



## **MODERN SLAVERY STATEMENT**

Under the Modern Slavery Act 2018 (Cth)

## **QUEENSLAND COUNTRY HEALTH FUND**

Queensland Country Health Fund Pty Ltd

ABN 18 085 048 237

## **REPORTING PERIOD**

1 July 2022 – 30 June 2023



This Modern Slavery Statement (Statement) has been prepared and lodged by Queensland Country Health Fund Pty Ltd ABN 18 085 048 237, including on behalf of its wholly owned subsidiary Queensland Country Care Navigation Pty Ltd ABN 92 610 024 916.

Pursuant to the requirements of the Modern Slavery Act 2018 (Cth), the contents of this Statement have been approved by the Board of Queensland Country Health Fund Pty Ltd ABN 18 085 048 237 as the governing body of the organisation.

A handwritten signature in black ink, appearing to read "Tony Crawford".

Tony Crawford

Chair, Queensland Country Health Fund Pty Ltd

26 April 2024



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## **Req. #1: Identifying the reporting entity.**

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The reporting entity covered by this Statement is **Queensland Country Health Fund Pty Ltd ABN 18 085 048 237** (QCHF).

QCHF also has an owned and controlled (but not individual reporting entity) - Queensland Country Care Navigation Pty Ltd - ABN 92 610 024 916 (Care Navigation).

QCHF, under Queensland Country Bank Limited – ABN 77 087 651 027 (QCB), has been a mandatory reporting entity since the commencement of the *Modern Slavery Act 2018*. This is the fourth modern slavery statement and covers the 2022-2023 Australian financial year.

During the reporting period, HBF Health Limited – ABN 11 126 884 786 (HBF) announced the acquisition of QCHF in November 2022 with the acquisition of QCHF completed on 1 July 2023. The entity MTG QCB Trust Repo Series No. 1 was not acquired and remains under QCB's ownership and control.

This Statement has been prepared based on the information provided by QCB as owner of QCHF during the reporting period.

During the reporting period, QCHF inherits a low modern slavery risk as QCB reported low degree of modern slavery risk due to operations being within Australia and the industry sector (financial and health insurance provider) in which it operates.



## **Req. #2: Our structure, operations, and supply chains.**

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### **Structure and Operations**

#### **Queensland Country Health Fund**

QCHF is a registered “for profit” health insurer. During the reporting period, QCHF shared management services with QCB as such QCHF has assessed its modern slavery position based on the information and services provided by QCB.

In the reporting period QCHF provided coverage to over 68,000 people throughout Australia. It continued to provide health insurance products to its customers in the Northern Territory through the brand ‘Territory Health Fund’, which is operated by QCHF.

QCHF provides the following types of insurance and health services:

- Members Claim Management
- Hospital and Extras Cover
- Dental Services
- Community Nurse Care Navigation Services
- Accommodation Units based near major Metropolitan Hospitals

#### **Queensland Country Care Navigation**

Care Navigation is an independent subsidiary of Queensland Country Health Fund Pty Ltd.

Launched in 2016, Care Navigation works with QCHF Members, specifically those living with a chronic illness or a recent discharge from hospital to understand and better manage their health.

Care Navigation’s Care Coordinators review QCHF’s hospital claims and identify Members who may benefit from extra support to improve their health, wellbeing, and overall quality of life. Care Navigation is operated by experienced Australian Registered Nurses (Care Coordinators) who work in partnership with the Member and their existing health professionals to help identify opportunities or contacts in their local area that might help them better manage their health.



## Supply Chains

A list of suppliers held during the reporting period was provided by QCB.

There is no separation of suppliers by entities and therefore this list may include suppliers and spend by QCB.

QCHF's supply chain used 823<sup>1</sup> suppliers in FY23 in support of its operations and the annual spend was approximately \$29 million.

The supplier industry categories include:

- Advertising Services
- Business Services
- Catering and Food Suppliers
- Cleaning Services
- Computer and Technical Services
- Construction and Maintenance Services
- Education Services
- Health Providers
- Insurance Services
- Legal Services
- Logistics, Postal and Transport Services
- Market Research
- Printing and Stationery Services
- Property and Facilities Management Services
- Services to Finance and Investment
- Telecommunication Services

An assessment of the top 50 suppliers based on the "Fairsupply – Initial Assessment Report", provided by QCB highlights that the geographical distribution of the top 50 suppliers by higher-risk industries based on forced labour are all based in Australia.

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<sup>1</sup> Only top 50 risk categories by industries and the corresponding suppliers that fall within the industries that had dealings with QCB was provided. The industry categories for the remaining 773 suppliers were not available.

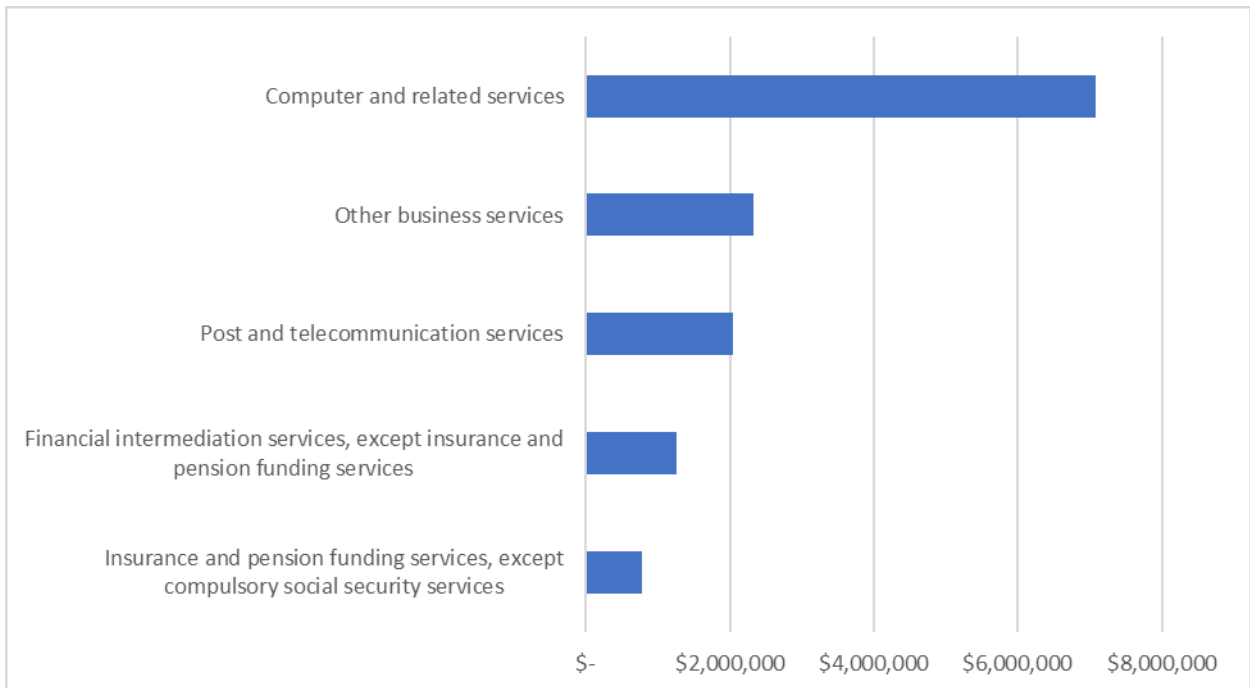
**Req. #3: Identified areas of potential modern slavery risk.**

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**Supply Chain Mapping**

The identification of modern slavery risk by industries have been derived from the Fair Supply Platform utilised by QCB. It uses an inhouse multi-regional input output table (MIRO) to track supply chain interactions which is overlaid by the Forced Labour data.

Within the supply chain, the top five higher-risk industries based on forced labour represented by their annual spend is as follows:



With reference to the FY23 Modern Slavery Statement lodged by QCB, the supplier industry categories remain unchanged from the previous reporting period FY22.

#### **Req. #4: Assessing and addressing identified modern slavery risk.**

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The assessment and associated actions undertaken to address modern slavery risk were undertaken by QCB as a group and were not separated by the entities (QCB, QCHF and Care Navigation).

QCHF, under QCB, was not aware of any actual or suspected incidences of modern slavery in the supply chains or operations during the reporting period. QCHF inherits a low modern slavery risk as QCB reported low degree of modern slavery risk due to operations being within Australia and the industry sector (financial and health insurance provider) in which it operates.

QCHF, under QCB, undertook the following actions:

- Engagement with external industry bodies, that enabled a forum for sharing good modern slavery practices. The Private Health Insurance Modern Slavery Community Interest forum attended by QCB had discontinued after the first half of the reporting period due to the sale of Health Insurance Fund portion of the business to HBF. QCHF plans to resume this participation through HBF.
- Education and training for internal staff.
- Ongoing support of Trade Unions and Worker Voice.
- Material suppliers are issued a copy of the Supplier Code of Conduct. Service contracts and sponsorship agreements include clauses to address modern slavery as a standard.
- Establishment of the Modern Slavery Working Group and Sustainability Committee.



**Req. #5: Measuring effectiveness.**

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The effectiveness of the actions undertaken were reviewed by QCB as a group and were not separated by the entities (QCB, QCHF and Care Navigation). Therefore, the effectiveness of the actions undertaken by QCHF and Care Navigation to address modern slavery risk were based on QCB’s effective measurement as reported in the FY23 Statement.

The effectiveness is measured on monitoring commitments made in the FY22 Statement and progress reporting. A Modern Slavery Working Group is responsible for tracking progress and updates made to the Sustainability Committee.

The following Table provides a snapshot summary of the QCB’s (also QCHF and Care Navigation) progress against key commitments from the FY22 Statement:

Commitment in FY22 Statement	Status
Due diligence efforts on engaging with longer-term sponsorships (one of the industry categories flagged that posted potential modern slavery risk exposure was with major sporting sponsorship and local sporting club) to collaboratively improve procurement practices.	In progress - no further collaboration or partnership transpired during the reporting period. Notwithstanding this, contracts with entities in this category that were renewed in this reporting period had modern slavery clauses. This industry engagement was not continued at QCHF.
Track emerging international evidence relating to elevated modern slavery risks associated with renewal energy infrastructure. Due diligence undertaken prior to significant purchasing decision.	Completed
Training with specialist training to relevant executive staff.	Completed
Continue engagement with suppliers on modern slavery issues including through the self-assessment questionnaire process.	Completed
Provide modern slavery training materials to suppliers when further questionnaires issued.	Completed
Modern Slavery Working Group uses the risk assessment results to inform follow up due diligence action.	Completed
QCB will continue to facilitate collaboration with its workers and ensure all staff have freedom of membership to relevant trade union.	Completed

Following the acquisition of QCHF by HBF, the actions to be undertaken to address modern slavery risk will be reviewed and aligned with HBF’s priorities.



**Req. #6: Consultation with owned entities.**

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QCHF has consulted Care Navigation in the preparation of this statement. The General Manager QCHF has responsibility for the Care Navigation Function and consulted with the Care Navigation Manager and senior staff to discuss the Modern Slavery reporting requirements and Risk Management Processes.

**Req. #7: Any other relevant information.**

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Nothing of note.