managers who are supported by regional management teams and the Sydney Home Office team. Opal HealthCare employs approx. 10,787 team members, mostly (approx. 71.87%) in clinical, nursing and resident facing care roles. Approx. 15.81% are employed in catering roles, and 5% in cleaning roles. All team members are based in our Care Communities in New South Wales, Victoria, Queensland and Western Australia, except regional management and Sydney Home Office team (approx. 300). Where needed, temporary labour is hired through local agencies (approx. 1.4% of total FTE hours in 2022).

Opal HealthCare operates and provides its services in Australia only. The location of Opal HealthCare's Care Communities, wellness centres and ALAs is set out below:



Total in Australia:



New South Wales



Victoria



Queensland



Western Australia



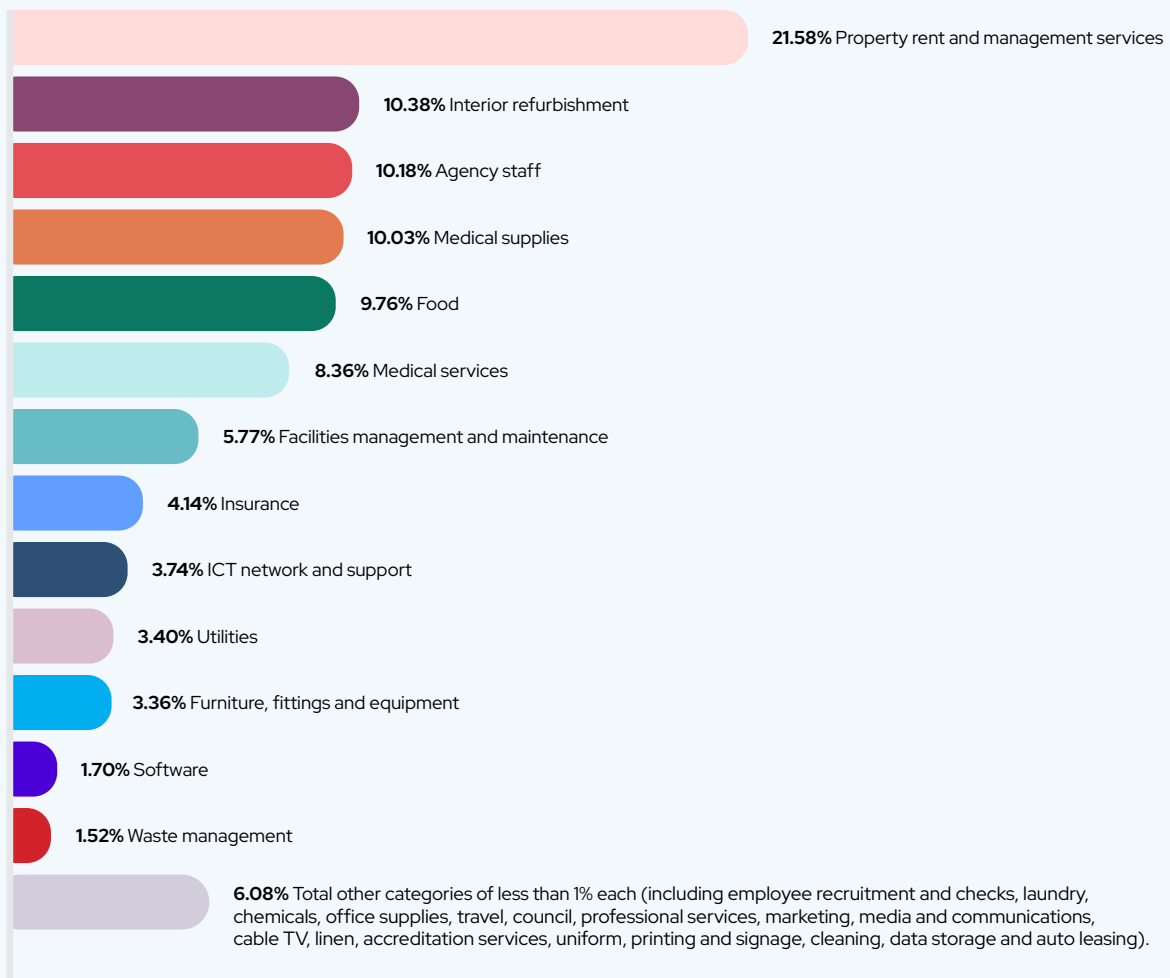
Reporting
Criteria 1 & 2

2.3 Supply chain

Opal HealthCare’s supply chain includes many suppliers of various sizes who supply a broad range of products and services across different sectors. Some suppliers have a long standing relationship with us while others are one off engagements, some are reporting entities themselves and others are SMEs or local traders.

We engaged approx. 2,580 tier 1 suppliers in 2022, almost all located in Australia (except a couple of software vendors).

The vast majority of Opal HealthCare's annual spend in 2022 (approx. 87%) was across 181 suppliers with an annual spend of \$200,000 or more in the following categories*:



*The spend percentages above are of the total spend in 2022 on suppliers with annual spend of \$200k or more.

Modern Slavery risks in our operations and supply chain

3.1 Operations risks

All Opal HealthCare group companies are registered and operating in Australia only. Our workforce is recruited and employed in Australia, and almost all deliver resident facing services at our Care Communities in New South Wales, Victoria, Queensland and Western Australia (except approx. 300 Sydney Home Office and regional management teams). Our team members are employed directly by us and recruited by us through online, media and print promotions and advertisements as well as word of mouth and referrals.

The aged care labour market is experiencing substantial shortages, which are expected to increase with the introduction of new regulation mandating minimum registered nurse care time per resident and 24/7 registered nurse presence. This creates difficult recruitment challenges in an already highly competitive candidate market, resulting in an increase of temporary staff sourced by us from labour hire agencies in 2022, to ensure our residents receive the required care (1.4% of total FTE hours in 2022 compared to 0.27% of total FTE in 2021). Most of the agency staff sourced by us (94%) are high skilled nursing staff with legal rights to work in Australia, and all agency staff are sourced in Australia through licensed Australian agencies.

We encourage, support and promote the rights, health and safety and wellbeing of our team in various ways including:



HR Policies, Procedures and Codes

A range of HR Policies, Procedures and Codes aimed to ensure equality, inclusion and wellbeing including a Code of Conduct, Flexible working Arrangement policy, Anti-Discrimination, Harassment and Bullying policy, Organisational Diversity and Inclusion policy, Parental Leave policy, Breastfeeding Policy, Complaints and Grievance Handling policy, Recruitment and Selection policy, and Work Health and Safety policy.



Wellbeing

Our wellbeing initiatives, including the Team Member Employee Assistance Program offering team members external free counselling sessions, access to a range of wellbeing resources such as articles, podcasts and monthly communications with wellbeing suggestions and tips.



Opal HealthCare Academy

Our Opal HealthCare Academy, which offers our team opportunities to upskill and advance their careers, grow personally and professionally and lead change through internal and external learning and development programs in partnership with leading education institutions (see <https://academy.opalhealthcare.com.au/>).

The Opal HealthCare Academy currently includes 6 schools offering programs in Nursing Health Services, Wellbeing & Meaningful Engagement, Hospitality, Business Services, Research and Leadership. Our internal development programs include a Nurse Graduate Program (transition from tertiary nursing studies into practice in aged care), Elevate Program (mid-career nurses with a passion for gerontology), RN2CM Program (to shift from pure nursing to a leadership role), Infection Prevention & Control Program, and emerging, senior and advanced leaders programs.

In addition, Opal HealthCare's Scholarship Program offers up to \$5,000 annual scholarships for team members wishing to develop their skills through tertiary studies that will develop and benefit their career.

Reporting Criteria 3



Social responsibility

As part of our broader social responsibility and human rights commitment, we have agreements with several universities and educational institutions offering their students the opportunity to undertake placements at our Care Communities to gain practical work experience.

We also have several partnerships in place to support the transition of disadvantaged groups into paid and meaningful work, including:

- A partnerships with Career Trackers to support indigenous interns into paid employment.
- A partnership with Career Seekers to support refugee interns into paid employment.
- A partnership with Asylum Seekers Centres NSW.

We believe that the varied human rights protections provided to our team through the highly regulated aged care and nursing sectors and a combination of strong industrial laws, modern awards, our enterprise agreements, HR policies and procedures, employment agreements and a range of grievance mechanisms, constitute robust safeguards against modern slavery, and consider the modern slavery, risk within our operations to be fairly low.



Health and Safety

Our dedicated Health and safety overseen by National and State health and safety managers.



Grievance Mechanisms

Our team members have a diverse range of grievance mechanisms available to them to raise concerns about their working conditions, rights or other matters, including workplace and enterprise agreement grievance policies, whistle-blower function, anonymous online team surveys and direct online feedback and communication facilities (intranet and website).

3.2 Supply chain risks

Our approach

In previous reporting periods we have mapped all our tier 1 suppliers with an annual spend over \$200,000 (key suppliers⁵) and identified their location, the categories of products and services they provide to us and the modern slavery risks associated with them. Through our actions to identify and assess risks as described in section 4 of this statement, we also gained better insight into where they source the products they supply to us.

While almost all our key suppliers are based in Australia and the majority are service providers, some of those who supply products to us source them (or some of their components) overseas often through complex multi-tiered supply chains.

We appreciate that the risk of modern slavery increases in remote supply chain tiers, where commodities, raw materials or products are sourced, processed, manufactured, packaged and shipped. Investigating risks in these remoter supply chain tiers remains a challenge due to their overseas geographical location, poor transparency and lack of available information, and we continue to engage with our suppliers to increase our visibility over their upstream supply tiers.

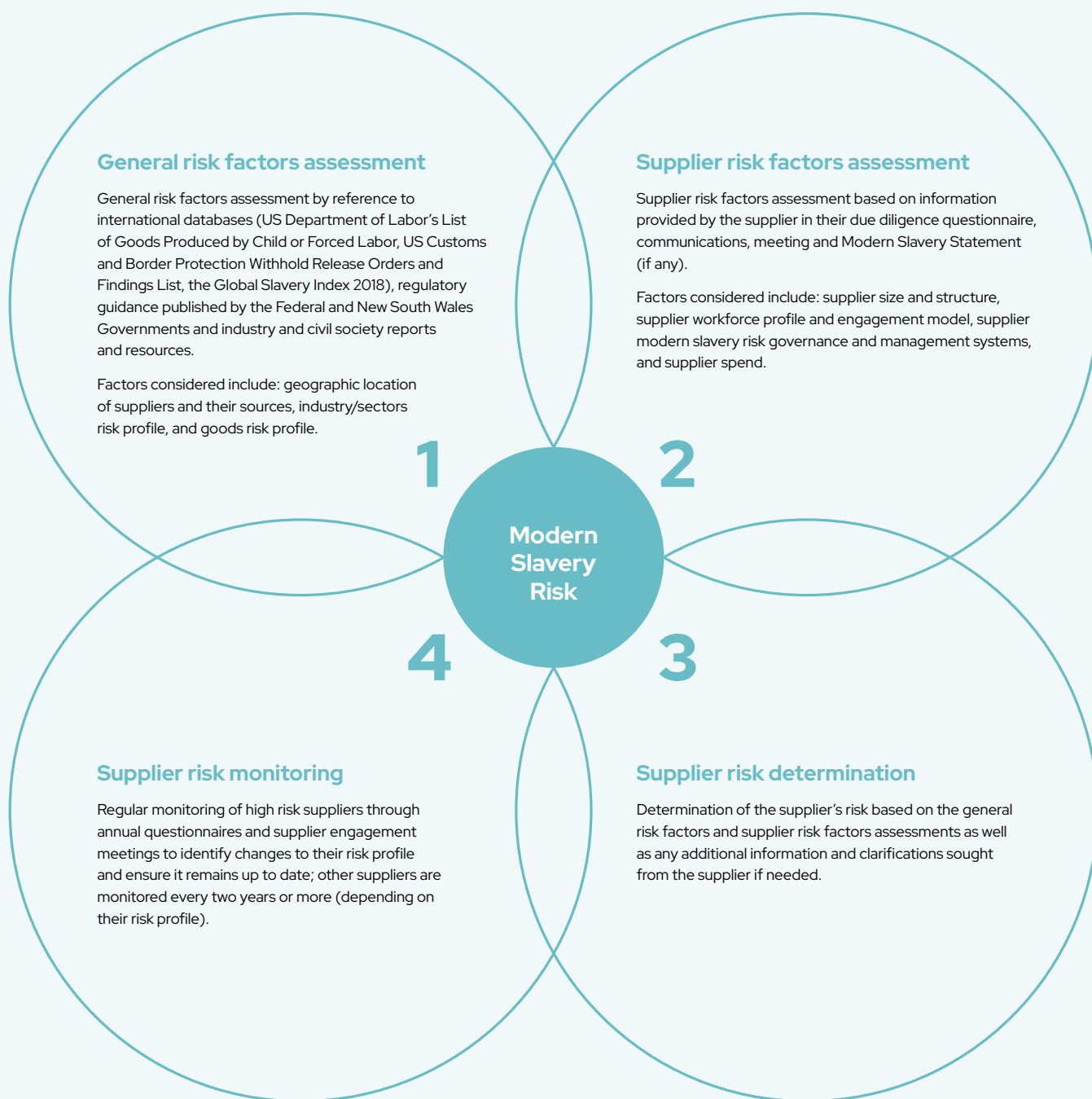
Our approach remains a targeted risk-based approach consistent with the United Nations Guiding Principles on Business and Human Rights, with a focus on high-risk suppliers with less mature modern slavery risk governance and management capabilities, where we feel we have greater ability to drive change, mitigate risks and impact human rights.

⁵Excluding low risk suppliers such as State and local Government, utilities, insurers and professional service providers.

Risk assessment, monitoring and mitigation

In assessing our suppliers’ modern slavery risks we utilise a multi factored risk assessment and monitoring methodology which is guided by information gathered through our due diligence actions, regulatory commentary and industry and civil society reports and resources. We are reviewing our risk assessment methodology on an ongoing basis and will continue to revise and refine it in the next reporting periods as needed to reflect insights, learnings and emerging trends.

Below is a summary of our current risk assessment methodology and process:



Reporting Criteria 3

We aim to mitigate risks by prioritising working with suppliers who we have long term relationships with, and suppliers with mature modern slavery risk governance and management systems where possible. Risk is also mitigated through the risk assessment embedded in key suppliers tendering and procurement processes and the inclusion of modern slavery risk identification, assessment, reporting and remediation related obligations in their contracts.

Where high risk suppliers are identified, we further engage with them to gain better visibility into their supply chain risks, including through meetings to discuss their modern slavery risk management and due diligence actions and by asking them to complete a questionnaire each year.

Modern slavery risks in our supply chain

Based on our risk assessment and monitoring methodology, the supply chain categories previously identified by us as associated with higher modern slavery risks continue to be assessed as such. Utilising the UN Guiding Principles on Business and Human rights, we do not believe Opal HealthCare causes or contributes to modern slavery given the low risk within our operations and the fact that almost all our tier 1 suppliers are based and operate in Australia.

We recognise we may be linked to modern slavery through remoter tiers of our supply chain where products or services are sourced via third party supply arrangements beyond our tier 1 suppliers in countries, sectors and industries associated with higher modern slavery risk. The supply chain categories associated with such risks are described below.

We will continue working with our key suppliers in the next reporting periods to further investigate risks beyond tier 1, recognising this is an ongoing, long and challenging journey given the multi layered complexity of global supply chains and the limited information and visibility available over remote supply chain tiers.

Medical consumables and PPE

Risk	The production of certain medical consumables particularly Personal Protective Equipment such as disposable gloves and face masks (PPE) in certain Asian regions is associated with high modern slavery risk which increased during Covid-19 supply pressures (where exploitive recruitment practices and working conditions were exposed in production facilities in Malaysia).
Mitigation	We source mainly from two large Australian based suppliers who are reporting entities, completed due diligence and have modern slavery related obligations in their contracts. Where smaller suppliers are used they are asked to complete our due diligence questionnaire and accept our modern slavery contract terms.

Solar panels

Risk	The majority of Polysilicon used in solar panels is produced in Xinjiang China where coercive recruitment and exploitive labour practices of ethnic minorities are reported. The solar panels installed in our Care Communities were sourced from one supplier who is based in Australia and identified China as one of their source countries.
Mitigation	Our solar panels supplier accepted our modern slavery contract terms, completed our due diligence questionnaire more than once and attended a modern slavery awareness and due diligence meeting with our procurement team. They implemented various actions to monitor and mitigate modern slavery risk, including factory visits and obtaining past EcoVadis certification from their key supplier.

Electronic devices

Risk	The mining and harvesting of some raw materials (cobalt, gold, titanium, tungsten and tin) incorporated in electronic devices such as computers, tablets and phones are associated with child and forced labour and exploitive working conditions in certain South East Asia countries.
Mitigation	We source electronic devices such as computers, tablets and phones from Australian resellers of large reputable multinationals headquartered in the US. These multinationals published statements confirming their commitment to combat human trafficking and slavery and detailing robust actions taken by them for this purpose, including the adoption of human rights and responsible sourcing policies, suppliers code of conduct and related contractual obligations, audits and due diligence, training and grievance mechanisms and remediation actions.

Reporting Criteria 3

Construction

<p>Risk</p>	<p>Modern slavery risks associated with the construction industry include subcontracting that may involve exploitation of vulnerable workers such as migrants (who may be unaware of or uncomfortable enforcing their rights), as well as poor visibility over supply chain of raw construction materials which could be sourced from high risk countries (for example stone, bricks, glass, timber, metals).</p>
<p>Mitigation</p>	<p>The construction services suppliers engaged by us to build and refurbish our Care Communities provide their services to us in Australia only and employ local labour.</p> <p>Of approx. nine providers of construction services in 2022, all but one completed our due diligence questionnaire disclosing various risk management measures including responsible modern slavery policies and supplier audits, with the larger ones also providing a list of the products they use and their source countries. Two thirds have modern slavery terms included in their contract (and all but one of the others are not currently used).</p>

Cleaning services

<p>Risk</p>	<p>The cleaning services sector is associated with higher modern slavery risk (unfair recruitment practices and working conditions) due to the low skilled low paid nature of the sector’s workforce which often includes migrants with limited ability to understand or enforce their rights.</p>
<p>Mitigation</p>	<p>We reduce this risk by directly employing our cleaning team members, who are protected by industrial laws, awards, enterprise agreements and Opal HealthCare’s policies. Where needed during infectious outbreaks or workforce shortages additional cleaning staff (approx. 0.014% of FTE in 2022) was temporarily hired through Australian agencies who source them locally and are asked to complete due diligence.</p> <p>Specialised cleaning services (ducts, fans, gutters) are provided by an external supplier who completed due diligence, accepted our modern slavery contract terms and attended a modern slavery awareness and due diligence meeting.</p>

Textiles

<p>Risk</p>	<p>The Textile industry, from the harvesting and processing of raw materials through to fabric knitting, weaving, dyeing and printing is associated with forced labour and exploitation in certain countries.</p> <p>While our three key suppliers of textile based products (linen, drapes and uniform) operate in Australia and employ local labour, some of their products are sourced from high risk countries such as China, India and Bangladesh.</p>
<p>Mitigation</p>	<p>All our key textile suppliers completed our due diligence and have modern slavery related obligations in their contracts.</p> <p>Our uniform supplier is part of a large reporting entity whose published modern slavery statements detail robust actions taken to mitigate modern slavery risks.</p> <p>Our linen and drapes suppliers participated in modern slavery awareness and education meetings and provided further satisfactory information as described in the case study below.</p>



Case study – Textile suppliers

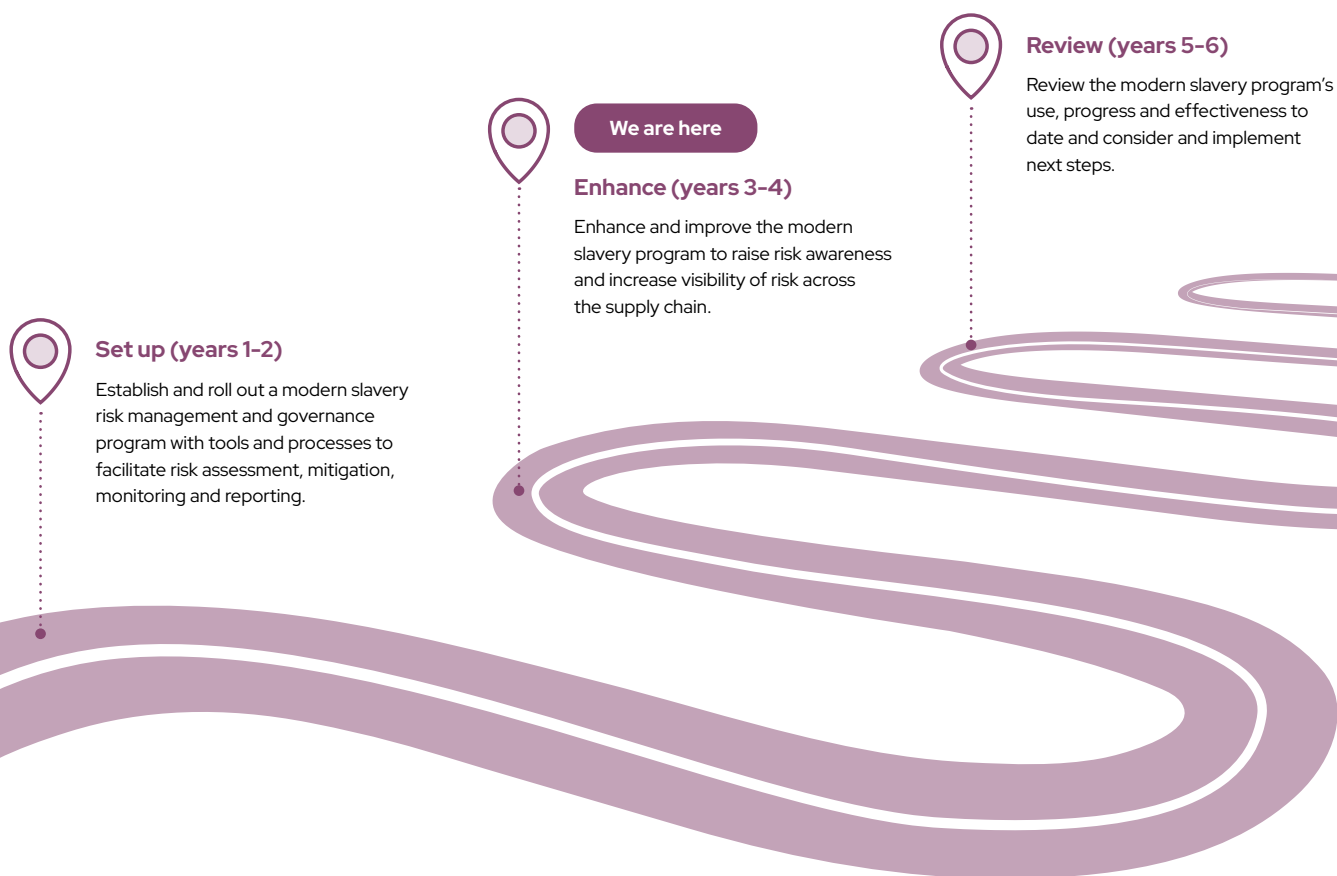
We have two long standing small business suppliers of textile based products (linen and drapes) whose modern slavery risk management and governance capabilities are not as mature and resourced as those of large reporting entities. Their due diligence questionnaires disclosed they source some of their products from high risk countries such as China and Turkey, and in 2022 our procurement team took it upon themselves to work closer with these suppliers to increase their awareness of modern slavery and dive deeper into their supply chain to assess modern slavery risks. Meetings were held with them to educate them about modern slavery risks in their supply chain, communicate our expectations on how to identify and address such risks and introduce them to resources that would assist them with this. These suppliers confirmed they do not work with any suppliers banned under the US Customs and Border Protection Withhold Release Orders and Findings List, and obtained from their large suppliers further helpful information demonstrating efforts to mitigate risks (including SMETA Sedex audit reports for some).

Actions taken to assess and address modern slavery risks

Our Modern Slavery Program Roadmap

The first two years of our journey to assess and address modern slavery risks in our operations and supply chain (FY20 and FY21) formed the “set up” phase, which was dedicated to establishing and rolling out our modern slavery program. During this phase, we designed and developed a fit for purpose modern slavery risk management and governance framework, with the tools and processes required to facilitate risk assessment, tracking, reporting and mitigation as well as risk awareness and education.

In 2022 we progressed into the “Enhance” phase of our journey, which is dedicated to enhancing and improving our modern slavery program in line with our six year road map summarized below:



Reporting Criteria 4

Our actions

In 2022, the first year of our “Enhance” phase period, we focused on strengthening and reinforcing the following elements of our program as described below:



Enhancing risk recording, tracking, monitoring and reporting capabilities

We enhanced our team’s ability to record, track, monitor and report modern slavery risks and due diligence actions, by developing (and migrating all key suppliers data into) upgraded and improved online modern slavery risk registers, with a simplified look and structure and new data fields and drop down menu options to expand data recording and reporting abilities. Our modern slavery registers now include:

- The supplier’s details and location
- The products and services provided by the supplier and where they are sourced
- The supplier’s workforce information
- The supply contract value and duration and whether it includes modern slavery terms
- Due diligence completed by the supplier in each reporting period and any outstanding due diligence information
- Risk controls implemented by the supplier (including modern slavery and responsible sourcing policies, supplier due diligence and audits and whether the supplier is a reporting entity)
- Details of annual high risk supplier engagement meetings
- The supplier’s previous and current year risk classification and reason
- The modern slavery working group input



Identifying suppliers who exceed the risk thresholds

We enabled our team to identify suppliers who exceed the risk thresholds during each reporting period; Opal HealthCare’s modern slavery risk thresholds call for identifying and assessing modern slavery risks of key suppliers with an annual spend of \$200,000 or more, and it became evident that for some suppliers this threshold was exceeded sometime after a lower value contract or purchase orders were made. To close this gap a new quarterly process was created to identify such suppliers once their spend exceeds the threshold so that they can be added to the modern slavery risk register, complete the required due diligence and have modern slavery terms added to their supply agreements if needed.



Increasing awareness and ability to identify and assess slavery risks

We increased our team’s awareness of and ability to identify and assess modern slavery risks by creating and uploading to our intranet a comprehensive process outlining all actions required to identify, assess, record, report and mitigate modern slavery risks, including enhanced and updated tools and resources for this purpose.

All senior team members involved in contracting and liaising with suppliers for the different business units (Procurement, People & Culture, Property and ICT) attended training to educate them about the new process and updated tools and resources, which include:

Reporting Criteria 4

- An updated modern slavery compliance actions checklist with detailed guidance
- Opal HealthCare’s modern slavery risk thresholds as updated in 2022 and approved by the ARC and Board
- Detailed step by step user guide for the upgraded modern slavery registers
- Links to the updated modern slavery due diligence questionnaire which was enhanced and improved to align with the upgraded online modern slavery risk registers
- Template communications to suppliers regarding Opal HealthCare’s Anti Slavery policy and with a link to the online self assessment due diligence questionnaire
- Template modern slavery terms to add to new supply agreements
- Template addendum to add modern slavery terms to existing supply agreements
- Links to modern slavery risk assessment databases and resources
- A link to the Australian Government modern slavery statements register



Case Study - Improving our supplier due diligence questionnaire

Having looked at suppliers’ responses to the due diligence questionnaire we had in place in previous reporting periods and how they are recorded and converted into meaningful insights, we identified areas for improvement. Based on input from legal, procurement, risk and process improvement team members we have simplified and improved the questionnaire by re-ordering and rewording questions to make them shorter, simpler and easier to respond to through tick boxes where possible. We also added questions to capture material information concerning the supplier’s workforce, and ensured the updated questionnaire’s structure and content is aligned with our upgraded and improved online modern slavery risk registers where the questionnaires responses are recorded.



Laying the foundations for more meaningful supplier engagement

We laid the foundations for more meaningful supplier engagement to increase suppliers' awareness of and ability to identify and assess modern slavery risk in their supply chain, by developing and introducing a process for modern slavery focused meetings with large and high risk suppliers.

This new process was uploaded to our intranet and senior team members involved in contracting and liaising with suppliers for the different business units (Procurement, People & Culture, Property and ICT) attended training to educate them about the new process and related resources, which include proposed template meeting invitation and agenda outlining matters to be discussed with the supplier, such as:

- Educational resources and short webinars explaining modern slavery to suppliers
- A copy of Opal HealthCare’s Anti Slavery policy communicating our expectations to suppliers
- Links to risk resources and guidance materials to be shared with suppliers
- Due diligence information to be discussed (including questionnaire, supplier’s own modern slavery statement if any)
- Risk controls implemented by or recommended to the supplier

High risk suppliers are further asked to confirm they do not source the products they supply to us from suppliers banned by the US Customs and Border Protection Withhold Release Orders and Findings List, and team members are asked to document the matters discussed at the supplier meetings for follow up purposes.

Reporting Criteria 4

Modern slavery risk management embedded in key suppliers' lifecycle management process

The actions we take to identify and assess modern slavery risks in our operation and supply chain, as well as actions to mitigate such risks, are now embedded in key suppliers' lifecycle management processes, from the tender phase through to contracting and contract renewal, as described below:



Our Continuous Improvement journey

Our journey to identify, assess and address modern slavery risks in our operations and supply chain, in line with our six year roadmap, has been one of continuous improvement. An overview of our progress to date can be found in the Appendix to this statement.

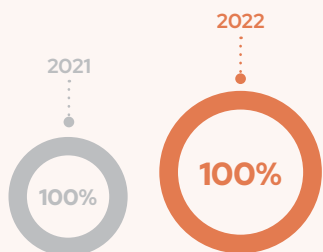
Effectiveness of actions taken to assess and address modern slavery risks

We are continuously reviewing and assessing the effectiveness of our modern slavery risk management program and its various components on an ongoing basis, utilising both quantitative and qualitative measures.

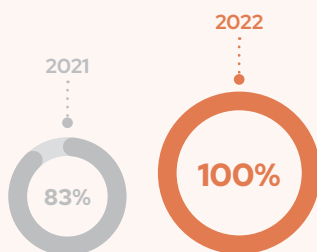
The reviews and assessments undertaken by us to date resulted in revising and improving various program components as described in this statement, including addressing the areas of improvement identified in our 2021 statement (improving our modern slavery risk registers, due diligence questionnaire and ARC and Board reports content and layout).

Below is a summary of our 2022 quantitative assessment metrics and approach to qualitative assessment.

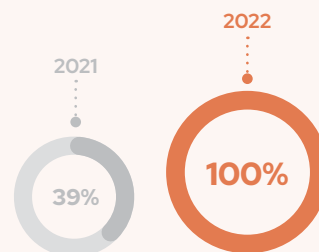
Quantitative Assessment



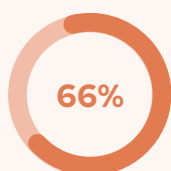
100% key suppliers (including all high risk key suppliers) mapped, recorded and tracked for modern slavery risk due diligence and contract terms



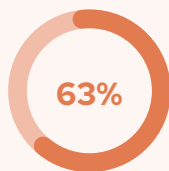
100% of the key suppliers (including all high risk key suppliers) completed due diligence at least once



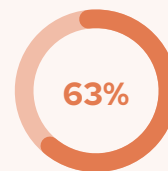
100% of the high risk key suppliers completed updated due diligence in this reporting period



66% of the high risk key suppliers have modern slavery terms in their contracts



63% of the high risk key suppliers completed due diligence more than once



63% of the high risk key suppliers attended modern slavery awareness, education and due diligence meetings

Reporting Criteria 5

Also from a quantitative perspective:



All modern slavery program components, processes, tools, resources and templates uploaded to the intranet



All senior managers from Procurement, HR, Property and ICT attended refresher training about the updated modern slavery program components uploaded to the intranet



Two half yearly in-depth audits of our modern slavery risk registers and related due diligence information completed by the Modern Slavery Working Group



Regular meetings of Modern Slavery Working Group members to review the program and develop and implement action plans (8 in 2022)



Regular modern slavery program and risk data updates to the Board (5 in 2022)



Regular modern slavery program and risk data updates to the ARC (5 in 2022)



Regular modern slavery program and risk data updates to the Executive Leadership Team (4 in 2022)








No modern slavery related complaints or concerns raised through our various grievance mechanisms

Qualitative Assessment

As we progress in our journey and our modern slavery risk management program evolves we increase our focus on qualitative outcomes, which are more difficult to measure than quantitative metrics, for example - the scope, depth and quality of the supply chain risk assessment information.

In the 2022 reporting period we have revised and upgraded various components of our program to facilitate better qualitative outcomes, including by:

-  Refining risk assessment capabilities through added due diligence information gathered via the updated supplier questionnaire and added risk assessment resources
-  Enhancing data recording, tracking, monitoring and reporting capabilities through upgraded online risk registers and dashboard reports
-  Improving processes, resources, tools and templates to identify and assess and mitigate modern slavery risk (updated questionnaire, template modern slavery contract and tender terms, action checklist, risk register guidance)
-  Increasing accessibility to processes, resources and tools through the intranet
-  Growing supplier modern slavery awareness and engagement through dedicated new supplier meeting process

Reporting Criteria 5

Our qualitative assessment of the effectiveness of our program has been and will continue to be informed by the quantitative metrics described above as well as by:



The adequacy and quality of information gathered from our suppliers



Review and audits undertaken by the Modern Slavery Working group



Supplier feedback obtained in supplier engagement meetings and communications

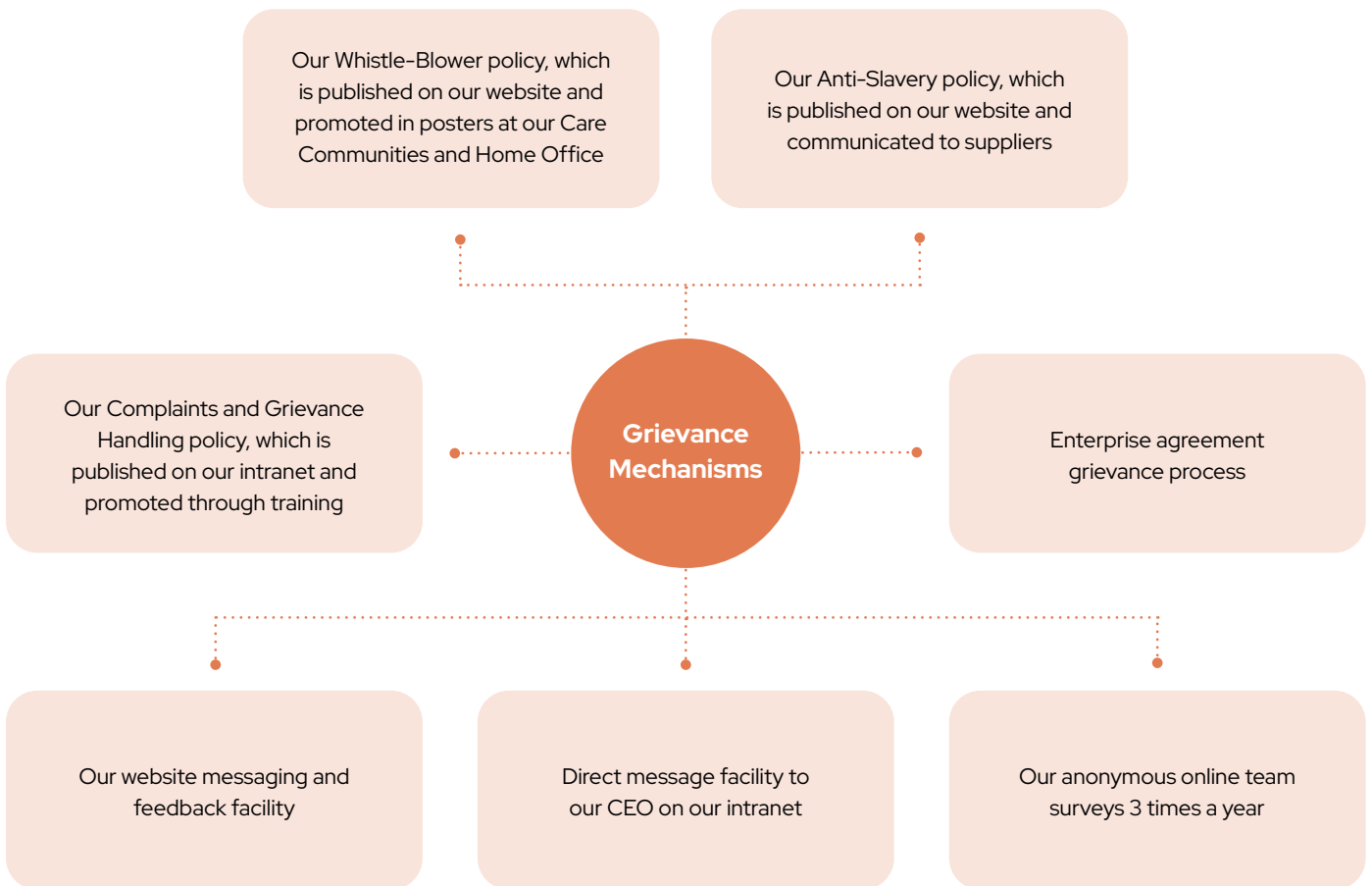


Input received from the Executive Leadership team, ARC and Board



Feedback from team members engaged in procurement of products and services

Our qualitative assessment will also be informed by information that may be received through our various grievance mechanisms described below which enable concerns to be raised in an accessible, equitable, confidential and anonymous manner:



Reporting Criteria 5

Based on review and assessment undertaken by us in the 2022 reporting period our focus in the next reporting periods will be on examining ways to increase the efficiencies of our modern slavery risk management program through:



Further enhancing our ability to record, track and report risk, by looking at ways to automate and streamline aspects of our data collection and recording tools and processes.



Exploring tools and processes to better assess modern slavery risks associated with suppliers of higher risk products and services and increase visibility over their upstream tiers.



Continuing to work with our team members and suppliers to increase their awareness of, and ability to identify and assess, modern slavery risks.

Reporting Criteria 6

Consultation with controlled entities

Opal HealthCare’s board oversees the performance and operations of the Opal HealthCare Group. Our CEO and CFO attend Opal HealthCare’s board meetings and serve as directors in all other Group companies’ boards. All Group companies are managed by the same Executive Leadership Team, supported by the same operational, governance, risk, compliance, finance and legal functions and share the same workforce and registered address, and accordingly we consider that all Group companies were consulted with in relation to this statement.

Reporting Criteria 7

Other relevant information

Opal HealthCare’s commitment to eradicate modern slavery is part of our broader commitment to respect and protect the human rights and wellbeing of those in our Care Communities and beyond. Our 2022 Social Impact Report available [here](#) describes the positive social impact delivered by Opal HealthCare in 2022 through its Care Communities in various domains.

Opal HealthCare's Continuous Improvement Journey Appendix

	FY 2020	FY 2021	FY 2022
Risk Governance	<ul style="list-style-type: none"> Risk management oversight vested with the ARC Anti-slavery policy adopted by the Board 	<ul style="list-style-type: none"> Modern Slavery Risk thresholds & actions adopted by the Board Anti-slavery policy updated 	<ul style="list-style-type: none"> Modern slavery working group set up to enhance risk governance structure Risk Thresholds updated to refine risk escalation and remediation process
Risk Assessment, Monitoring and Remediation	<ul style="list-style-type: none"> Key suppliers and their supply arrangements mapped Due diligence questionnaire developed Key suppliers' risk assessed and recorded 	<ul style="list-style-type: none"> New key suppliers mapped and risk assessed Annual Modern Slavery Declaration developed for high risk key suppliers 	<ul style="list-style-type: none"> Due Diligence Questionnaire enhanced and improved and merged with the Declaration High risk key suppliers to complete the Questionnaire every year to identify risk change New process for meeting with high risk key suppliers to discuss their risk profile and due diligence status
Risk Tracking and Reporting	<ul style="list-style-type: none"> Key supplier online modern slavery risk registers set up Periodic modern slavery program updates to the Board and ARC 	<ul style="list-style-type: none"> Modern slavery key data dashboard report developed Regular modern slavery program updates and reports to the Executive Leadership Team, ARC and Board 	<ul style="list-style-type: none"> Key supplier online modern slavery risk registers upgraded and improved Modern slavery key data dashboard report expanded Regular modern slavery program updates and reports to the Executive Leadership, ARC and Board New quarterly process to identify key suppliers who exceed the risk thresholds during the reporting period and require program actions
Risk Management	<ul style="list-style-type: none"> Template modern slavery contract terms developed Addendums to add the template modern slavery terms to existing key supply contracts developed Key business functions (procurement, HR, property and ICT) meet regularly to implement modern slavery program actions 	<ul style="list-style-type: none"> Tender terms updated to require key suppliers to complete due diligence and accept modern slavery contract terms Key supply contracts renewal process updated to remind to add modern slavery terms if needed 	<ul style="list-style-type: none"> Modern slavery risk management actions embedded in key suppliers' lifecycle management process Template modern slavery causes reviewed, updated and uploaded to the intranet Procurement department modern slavery tender terms reviewed and updated Modern slavery working group formed and met regularly to implement modern slavery program actions
Risk awareness and education	<ul style="list-style-type: none"> Training delivered to executives on embedding modern slavery requirements in their departments' procurement process 	<ul style="list-style-type: none"> Modern Slavery Compliance Checklist with required actions and resources prepared and followed by training to senior managers engaged in procurement Modern slavery executive actions checklist prepared for executives to oversee within their departments 	<ul style="list-style-type: none"> New process created and uploaded to the intranet followed by training to increase team members' awareness of and ability to identify and assess modern slavery risks, including an updated actions checklist and enhanced and improved tools and resources New process created and uploaded to the intranet followed by training for meeting with high risk key suppliers to increase their awareness of and ability to identify and assess modern slavery risks