



Eldercare

Modern Slavery Statement

1 July 2019 to 30 June 2020

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INTRODUCTION

Eldercare Incorporated (“**Eldercare**”) is one of South Australia’s largest and most experienced aged care providers. Eldercare was founded in 1990 with a purpose to deliver peace of mind with our care based on the values of respect, accountability, and connection.

Suppliers are an integral part of Eldercare’s activities and the everyday needs of residents, employees, volunteers and other third parties. It is essential that suppliers share Eldercare’s values, principles, and commitments. To ensure this, Eldercare encourages a relationship of openness, collaboration, and discussion with suppliers.

Eldercare sets high expectations for itself and external parties with whom it works closely. Eldercare is committed to actions based on transparency, integrity and performance and promotes a high level of compliance and ethical behaviours. Eldercare genuinely seeks to identify risks of modern slavery within its business and supply chains and has taken numerous steps to put this into practice.

This modern slavery statement is for the reporting period of 1 July 2019 to 30 June 2020. This is Eldercare’s first modern slavery statement, and it sets out the actions that Eldercare has taken to develop and implement procedures to detect and address modern slavery risks in Eldercare’s business and supply chains.

CRITERIA 1: REPORTING ENTITY

Eldercare (ABN 63 758 127 271) is a reporting entity pursuant to the *Modern Slavery Act 2018 (Cth)* (“**Act**”). This statement is lodged pursuant to the Act.



CRITERIA 2: STRUCTURE, OPERATIONS AND SUPPLY CHAINS

The following sets out Eldercare's structure, operations, and supply chains for the reporting period.

1. Structure

Entity Structure

- Eldercare is an incorporated association and not for profit entity registered with the Australian Charities and Not-for-profits Commission.
- Eldercare operations is headquartered and solely based in South Australia¹.
- Eldercare does not own or control any other entities.

Employees

Eldercare's operations are supported by approximately 1,600 employees. In addition, there are over 300 volunteers.

2. Operations

- Eldercare provided a range of aged care related services during the reporting period across South Australia. The services provided include the provision and management of:
 - **residential aged care accommodation** to almost 1,000 residents across 11 residential care facilities²;
 - **retirement villages** and facilities with 200 self-contained independent living units across 13 retirement villages³;
 - **home care services** to the community including general home support, personal care, and health treatments; and
 - **day therapy centre** including individual and allied health services such as physiotherapy, occupational therapy, podiatry, and speech pathology.

¹ Our head office is located at 247 Fullarton Road Eastwood South Australia.

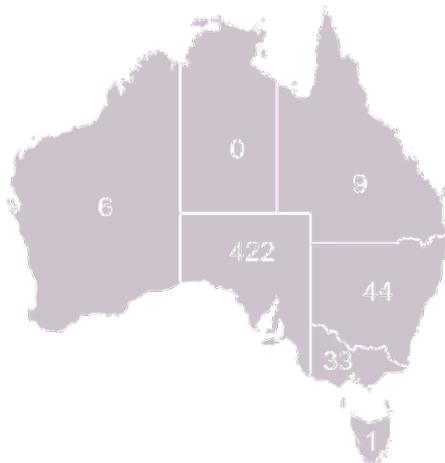
² Located in South Australia at Acacia Court, Hendon; Allambi, Glengowrie; Cottage Grove, Woodcroft; Elanora, Stansbury; Evanston Park, Evanston Park, Oxford, Hove; Sash Ferguson, Mount Barker; Seaford, Seaford; South Park, Minlaton; The Lodge, Wayville; The Village, Maitland; and Trowbridge House, Payneham.

³ Located in South Australia at Mulberry Grove, Felixstow; Old Oxford Court, Hove; Oxford Units, Hove; College Green, Kent Town; The Village Units, Maitland; Collett Barker, Mount Barker; Elmwood Grove, Mount Barker; Exhibition Court, Mount Barker; Jubilee Cottages; Mount Barker; Sash Ferguson Units, Mount Barker; Kingsborough, Norwood; Correll Cottages, Stansbury; and Cottage Grove Court, Woodcroft.

CRITERIA 2: STRUCTURE, OPERATIONS AND SUPPLY CHAINS

2.2 Supplier relationships

- Eldercare's immediate supplier relationships are stable and long term. Eldercare seeks to engage suppliers that are reputable and industry leaders in their sector.
- As Eldercare is based in South Australia, Eldercare engages Australian and predominantly South Australian tier one suppliers. Eldercare utilises local suppliers in regional locations where possible, ensuring support of local business and the surrounding community.
- The location of Eldercare's immediate (tier one suppliers) can be summarised as follows:



- Eldercare has a centre-led category management procurement model. This provides for centralised strategic procurement decisions, management of suppliers and standardised purchasing processes. Eldercare's procurement practices provide high visibility over Eldercare's supply chains and allows Eldercare to thoroughly assess risks when new suppliers are on-boarded.
- Where Eldercare approves suppliers to engage sub-contractors, Eldercare ensures oversight is maximised over their operations through registration into a contractor management system. Contractors provide relevant declarations, insurance details and police checks which can be tracked at point of entry in an Eldercare facility.

CRITERIA 2: STRUCTURE, OPERATIONS AND SUPPLY CHAINS

3. Supply chains

Eldercare's supply chains can be summarised into two overarching parts; direct care and support services to direct care. This is explained in further detail below.

- Direct Care

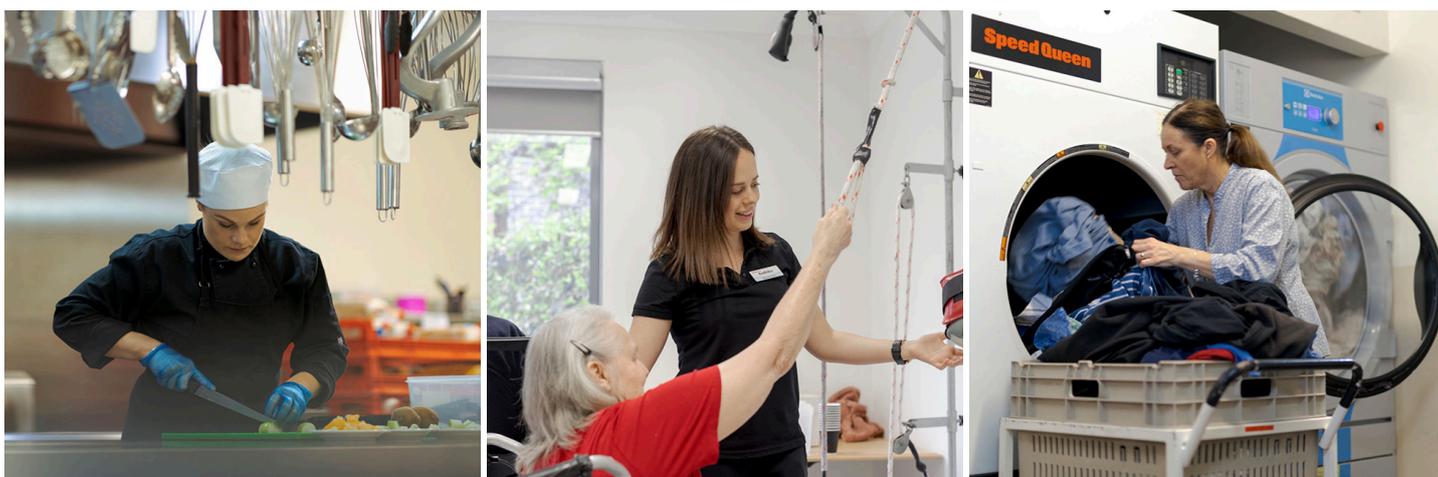
Eldercare utilises a range of suppliers who provide goods and services which directly support the provision of care to our residents. For example:

- **Hospitality** - catering, cleaning, external linen, and resident personal laundry.
- **Care services** - nurses, personal care workers, allied health professionals, medical consumables, medical equipment, pharmaceuticals, support equipment and personal protective equipment.
- **Wellbeing** - chaplaincy, lifestyle activities, events, and entertainment.

- Support services to Direct Care

Eldercare engages a wide range of suppliers who provide goods and services which support the provision of direct care to residents. For example:

- **Business administration** - professional services, consultancy, IT, insurance, head office support.
- **Property services** - utilities, maintenance to buildings and grounds, equipment servicing, new building projects and refurbishment.



CRITERIA 3: RISKS OF MODERN SLAVERY

4. Overview

- Eldercare recognises that risks in its supply chains are influenced by:
 - vulnerable populations;
 - high risk industries; and
 - high risk locations.
- Eldercare considers these influences when completing risk assessments and scoping of its operations and supply chains.

5. Scoping Exercise

- In the reporting period, Eldercare initially completed a scoping exercise by identifying all immediate (tier one) suppliers.
- All suppliers were then characterised into high, medium, and low risk using a risk matrix. This was broadly based upon:
 - the approximate annual spend with the supplier;
 - industry in which the supplier operates; and
 - location of the supplier.
- Consequently, and as set out in detail under Criteria 4 below:
 - all tier one suppliers were independently screened for modern slavery risks; and
 - modern slavery questionnaires were sent to suppliers for completion who were risk characterised as high or moderate risk.

6. Risks

Eldercare identifies that it has the following modern slavery risks:

- Tier one suppliers that were risk characterised as low risk who were not required to complete a modern slavery questionnaire.
Although these suppliers were independently screened for modern slavery risks, and they were not required to complete a questionnaire, Eldercare acknowledges that even for suppliers deemed as low risk, modern slavery risks could still be present.
- Eldercare prioritised tier one suppliers characterised as high risk or moderate risk for due diligence.
Eldercare acknowledges that it does not have full visibility further down its supply chains, for example, from tier two suppliers. Therefore, there is a risk that modern slavery risks may be present deeper in Eldercare's supply chains.
- Eldercare has identified that there are some of its supply chains that present a higher risk than others.
Examples include uniforms, linen, cleaning, building maintenance work, fresh and packaged food. These particularly present risks deeper in Eldercare's supply chains.

CRITERIA 3: RISKS OF MODERN SLAVERY

7. Next Steps

In the next reporting period, Eldercare will prioritise due diligence on suppliers where Eldercare may cause, contribute to, or be directly linked to modern slavery risks.

- **Cause**
 - Eldercare considers that their operations do not directly cause modern slavery practices.
 - Due to COVID-19, a rollout of face-to-face employee training was not able to be completed. Face-to-face training will be completed in the next reporting period to increase staff awareness of modern slavery risks, this may highlight matters that have not previously been raised.
- **Contribute to**
 - Eldercare does not knowingly contribute to modern slavery.
 - Eldercare's centralised procurement team regularly liaise with suppliers to ensure delivery timeframes and associated costs are appropriate.
 - Eldercare maybe unaware a delivery timeframe is unreasonable unless a supplier communicates this with Eldercare. Eldercare intends to capture such information through ongoing due diligence on suppliers.
- **Be directly linked to**
 - High risk areas of Eldercare's operations include the external laundry services, medical consumables, uniforms, cleaning and building maintenance work. Eldercare may be directly linked through relationships with suppliers. Due diligence of these high-risk industries will be prioritised in the next reporting period.

CRITERIA 4: ACTIONS ELDERCARE HAS TAKEN

8. Summary of Actions

This is the first reporting period for Eldercare. Accordingly, Eldercare implemented a number of actions, systems, and processes to address modern slavery risks going forward.

In summary, Eldercare:

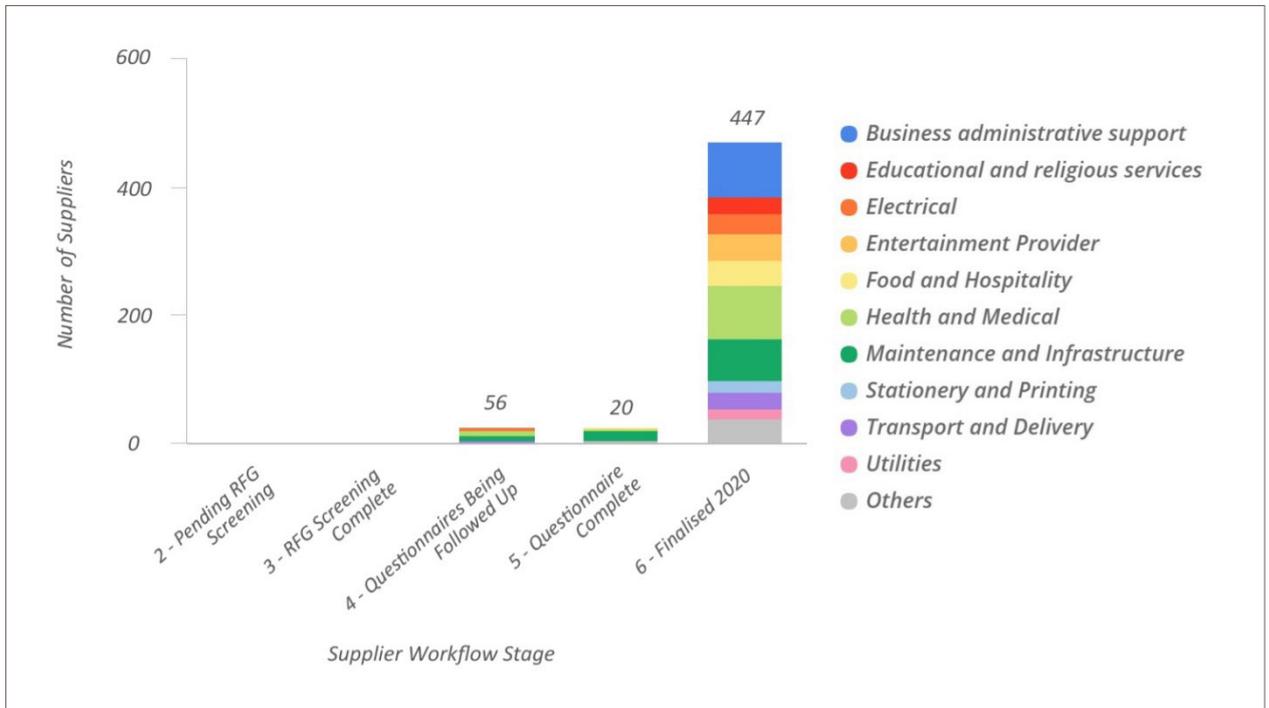
- engaged a third party to provide modern slavery compliance guidance and a technology solution to establish and implement Eldercare’s “Modern Slavery Supplier Portal” (“**Portal**”);
- implemented a procedure and process for conducting due diligence on suppliers;
- conducted due diligence on tier one suppliers via the Portal;
- implemented a modern slavery policy;
- implemented a supplier code of conduct;
- implemented an employee training program on modern slavery;
- ensured that all contracts with new suppliers contain a modern slavery contract clause;
- put in place remediation processes via the Portal in the event that modern slavery risks are identified with suppliers;
- issued modern slavery training to certain suppliers via the Portal;
- implemented a process that all contractors entering an Eldercare site must disclose the steps they are taking in regard to identifying modern slavery risks; and
- put in place a process to regularly report to the Eldercare Board regarding the status of modern slavery compliance activities.

8. Portal

- A significant action that Eldercare took in the reporting period was to implement the Portal. The Portal is an interactive database on Eldercare suppliers. The Portal automates a risk characterisation on the supplier, screens the supplier based on publicly available information and issues a questionnaire to the supplier. The supplier data gathered is incorporated into an interactive dashboard, so Eldercare can readily analyse suppliers, track remediation on suppliers (if necessary) and generate reports on suppliers. The Portal is fully auditable and is explained in further detail below.
- All Eldercare existing tier one suppliers were entered into the Portal. In order to prevent modern slavery risks, any new suppliers that Eldercare wishes to engage are entered into the Portal (excluding suppliers of very low spend) and must complete the due diligence process prior to Eldercare conducting business with these suppliers.
- The Portal provides for a high-level overview of all suppliers via a dashboard, with the ability to track suppliers, track remediation and generate reports. Each Eldercare supplier has a target profile to be “low risk”. Any supplier not deemed “low risk” is remediated and tracked via the Portal.

CRITERIA 4: ACTIONS ELDERCARE HAS TAKEN

- Suppliers are assessed via the Portal in three stages:
 - a high-level risk matrix assessment;
 - high level independent due diligence screening using publicly available information; and
 - questionnaire assessment.
- All supplier data collected through the three stages is subject to independent legal review.



Above: Graph indicating suppliers within the risk assessment work flow. Suppliers are also segregated based on supplier type.

CRITERIA 4: ACTIONS ELDERCARE HAS TAKEN



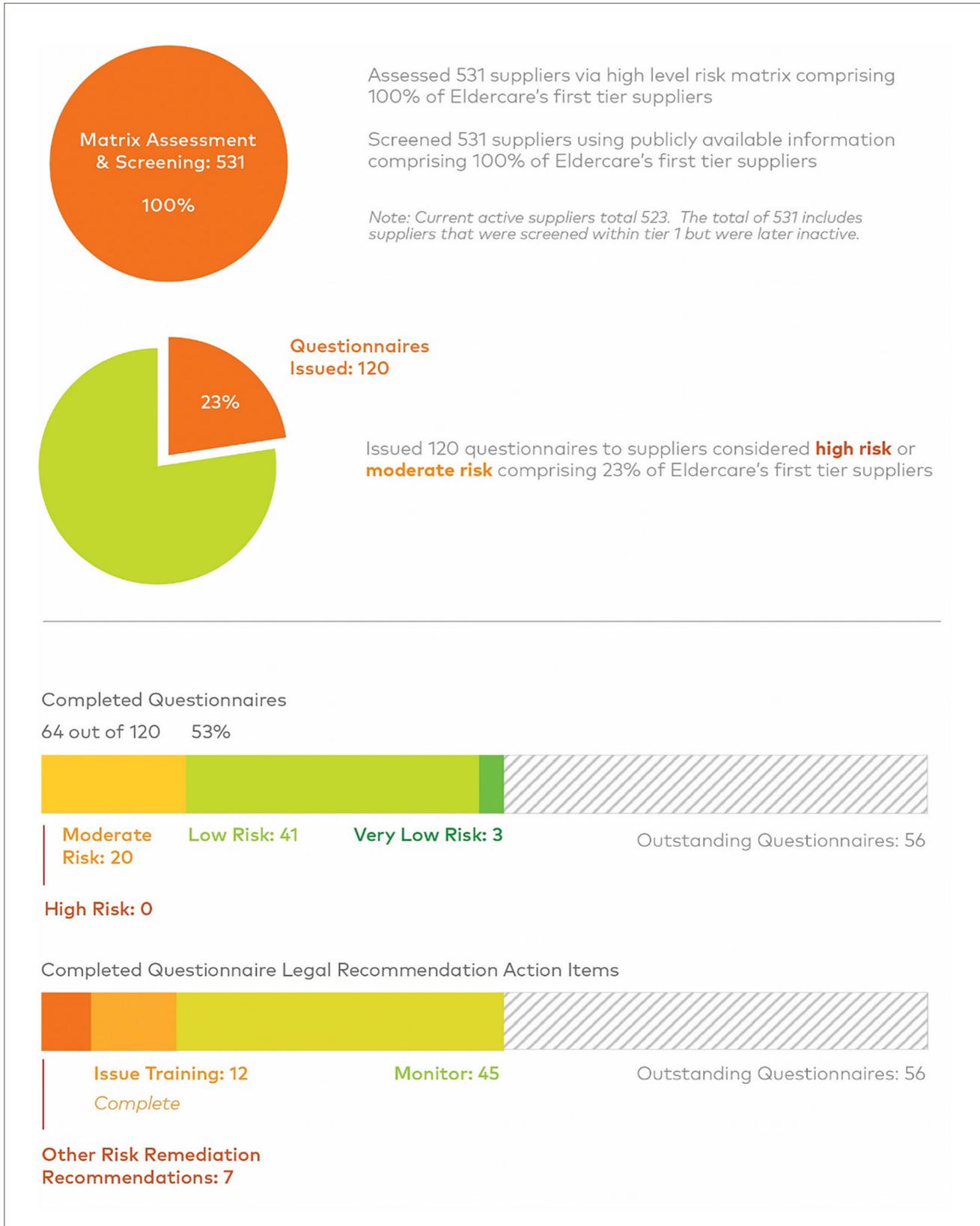
Above: Portal dashboard summary of all tier one suppliers and risk characterisation. The left graph summarises all suppliers and their most recent rating. The right graph summarises each supplier's risk rating in comparison to their target risk. In the reporting period the 5 suppliers characterised as high risk had not yet completed their questionnaire and are characterised as high risk based upon their risk matrix characterisation and independent screening.



Above: Summary of high and moderate risk tier one suppliers separated by industry.

CRITERIA 4: ACTIONS ELDERCARE HAS TAKEN

During the reporting period:



CRITERIA 4: ACTIONS ELDERCARE HAS TAKEN

- Any suppliers deemed moderate risk or above are reviewed and monitored. If necessary, auto-generated alerts are sent to suppliers to seek information on actions taken by suppliers.

Example

Eldercare sent a modern slavery questionnaire to a supplier who provides building maintenance materials. The supplier disclosed that it had identified modern slavery in its supply chains.

The supplier disclosed all the steps it was taking to remedy such identification of modern slavery in its supply chains and the internal processes and procedures it had in place.

Eldercare put in place a remediation plan to track and ensure the supplier was taking the disclosed steps to remedy the modern slavery including but not limited to, refreshment of due diligence, issuing requests for information and reviewing the entity's modern slavery statement.

- Going forward, suppliers will be subject to an annual refreshment of due diligence automated via the Portal. This includes an independent screening against publicly available information and an annual questionnaire.

10. Governance

- **Modern Slavery Policy**
 - In the reporting period Eldercare implemented a Modern Slavery Policy. The Modern Slavery Policy sets out key procedures regarding employee training, reporting mechanisms and due diligence requirements on suppliers (new and existing).
 - Eldercare will review the Modern Slavery Policy annually to ensure it remains relevant to Eldercare supplier's risks and continually improves Eldercare's risk assessment and remediation processes.
- **Supplier Code of Conduct**
 - In the reporting period Eldercare implemented a Supplier Code of Conduct. This sets out clear expectations that Eldercare suppliers must follow and the reporting requirements for Eldercare suppliers.
 - Via the Portal, all suppliers receive a copy of the Supplier Code of Conduct and are required to declare that they have read and accept the terms of this document. Suppliers who fail to comply with the terms of the Supplier Code of Conduct are consulted. Where suppliers commit serious breaches or demonstrate continued non-compliance with the Code of Conduct, this may result in Eldercare making alternative supply chain arrangements.
 - Further, the Supplier Code of Conduct expresses Eldercare's commitment to human rights and rejection of any form of modern slavery and requires suppliers to notify Eldercare of any suspected modern slavery risk in their supply chains.

CRITERIA 4: ACTIONS ELDERCARE HAS TAKEN

11. Employee Training

- In the reporting period Eldercare commenced the development of face-to-face training for all employees. Due to COVID-19, it was not possible to roll out such face-to-face training.
- Systems were put in place for employees to complete an online training module, which will be implemented in the next reporting period.
- In the next reporting period all new employees will attend an induction session which will contain training on what modern slavery is, how to identify modern slavery risks and how to report any concerns.

12. Remediation

- The procedures described to assess and identify modern slavery risks provide a robust platform for Eldercare to undertake tailored remediation processes for any suppliers that present modern slavery risks.
 - Remediation processes may include;
 - undertaking further due diligence;
 - requesting further information on specific risks that were apparent throughout a questionnaire;
 - providing modern slavery training to the supplier;
 - auditing the supplier;
 - requesting that the supplier stop or change certain activities; or
 - reviewing certain answers to a supplier's questionnaire in more detail in a subsequent year if they have not changed.
- Eldercare's preferred course of action will always be to work with the supplier to remedy any risks rather than terminating the relationship.
- Via the Portal, Eldercare can track remediation processes with a supplier and audit whether the supplier has actioned any requests. Eldercare can track whether the suppliers' processes have improved over time.

13. COVID-19

- During the reporting period, Eldercare faced the unprecedented situation of the global pandemic of COVID-19. As an aged care provider, Eldercare was required to adapt and respond quickly.
- Eldercare recognised that COVID-19 may change risk profiles of suppliers and increase modern slavery risks.

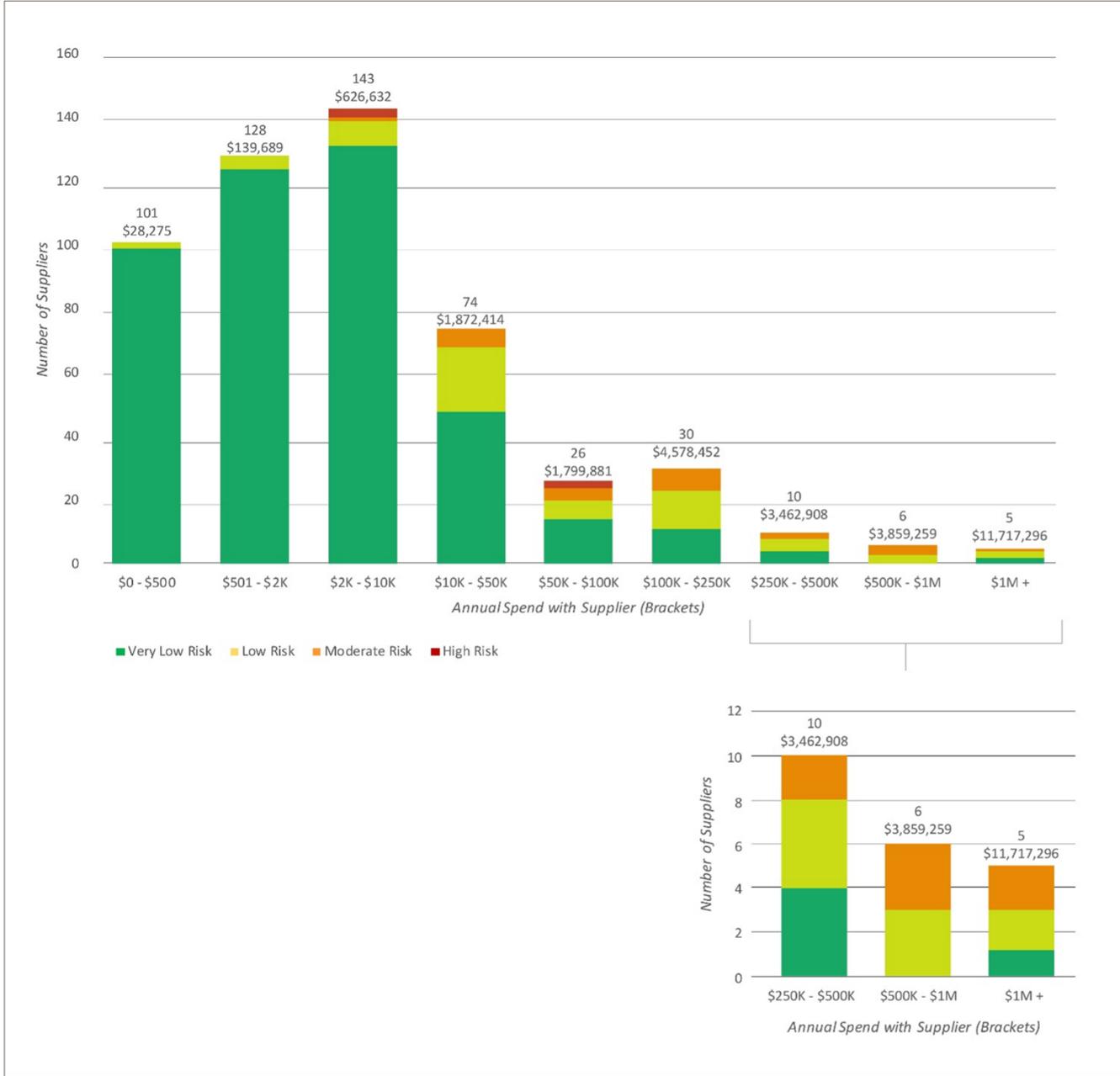
CRITERIA 4: ACTIONS ELDERCARE HAS TAKEN

- Eldercare took many steps to mitigate increased risks of modern slavery in its supply chains due to COVID-19 including:
 - directly liaising with suppliers regarding delivery timeframes, product availability and that delivery timeframes were achievable and reasonable;
 - critiquing product efficacy, source of origin and compliance with TGA regulations; and
 - directly liaising with high and moderate risk suppliers regarding what steps they took to protect workers due to COVID-19 and to confirm that workers were being paid overtime during COVID-19.

CRITERIA 5: ASSESSING EFFECTIVENESS OF ACTIONS

- 14.** In the next reporting period, Eldercare intends to take a number of steps to assess its modern slavery risks and assess effectiveness of actions taken in its first reporting period. This includes:
- appointing a third-party subject matter expert to assess Eldercare's actions and provide overall guidance;
 - refreshing due diligence on new and existing suppliers;
 - conducting an internal audit on due diligence processes including:
 - the number of suppliers who have completed due diligence;
 - the number of suppliers Eldercare is tracking for remediation including liaising directly with suppliers;
 - the number of contracts that contain modern slavery contract clauses;
 - compliance with the modern slavery policy including due diligence being completed on new suppliers;
 - number of employees to complete modern slavery training; and
 - number of suppliers to complete modern slavery training.

CRITERIA 5: ASSESSING EFFECTIVENESS OF ACTIONS



Above: Graph indicating each supplier separated into annual spend brackets and risk rating. Portal data will be used to ensure Eldercare systematically approaches due diligence on suppliers.

CRITERIA 6: CONSULTATION

15. The criteria of consultation does not apply to Eldercare as it does not own or control any other entities.

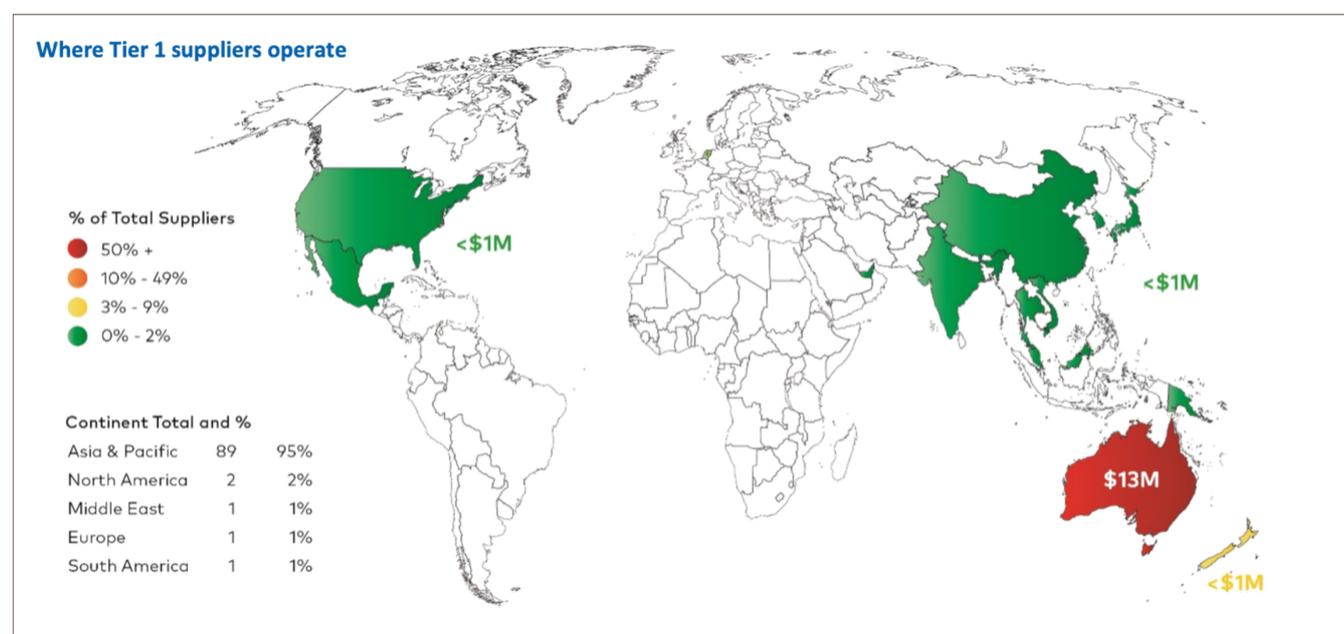
CRITERIA 7: OTHER INFORMATION – LOOKING FORWARD

16. For Eldercare’s first reporting period, Eldercare has largely focused on implementing systems, processes and gathering data to build upon going forward.

17. In the next reporting period, Eldercare will:

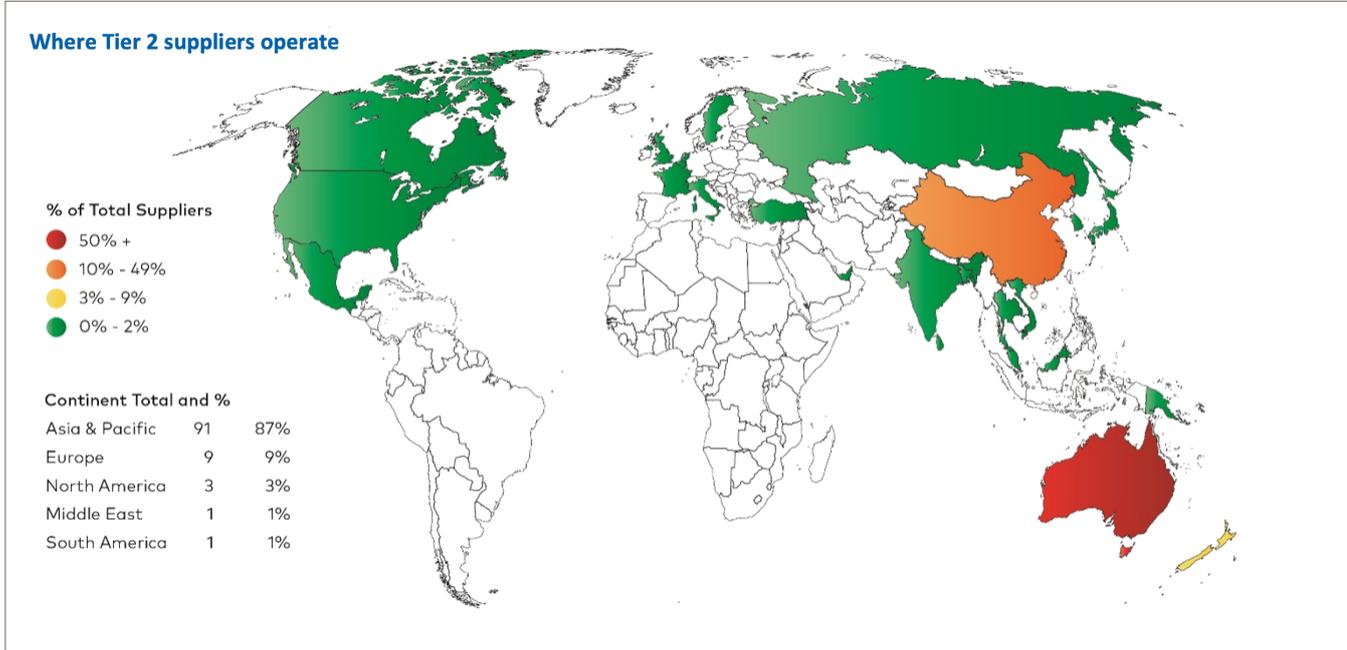
- remediate any identified risks for tier 1 suppliers;
- commence the process of annual refreshment of due diligence on tier 1 suppliers;
- commence due diligence on high-risk tier 2 suppliers;
- consider any modern slavery risks in Eldercare’s investment portfolio;
- provide modern slavery training to more existing employees and all new employees;
- imbed within Eldercare the requirement for modern slavery due diligence on new suppliers; and
- draw learnings from 2020 data and address high level risks by devising further steps for due diligence in high-risk areas or sectors, pursuant to the data set out below.

Below sets out further data which Eldercare will use to approach the matter set out above.

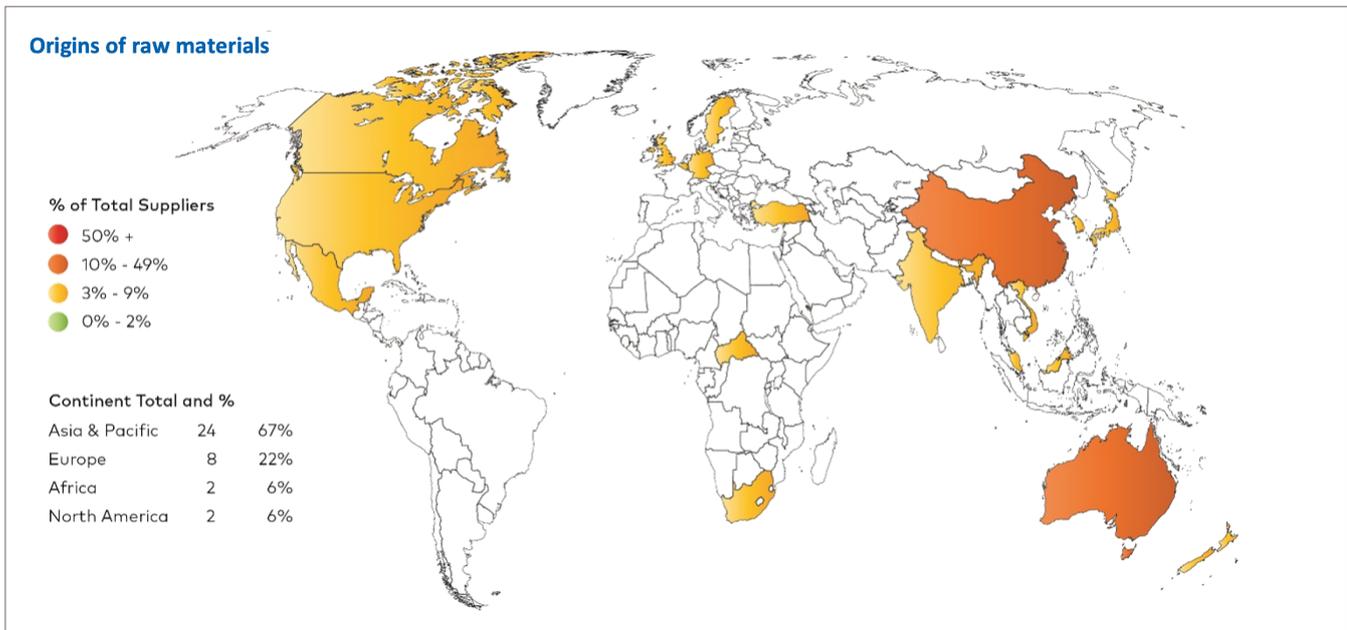


Above: This sets out information gathered from issuing a questionnaire to high and moderate risk suppliers via the Portal. This indicates where Eldercare’s tier one suppliers operate. While all of Eldercare’s suppliers are headquartered in Australia, this highlights suppliers who are operating globally. For those suppliers that have completed the questionnaire, it also demonstrates annual spend associated within the region.

CRITERIA 7: OTHER INFORMATION – LOOKING FORWARD



Above: Through analysis of data from supplier's completing the questionnaire, Eldercare can summarise the locations of its tier two suppliers. This data will assist in prioritising which suppliers Eldercare will work with regarding due diligence on tier two suppliers.



Above: The supplier questionnaire collated data relating to Eldercare's tier one suppliers' origins of raw materials. Through the analysis of this data, Eldercare can summarise where its suppliers obtain their raw materials. This data will further assist Eldercare with prioritising which suppliers will require further due diligence.

CONCLUSION



Eldercare is proud of the significant work undertaken and steps taken in the first reporting period. Eldercare is committed to building upon the foundations laid, identifying any modern slavery risks in its supply chains, and contributing to eradicate modern slavery.

This modern slavery statement for the reporting period was approved by the Board of Eldercare.

Signed

A handwritten signature in black ink, appearing to read 'James Lawes', written over a white background.

Mr James Lawes
Board Chair
23 February 2021