



## MODERN SLAVERY STATEMENT

<b>Period ending</b>	30 June 2024
<b>Name of Reporting Entity</b>	The Pharmacy Guild of Australia Level 2, 15 National Circuit Barton ACT 2600
<b>ABN</b>	84 519 669 143

### 1 GROUP OVERVIEW

#### Primary Function

The Pharmacy Guild of Australia is registered under the *Fair Work (Registered Organisations) Act 2009* (RO Act) to provide industrial relations advice and support to pharmacy businesses in Australia. Functions provided by The Pharmacy Guild of Australia are listed below.

#### Services:

- Industrial relations advice and support to pharmacy businesses
- Negotiation of industrial instruments
- Negotiation of Community Pharmacy Agreements with the Commonwealth of Australia
- Government programs
- Political advocacy
- Training and events
- Business support tools
- Quality care assurance program

#### Products:

- Insurance - Professional Indemnity, Business, Property, WorkCover, Motor Vehicles and Pet.
- Business Finance - Chattel Mortgage and Hire Purchase Finance to businesses: funding is provided directly by Guild Insurance.
- Professional legal services under the name: Meridian Lawyers

#### Number of Employees

The number of employees as at 30 June 2024 was 843.

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#### National Secretariat

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**Incorporation**

All entities covered by this report are incorporated in Australia, with the exception of Guild Solutions Inc, a fully owned subsidiary which is incorporated in the Philippines.

The Pharmacy Guild of Australia (including its Branches) is registered under the RO Act and is an incorporated entity per section 27 of that legislation.

**Product and Service Delivery**

All entities covered by this report deliver products and services in Australia.

Some support services are provided by Guild Solutions Inc, a fully-owned subsidiary which is incorporated in the Philippines.

## Entities owned or controlled

\* Note: Control is defined inside the Modern Slavery Act through the use of the Australian Accounting Standards (AASB10).

Entity Name	% owned	Activities	Location
Guild Group Holdings Ltd (ACN 060 237 774)	100%	Insurance	Australia
Guild Insurance Ltd (ACN 004 538 863)	100%	Superannuation (to 14-Dec-23 <sup>2</sup> )	The Philippines
Guild Insurance Plus Pty Ltd (ACN 648 988 916)	100%	Business Finance	
Guild Early Learning Pty Ltd (ACN 618 589 370)	50%	Professional legal services	
Gold Cross Products and Services Pty Ltd (ACN 009 662 051)	100%		
PharmaDotCom Pty Ltd (ACN 608 161 468)	100%		
Guild Superannuation Services Ltd (ACN 004 399 464)	100%		
Guild Trustee Services Pty Ltd (ACN 068 826 728)	100%		
Guild Finance Facility Ltd (ACN 114 423 362)	100%		
Guild Commercial Finance Pty Ltd (ACN 126 253 727)	100%		
Meridian Lawyers Ltd (ACN 108 546 774)	50.05%		
Guild Solutions Inc (Incorporated in the Philippines)	100%		
GFMN Pty Ltd (ACN 678 507 858)	100%	Investment	Australia
GFM Passive Fund	100%		
Australian College of Pharmacy Pty Ltd (ACN 008 588 841) <sup>1</sup>	51%	Training	Australia
The Pharmacy Guild of Australia – Queensland Branch	Controlled, not owned	Industrial relations advice	Queensland
Guildprop Pty Ltd (ACN 113 023 779)	100%	Support to pharmacy businesses	
Australian College of Pharmacy Pty Ltd (ACN 008 588 841) <sup>1</sup>	24.5%	Negotiation of industrial instruments	
The Pharmacy Guild of Australia – New South Wales Branch	Controlled, not owned	Government programs	New South Wales
Pharmacy Guild Services (NSW) Pty Ltd (ACN 001 081 296)	100%	Political advocacy	
Pharmacy Guild Sales and Valuations (NSW) Pty Ltd (ACN 001 444 060)	100%	Events	
Australian College of Pharmacy Pty Ltd (ACN 008 588 841) <sup>1</sup>	24.5%	Business support tools	
The Pharmacy Guild of Australia – Victoria Branch	Controlled, not owned		Victoria
Pharmacy Computers Australia Pty Ltd (ACN 007 261 332)	100%		
The Guild (Victoria) Computer Unit Trust	100%		

Entity Name	% owned	Activities	Location
The Guild Properties (Victoria) Unit Trust	100%		
Care Energy Australia Pty Ltd (ACN 606 765 940)	100%		
The Pharmacy Guild of Australia – ACT Branch	Controlled, not owned		ACT
The Pharmacy Guild of Australia – Tasmania Branch	Controlled, not owned		Tasmania
The Pharmacy Guild of Australia – South Australia Branch GP Payroll Pty Ltd (ACN 137 968 524)	Controlled, not owned 100%		South Australia
The Pharmacy Guild of Australia – Northern Territory Branch	Controlled, not owned		Northern Territory
The Pharmacy Guild of Australia – Western Australia Branch	Controlled, not owned		Western Australia

Notes:

1. *The interests in Australian College of Pharmacy Pty Ltd are held by The Pharmacy Guild of Australia National Secretariat (51%), The Pharmacy Guild of Australia QLD Branch (24.5%) and The Pharmacy Guild of Australia NSW Branch (24.5%)*
2. *Guild Trustee Services Pty Ltd retired in its capacity as Trustee of the Guild Retirement Fund (GRF) on 14 December 2023, which resulted in the Trustee of GRF transitioning to Equity Trustees Superannuation Limited.*

## **2 STRUCTURE AND KEY SUPPLIERS**

*Refer Attachment 1 – Pharmacy Guild of Australia Structure.*

*Refer Attachment 2 – Pharmacy Guild of Australia Key Suppliers.*

For the year ended 30 June 2024, the number of vendors significantly reduced due to the divestment of the superannuation businesses of Guild Trustee Services Pty Ltd (GTS), in which GTS retired in its capacity as Trustee of the Guild Retirement Fund.

## **3 RISKS OF MODERN SLAVERY PRACTICES IN OPERATIONS AND SUPPLY CHAINS**

For the entities covered by this report, The Pharmacy Guild of Australia considers that the risk of modern slavery in its Australian operations is low due to its higher skilled workforce. The Pharmacy Guild of Australia takes the view that Australian employment laws create a compliance environment where there is no appreciable risk of Modern Slavery within its Australian domiciled workforce.

The Pharmacy Guild of Australia has identified a higher inherent risk of modern slavery in its wholly owned subsidiary, Guild Solutions Inc. (GSI), which operates in the Philippines and as such is not subject to Australian labour law.

From risk assessments undertaken of key suppliers, the risk of modern slavery in The Pharmacy Guild of Australia supply chains has been identified in the areas of outsourced cleaning contractors, and professional service firms that outsource services to overseas countries and information technology companies that manufacture electronic products globally, which are not subject to Australian labour law.

## **4 DUE DILIGENCE, RISK MITIGATION AND REMEDIATION**

In order to determine whether and to what extent modern slavery risks are present in the Pharmacy Guild of Australia and its supply chain, the Pharmacy Guild of Australia:

1. Maintains employment practices that comply with Australian labour law
2. Requires new key suppliers to complete a Modern Slavery Questionnaire as part of the selection process
3. Requires the completion of an annual Modern Slavery Questionnaire by its key suppliers and/or for any key suppliers whose responses to the annual Modern Slavery Questionnaire indicate the Modern Slavery Risk is likely or almost certain to be present in their business or supply chain:
  - a. Vendor managers work with key suppliers to check how they are progressing and any actions they have put in place to address Modern Slavery risks,
  - b. They are required to complete the Modern Slavery Questionnaire on a half-yearly basis, and
  - c. Half-yearly attestations are obtained from the relevant business unit leader where that business unit wishes to continue to use the supplier.
4. Analyses the responses to the Modern Slavery Questionnaires completed by each of its key suppliers and arrives at a Modern Slavery risk rating for its key suppliers.

5. Tracks its risk of Modern Slavery via its risk management frameworks. The Pharmacy Guild of Australia's risk register, which includes Modern Slavery risk, is reviewed on an ongoing basis and is reported to National Council, the relevant Branch Committee or company board, as applicable.

Guild Solutions Inc. (GSI) is a wholly owned subsidiary of Guild Group Holding Ltd (GGHL), which is incorporated in the Philippines. GSI takes the following steps to lower the risk of modern slavery in its Philippines operations:

- GSI staff receive salary and benefits which exceed government-mandated minimum standards.
- GSI Staff use a clock-in / clock-out system in line with local HR requirements to ensure worked hours can be monitored and overtime paid.

## **5 CONSULTATION PROCESS WITH ENTITIES THAT THE REPORTING ENTITY OWNS OR CONTROLS**

On an annual basis, entities within the controlled group are provided with an update on modern slavery reporting requirements and provided with materials to conduct key supplier questionnaires, risk assessments and remediation processes.

Entities within the group provide the results of their risk assessments to The Pharmacy Guild of Australia on an annual basis to enable a Modern Slavery risk assessment and analysis to be conducted at a consolidated level for the reporting period.

## **6 EFFECTIVENESS OF ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

The Pharmacy Guild of Australia understands that a key process in the management of Modern Slavery risks is to continually review the effectiveness of its actions to assess and address Modern Slavery risks in its operations and supply chains. The following activities assist the entity in achieving this outcome:

1. Board oversight of Modern Slavery risks through regular reviews of The Pharmacy Guild of Australia's Risk Register and Modern Slavery Policy, which includes the incorporation of ongoing learnings into the policy and associated processes
2. Training of relevant employees on Modern Slavery risks
3. Operation of an independent Whistleblower service in which employees can report suspected misconduct
4. Ongoing review of Modern Slavery reporting processes, including the Modern Slavery Questionnaire and risk assessment procedure

## **7 MODERN SLAVERY RISK ASSESSMENT**

For the period ended 30 June 2024, The Pharmacy Guild of Australia has found no likelihood of any modern slavery risk in its or any of its subsidiary businesses or supply chains.

This statement was approved by the National Council of The Pharmacy Guild of Australia (principal governing body) on 17 December 2024.

Signed for and on behalf of **The Pharmacy Guild of Australia.**



Trent Twomey

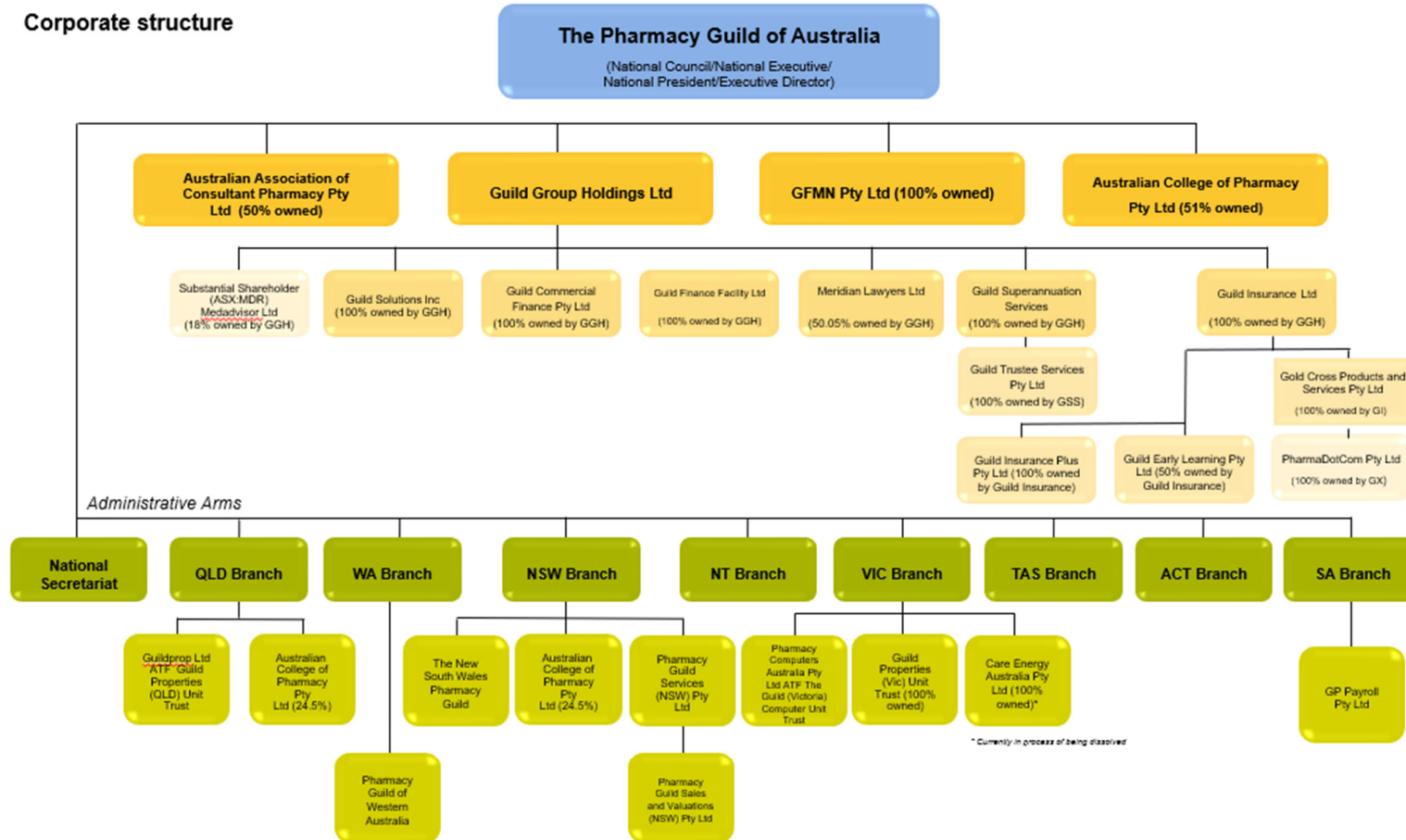
National President

The Pharmacy Guild of Australia

Date: 17 December 2024

# Attachment 1 – Pharmacy Guild of Australia Structure (as at 30 June 2024)

## Corporate structure



**The Pharmacy Guild of Australia**

Note: Australian Association of Consultant Pharmacy Pty Ltd, which was not trading and under external administration, was wound up on 4 July 2024.



## Attachment 2 – Pharmacy Guild of Australia Key Suppliers

ASP Healthcare Pty Ltd
Brennan IT Pty Ltd
Cleansland
Cloud Assess
CT Group
Curious Minds Media Pty Ltd
Dreamweavers
E&P Financial Group
EY Australia
Exponet Pty Ltd
Figari Solutions
Fisher Family
Flight Centre Travel Group Ltd
Forvis Mazars Assurance
James Cook University
KDN Group Pty Ltd
KPMG
Med-X Pty Ltd
MGI Joyce Dickson
Macquarie Telecom
Microsoft Pty Ltd
MYOB
National Australia Bank Ltd
Nestle
Origin Energy Electricity Ltd
Piccalilli Catering
Prologic Cleaning Services
SEC Newgate Australia
Sharp & Carter
SunFish DataOn
Telstra
The Star Group