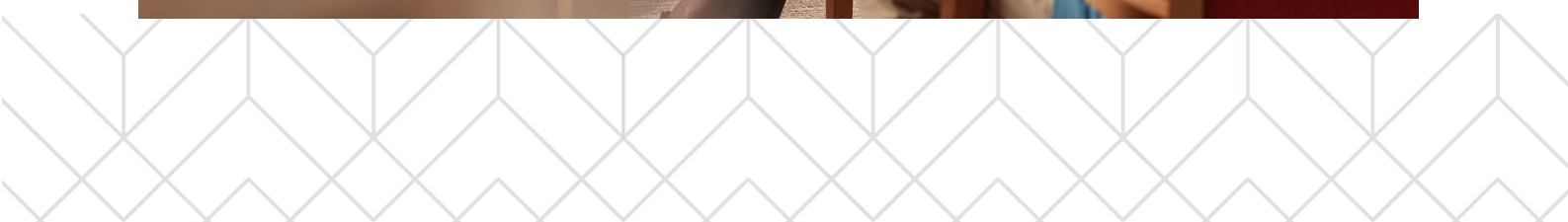


# Modern Slavery Statement

2023



## About this statement

This statement is made on behalf of RA (Holdings) 2014 Pty Limited, ACN 603 289 792 (**RetireAustralia**) as the reporting entity pursuant to the *Modern Slavery Act 2018* (Cth) in respect of RetireAustralia and all entities owned or controlled by RetireAustralia (**RetireAustralia Group**) for the year 1 April 2022 to 31 March 2023.

This statement is endorsed on behalf of the Directors of RetireAustralia on 22 September 2023.



Dr Brett Robinson  
Chief Executive Officer



Mr Anthony Heald  
General Manager – Culture, Strategy & Business  
Services

On behalf of the Directors of RetireAustralia

# Message from the Chief Executive Officer

RetireAustralia understands and takes seriously its responsibility to uphold high quality, safe and ethical practices. As part of this, RetireAustralia recognises its obligation to respect and defend human rights by taking measures to prevent modern slavery in its supply chain and procurement practices through compliance and risk management, and through employee education and training.

RetireAustralia's Modern Slavery Statement is an important means to progress the cause of human rights for all people to live in this world free of modern slavery. It outlines RetireAustralia's commitment to preventing, minimising and mitigating Modern Slavery risks in RetireAustralia's operations and supply chains.

As a recognised leader in the retirement living industry, both as an operator and as a developer, RetireAustralia recognises that it must take an active leading role in the prevention of Modern Slavery. RetireAustralia recognises that no country, industry or individual is immune from the risk of Modern Slavery in the supply chains that it uses or the products it buys and therefore the responsibility falls on all of us to recognise the human suffering that may be implicit in the actions we take, and to make changes to address this.

This Statement summarises the steps that RetireAustralia is taking to identify, prevent, mitigate and verify for how it addresses Modern Slavery risks within our operations and our supply chains. RetireAustralia believes that education, transparency, compliance and accountability are critical to ensure fair, transparent and ethical dealings. Our employees, contractors, residents, volunteers, and consultants are at the centre of our commitment to responsibility and are central to our plan to actively identify and work towards eliminating all forms of Modern Slavery in our operations and supply chains.



Dr Brett Robinson  
Chief Executive Officer

## Modern Slavery Statement

### 1. About RetireAustralia:

RetireAustralia is the relevant reporting entity and has its registered office at Level 4, 200 Mary Street, Brisbane, Queensland 4000 Australia.

The RetireAustralia Group comprises of 60 private companies, being listed in the below table, operating in Queensland, New South Wales and South Australia. The companies all operate and develop retirement villages.

Table 1: Entities comprising the RetireAustralia Group.

Entity	ACN
RA (Holdings) 2014 Pty Ltd	603 289 792
RA 2014 Pty Ltd	603 311 619
Retire Australia Management Pty Ltd	151 586 597
Retire Australia Finance Pty Ltd	605 719 739
Retire Australia Management No. 2 Pty Ltd	611 100 746
Bartonvale Holdings (SA) Pty Ltd	124 282 462
Bartonvale Consolidated Pty Ltd	124 284 117
Lifestyle Property Services Pty Ltd	003 249 509
Retire Australia Care and Services Pty Ltd	617 346 077
Tarragal Glen Retirement Village Pty Ltd	002 784 929
Tarragal Glen Retirement Village II Pty Ltd	003 739 464
Tarragal Glen Retirement Village III Pty Ltd	082 159 117
Glengara Village Pty Ltd	075 803 342
Wood Glen Retirement Village Pty Ltd	060 007 123
Errol Investments Pty Ltd	001 183 277
Ultimate Staff Suppliers Pty Ltd	083 260 913
The Glen Group (NSW) Pty Ltd	110 532 511
Gannon Holdings (SA) Pty Ltd	122 282 651
Gannon Consolidated Pty Ltd	122 284 155
Tincture Press Pty Ltd	079 087 399
Murray Gardens Retirement Estate Pty Ltd	078 956 706
Riverina Gums Estate Pty Ltd	008 284 599
Glengowrie Estate Pty Ltd	061 931 628
Gannon Estates Pty Ltd	106 052 671
Spring Grove Estate Pty Ltd	090 590 248
Gannon Retirement Services Pty Ltd	008 202 677
Lincoln Grove Estate Pty Ltd	093 548 737
Boambee Gardens Estate-Coffs Harbour Pty Ltd	051 065 331
Scarborough Mews Estate Pty Ltd	084 370 570
Carlyle Gardens Retirement Village Bargara Pty Ltd	111 524 095
Krogate Management Pty Ltd	008 056 817
Tea Tree Gardens Holdings Pty Ltd	008 083 547
Quantivale Pty Ltd	008 083 556
Bartonvale Pty Ltd	008 006 862
Barton Vale Lodge Pty Ltd	008 120 750
Manor Group Holdings (Qld) Pty Ltd	124 665 729
Manor Group Consolidated Pty Ltd	124 665 738
The Manor Group Pty Ltd	065 215 189
Wellington Manor Pty Ltd	054 667 024
Hatway Holdings Pty Ltd	050 411 044
Palm Gardens Holdings (SA) Pty Ltd	124 715 797
Palm Gardens Consolidated Pty Ltd	124 715 804
Retire Australia (Palm Gardens) Pty Ltd	127 155 855
Lifestyle Holdings (NSW) Pty Ltd	126 128 229
Lifestyle Consolidated Pty Ltd	126 128 238
Lifestyle Management Services Pty Ltd	066 842 822
Lifestyle Care Services Pty Ltd	003 177 491
Noyea Pty Ltd	169 342 170
Noyea Operations Pty Ltd	169 342 189
Retire Australia Sales (QLD) Pty Ltd	600 309 411
Aberdeen (N.S.W.) Pty Ltd (Bramblewood)	000 412 608
Drayton Villas Pty Ltd	010 994 251
Retire Australia (Tarragindi) Pty Ltd	614 087 375
30 Andrew Avenue Pty Ltd	614 087 866
Retire Australia (Lutwyche) Pty Ltd	614 307 005
Retire Australia (Ashgrove) Pty Ltd	615 409 464
Retire Australia (Burleigh) Pty Ltd	616 531 401
Retire Australia (Lane Cove) Pty Ltd	619 956 884
Retire Australia (Yeronga) Pty Ltd	644 707 951
Yeronga Heart Pty Ltd	646 702 534

This statement is made on behalf of all of the entities that are owned or controlled by RetireAustralia.



## 2. Structure, operations and supply chains:

### Our Structure

Since 2014, RetireAustralia has been jointly owned by Infratil Limited and New Zealand Superannuation Fund. As stated in Part 1 of this Statement, RetireAustralia is part of the RetireAustralia Group together with the other entities listed in that Part.

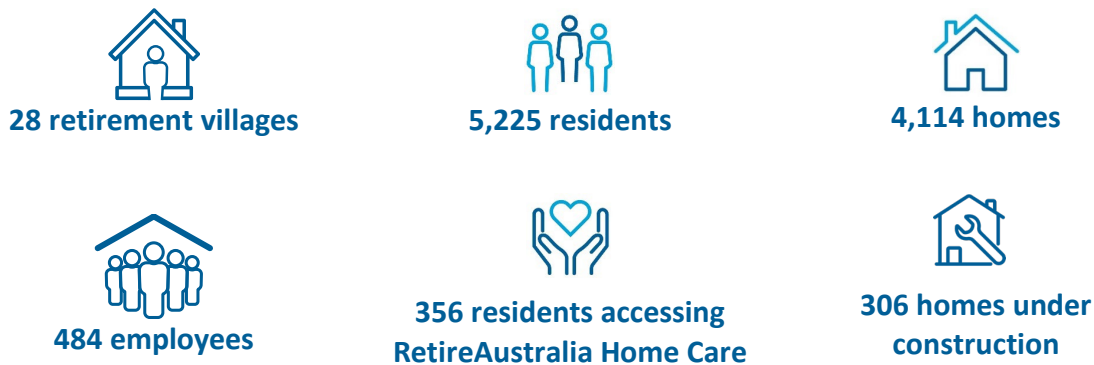
RetireAustralia and its subsidiaries are governed by a board of non-executive Directors with expertise spanning healthcare, property development, corporate finance and business development. We currently manage 28 retirement villages with over 4,000 homes across New South Wales, Queensland and South Australia. We directly employ over 450 workers across these locations.

### Our Operations

RetireAustralia is a leading private owner, operator and developer of retirement villages in Australia. Our purpose is to create thriving communities where older Australians live the life they choose in their own home. Our vision is to be a leading provider of integrated care and independent living communities for older Australians.

As at 31 March 2023, our portfolio consists of 28 retirement villages, with three brownfield developments and one greenfield development under construction. Our communities offer a comprehensive range of care and living options including independent living units, serviced apartments, care apartments and home care.

Table: Overview of our core operations\*



\*As at 31 March 2023.

RetireAustralia is actively involved in the resale and refurbishment of units in established communities to new incoming residents and the sale of units to new residents in new communities following development. In our financial year to 31 March 2023 (Financial Year), RetireAustralia refurbished and resold 489 units.

We also operate a home care business, RetireAustralia Home Care Services (RetireAustralia Care and Services Pty Ltd), that provides home care services exclusively to residents of RetireAustralia villages in New South Wales, Queensland and South Australia.



## Modern Slavery Statement

As a business, RetireAustralia has three main areas of focus in our operations:

### **We're dedicated to providing an exceptional resident experience.**

Our communities are run with care, experience and passion. We work hard to ensure our residents can live the life they choose in their own home, supported by seamless support and care pathways and quality age-friendly homes. We're focused on ensuring our residents and their families have a positive experience when moving into, living in and leaving a RetireAustralia community. We're upfront about our offering, so from the day residents move in, they have peace of mind knowing exactly what they will pay and the lifestyle, care and support they can expect.

### **We enable a nimble and empowered workforce.**

Providing quality service to our residents takes a richly skilled team, who ably demonstrate a deep sense of conviction in our Purpose and Vision. Our team members work dynamically and with simplicity to meet performance expectations while consistently upholding our Culture of Care and our values of Leadership, Integrity, Respect, One Team and Excellence, which are the foundation of all our actions, behaviours and decisions.

### **We are growing an optimal portfolio of retirement communities.**

We are developing new retirement communities in metropolitan areas while consistently optimising our established retirement communities to ensure they provide high-quality retirement lifestyles, with choices in care and support available to residents when needed. Our new villages are contemporary in design, integrated with the surrounding community and have age-friendly features making them perfect for now and ideal for later.

## **Our Governance Framework**

RetireAustralia is committed to good governance. A board of non-executive Directors, with expertise spanning healthcare, property development, corporate finance and business development, governs the way we operate. The following Board committees assist with providing governance and oversight:

- Audit Committee
- Clinical and Care Governance Committee
- Remuneration Committee

All Directors, Executives, and workers are required to meet standards of conduct and behaviour set out in RetireAustralia's Code of Conduct.

Our Executive Leadership Team includes the CEO and leaders who are accountable for:

- Care and Operations
- Development and Acquisitions
- Culture, Strategy and Business Services
- Finance
- Sales and Marketing

The majority of our retirement villages also have a Residents Committee, and we also work closely with residents' families and advocates.

### Our values, Code of Conduct and Policies

Our values, Code of Conduct and policies set out our behavioural standards and expectations and provide guidance for anyone who works at RetireAustralia.

Within all of our operations, RetireAustralia is actively committed to acting ethically and with integrity in the engagement and management of all employees (workers), contractors, volunteers and consultants and minimising the risk of Modern Slavery practices within our supply chains.

All RetireAustralia workers are responsible for knowing the ethical, legal, and policy requirements that apply to their jobs, and reporting any suspected breaches of law, the Code of Conduct or RetireAustralia's policies. Our Executives and leaders are accountable for creating and promoting a workplace environment in which compliance and ethical conduct are expected.

#### Our values

Our values describe what we stand for and guide the way we do things. They are an integral part of how we represent ourselves. We share and live these values which convey a genuine, trustworthy, and honest face of our organisation. We have five core values – One Team, Leadership, Excellence, Respect and Integrity.

#### Code of conduct

Our Code of Conduct guides our actions, words and behaviours. It helps us take a consistent approach to ethical, legal and compliance issues. We require our CEO, Executive Leadership Team, workers, consultants and contractors to abide by our Code of Conduct.

#### Policies

Our policies cover many important elements about how we work, including key elements on behaving ethically and lawfully. Policies and procedures outline key responsibilities and actions. They are regularly reviewed to ensure they align with best practice and all relevant regulatory requirements.

### Our Supply Chains

RetireAustralia's supply chains are made up of simple structured networks of predominantly small and medium size businesses, with a few large businesses who provide us with the relevant goods and services that enable and support us to operate.

In comparison to the previous reporting period, the last Financial Year did not have any significant changes in the types of goods and services procured or vendors. During this Financial Year, RetireAustralia directly engaged with approximately 1,430 vendors.

Of the 1,430 vendors, five are located (or have a head office) outside of Australia. Of these foreign account holders (New Zealand and America), three provide consulting services and two are software providers. These vendors invoiced a combined sum of \$200,000, which is 0.1% of total Financial Year expenditure. In terms of Modern Slavery, none of the goods and / or services provided by these foreign vendors are considered to be high risk.

Approximately 87% of the last Financial Year's spend was for the purchase of goods and or services from vendors under formal contracts with clauses requiring compliance with the Modern Slavery Act.



### 3. Risks:

#### Risks in RetireAustralia’s operations and supply chains

##### Our Operations

RetireAustralia has not identified any instances of Modern Slavery in our operations in the last Financial Year.

RetireAustralia understands that it has vulnerable groups working across its operations, including 74 Visa holders, 151 part time workers and 82 casual workers. RetireAustralia takes steps to prevent Modern Slavery in its operations including:

- Compliance with Australian employment, industrial relations and human rights laws
- Ensuring workers have formal contractual arrangements in place
- Implementing comprehensive internal policies, principles and practices
- Ensuring workers have access to information about their rights and access to grievance channels.

##### Our supply chains

RetireAustralia performed a high-level risk assessment of our supply chains from May to June 2023. This assessment took into consideration the volume and category of goods and or services procured, as well as the geographic location of our vendors and of their manufacturers for goods and services we purchase from them.

To identify the areas of highest risk, RetireAustralia considered the following risk indicators for the potential occurrence of Modern Slavery:

**Industry sector:** Certain industries may have a high prevalence of Modern Slavery because of their characteristics, products and processes. For example – manufacturing, cleaning, construction, waste management, food, hospitality, uniforms, PPE and security.

**Product and services:** Certain products and services may have a high prevalence for Modern Slavery because of the way they are produced or used. For example – use of under paid and over worked labour, child labour and forced labour.

**Supply chain model:** Where supply chain models are larger and more complex, they are more prevalent to carry a higher risk of Modern Slavery. For example – levels of subcontracting, recruiter fees, lack of supply chain processes, poor audit trails and lack of transparency.

**Geographic location:** Certain countries have a high prevalence of Modern Slavery due to poor government structures, corruption, weak labour laws, conflict and or political instability, migration flow and poverty.

Based on these risk indicators, this Financial Year's spend and vendors were categorised by their potential exposure to modern slavery risks as per the following table:

High Risk	Medium Risk	Low Risk
Construction (64%) Facilities Management (23%) IT Hardware (<1%) Stationery and Office Supplies (<1%) Uniforms and PPE (<1%) Food supply and Hospitality (2%)	Fleet and Vehicle Management (<1%) Utilities (1%) Advertising and Marketing (3%) Travel and Accommodation (- 1%)	Professional Services (5%) Corporate expenses (excluding stationery and travel) (<1%)



## Modern Slavery Statement

The Construction category has been assessed as being the highest risk due to the nature of the services and the amount of spend. Although the highest spend, the construction category has the least number of vendors (14), with the six major ones being engaged under robust terms and conditions of contract. This was further confirmed by Fair Supply, who were engaged to assess the modern slavery risks in our top 100 vendors by spend. Fair Supply's report found that overall RetireAustralia has a low risk of modern slavery with 0.0090 theoretical slaves in the supply chain per million dollars spent.

### 4. Actions:

RetireAustralia is committed to ensuring that in providing the many services it offers, it minimises the risk of Modern Slavery being present in our supply chains. RetireAustralia strives to achieve this through its Governance Framework and ensuring that goods and or services purchased are provided by vendors who respect and adhere to the Act.

As part of RetireAustralia's work to identify and mitigate the risks of Modern Slavery, we undertake due diligence on new vendors and undertake regular reviews of existing vendors. This process enables RetireAustralia to:

- identify and assess potential risks within its supply chain;
- map the supply chain to assess particular product or geographical risks of Modern Slavery;
- set clear expectations of vendor's business behaviour in RetireAustralia's contractual arrangements;
- mitigate and resolve any identified Modern Slavery risks within RetireAustralia's supply chain;
- monitor risk within RetireAustralia's supply chain and conduct audits if necessary;
- take steps to ensure substandard vendors implement appropriate action plans to prevent or mitigate the harm and its recurrence; and
- invoke appropriate sanctions against vendors which could include termination of the business relationship.

Some of the steps we have taken to address the risks of Modern Slavery in our operations and supply chain are described below.

### Training

To ensure an understanding of the risks of Modern Slavery in our operations and supply chains, RetireAustralia provides training to workers involved in roles where Modern Slavery may be a risk factor and all Directors have been briefed on the subject.

### Recruitment

RetireAustralia's pre-employment screening includes identity checks, criminal history checks and confirmation of the applicants rights to work in Australia.

### Procurement Framework

RetireAustralia procures goods and services in accordance with our Procurement Framework, corporate policies, processes and procedures.

RetireAustralia's Procurement Framework is applicable to all workers, contractors, volunteers and consultants engaged to perform work on behalf of RetireAustralia. It sets out RetireAustralia's procurement methodologies, outlining the value and risks associated with the purchasing of any goods and / or services. The Procurement Framework's main principles are:

## Modern Slavery Statement

- Value for money;
- Probity and accountability; and
- Social, sustainable and environmental responsibility.

As part of RetireAustralia's work to identify and mitigate the risks of Modern Slavery practices, RetireAustralia undertake due diligence on new vendors and undertake reviews of existing vendors in accordance with our Procurement Framework. This due diligence process enables RetireAustralia to:

- identify and assess potential Modern Slavery risks within in those new vendors;
- map our supply chains to assess particular industry, product or geographical risks of Modern Slavery;
- set clear expectations of vendor's business practices and respect for human rights in RetireAustralia's contractual arrangements;
- mitigate and resolve any identified Modern Slavery risks within the supply chain; and
- monitor the risk of Modern Slavery practices within the supply chain and conduct audits if necessary.

RetireAustralia also has systems in place for remediation in the event that any Modern Slavery practices are identified in our supply chain. This remediation process provides for appropriate steps to be taken to:

- ensure our vendors implement appropriate action plans and systems to address any identified Modern Slavery practices or risks in their organisation or supply chains; and
- take appropriate action where vendors fail to address any identified Modern Slavery practices or risks in their organisation or supply chains.

Some practical steps we have taken to address the risks of Modern Slavery in our operations and supply chain are described below.

### Risk mitigation through our Procurement Framework

RetireAustralia's Procurement Framework addresses Modern Slavery, including as follows:

#### Governance

Adherence to our Procurement Framework ensures open competition, transparency, probity and fairness in all stages of the procurement process and in dealings with current and proposed vendors. The Framework requires all those conducting our procurement activities to uphold the principle of sustainable, social responsible and environmental responsibility and explicitly refers to compliance with the domestic and international laws referred to in the definition of Modern Slavery in the Act.

#### Tendering

Within RetireAustralia's tendering documentation (Request for Tender, Request for Quote and Request for Proposal), potential vendors are required to respond to a selection of questions about their sustainable procurement, labour practices, recruitment and supply chains. Their responses to these sections are a weighted criteria and form part of any project's evaluation plan.

#### Vendor Screening

Screening is conducted on shortlisted vendors of high risk, high value categories. This screening is performed by a third party and includes financial checks, compliance with laws, company ownership, and Director. This screening is used to identify any incidents concerning labour practices, legal offences or insolvency that could have or has had an adverse impact on human rights.

#### Contract

All of the terms and conditions of engagement (Precedents and Purchase Orders) used by RetireAustralia include clauses addressing any actual or suspected Modern Slavery in our vendors and their supply chains.



## Modern Slavery Statement

The clauses clearly state RetireAustralia's expectation that our vendors are required to comply with the Modern Slavery Act 2018, be open to being audited by us for compliance, and what actions (support and guidance towards remediation) or consequences (including possible termination) will apply if breaches are identified. Furthermore, vendors are not permitted to subcontract any of the required goods and services without written confirmation and approval by RetireAustralia.

### Contractor management

In addition to our Procurement Framework and tendering and contractual documentation, RetireAustralia has a Code of Conduct, which is promoted through our vendor inductions, contract templates, and procurement and contractor management documents.

Our Code of Conduct sets out RetireAustralia's commitment to and expectations that our vendors will conduct their operations free from Modern Slavery and take appropriate steps to identify and rectify any Modern Slavery that is present in their organisations and supply chains. The Code has been provided to all of our vendors engaged under a formal agreement and those categorised as a potential risk of instances of Modern Slavery.

Vendors delivering goods and or services under a formal agreement are obligated to deliver the goods and services to a set of Key Performance Indicators (KPI), including sustainable procurement, corporate responsibility, environmental impact and innovation. The KPIs are used to measure the vendor's performance and compliance.

### Engaging with local and small businesses

Due to the geographical spread of the RetireAustralia portfolio within Australia it is often difficult to engage with national or state based vendors to supply to multiple locations. RetireAustralia therefore depends on local and small businesses to provide us with goods and services. The benefits of this is that the services are generally provided by the business owners directly, with very limited tiering occurring and wherever possible goods are locally sourced. This makes it easier for RetireAustralia to have transparency for risk management and compliance purposes.

### Impact of Covid-19

The majority of our supply chains were disrupted as a direct result of Covid-19. Long lead times, increased transportation costs and a lack of availability of goods, equipment and materials affected all sectors of business. Operations and vendors experienced major labour shortages and in some cases existing workers were utilised to assist with performance of activities outside of their roles and responsibilities. RetireAustralia has otherwise not identified any ongoing risk of Modern Slavery arising from the impacts of Covid-19.

## 5. Effectiveness:

RetireAustralia will continue to review and improve our processes and procedures as necessary so that we comply with our obligations under the Act, through:

### Governance

- regularly reviewing how Modern Slavery is dealt with, educated and communicated in relevant policies, documentation and contracts;

## Modern Slavery Statement

- conducting internal audits or monitoring of specific steps taken by RetireAustralia to assess and address Modern Slavery risks.

### Risk Management

- monitoring the number and range of suppliers who have been issued and have completed the assessment, the corrective action plans implemented, and actions completed;
- ensuring that Modern Slavery is addressed throughout the procurement process through due diligence and to identify any improvements before they enter the supply chain.

### Communication:

- monitoring frequency and trends of whistleblowing channels;
- the provision of appropriate training and education to key individuals and teams who are responsible for managing procurement processes and contractual relationships; and
- continuing to promote awareness of Modern Slavery across the wider organisation and with our vendors.

## 6. Consultation:

RetireAustralia oversees the operations of, and receives regular reports from, the entities that it owns or controls, which are listed in Part 1 and 2 of this Statement. There is significant commonality of management between RetireAustralia and most of its owned businesses. There are also regular discussions between RetireAustralia and the officers and boards of those entities in relation to governance and organisational risks.

RetireAustralia has not specifically consulted with those entities in relation to the preparation of this Statement as those entities are wholly owned subsidiaries and the nature of the operations and activities of those entities means that they do not have their own supply chains separate to those of RetireAustralia.

## 7. Additional relevant information

RetireAustralia supports and encourages its workers to raise genuine concerns about Modern Slavery matters, whether identified by, or affecting them, in the workplace.

We encourage our workers and the representatives of our vendors to report any instances suggesting that there is a risk, both potential and or actual, of Modern Slavery occurring in RetireAustralia's operations or supply chain through the Whistleblower Policy

The following definitions are relevant to the document:

**Act** means the *Modern Slavery Act 2018* (Cth).

**Modern Slavery** includes eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services. The worst forms of child labour means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

**Operations** are the activities undertaken by RetireAustralia to pursue our business objectives and strategy in Australia which include:

- the direct employment of workers;



## Modern Slavery Statement

- delivery of services;
- construction;
- financial investments;
- joint ventures;
- sale, management and leasing of property; and
- purchasing, marketing and sales.

**Risks of Modern Slavery** means the potential for an entity to cause, contribute to, or be directly linked to Modern Slavery through our operations and supply chains.

**Supply chains** means the products and services (including labour) that contribute to RetireAustralia's products and services. This includes products and services sourced in Australia or overseas and extends beyond direct vendors. The definition of supply chains includes:

- products provided to the entity by vendors;
- services provided by vendors; and
- products and services used by indirect vendors in the entity's supply chains.